

UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF ILLINOIS
 EASTERN DIVISION

In re:)	
)	Case No. 20bk21625
Marshall Spiegel,)	
)	Chapter 11
Debtor(s).)	
)	Judge Timothy A. Barnes

FINDINGS OF FACT AND CONCLUSIONS OF LAW IN SUPPORT OF ORDER
 AWARDING TO SMITH GAMBRELL & RUSSELL LLP, COUNSEL FOR DEBTOR, FOR
 ALLOWANCE AND PAYMENT OF INTERIM COMPENSATION AND
 REIMBURSEMENT OF EXPENSES

TOTAL FEES REQUESTED:	\$ 451,952.00	TOTAL COSTS REQUESTED:	\$ 14,076.32
TOTAL FEES REDUCED:	\$ 49,989.10	TOTAL COSTS REDUCED:	\$ 968.86
TOTAL FEES ALLOWED:	\$ 401,962.90	TOTAL COSTS ALLOWED:	\$ 13,107.46

TOTAL FEES AND COSTS ALLOWED: \$ 415,070.36

The attached time and expense entries have been underlined to reflect disallowance in whole or in part. The basis for each disallowance is reflected by numerical notations that appear on the left of each underlined entry. The numerical notations correspond to the enumerated paragraphs below.

(1) Unreasonable Time – TOTAL of disallowed amounts: \$ 5,802.90

The Court denies the allowance in part of compensation for the indicated task(s) since the professional or paraprofessional expended an unreasonable amount of time on the task(s) in light of the nature of the task(s), the experience and knowledge of the professional performing the task(s), and the amount of time previously expended by the professional or another on the task(s). *In re Pettibone*, 74 B.R. 293, 306 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (“The Court will determine what is the reasonable amount of time an attorney should have to spend on a given project... An attorney should not be rewarded for inefficiency. Similarly, attorneys will not be fully compensated for spending an unreasonable number of hours on activities of little benefit to the estate.”); *In re Wildman*, 72 B.R. 700, 713 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (same).

As to the time devoted to the preparation of the fee application itself, the Court denies the allowance of compensation that is disproportionate to the total hours in the main case. *In re Wildman*, 72 B.R. 700, 711 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (“In the absence of unusual circumstances, the hours allowed by this Court for preparing and litigating the attorney fee application should not exceed three percent of the total hours in the main case.”); *In re Spanjer Bros., Inc.*, 203 B.R. 85, 93 (Bankr. N.D. Ill. 1996) (Squires, J.) (compensation limited to 5%); *see also In re Pettibone Corp.*, 74 B.R. 293, 304 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (*citing Coulter v. State of Tennessee*, 805 F.2d 146, 151 (6th Cir. 1986) (in nonbankruptcy cases, compensation for preparation and litigation of fee petitions limited to 3-5% of the hours of the main case)). However, for

applications for compensation that request total fees of \$10,000.00 or less, this Court will allow compensation for the time devoted to the preparation of the fee application itself in the following manner: For the first \$5,000.00 of total compensation requested, this Court will limit time devoted to preparation of the fee application to 10% of total compensation requested and will allow 5% of additional total compensation requested for time devoted to preparation of the fee application.

(2) Insufficient Description – TOTAL of disallowed amounts: \$ 29,661.00

The Court denies the allowance of compensation for the indicated task(s) as the description of each task fails to identify in a reasonable manner the service rendered. *In re Pettibone*, 74 B.R. 293, 301 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (“A proper fee application must list each activity, its date, the attorney who performed the work, a description of the nature and substance of the work performed, and the time spent on the work. [Citation omitted] Records which give no explanation of the activities performed are not compensable.”); *In re Wildman*, 72 B.R. 700, 708-09 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (same).

(3) Duplication of Services – TOTAL of disallowed amounts: \$ 440.00

The Court denies the allowance of compensation for services that duplicate those of another professional or paraprofessional. *See* 11 U.S.C. § 330(a)(4)(A)(i). Reduction in fees is warranted if multiple attorneys from the same firm appear in court on a motion or argument or for a conference, unless counsel adequately demonstrates that each attorney present contributed in some meaningful way. *In re Pettibone*, 74 B.R. 293, 307 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (“A debtor’s estate should not bear the burden of duplication of services. If found in the record, such duplication shall be disallowed by the court as unnecessary.”). It is also an accepted principle that generally no more than one attorney may bill for time spent in an intra-office conference or meeting absent an adequate explanation. *See In re Adventist Living Ctrs., Inc.*, 137 B.R. 701, 716 (Bankr. N.D. Ill. 1991) (Sonderby, J.); *In re Pettibone*, 74 B.R. at 303; *But see In re MEP Infrastructure Sols., Inc.*, 654 B.R. 922, 925 (Bankr. N.D. Ill. 2023) (Goldgar, J.) (incorrectly citing *In re Stainless Sales Corp.*, Case No. 17 B 3148, 2017 WL 2829675, at *2 (Bankr. N.D. Ill. June 27, 2017) (Barnes, J.) for the proposition that intra-office meetings between multiple lawyers are never compensable when *Stainless* cites to *Pettibone* for the foregoing—that an application must “adequately demonstrate[] that each attorney present contributed in some meaningful way” and thus satisfy 11 U.S.C. § 330(a)(3)(D) by demonstrating that the meeting is “necessary” or “beneficial” and must have taken a “reasonable amount of time.”).

(4) Clerical Work Not Compensable – TOTAL of disallowed amounts: \$ 4,139.25

The court disallows the compensation of clerical or stenographic employees of the professional for the performance of routine clerical or administrative activities in the normal course of the professional’s business, such as photocopying, secretarial work, or routine filing. Such activities are not in the nature of professional services and must be absorbed by the applicant’s firm as an overhead expense. *In re Dimas, LLC*, 357 B.R. 563, 577 (Bankr. N.D. Cal. 2006) (*citing Missouri v. Jenkins*, 491 U.S. 274, 288 n. 10 (1989)); *see also In re Chellino*, 209 B.R. 106, 114 (Bankr. C.D. Ill. 1996) (Paralegal, but not “clerk” services entitled to compensation at an hourly rate; clerk activities are overhead of the professional); *Souza v. Miguel*, 32 F.3d 1370, 1375 (9th Cir. 1994) (Trustee not entitled to reimbursement or compensation of overhead expenses such as secretarial, stenographic, clerical, and routine messenger services).

(5) Improper Allocation of Professional Resources – TOTAL of reduced amounts \$ 4,139.94

This Court finds that \$19,534.50 of the fees requested are for compensation for 42.2 hours of work on tasks that could have been performed by a beginning associate but was in fact performed by and billed at the rate of a partner. The court will allow compensation of the affected time entries at the reduced rate of \$364.80 per hour.¹

The Court denies the allowance in part of compensation for the indicated task(s) as a professional with a lower level of skill and experience or a paraprofessional could have performed the task(s). *In re Pettibone*, 74 B.R. 293, 303 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (“Senior partner rates will be paid only for work that warrants the attention of a senior partner. A senior partner who spends time reviewing documents or doing research a beginning associate could do will be paid at a rate of a beginning associate. [Citation omitted]. Similarly, non-legal work performed by a lawyer which could have been performed by less costly non-legal employees should command a lesser rate.”); *In re Wildman*, 72 B.R. 700, 710 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (same); *In re Alberto*, 121 B.R. 531, 535 (Bankr. N.D. Ill. 1990) (Squires, J.) (determining use of partner appropriate where attendant complex legal issues warrant highly experienced practitioner).

(6) Lumping – TOTAL of disallowed amounts (10% of affected entries): \$ 4,837.15

The Court may impose a ten percent penalty on entries that appear to be “lumping.” The Court will reduce each entry marked as such per the penalty. *In re Wildman*, 72 B.R. 700, 709 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (“Applicants may not circumvent the minimum time requirement or any of the requirements of detail by “lumping” a bunch of activities into a single entry. [citation omitted]. Each type of service should be listed with the corresponding specific time allotment.”).

(7) Meal Expenses – TOTAL of disallowed amounts: \$ 968.86

The Court denies the allowance of reimbursement of this meal expense. *In re Covent Guardian Corp.*, 103 B.R. 937, 942 (Bankr. N.D. Ill. 1989) (Sonderby, J.) (“[I]t is highly unlikely that counsel could prove that the meal expenses were reasonably necessary for the proper representation of the debtor . . . If the attorney were not working on the case, he would still have to eat. Accordingly, the Court finds that, except in very limited circumstances, local meals are not reasonably necessary for the proper representation of the client.”).

Dated: September 12, 2024



Timothy A. Barnes, Judge
United States Bankruptcy Court

¹ This Court used the following methodology to calculate the reduced hourly rate of \$364.80 because no associate level attorneys have worked on this case: Counsel has provided this Court with an explanation of its billing rates with respect to associate attorneys. Supplemental Declaration of Shelly DeRousse in Support of the Second Interim Fee Application of Smith Gambrell & Russell LLP as Counsel to the Debtor [Dkt. No. 1268], at pp. 2–3 (the “Declaration”). While Counsel did not provide its billing rates for associates in the Declaration, it did state that “[c]urrent standard associate billing rates in Chicago for litigation and corporate associates range from \$420.00 to \$540.00 per hour.” *Id.* at p. 3. For lack of a better methodology, this Court uses the midpoint, \$480.00, as a starting point for determining an associate rate. Because Counsel provided that the partners working on this case have been billed at a 24% discount to their standard rates, *Id.* at p. 2, this Court calculated the derived rate of \$364.80 by discounting the midpoint of \$480.00 by 24%.

C. Creditor and Vendor Issues and Inquiries \$518.50

22. SGR spent 1.0 hours at a cost of \$518.50 on SGR creditor and vendor issues and inquiries. This category includes time spent preparing for a special assessments meeting. SGR's detailed time records for this category are attached hereto and incorporated herein as Exhibit C.

D. Secured Creditor Issues \$220.00

23. SGR spent 0.4 hours at a cost of \$220.00 on secured creditor issues. This category includes internal conferences regarding claims asserted by the Association, as well as time spent analyzing the Debtor's affirmative defenses to the same. SGR's detailed time records for this category are attached hereto and incorporated herein as Exhibit D.

E. SGR Retention and Fee Applications \$6,472.00 (1) unreasonable time

24. SGR spent 15.3 hours at a cost of \$6,472.00 on SGR retention and fee application matters. This category includes time spent preparing the first interim fee application of SGR and submitting an amended retention application for SGR. SGR's detailed time records for this category are attached hereto and incorporated herein as Exhibit E.

F. Other Professional Retention \$19,960.50 (1) unreasonable time

25. SGR spent 43.2 hours at a cost of \$19,960.50 on other professional retention matters. Time in this category primarily includes time spent reviewing the fee applications the Committee's counsel, preparing objections to the same, and attending court hearings on the same. SGR's detailed time records for this category are attached hereto and incorporated herein as Exhibit F.

G. Plan and Disclosure Statement \$363,294.50

26. SGR spent 709.9 hours at a cost of \$363,294.50 on plan and disclosure statement matters. This category includes time spent researching plan confirmation issues and post-trial brief

Matter: 234844.001
 Invoice No. 1150000

Page 2
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
12/15/23	SAD	Telephone conference with Michael Desmond regarding case strategy and open issues (0.3); telephone conference with Tom Goldblatt, Alan Kravel and Marshall Spiegel regarding financing (0.6); telephone conference with Michael Desmond, David Welch, William Factor and Marshall Spiegel regarding case strategy (1.5).	550.00	2.40	1320.00
12/18/23	SAD	Telephone conference with Michael Desmond and Joe Mandarino regarding tax issues (1.0); telephone conference with David Welch regarding case issues (0.1); telephone conference with Michael Desmond regarding open case issues (0.3); e-mail correspondence to P. Cohen regarding financing (0.1); e-mail correspondence to Alan Kravets regarding financing (0.1); telephone conference with David Welch regarding LLC issues (0.1).	550.00	1.70	935.00
	(2) insufficient description				
12/19/23	SAD	Review e-mail correspondence from various lenders (0.1); telephone conference with Michael Desmond regarding open potential issues (0.4).	550.00	.50	275.00
	(2)				
12/20/23	SAD	Telephone conference with David Welch and Michael Desmond regarding financing (0.5).	550.00	.50	275.00
12/21/23	SAD	Telephone conference with William Factor regarding case strategy (0.4).	550.00	.40	220.00
12/22/23	SAD	Telephone conference with David Welch regarding funding and open case issues (0.5); telephone conferences with Michael Desmond regarding case strategy, confirmation and conversion (1.3).	550.00	1.80	990.00
12/29/23	SAD	E-mail correspondence to Nate Rugg regarding Association request to enter apartment (0.2).	550.00	.20	110.00
01/02/24	SAD	E-mail correspondence with William Factor, David Welch and Michael Desmond regarding Spiegel strategy call (0.1); review expert notice (0.1); e-mail correspondence to Michael Desmond regarding trustee motion (0.1); telephone conference with Michael Desmond regarding case strategy (0.4).	550.00	.70	385.00
	(3) duplication of services				
01/03/24	SAD	Telephone conference with William Factor, David Welch and Michael Desmond regarding case strategy (0.9).	550.00	.90	495.00
01/05/24	SAD	Telephone conference with Michael Desmond regarding deposition schedule and other case issues (0.3).	550.00	.30	165.00

Matter: 234844.001
 Invoice No. 1150000

Page 3
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
01/10/24	SAD	Telephone conference with David Welch regarding case status (0.3); telephone conference with William Factor regarding case status and Nickolas Dallas deposition (0.3).	550.00	.60	330.00
01/11/24	SAD	E-mail correspondence with Nick Dwayne regarding privileged documents (0.2); e-mail correspondence to Jeremy Bolder regarding privileged documents (0.1); telephone conference with Jeremy Bolder regarding privileged documents produced (0.2); telephone conference with William Factor regarding privilege issues (0.1).	550.00	.60	330.00
01/15/24 (4) secretarial	JW	Coordinate pick up and delivery of trial boxes for January 16, 2024 trial (0.3).	275.00	.30	82.50
01/16/24 (4)	JW	Assist with trial supply preparation (0.3); create zip drive of trial exhibits for Shelly DeRousse (0.3); print new trial exhibits per Michael Desmond's request (0.3).	275.00	.90	247.50
01/19/24 (4)	JW	Download and save transcripts from first week of trial (0.2); e-mail correspondence with Shelly DeRousse regarding same (0.1); download and save term loan proposal for Greenleaf per Shelly DeRousse's instruction (0.1).	275.00	.40	110.00
01/22/24 (4)	JW	Order transcripts from second week of trial per Shelly DeRousse's instruction (0.1); locate and forward debtor production documents from 2022 to Shelly DeRousse and Michael Desmond (0.3); bates stamp document to be used as exhibit in trial (0.2); coordinate delivery of same to Judge Barnes' courtroom for trial (0.1); forward filed first fee application of Smith Gambrell & Russell LLP per Shelly DeRousse's instruction (0.2).	275.00	.90	247.50
01/23/24 (4)	JW	Print documents per Michael Desmond's request (0.1); deliver to courtroom for use during trial (0.5).	275.00	.60	165.00
01/24/24	SAD	Telephone conference with Adam Toosley and John Xydakis regarding condo assessment issue (0.4).	550.00	.40	220.00
01/25/24	SAD	Review and revise letter to Association's attorney regarding special assessment meeting (0.4); telephone conference with Adam Toosley regarding letter to Association (0.1).	550.00	.50	275.00
01/29/24	JW (4)	Pay invoice for trial transcript deposit (0.1).	275.00	.10	27.50
01/31/24	JW (4)	Order trial transcript for second week of trial (0.2).	275.00	.20	55.00
01/31/24	SAD	Telephone conference with William Factor regarding loan update (0.1); telephone conference with Josh Orlan regarding loan (0.1).	550.00	.20	110.00

Matter: 234844.001
 Invoice No. 1150000

Page 4
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
02/05/24	JW	Search case docket for discovery sanctions order (0.8); e-mail correspondence with Shelly DeRousse regarding same (0.1).	275.00	.90	247.50
02/05/24	SAD	Telephone conference with Nick Dwayne regarding request for release letter (0.2); telephone conference with Michael Desmond regarding plan and other open issues (0.3); search court docket for sanctions order (0.2); telephone conference with Josh Orlan regarding financing (0.1).	550.00	.80	440.00
02/07/24	JW	Conference with Shelly DeRousse regarding filing notice of objection to motion to compel payment (0.1); draft same (0.1); file same (0.1).	275.00	.30	82.50
02/07/24	SAD	Conference with Michael Desmond regarding open case issues and strategy (0.2); e-mail correspondence to Josh Orlan regarding financing (0.1).	550.00	.30	165.00
02/08/24	SAD	E-mail correspondence with Michael Desmond regarding Association's counsel (0.1); multiple e-mail correspondence with Marshall Spiegel and Mike Brady regarding financing (0.2).	550.00	.30	165.00
02/13/24	SAD	Telephone conference with Michael Desmond and David Welch regarding motion to pay Adelman and other open case issues (0.4); conference with Adam Toosley regarding condo issue (0.1).	550.00	.50	275.00
02/14/24	SAD	Draft and revise letter to condo association (0.2); e-mail correspondence to Susan Anderson regard letter to condo association (0.1).	550.00	.30	165.00
02/15/24	SAD	Telephone conference with Chris West, Richard Renell, Josh Orlan, Marshall Spiegel and Greg Kuehnle regarding financing options (0.8); telephone conference with Josh Orlan and Marshall Spiegel regarding financing (0.3); telephone conference with William Factor regarding financing (0.5).	550.00	1.60	880.00
02/16/24	JW (4)	E-mail correspondence with court reporter regarding status of trial transcripts (0.2); e-mail correspondence with Shelly DeRousse and Michael Desmond regarding same (0.1).	275.00	.30	82.50

Matter: 234844.001
 Invoice No. 1150000

Page 5
 June 18, 2024

Date	Biller	Narrative	Rate	Time	Fee
2/16/24	SAD	Telephone conference with Michael Desmond regarding update on plan financing, documents requested by lender and cases strategy (0.5); review operating agreement and other documents (1.3); multiple e-mail correspondence with Greg Kuehnle regarding requested documents and plan financing (0.3).	550.00	2.10	1155.00
02/20/24	JW (4)	Locate and forward first week trial transcripts to Shelly DeRousse and Michael Desmond (0.2).	275.00	.20	55.00
02/21/24	JW (4)	E-mail correspondence to court reporter regarding status of transcripts (0.1); e-mail correspondence with Shelly DeRousse regarding same (0.1).	275.00	.20	55.00
02/21/24	SAD (5)	Create spreadsheet of UST payments (1.5).	550.00	1.50	825.00
02/28/24	JW (4)	Pay balance of trial transcript invoices (0.1); download week 2 trial transcripts (0.2); e-mail correspondence with Shelly DeRousse and Michael Desmond regarding same (0.1).	275.00	.40	110.00
02/28/24	SAD	Telephone conference with Josh Orlan regarding financing options (0.5).	550.00	.50	275.00
02/29/24	SAD	Telephone conference with Michael Desmond regarding case strategy regarding administrative priority claims, confirmation and other open issues (0.3).	550.00	.30	165.00
03/04/24	JW (4)	Download and save week 3 trial transcripts (0.3); e-mail correspondence with Shelly DeRouse and Michael Desmond regarding same (0.1).	275.00	.40	110.00
03/06/24	JW (4)	E-mail correspondence with Shelly DeRousse regarding quarterly fee statements (0.1).	275.00	.10	27.50
03/11/24	SAD	Telephone conference with Josh Orlan regarding financing of plan (0.1); multiple e-mail correspondence with Josh Orlan regarding same (0.2).	550.00	.30	165.00
03/12/24	SAD	Telephone conferences with Josh Orlan regarding financing (0.3); telephone conference with Nick Dallas regarding filing tax returns (0.3).	550.00	.60	330.00
03/18/24	JW (4)	Forward link for trial exhibits to Shelly DeRousse (0.2); order trial transcript for March 18, 2024 (0.2).	275.00	.40	110.00
03/20/24	SAD	Telephone conference with William Factor regarding Greenleaf financing issues (0.4); telephone conference with Josh Orlan regarding financing update (0.4).	550.00	.80	440.00

Matter: 234844.001
 Invoice No. 1150000

Page 6
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
03/26/24	JW (4)	Follow up with court reporter regarding status of March 18, 2024 trial transcript (0.2); e-mail correspondence with Michael Desmond regarding same (01.).	275.00	.30	82.50
03/28/24	SAD	Telephone conference with Nick Dwayne and Mike Desmond regarding potential resolution of case (1.8).	550.00	1.80	990.00
04/25/24	SAD	Review documents related to history of transfer of the Greenleaf buildings (1.0).	550.00	1.00	550.00
04/29/24	SAD (2)	Telephone conference with Julie Boynton regarding various open issues in case (0.6).	550.00	.60	330.00
05/13/24	KNF	Conduct e-mail correspondence with Spiegel team regarding upcoming filing of Post-Trial Brief (0.4).	275.00	.40	110.00
05/14/24	SAD	Telephone conference with John Xydakis regarding trustee issue (0.2).	550.00	.20	110.00
05/15/24	MKD	Conference call with N. Dwayne regarding settlement (0.5)	505.00	.50	252.50
05/16/24	ELJ (1)	Telephone conference with Shelly DeRousse regarding chapter 11 administrative expenses and professional fees owed (0.1); review prior fee orders and draft summary of same (0.5).	430.00	.60	258.00
TOTAL FEES FOR SERVICES					\$20,255.50

TIME AND FEE SUMMARY

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Jacqueline Webster	275.00	7.60	2,090.00
Elizabeth L. Janczak	430.00	0.60	258.00
Shelly A. DeRousse	550.00	31.90	17,545.00
Michael K. Desmond	505.00	0.50	252.50
Kirstin N. Flynn	275.00	0.40	110.00
TOTAL		41.00	\$20,255.50

Please send remittance to:
 SMITH, GAMBRELL & RUSSELL LLP
 PO BOX 930930
 ATLANTA, GA 31193-0930
 Main: 404-815-3500
 www.sgrlaw.com



Marshall Spiegel
 1618D Sheridan Road
 Wilmette, IL 60091

Page 1
 Date: June 18, 2024
 Matter: 234844.002
 Invoice No. 1150001

Shelly A. DeRousse

Matter: Litigation

For Professional Services

Date	Billor	Narrative	Rate	Time	Fee
(2) 11/12/23	MKD	Review additional e-mail documents from client (0.5).	505.00	.50	252.50
11/17/23	SRI	Draft response to motion to compel discovery (5.8); e-mail correspondence with Shelly DeRousse and Michael Desmond regarding same (0.1).	475.00	5.90	2802.50
11/20/23	SRI	E-mail correspondence with Shelly DeRousse and Michael Desmond regarding response to motion to compel discovery (0.1).	475.00	.10	47.50
11/21/23	SRI	Revise objection to motion to compel discovery (1.2); multiple e-mail correspondence with Shelly DeRousse and Michael Desmond regarding same (0.2).	475.00	1.40	665.00
11/22/23	SRI	Review filed objection to motion to compel and multiple e-mail correspondence with Shelly DeRousse and Michael Desmond regarding same (0.5).	475.00	.50	237.50
12/04/23	SRI	Review order on motion to compel discovery (0.1).	475.00	.10	47.50
(2) 12/22/23	SAD	Research regarding potential litigation (0.4).	550.00	.40	220.00
12/27/23	MKD	Reseach under 544 and application of 10-year IRS Code 6502 (.8) Conference with SAD (.2); Draft 30(b)(6) Notice for Committee Representative(.6).	505.00	1.60	808.00
01/09/24	MKD	Prepare for 30(b)(6) deposition of Committee Representative (1.0); Meeting with SAD regarding same (.5).	505.00	1.50	757.50
01/10/24	MKD	Review documents produced by N. Dallas (1.0).	505.00	1.00	505.00
01/11/24	MKD	Review documents produced by N. Dallas (1.4); Prepare supplemental document production for Debtor (1.0).	505.00	2.40	1212.00

Matter: 234844.002
 Invoice No. 1150001

Page 2
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
01/11/24	MKD	Attend N. Dallas deposition (1.4).	505.00	1.40	707.00
01/30/24	SAD	Review appellate court brief in sanctions appeal (0.5).	550.00	.50	275.00
(3) 01/30/24	SAD	Review appellate court brief in sanctions appeal (0.4).	550.00	.40	220.00
TOTAL FEES FOR SERVICES					\$8,757.00

TIME AND FEE SUMMARY

	Rate	Hours	Amount
Michael K. Desmond	505.00	8.40	4,242.00
Shira R. Isenberg	475.00	8.00	3,800.00
Shelly A. DeRousse	550.00	1.30	715.00
TOTAL		17.70	\$8,757.00

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT \$8,757.00

THIS STATEMENT REFLECTS ALL PAYMENTS POSTED 5 DAYS PRIOR TO INVOICE DATE.
 THIS STATEMENT MAY NOT INCLUDE CHARGES FOR WHICH WE HAVE NOT YET BEEN BILLED,
 OR WHICH HAVE NOT YET BEEN POSTED. THESE WILL BE INCLUDED ON A LATER INVOICE.
 CERTAIN CHARGES ON YOUR ACCOUNT INCLUDE AN ALLOCATION OF OVERHEAD ASSOCIATED WITH SUCH CHARGE.

Please send remittance to:
 SMITH, GAMBRELL & RUSSELL LLP
 PO BOX 930930
 ATLANTA, GA 31193-0930
 Main: 404-815-3500
 www.sgrlaw.com



Marshall Spiegel
 1618D Sheridan Road
 Wilmette, IL 60091

Page 1
 Date: June 18, 2024
 Matter: 234844.006
 Invoice No. 1150005

Shelly A. DeRousse

Matter: Other Professional Retention

For Professional Services

Date	Billor	Narrative	Rate	Time	Fee
11/27/23	SAD	Review draft objection to Adelman and Gettleman fee application (0.5); e-mail correspondence to Elizabeth Janczak regarding draft objection and exhibits thereto (0.1).	550.00	.60	330.00
11/28/23	SAD	Draft objection to Adelman and Gettleman fee application (6.0).	550.00	6.00	3300.00
11/29/23	ELJ	Review and revise objection to A&G fee application (0.6); draft exhibits to same (1.4); draft motion to exceed page limitations (0.2).	430.00	2.20	946.00
11/29/23	JW (4)	Add signature block to draft agreed order on motion per Michael Desmond's request (0.2); review objection to committee's fourth interim fee application (0.1); draft certificate of service regarding same (0.1); organize exhibits regarding same (0.4); file same (0.2); e-mail correspondence with Elizabeth Janczak and Shelly DeRousse regarding same (0.1); review and edit motion to exceed page limit (0.1); draft notice of motion and certificate of service regarding same (0.2); draft proposed order regarding same (0.1); file same (0.1); e-mail correspondence with Elizabeth Janczak regarding same (0.1).	275.00	1.70	467.50
11/29/23	MKD	Review and revise Objection to A&G Fee Application; Prepare exhibits regarding same (2.0).	505.00	2.00	1010.00

Matter: 234844.006
 Invoice No. 1150005

Page 2
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
11/29/23	SAD (5)	Draft and revise objection to Adelman and Gettleman fee application (4.1); research related to Adelman and Gettleman fees (1.6); conference with Elizabeth Janczak regarding exhibits to objection to Adelman and Gettleman fee application (0.4); review and revise exhibits to fee application objection (0.5); multiple e-mail correspondence to William Factor regarding joint objection to Adelman and Gettleman fee application (0.2).	550.00	6.80	3740.00
12/13/23	MKD	Court appearance for hearing on A&G Fee Application and Motion in Limine regarding Deluca (1.2).	505.00	1.20	606.00
01/09/24	SAD	Review court ruling on Adelman & Gettleman fee application (0.5).	550.00	.50	275.00
02/07/24	SAD	Review Adelman and Gettleman motion to compel payment (0.2).	550.00	.20	110.00
02/14/24	SAD	Telephone conference with Michael Desmond regarding Adelman and Gettleman motion to compel payment (0.2); e-mail correspondence to David Welch and William Factor regarding hearing on motion to compel payment (0.1).	550.00	.30	165.00
02/28/24	SAD	Review Adeleman & Gettleman fee application (0.3).	550.00	.30	165.00
02/29/24	MKD	Review Fifth Fee Application by Committee counsel (.4); Conference with SAD regarding Bridge Lender (.5)	505.00	.90	454.50
02/29/24	SAD	E-mail correspondence to Michael Desmond regarding Adelman & Gettleman fee application (0.1); conference with Susan Anderson regarding fee spreadsheet (0.2).	550.00	.30	165.00
04/10/24	JW	Telephone conference with Shelly DeRousse regarding drafting objection to committee's fifth interim fee application and Smith Gambrell & Russell's second interim fee application (0.2); review pleadings related to same (0.6).	275.00	.80	220.00
04/10/24	SAD	Telephone conference with Jacqueline Webster regarding objection to Adelman & Gettleman fee application (0.1).	550.00	.10	55.00
04/12/24	JW	Continue to review pleadings related to drafting objection to committee's fifth interim fee application (1.6); begin drafting same (0.6); e-mail correspondence with Elizabeth Janczak regarding same (0.1); e-mail correspondence with Shelly DeRousse regarding same (0.1).	275.00	2.40	660.00

Please send remittance to:
 SMITH, GAMBRELL & RUSSELL LLP
 PO BOX 930930
 ATLANTA, GA 31193-0930
 Main: 404-815-3500
 www.sgrrlaw.com



Marshall Spiegel
 1618D Sheridan Road
 Wilmette, IL 60091

Page 1
 Date: June 18, 2024
 Matter: 234844.007
 Invoice No. 1150006

Shelly A. DeRousse

Matter: Plan and Disclosure Statement

For Professional Services

Date	Billor	Narrative	Rate	Time	Fee
11/01/23	MKD	Court appearance for pre-trial conference on confirmation (.7); Conference with M. Spiegel regarding same (.2); Review documents produced by Greenleaf (.3).	505.00	1.20	606.00
11/01/23	MKD	Review e-mail documents from client for production (2.7).	505.00	2.70	1363.50
11/01/23	SAD (2)	Prepare for confirmation hearing (4.3); telephone conference with David Lloyd regarding trial subpoena (0.2); e-mail correspondence to David Welch, William Factor and Michael Desmond regarding agreement to be bound by plan (0.1); e-mail correspondence to all parties' attorneys regarding Lloyd subpoena (0.1); telephone conference with Amy Johnson regarding ballot (0.1).	550.00	4.80	2640.00
11/02/23	KNF	Coordinate upload and conveyance of latest production materials to client for review (0.8).	275.00	.80	220.00
11/02/23	MKD	Meeting with S. DeRousse regarding confirmation issues (.5); Meeting with D. Welch, B. Factor and S. DeRousse regarding tax allocations and tax expert (.6); Review e-mail documents for production (1.3) and conference with B. Factor; Conference call with C. Novy regarding Expert Report (.8); Prepare Exhibits for trial (1.2)	505.00	4.40	2222.00
11/02/23	SAD	Telephone conference with Michael Goldman regarding accounting issues (0.6); telephone conference with David Welch, William Factor and Michael Desmond regarding same (0.8); conference with Michael Desmond regarding preparation for confirmation hearing (0.2); draft reply in support of confirmation (2.3).	550.00	3.90	2145.00

Matter: 234844.007
 Invoice No. 1150006

Page 2
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
11/02/23	SRI	E-mail correspondence with Shelly DeRousse regarding drafting reply to plan and disclosure statement objections (0.1).	475.00	.10	47.50
11/03/23	JW	Review and pull electronic exhibits for use at confirmation hearing and filing response to plan objections (1.1).	275.00	1.10	302.50
11/03/23	MKD	Meeting with S. DeRousse re: confirmation hearing (0.2); Review and revise responses to Objection to Plan and Disclosure Statement (0.8).	505.00	1.00	505.00
11/03/23	MKD	Meeting with M. Spiegel and D. Welch regarding deposition preparation 30(b)(6) (0.4); deposition preparation (1.9).	505.00	2.30	1161.50
(2)11/03/23	MKD	Prepare trial exhibits (1.5).	505.00	1.50	757.50
11/03/23	MKD	Review and prepare client e-mail documents for production (2.0); Prepare and revise privilege log (0.7); Conference call with Curt Novy regarding expert report (1.0).	505.00	3.70	1868.50
11/03/23	SRI	Telephone conference with Shelly DeRousse regarding drafting reply to plan and disclosure statement objections (0.2); draft same (3.5).	475.00	3.70	1757.50
11/04/23	SRI	Draft reply to objections to plan (3.3); communications with Shelly DeRousse regarding same (0.1).	475.00	3.40	1615.00
11/05/23	MKD	Conference call with S. DeRousse, D. Welch, B. Factor and M. Spiegel regarding deposition and preparation for confirmation hearing (1.0); Draft Exhibit List (.6).	505.00	1.60	808.00
11/05/23	SAD	Team meeting with William Factor, David Welch, Michael Desmond and Marshall Spiegel regarding discovery issues related to confirmation (1.1).	550.00	1.10	605.00
11/05/23	SRI	Draft reply to objections to plan (4.1); e-mail correspondence regarding same with Shelly DeRousse (0.1).	475.00	4.20	1995.00
11/06/23	JW	Forward filed ballots to Shira Isenberg (0.2); update confirmation hearing exhibit list (0.8); e-mail correspondence with Michael Desmond regarding same (0.1); review and file reply in support of seventh amended plan (0.3); review and file reply in support of sixth amended disclosure statement (0.3); review and edit motion to exceed page limit (0.8); draft notice of motion regarding same (0.2); draft proposed order regarding same (0.2); telephone conference with courtroom deputy regarding same (0.1); file same (0.2).	275.00	3.20	880.00

Matter: 234844.007
 Invoice No. 1150006

Page 3
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
(2)11/06/23	MKD	Prepare Trial Exhibits for Confirmation Hearing (1.1); Review and revise Privilege Log and produce same (1.0).	505.00	2.10	1060.50
11/06/23	MKD	Meeting with Curt Novy regarding Expert Report (1.3); Draft and revise response to Objections to confirmation (.7).	505.00	2.00	1010.00
11/06/23	SAD	Draft and revise reply in support of plan confirmation (5.5); draft and revise reply in support of disclosure statement (1.5); attend telephone conference with William Factor, David Welch, Michael Desmond, Marshall Spiegel and Curt Novy regarding expert opinion regarding Greenleaf loan transaction (1.3).	550.00	8.30	4565.00
11/06/23	SRI	Draft reply to objections to the disclosure statement (4.6); revise reply to objections to the plan (0.7); finalize and coordinate filing of replies to objections to the plan and to the disclosure statement (1.3); draft motion to exceed page limit for reply to plan objections (0.5); coordinate filing of same (0.5); multiple e-mail correspondence with Shelly DeRousse regarding today's filings (0.2); conference with Michael Desmond regarding balloting report and research for confirmation hearing (0.1); conferences with Shelly DeRousse regarding replies to plan and disclosure statement objections (0.2); draft voting report (0.2).	475.00	8.30	3942.50
11/07/23	JW (2); (5)	Multiple e-mail correspondence with Shira Isenberg regarding status of various pending matters (0.2); add additional exhibits to exhibit list (1.3); multiple e-mail correspondence with Shelly DeRousse and Michael Desmond regarding same (0.2).	275.00	1.70	467.50
(2)11/07/23	MKD	Prepare Trial Exhibits for Confirmation hearing (2.5).	505.00	2.50	1262.50
11/07/23	MKD	Correspondence with N. Dwayne regarding deposition scheduling and stipulation (.4); Conference with S. DeRousse regarding deposition of Debtor (.7).	505.00	1.10	555.50
11/07/23	SAD	Draft plan confirmation hearing witness outline for Debtor (6.7); telephone conferences with Michael Desmond regarding deposition and trial preparation (0.7).	550.00	7.40	4070.00
11/07/23	SRI (5)	Draft ballot report (0.3); research on estimation of administrative claims for purposes of plan confirmation (6.1); multiple e-mail correspondence with Michael Desmond regarding same (0.2).	475.00	6.60	3135.00

Matter: 234844.007
 Invoice No. 1150006

Page 4
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
11/08/23	JW (5)	Telephone conference with Michael Desmond regarding finalizing exhibit list (0.1); organize and compile exhibits (2.3); review ballot voting report (0.1); draft notice and certificate of service regarding same (0.3); e-mail correspondence with Shira Isenberg regarding same (0.1); file same (0.1); draft notice of objection to application for emergency hearing (0.1); file same (0.1).	275.00	3.20	880.00
11/08/23	MKD	Draft Witness and Exhibit Lists (.6); Meeting with S. DeRousse regarding deposition of Debtor (.4).	505.00	1.00	505.00
11/08/23	MKD	Draft Expert Disclosure for Curt Novy (0.5).	505.00	.50	252.50
11/08/23	SAD (2)	E-mail correspondence from David Welch regarding LLC deposition (0.1); attend Spiegel and LLC depositions (4.7); conference with Michael Desmond regarding deposition and hearing preparation (0.5); telephone conference with David Welch, William Factor and Michael Desmond regarding exhibits for hearing (0.5); prepare for confirmation hearing (1.0).	550.00	6.80	3740.00
11/08/23	SRI	Coordinate finalization and filing of ballot report (0.2); e-mail correspondence regarding same with Michael Desmond (0.1); conference with Michael Desmond regarding status of case (0.2); telephone conference with Adam Toosley regarding Association administrative claim (0.1).	475.00	.60	285.00
11/09/23	KNF (5)	Assemble trial exhibit and additional attorney materials, including courtesy copies for courtroom proceedings, in anticipation of upcoming trial (7.0).	275.00	7.00	1925.00
11/09/23	MKD (5)	Prepare Trial exhibits and revise Witness and Exhibit lists (3.0) and submit to Court; Serve expert disclosure for Curt Novy (.6); Meeting with S. DeRousse regarding trial exhibits (.2).	505.00	3.80	1919.00
11/09/23	MKD	Review Trial exhibits submitted by U.S. Trustee (.8); Review Trial Exhibits submitted by the Creditor Committee (1.6)	505.00	2.40	1212.00
11/09/23	SAD (5)	Pull exhibits for confirmation trial (1.8); prepare witness outlines for trial (6.5).	550.00	8.30	4565.00

Matter: 234844.007
 Invoice No. 1150006

Page 5
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
11/10/23	JW (5)	Meeting with working group regarding trial preparation (0.9); prepare USB drives for Shelly DeRousse and Michael Desmond of exhibits for use at trial (0.8); multiple e-mail correspondence with working group regarding trial prep (0.6); review objection to the official committee of unsecured creditors motion for administrative claim approval (0.1); draft certificate of service regarding same (0.1); e-mail correspondence with Michael Desmond regarding same (0.1); file same (0.1); review debtor's objection to the official committee of unsecured creditor's trial exhibits (0.1); draft certificate of service regarding same (0.1); e-mail correspondence with Michael Desmond regarding same (0.1); file same (0.1); review and revise motion in limine regarding the official committee of unsecured creditor's expert (0.4); draft notice and certificate of service regarding same (0.2); draft proposed order regarding same (0.2); file same (0.1); e-mail correspondence with Michael Desmond regarding same (0.1).	275.00	4.10	1127.50
11/10/23	KNF (2)	Continue to assist with trial preparation of all attorney materials and exhibits, in anticipation of upcoming proceedings (3.3).	275.00	3.30	907.50
11/10/23	KNF	Attend meeting with S. DeRousse, M. Desmond, and J. Webster regarding trial preparation for next week (0.5).	275.00	.50	137.50
11/10/23	MKD	Review trial exhibits submitted by Committee and U.S. Trustee (1.3); Draft objections to Committee exhibits (1.0).	505.00	2.30	1161.50
11/10/23	MKD	Meeting with S. DeRousse regarding trial preparation (0.5); Conference with M. Spiegel regarding expert (0.2).	505.00	.70	353.50
11/10/23	MKD	Draft Motion in Limine regarding Committee Tax Expert Louis DeLuca (2.0); Research regarding Same (1.2).	505.00	3.20	1616.00
11/10/23	MKD (4)	Conference call with B. Factor and J. Boeder regarding Nick Dallas (0.3); Forward Tax returns for Greenleaf and M. Spiegel (0.1).	505.00	.40	202.00
11/10/23	SAD	Prepare witness exam for confirmation hearing (7.6); review motion to exclude expert (0.5); multiple e-mail correspondence with Michael Desmond regarding same (0.3).	550.00	8.40	4620.00

Matter: 234844.007
 Invoice No. 1150006

Page 6
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
11/10/23	SRI	Draft motion to estimate claim of Association for plan confirmation (1.5); telephone conference regarding same with Michael Desmond (0.1); multiple e-mail correspondence with Michael Desmond regarding same (0.2); review objection to Association motion for administrative expense and provide comments on same (0.6); research regarding legal authority to bar undisclosed expert witness (1.1); multiple e-mail correspondence regarding same with Michael Desmond (0.2).	475.00	3.70	1757.50
11/11/23	MKD	Draft outline regarding opening statements (2.4).	505.00	2.40	1212.00
11/11/23	SAD	Prepare opening argument for motion to convert (5.5).	550.00	5.50	3025.00
11/12/23	MKD	Prepare outline for trial (2.5); Meeting with D. Welch, B. Factor and S. DeRousse (.4).	505.00	2.90	1464.50
11/12/23	SAD	Draft opening argument for confirmation (1.9); draft opening argument for the disclosure statement (0.8); draft opening argument for conversion (1.0); draft direct examination for debtor (0.5); telephone conference with David Welch, William Factor and Michael Desmond regarding procedure at trial (0.8).	550.00	5.00	2750.00
11/13/23	KNF (4)	Assemble and convey all trial materials to courthouse, in anticipation of trial proceedings (3.1).	275.00	3.10	852.50
11/13/23	MKD (2)	Court appearance for trial and Opening Arguments (5.5); Prepare for Same (0.8).	505.00	6.30	3181.50
11/13/23	SAD (2)	Prepare for trial (1.0); attend trial (5.5); various meetings w/Marshall Spiegel at court house (0.8).	550.00	7.30	4015.00
11/14/23	MKD (2); (5)	Prepare for and attend Trial (5.5); Research admissibility of prior deposition testimony (.4); Conference with B. Factor (.1).	505.00	6.00	3030.00
11/14/23	MKD (6)	Meeting with S. DeRousse regarding testimony of Matt Spiegel and Prepare list of exhibits (0.9).	505.00	.90	454.50
11/14/23	SAD (2)	Prepare for confirmation hearing (1.2); attend confirmation hearing (5.5); meeting with Marshall Spiegel at court house (1.0).	550.00	7.70	4235.00
11/14/23	SRI	Review motion to compel, deposition transcript from November 8th and review cases cited in motion to compel (4.8); conference with Michael Desmond and Shelly DeRousse regarding same (0.4).	475.00	5.20	2470.00
11/15/23	KNF (4)	Convey additional trial materials to courthouse (0.8).	275.00	.80	220.00

Matter: 234844.007
 Invoice No. 1150006

Page 7
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
(6) 11/15/23	MKD	Prepare for and attend trial on confirmation of Plan (5.5).	505.00	5.50	2777.50
11/15/23	MKD	Review Committee's Motion to Compel and review deposition transcript (0.3); Meeting with S. Isenberg regarding response (0.3).	505.00	.60	303.00
(2) 11/15/23	SAD	Prepare for trial on confirmation (1.4); attend hearing on confirmation (5.5).	550.00	6.90	3795.00
11/15/23	SRI	(5) Research for response to motion to compel discovery (2.5); conference with Michael Desmond regarding same (0.3); (1) draft amended retention application (including research for caselaw) and declaration for same (3.6); e-mail correspondence regarding same with Shelly DeRousse (0.1).	475.00	6.50	3087.50
11/16/23	KNF	(4) Convey additional trial materials to courthouse (0.8).	275.00	.80	220.00
11/16/23	MKD	(6) Prepare for and attend trial on confirmation of Plan (6.0).	505.00	6.00	3030.00
11/16/23	SAD	Attend hearing on confirmation (6.0); prepare for hearing (2) (3.0).	550.00	9.00	4950.00
11/16/23	SRI	(5) Draft response to motion to compel discovery (4.1); (5) research for same (1.8).	475.00	5.90	2802.50
11/17/23	KNF	(4) Breakdown all trial supplies and materials and convey back to firm, for continuance at later trial date (2.0).	275.00	2.00	550.00
11/17/23	MKD	(6) Prepare for and attend trial on confirmation of Plan (5.5).	505.00	5.50	2777.50
11/17/23	SAD	(2) Prepare for confirmation hearing (3.2); attend confirmation hearing (5.5); telephone conference with Chris Langone regarding confirmation hearing (0.1).	550.00	8.80	4840.00
11/20/23	MKD	Draft and revise Response to Motion to Compel (2.0); Review deposition transcripts and prepare exhibits (0.7).	505.00	2.70	1363.50
11/20/23	MKD	Review Motion to compel by Committee and proposal from N. Dwayne (.3); Review Privilege log (.5); Conference with D. Welch and M. Spiegel regarding same (.2).	505.00	1.00	505.00
11/21/23	MKD	Revise response to Motion to compel and file same (1.0).	505.00	1.00	505.00
11/21/23	SAD	Revise response to motion to compel (1.5); telephone conferences with David Welch regarding motion to compel and meeting regarding confirmation (0.3); attend team meeting with Marshall Spiegel, David Welch, William Factor, Michael Desmond, John Xydakis, Chris Langone and Julie Boynton regarding global resolution of case (2.4); (5) research regarding motion to compel (0.8); telephone conference with Michael Desmond regarding response to motion to compel (0.1).	550.00	5.10	2805.00

Matter: 234844.007
 Invoice No. 1150006

Page 8
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
11/22/23	SAD	Review motion in limine to prepare for hearing (0.4); attend hearing on motion in limine (1.1); e-mail correspondence to David Welch, Michael Desmond and William Factor regarding motion in limine hearing (0.1).	550.00	1.60	880.00
11/26/23	MKD	Review Privilege log and documents Identified by the Committee (0.8).	505.00	.80	404.00
11/27/23	MKD (2)	Draft Settlement Demand to UCC (.8); Conference call with Shelly & Dave (.4).	505.00	1.20	606.00
11/27/23	MKD (2)	Review documents on Privilege log (.6); Conference with N. Dwayne (.1); Conference call with Debtor regarding same (.3).	505.00	1.00	505.00
11/27/23	SAD	Zoom meeting with Michael Desmond and David Welch regarding resolution of committee's motion to compel (0.5); review multiple e-mail correspondence related to privilege (0.4); conference with Michael Desmond regarding privileged e-mail correspondence (0.2);	550.00	1.10	605.00
11/28/23	MKD	Draft proposed order regarding Motion to Compel (0.4).	505.00	.40	202.00
11/29/23	MKD	Court appearance on Committees's Motion to Compel (0.4); draft and revise Proposed Agreed Order (0.4).	505.00	.80	404.00
12/01/23	MKD	Meeting with client regarding status and strategy (.8); Conference with N. Dwayne, H. Adelman and S. DeRousse regarding settlement demand (.2).	505.00	1.00	505.00
12/05/23	MKD	Meeting with Debtor regarding status of additional financing (0.7).	505.00	.70	353.50
12/06/23	MKD	Meeting with D. Welch, B. Factor regarding status of Plan and outstanding discovery issues and deposition of Debtor (1.2); Conference with M. Spiegel regarding same (.2); Conference with N. Dwayne regarding deposition of Debtor (.1)	505.00	1.50	757.50
12/07/23	MKD	Conference call with M. Spiegel regarding plan issues and additional financing (0.4).	505.00	.40	202.00
12/11/23	MKD	Conference call with N. Dwayne and D. Welch regarding deposition of Debtor (0.2).	505.00	.20	101.00
12/13/23	SAD	E-mail correspondence to Michael Desmond regarding tax issues for confirmation (0.1).	550.00	.10	55.00
12/15/23	MKD	Review documents produced by ReadyCap and Marcus and Milichap (0.8); conferences with M. Spiegel regarding same (0.4).	505.00	1.20	606.00

Matter: 234844.007
 Invoice No. 1150006

Page 9
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
12/15/23	MKD	Meeting with S. DeRousse, D. Wealch and B. Factor regarding Plan and strategy for confirmation (1.4).	505.00	1.40	707.00
12/18/23	JCM	Discuss S corp and related tax issues with Shelly DeRousse re: disclosure statement objective (1.0).	925.00	1.00	925.00
12/18/23	MKD	Meeting with SAD and J. Mandarino regarding tax issues for LLC (1.0).	505.00	1.00	505.00
12/19/23	MKD	Meeting with SAD regarding new financing and potential Tax issues for LLC (1.2).	505.00	1.20	606.00
12/20/23	MKD	Conference call with D. Welch and SAD regarding Greenleaf LLC and Plan funding (0.4).	505.00	.40	202.00
12/22/23	MKD	Conference call with SAD regarding status and Strategy (5) (.4); Research SOL on Fraudulent Transfer Claim by Trustee (.6).	505.00	1.00	505.00
12/22/23	SAD	(5) Research related to confirmation and conversion (0.5).	550.00	.50	275.00
12/27/23	SAD	Conference with Michael Desmond regarding trial strategy for plan and conversion motion (0.3).	550.00	.30	165.00
12/27/23	SAD	(5) Research regarding plan confirmation and motion to convert (2.0).	550.00	2.00	1100.00
12/28/23	MKD	Meeting with client regarding plan funding and status and strategy (2.0).	505.00	2.00	1010.00
12/28/23	SAD	Telephone conference with Michael Desmond regarding confirmation strategy (0.4); telephone conference with Gretchen Silver regarding confirmation hearing (0.2); conference with Michael Desmond regarding case strategy (0.2).	550.00	.80	440.00
01/02/24	MKD	Conference with M. Spiegel regarding N. Dallas deposition (.3); Phone call to J. Boeder regarding same (.1); Conference with SAD regarding deposition of Committee representative (.2).	505.00	.60	303.00
01/02/24	SAD	Review deposition notice (0.2); e-mail correspondence to Michael Desmond regarding deposition notice (0.1); e-mail correspondence to Michael Desmond regarding Nick Dallas deposition (0.1); e-mail correspondence with Nicholas Dwayne regarding Nick Dallas deposition (0.1).	550.00	.50	275.00
01/03/24	MKD	Conference call with SAD, D. Welch and B. Factor regarding status and strategy (1.0).	505.00	1.00	505.00

Matter: 234844.007
 Invoice No. 1150006

Page 10
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
01/05/24	MKD	Conferences with SAD and N. Dwayne regarding depositions of Committee Representative and N. Dallas (.5); Conference call with M. Spiegel regarding same (.5); Review documents produced by N. Dallas (1.0).	505.00	2.00	1010.00
01/08/24	MKD	Review documents produced by N. Dallas (1.0)	505.00	1.00	505.00
01/08/24	SAD	Prepare outline for committee 30(b)(6) deposition (2.0).	550.00	2.00	1100.00
01/10/24	MKD (6)	Prepare for and take deposition of William Hall as representative for the Association (4.5).	505.00	4.50	2272.50
01/10/24	SAD (5)	Prepare exhibits and notes for deposition of committee 30(b)(6) witness for confirmation hearing (2.1); prepare chart of exhibits (0.3); prepare claims spreadsheet (0.2); prepare Adelman & Gettleman paid claims spreadsheet (0.4); attend deposition of 30(b)(6) witness (1.0) (only partially billed for collaborating during breaks and monitoring for assistance with exhibits).	550.00	4.00	2200.00
01/11/24	SAD	Prepare for Nickolas Dallas deposition (0.6); review documents produced by Nickolas Dallas related to confirmation (0.8); conference with Michael Desmond regarding deposition of Nickolas Dallas (0.3); attend deposition of Nickolas Dallas (5.6); conference with Mick Dwayne and William Factor regarding trial schedule (0.5).	550.00	7.80	4290.00
01/12/24	MKD	Review Bank statements from Greenleaf and 2021 Final Greenleaf Tax Return (5); Conference with M. Spiegel and SAD regarding trial exhibits (.5)	505.00	1.00	505.00
01/12/24	SAD	Telephone conference with Mike Desmond regarding discovery requests for hearing (0.5).	550.00	.50	275.00
01/15/24	MKD	Attend Chambers conference with Judge Barnes (.4); Meeting with opposing counsel regarding scheduling of witnesses (.5).	505.00	.90	454.50
01/15/24	MKD(2)	Prepare for trial (2.6).	505.00	2.60	1313.00

Matter: 234844.007
 Invoice No. 1150006

Page 11
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
01/15/24	SAD (2)	Prepare for confirmation trial (3.0); telephone conference with Nick Dwayne, Howard Adelman, William Factor, Michael Desmond and Gretchen Silver regarding trial schedule (0.3); telephone conferences with Michael Desmond, William Factor, Matthew Spiegel and Marshall Spiegel regarding ability to testify at trial (0.6); attend judicial conference with Judge Barnes regarding trial dates (0.5); telephone conference with Nick Dwayne, Gretchen Silver, Michael Desmond and William Factor regarding witness order (0.7); telephone conference with Susan Anderson in preparation for hearing (0.2).	550.00	5.30	2915.00
01/16/24	MKD (6)	Prepare for and attend trial (6.5).	505.00	6.50	3282.50
01/16/24	MKD	Prepare outline of Cross-Exam of Debtor and Matt Spiegel Testimony (1.0).	505.00	1.00	505.00
01/16/24	MKD	Conference call with B. Factor and SAD regarding trial testimony (.3); Conference with Debtor regarding any payments made by Greenleaf since 12/31/23 (.2).	505.00	.50	252.50
01/16/24	SAD (2)	Prepare for hearing (0.9); attend confirmation/conversion hearing (6.0); prepare for next trial day (2.3); telephone conference with William Factor regarding trial schedule for Matthew Spiegel testimony and preparation (0.2); e-mail correspondence with William Factor regarding scheduling Matthew Spiegel testimony (0.1).	550.00	9.50	5225.00
01/17/24	MKD	Meeting with SAD and B. Factor regarding preparation of testimony for M. Spiegel (2.5).	505.00	2.50	1262.50
01/17/24	MKD (6)	Prepare for and attend trial (6.5).	505.00	6.50	3282.50
01/17/24	SAD (2)	Prepare for confirmation/conversion hearing (1.9); attend confirmation/conversion hearing (6.3); telephone conference with David Welch regarding confirmation hearing (0.3); prepare Matthew Spiegel direct exam outline (1.5); Zoom with Michael Desmond, William Factor and Matthew Spiegel regarding preparation of testimony (2.9).	550.00	12.90	7095.00
01/18/24	MKD (6)	Prepare for and attend trial (8.5).	505.00	8.50	4292.50
01/18/24	MKD	Conference call with SAD and J. Boeder regarding N. Dallas (0.6).	505.00	.60	303.00

Matter: 234844.007
 Invoice No. 1150006

Page 12
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
01/18/24	SAD (2)	Prepare for confirmation; conversion hearing (1.1); attend confirmation/conversion hearing (9.2); prepare for Nick Dallas testimony for hearing tomorrow (0.2); telephone conference with Michael Desmond and Jeremy Bolder regarding preparation for Nick Dallas testimony (0.5).	550.00	11.00	6050.00
01/19/24	MKD (6)	Prepare for and attend trial on confirmation (9.5).	505.00	9.50	4797.50
01/19/24	SAD (2)	Prepare for hearing (1.8); attend hearing on confirmation/conversion (9.0).	550.00	10.80	5940.00
01/20/24	MKD	Meeting with M. McClintock and S. DeRousse regarding Marcus & Milichap (.4); Prepare outline of testimony for D. Giannakopoulos (.6).	505.00	1.00	505.00
01/20/24	SAD	Telephone conference with Matt McClintock and Michael Desmond regarding confirmation hearing (1.0).	550.00	1.00	550.00
01/21/24	MKD	Meeting with Curt Novy (0.5); prepare outline of expert testimony (1.0).	505.00	1.50	757.50
01/21/24	SAD	Telephone conference with Michael Desmond, William Factor and Curt Novy regarding confirmation hearing (1.9).	550.00	1.90	1045.00
01/22/24	ACT (5)	Research rules of evidence for confirmation hearing issue (0.4).	550.00	.40	220.00
01/22/24	MKD (6)	Prepare for and attend trial on confirmation (9.5).	505.00	9.50	4797.50
01/22/24	SAD (2)	Prepare for hearing (0.4); attend hearing on confirmation/conversion and trustee motion (8.7); telephone conference with William Factor regarding confirmation hearing (0.4).	550.00	9.50	5225.00
01/23/24	MKD (6)	Prepare for and attend trial on confirmation (10.0).	505.00	10.00	5050.00
01/23/24	SAD (2)	Prepare for hearing (0.4); attend confirmation/conversion/trustee hearing (10.0).	550.00	10.40	5720.00
01/24/24	ACT	Telephone conference with Shelly DeRousse and John Xydakis re Special Assessment Notice (.3); Prepare draft response to same and demand to inspect to go to the board's counsel (.4).	550.00	.70	385.00
01/24/24	MKD (6)	Draft outline to Testimony of William Hall (1.5); Prepare for and attend trial on confirmation (4.0)	505.00	5.50	2777.50
01/24/24	SAD (2)	Attend confirmation hearing (4.5); prepare for confirmation hearing (2.0); Zoom meeting with Matthew Spiegel, William Factor and Michael Desmond to prepare for testimony in hearing (1.2).	550.00	7.70	4235.00

Matter: 234844.007
 Invoice No. 1150006

Page 13
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
01/25/24	ACT	Receipt and review of Amended and Restated Condominium Declaration and amendment to draft letter to Condominium Association's counsel (.2); Telephone conference with Shelly DeRousse re same (.2).	550.001	.40	220.00
01/25/24	MKD	(6) Prepare for and attend trial on confirmation (5.0) Prepare outline of testimony for Greenleaf (1.0); Conference call with B. Factor regarding M. Spiegel (.4); Meeting with M. Spiegel regarding Greenleaf and trial preparation (1.0).	505.00	7.40	3737.00
01/25/24	SAD	(2) Prepare for confirmation hearing (3.0); attend confirmation hearing (4.9); Zoom conference with Marshall Spiegel and Michael Desmond regarding preparation for LLC testimony (1.0).	550.00	8.90	4895.00
01/25/24	TLK	Conference with MKD re: 1116-22 Greenleaf Building LLC Articles of Organization and Articles of Amendment (0.1); review MKD e-mail and prior Articles (0.1); research Secretary of State's online data re: entity, documents filed, etc. (0.1).; conference with Joyce, Maria and Michell at Secretary of State re: same (0.1); order Articles online (0.1).	125.00	.50	62.50
01/26/24	MKD	(2) Prepare for hearing (1.0); attend trial on confirmation (5.5)..	505.00	6.50	3282.50
01/26/24	SAD	Attend hearing on confirmation and conversion (5.5).	550.00	5.50	3025.00
01/28/24	MKD	Meeting with M. Spiegel, SAD and Bill Factor regarding status and strategy (1.0)..	505.00	1.00	505.00
02/01/24	MKD	Conference call with N. Dwayne regarding payment of Committee Fee Application (0.6)	505.00	.60	303.00
02/05/24	MKD	Conference call with SAD regarding pending financing (.2); Research Court docket regarding sanctions order entered by the Bankruptcy Court against Greenleaf (.3)	505.00	.50	252.50
02/07/24	MKD	Review Committee's Motion to Compel Payment of Professional Fees and research Court docket for prior orders regarding same (.6); Research regarding response (.5).	505.00	1.10	555.50
02/08/24	MKD	Conference call with SAD regarding refinancing by FHLMC and Fannie Mae re: Greeneleaf (0.5).	505.00	.50	252.50
02/08/24	SAD	Telephone conference with Michael Desmond regarding plan funding (0.4).	550.00	.40	220.00
02/12/24	MKD	Meeting with SAD regarding Committee Motion to compel payment and hearing regarding same (0.3)	505.00	.30	151.50
02/13/24	MKD	Meeting with SAD regarding Committee Motion to Compel payment and status of financing (0.4).	505.00	.40	202.00

Matter: 234844.007
 Invoice No. 1150006

Page 15
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
03/05/24	MKD	Review documents from client and Bank Statements for Supplemental Production (.3); Conference with SAD regarding same (.2).	505.00	.50	252.50
03/06/24	SAD	Review multiple e-mail correspondence from Josh Orlan regarding plan financing (0.4).	550.00	.40	220.00
03/11/24	MKD	Meeting with SAD regarding confirmation issues and additional financing (.3) Conference call with B. Factor regarding Loan Commitment for Greenleaf (.5).	505.00	.80	404.00
03/11/24	SAD	Telephone conference with Michael Desmond regarding preparation for confirmation trial and closing (0.4); Zoom meeting with Michael Desmond and William Factor regarding confirmation strategy (0.4).	550.00	.80	440.00
03/12/24	MKD (2)	Meeting with SAD and preparation for trial (.4); Conference with G. Murphy regarding settlement letter (.1).	505.00	.50	252.50
03/12/24	SAD	Conference with Michael Desmond regarding preparation for trial (0.3).	550.00	.30	165.00
03/13/24	MKD	Prepare documents for Fourth Supplemental Production (2)(.7); Prepare for trial (.5).	505.00	1.20	606.00
03/13/24	MKD	Conference call with N. Dwayne regarding trail scheduling (.2); Review settlement letter from G. Murphy and conference with SAD (.2).	505.00	.40	202.00
03/13/24	SAD (2)	E-mail correspondence with Josh Orlan regarding plan financing (0.1); telephone conferences with Josh Orlan regarding plan financing (0.4); review settlement offer from Association (0.3); prepare for hearing (0.8).	550.00	1.60	880.00
03/14/24	MKD	Review trial transcripts for closing arguments (2.0); Meeting with S. DeRousse and M. Spiegel (1.4).	505.00	3.40	1717.00
03/14/24	MKD (5)	Prepare new trial exhibits (1.4)..	505.00	1.40	707.00
03/14/24	SAD	Draft closing argument for confirmation (1.5); draft confirmation outline (2.1).	550.00	3.60	1980.00
03/15/24	MKD (6); (2)	Review Trial exhibits and trial transcripts and prepare for hearing (3.0); Meeting with SAD (.3); Draft and revise proposed agreement to defer fees (.7).	505.00	4.00	2020.00

Matter: 234844.007
 Invoice No. 1150006

Page 16
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
03/15/24	SAD	Create demonstrative exhibit (0.8); conferences with Michael Desmond to coordinate closing arguments and remaining exams (1.2); draft closing argument for confirmation, disclosure statement and conversion (2.5); e-mail correspondence to Marshall Spiegel, Matthew Spiegel and William Factor regarding witness preparation (0.1); (5) prepare exhibits for hearing (0.4); research regarding confirmation (1.5).	550.00	6.50	3575.00
03/16/24	MKD	Review Trial Exhibits and prepare for closing arguments (1.5).	505.00	1.50	757.50
03/17/24	MKD	Prepare trial testimony and draft outline of Closing Arguments (2.0); Meeting with M. Spiegel, Matt Spiegel, Bill Factor and S. DeRousse regarding same (1.5).	505.00	3.50	1767.50
03/17/24	SAD	Telephone conference with Marshall Spiegel, William Factor and Michael Desmond regarding preparation for confirmation hearing (1.6); telephone conference with Marshall Spiegel regarding preparation for confirmation (0.6).	550.00	2.20	1210.00
03/18/24	MKD	(6) Prepare for and attend trial (7.4).	505.00	7.40	3737.00
03/18/24	SAD	(2) Prepare for confirmation hearing (1.0); attend confirmation hearing (8.2).	550.00	9.20	5060.00
03/19/24	MKD	Review pleading and begin draft outline of proposed findings (2.5).	505.00	2.50	1262.50
03/19/24	MKD	Meeting with SAD regarding refinancing by Greenleaf to fund Plan (0.4).	505.00	.40	202.00
03/19/24	SAD	Telephone conference with Josh Orlan regarding plan financing (0.5); e-mail correspondence to William Factor regarding plan financing (0.1); review notes/transcripts regarding confirmation hearing (1.1).	550.00	1.70	935.00
03/20/24	MKD	Review trial transcripts and draft proposed findings (3.5).	505.00	3.50	1767.50
03/22/24	MKD	Review trial transcripts regarding proposed Findings of Fact and Conclusions of Law (2.0).	505.00	2.00	1010.00
03/25/24	MKD	Review briefs on Motion for appointment of Trustee (.4); Review trial testimony of D. Giannakopoulos (1.6)	505.00	2.00	1010.00
03/26/24	MKD	Review trial transcripts and exhibits (1.7).	505.00	1.70	858.50
03/28/24	MKD	Meeting with N. Dwayne and S. DeRousse regarding status of financing and potential for Stipulation on confirmation (1.4).	505.00	1.40	707.00

Matter: 234844.007
 Invoice No. 1150006

Page 17
 June 18, 2024

Date	Billor	Narrative	Rate	Time	Fee
04/02/24	MKD	Conference with SAD regarding status of plan financing (0.2).	505.00	.20	101.00
04/05/24	SAD	Telephone conference with Josh Orlan regarding financing of plan (0.1).	550.00	.10	55.00
04/09/24	JW (4)	Follow up regarding status of final trial transcript (0.1); obtain same (0.1).	275.00	.20	55.00
04/11/24	SAD	Address plan funding issues (0.7).	550.00	.70	385.00
04/12/24	MKD	Draft proposed findings of fact regarding confirmation (1.0).	505.00	1.00	505.00
04/15/24	SAD	Telephone conferences with Josh Orlan regarding plan financing (0.4).	550.00	.40	220.00
04/16/24	MKD	Review transcripts regarding proposed findings of fact and conclusions of law (1.4).	505.00	1.40	707.00
04/17/24	SAD	Telephone conference with Julie Boynton regarding plan financing and related issues (0.1); telephone conference with Michael Desmond regarding confirmation issues (0.2).	550.00	.30	165.00
04/18/24	MKD	Review Trial transcripts for proposed findings (1.0).	505.00	1.00	505.00
04/18/24	SAD	Address plan funding issues (0.1); telephone conference with Josh Orlan regarding status of plan funding (0.2); e-mail correspondence to Marshall Spiegel and Matthew Spiegel with a copy to Julie Boynton regarding payment of SGR fees pursuant to plan (0.1).	550.00	.40	220.00
04/22/24	SAD	Review motion to extend time (0.2).	550.00	.20	110.00
04/23/24	MKD	Review trial transcripts and draft proposed findings (1.5).	505.00	1.50	757.50
04/25/24	MKD	Review document production regarding Land Trust and Assignment of Beneficial Interest (0.8); review Title Loan Policy (0.4).	505.55	1.20	606.00
04/26/24	MKD	Review Trial transcripts and draft proposed findings (4.5).	505.00	4.50	2272.50
04/26/24	SAD	Telephone conference with Josh Orlan regarding status of loan closing (0.2); draft proposed findings of fact (1.5).	550.00	1.70	935.00
04/27/24	MKD	Review trial transcripts and expert testimony of Curt Novy (1.5).	505.00	1.50	757.50
04/28/24	MKD	Review Trial transcripts and draft proposed findings (3.5).	505.00	3.50	1767.50
04/29/24	MKD (5)	Draft Post trial Brief (5.2); Research regarding same (1.2).	505.00	6.40	3232.00
04/29/24	SAD	Telephone conference with Michael Desmond regarding closing argument briefs (0.2) draft closing argument for plan confirmation (3.2).	550.00	3.40	1870.00

Please send remittance to:
 SMITH, GAMBRELL & RUSSELL LLP
 PO BOX 930930
 ATLANTA, GA 31193-0930
 Main: 404-815-3500
 www.sgrlaw.com



Marshall Spiegel
 1618D Sheridan Road
 Wilmette, IL 60091

Page 1
 Date: June 18, 2024
 Matter: 234844.013
 Invoice No. 1150009

Shelly A. DeRousse

Matter: Claims Analysis

For Professional Services

Date	Billor	Narrative	Rate	Time	Fee
11/08/23	ACT (6)	Prepare initial draft of response to the Association's administrative expense claim and Westlaw research in support of same (3.2).	550.00	3.20	1760.00
11/09/23	ACT (5)	Continued Westlaw research on the issues raised by the Association in its Motion asking that the fines be considered an administrative expense (0.8); Edit to the draft response (0.3).	550.00	1.10	605.00
11/10/23	MKD	Draft and revise Objection to Motion of Association for Allowance of Chapter 11 Administrative Claim (2.7); Draft and revise Motion to Value Claim for Confirmation (1.0).	505.00	3.70	1868.50
12/21/23	SAD	Telephone conference with Michael Desmond regarding Association reply (0.3); review Association reply (0.4).	550.00	.70	385.00
01/10/24	MKD	Court appearance for ruling on Objection to Motion of Association for allowance of administrative claim (1.0).	505.00	1.00	505.00
02/12/24	ACT	Receive, review and analyze new notice for the special assessment (0.2); conferences with Shelly DeRousse re responding to same (0.1).	550.00	.30	165.00
02/14/24	ACT	Prepare draft letter to Association's counsel re new meeting and failure to respond to demand to inspect (0.3).	550.00	.30	165.00
04/02/24	ACT	Telephone conference with client and S. DeRousse re board decision on the special assessment (0.8).	550.00	.80	440.00
TOTAL FEES FOR SERVICES					\$5,893.50

Matter: 234844.015
 Invoice No. 1150010

Page 1
 June 18, 2024

DISBURSEMENTS

11/03/23	Messenger Service - - VENDOR: US MESSENGER & LOGISTICS, INC.	23.32
11/13/23	Business Meal - lunch for Michael Colannino dep prep	97.61
(7) 11/14/23	Business Meal	101.19
11/15/23	Business Meal	94.93
11/15/23	Business Meal	110.29
11/17/23	Business Meal	108.19
11/22/23	- VENDOR:VERITEXT LEGAL SOLUTIONS 11/08/23 CERTIFIED TRANSCRIPTS	1,365.45
12/31/23	Document Retrieval - - VENDOR: PACER SERVICE CENTER,INC.	0.20
01/16/24	Business Meal - Lunch with Marshall Spiegel duing hearing break.	15.58
(7) 01/16/24	Messenger Service - - VENDOR: US MESSENGER & LOGISTICS, INC.	104.42
01/18/24	Business Meal - Lunch with Marshall Spiegel during hearing break	73.06
01/19/24	Business Meal - Lunch with Marshall Spiegel during hearing break.	59.95
01/22/24	Business Meal - Lunch with Marshall Spiegel during hearing break.	102.02
01/23/24	Business Meal - Lunch with Marshall Spiegel during hearing break.	102.02
01/25/24	- VENDOR:VERITEXT LEGAL SOLUTIONS	1,188.70
01/26/24	Certified Copies of filing with State of IL	76.69
01/29/24	Charge for Transcript	1,483.32
02/06/24	Charge for Transcript	3,089.91
02/28/24	Court Reporter Fee	2,624.41
02/28/24	Court Reporter Fee	1,302.06
03/15/24	Messenger Service - - VENDOR: US MESSENGER & LOGISTICS, INC.	80.33
(7) 03/18/24	Business Meal - Lunch with Marshall Spiegel during hearing break	104.02
(4)	Secretarial Overtime Charges	487.50
03/31/24	Document Retrieval - - VENDOR: PACER SERVICE CENTER,INC.	30.70
03/31/24	Document Retrieval - - VENDOR: PACER SERVICE CENTER,INC.	3.00
03/31/24	Document Retrieval - - VENDOR: PACER SERVICE CENTER,INC.	4.20
04/09/24	Charge for Transcript	1,162.00
(4)	Secretarial Overtime Charges	81.25
	TOTAL	\$14,076.32