

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT, IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

STATE OF FLORIDA, OFFICE OF FINANCIAL
REGULATION,

CASE NO.: 07-43672 CA 09

Plaintiff,

v.

BERMAN MORTGAGE CORPORATION , a
Florida corporation, M.A.M.C.
INCORPORATED, a Florida corporation, DANA
J. BERMAN, as Owner and Managing Member,

Defendant.

and,

DB ATLANTA, LLC, a Florida Limited Liability
Company, **DB DURHAM, LLC**, a Florida
Limited Liability Company, **NORMANDY
HOLDINGS II, LLC**, a Florida Limited Liability
Company, **NORMANDY HOLDINGS III, LLC**,
a Florida Limited Liability Company,
ACQUISITIONS, LLC, a Florida Limited
Liability Company, **DBKN GULF
INCORPORATED**, a Florida Limited Liability
Company, **OCEANSIDE ACQUISITIONS,
LLC**, a Florida Limited Liability Company, **DB
BILOXI, LLC**, a Florida Limited Liability
Company, **DB BILOXI II, LLC**, a Florida
Limited Liability Company, , **DB BILOXI III,
LLC**, a Florida Limited Liability Company, **DBDS
VERO BEACH, LLC**, a Florida Limited Liability
Company, **DB TAMPA, LLC**, a Florida Limited
Liability Company, **DB SIMPSONVILLE, LLC**,
a Florida Limited Liability Company,
REDLANDS RANCH HOLDINGS, LLC, a
Florida Limited Liability Company, **DB
CARROLL STREET, LLC**, a Florida Limited
Liability Company,

Relief Defendants.

THE ORIGINAL
FILED ON:

NOV 13 2008

IN THE OFFICE OF
CIRCUIT COURT DADE CO. FL

**RECEIVER'S MOTION FOR COURT ORDER AUTHORIZING AN INTERIM
PAYMENT OF REASONABLE ATTORNEYS' FEES AND RECEIVER
FEES IN CONJUNCTION WITH THE NORMANDY HOLDINGS II, LLC PROJECT**

Michael I. Goldberg, as Court Appointed Receiver, by and through undersigned counsel, files this Motion for a Court Order authorizing the Receiver to make an interim payment of certain attorneys' fees and receivership fees from assets of Normandy Holdings II, LLC and as grounds therefore states:

1. Michael I. Goldberg, was appointed as Receiver in this case on December 11, 2007.

2. The Receiver and his counsel jointly make this application for an interim payment of attorneys' fees and receivership fees and costs incurred with respect to the Normandy Holdings II, LLC Project from funds held by M.A.M.C. Incorporated for the benefit of Normandy Holdings, II, LLC (the "Funds").

3. The Receiver and Berger Singerman have significant unpaid fees and costs advanced in this case by virtue of the majority of the estate having little cash. This is one of the few parts of the estate that has the current cash to pay fees.

4. Normandy Holdings II, LLC is a relief defendant that, at the time of the institution of this receivership, was the developer of a town home project with unsold units remaining. The Receiver and his counsel has managed the project, marketed, sold off the remaining units, negotiated and arranged for the pay-off of a third party secured lien holder on the project and defended discovery and motions filed by Ira Sukoff.

5. As a result of the sale of the assets in this case, the Receiver is holding approximately \$1.4mm. The Receiver must complete discovery with respect to Ira Sukoff's

claim against this asset and conduct a final hearing to allow this Court to determine how to distribute the final net proceeds..

6. By prior Order, this Court has authorized the Receiver to retain counsel to preserve assets and recover assets on behalf of the Receivership and to establish procedures regarding same.

7. The Court's Order also authorized payment of reasonable compensation for these endeavors.

8. Accordingly, the Receiver and his counsel jointly move for payment of attorneys' fees and receivership fees from the Funds held by M.A.M.C. Incorporated for the benefit of Normandy Holdings II, LLC, which Funds.

9. Attached hereto and made a part hereof as Exhibit "A," are the invoices for services rendered to the Receiver in relation to the Normandy Holdings II, LLC Project by Berger Singerman, P.A., totaling \$32,398.00, for which we seek the Court's authorization to pay from the Funds.

10. Additionally, the Receiver seeks payment from the Funds of Receivership fees associated with this Project, totaling \$7,500.00, including fees for Receiver's attendance at meetings, depositions, hearings and the like.

WHEREFORE, the Receiver respectfully moves this Court for an Order granting Receiver's Motion and directing the payment of Receiver's reasonable attorneys' fees and receivership fees from funds held by MAMC Incorporated for the benefit of Normandy Holdings II, LLC.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail and U.S. Mail on this **13th day of November 2008**, to: **Cristina Saenz, Assistant General Counsel**, STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION, 401 N.W. 2nd Avenue, Suite N-708, Miami, Florida 33128; to **Alan M. Sandler, Esquire**, *Counsel for Defendants, Joel and Deborah Sokol, Darlene Levasser, Robert Dzimidas IRA, Lawrence Meyer IRA, Lawrence Meyer Roth IRA and Mary Joe Meyer SD IRA and Mary Joe Meyer Roth IRA*, of SANDLER & SANDLER, 117 Aragon Avenue, Coral Gables, Florida 33134; to **Allan A. Joseph, Esquire**, *Counsel for The Amadi Companies and Amedia Family Investors*, DAVID AND JOSEPH, P.L., 1001 Brickell Bay Drive, Suite 2002, Miami, Florida 33131; to **Richard R. Robles, Esquire**, LAW OFFICES OF RICHARD ROBLES, P.A., *Counsel for the Four Ambassadors Association, Inc.*, 905 Brickell Bay Drive, Tower II, Mezzanine, Suite 228, Miami, Florida 33131; to **Daniel Kaplan, Esquire**, *Counsel for Deborah A. Berman*, at the LAW OFFICES OF DANIEL KAPLAN, P.A., Turnberry Plaza, Suite 600, 2875 N.E. 191st Street, Aventura, Florida 33180; to **Howard N. Kahn, Esquire**, *Attorneys for Intervenor, Ira Sukoff*, KAHN, CHENKIN & RESNIK, P.L., 1815 Griffin Road, Suite 207, Dania, Florida 33304; to **Charles Pickett, Esquire and Linda Dickhaus Agnant, Esquire**, *Attorneys for Johns Manville*, CASEY CIKLIN LUBITZ MARTENS & O'CONNELL, P.A., 515 North Flagler Drive, Suite 1900, West Palm Beach, Florida 33401; to **Allen P. Pegg, Esquire**, *Counsel for IBEX Cheoah I, LLC*, MURAI, WALD, BIONDO, MORENO & BROCHIN, P.A., Two Alhambra Plaza, PH-1B, Coral Gables, Florida 33134; to **Helen Schwartz Romañez, Esquire**, *Attorneys for Turnberry Bank & Bank of Coral Gables*, The Romañez Law Firm, 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33134; to **Charles W. Throckmorton, Esquire**, *Attorneys for Dana Berman*, KOZYAK TROPIN THROCKMORTON, P.A., 2525 Ponce de Leon Boulevard, 9th Floor, Coral Gables, Florida 33134; to **J. Andrew Baldwin, Esquire**, *Attorneys for Regions Bank*, THE SOLOMON LAW GROUP, P.A., 1881 West Kennedy Boulevard, Tampa, Florida 33606-1606; to **Rey Hicks and Javier Castillo** of COMPLETE PROPERTY MANAGEMENT, at Post Office Box 402507, Miami Beach, Florida 33140; to **Daren Schwartz**, BERMAN MORTGAGE CORPORATION D/B/A M.A.M.C., INC., at 402 Continental Plaza, 3250 Mary Street, Coconut Grove, Florida 33133; to **Norman S. Segall, Esquire**, *Attorneys for Skilled Services of Tampa Bay, LLC*, RUDEN MCCLOSKEY SMITH

SCHUSTER & RUSSELL, P.A., 701 Brickell Avenue, Suite 1900, Miami, Florida 33131; to **Norman Malinski, Esquire**, *Counsel for Giles Construction*, 2875 NE 191st Street, Suite 508, Aventura, Florida 33180; **Gabrielle D'Alemberte, Esquire**, LAW OFFICES OF ROBERT PARKS, 2121 Ponce de Leon Boulevard, Suite 505, Coral Gables, Florida 33134; to **Robert B. Miller, Esquire**, *Attorneys for Atlantic Lending, LLC*, TABAS, FREEDMAN, SOLOFF & MILLER, P.A., The Ingraham Building 25 SE 2nd Avenue, Suite 919, Miami, Florida 33131-1538; to **Richard P. Cole, Esquire**, **Edward S. Polk, Esquire and/or Crystal Leah Arocha, Esquire**, *Attorneys for Meland Russin Hellinger & Budwick, P.A.* COLE SCOTT & KISSANE, P.A., Pacific National Bank Building, 1390 Brickell Avenue, Third Floor, Miami, Florida 33131; to **David A. Wheeler, Esquire**, *Counsel for Various Unit Owners at Le Chateau Condominiums at DB Biloxi II, LLC* WHEELER & WHEELER, PLLC, 185 Main Street, Biloxi, Mississippi 39530; to **James M. Kaplan, Esquire**, **Nanci S. Landy, Esquire and/or Kristen A. Rosenthal, Esquire**, *Attorneys for Non-Parties, Barry A. Imber and Imber & Company*, KAPLAN ZEENA, LLP, Two South Biscayne Boulevard, One Biscayne Tower, Suite 3050, Miami, Florida 33131-1806; to **Michael A. Hanzman, Esquire**, HANZMAN GILBERT, LLP, 2525 Ponce de Leon Boulevard, Suite 700, Coral Gables, Florida 33134; to **Paul Huck, Esquire and Dean C. Colson, Esquire**, COLSON HICKS EIDSON, 255 Aragon Avenue, Second Floor, Coral Gables, Florida 33134; and to **Jason S. Miller, Esquire**, *Counsel for Flagstar Bank*, ADORNO & YOSS, LLP, 2525 Ponce de Leon Boulevard, Suite 400, Coral Gables, Florida 33134.

Respectfully submitted,

BERGER SINGERMAN

Attorneys for Receiver, Michael Goldberg

200 South Biscayne Boulevard, Suite 1000

Miami, Florida 33131

Phone: (305) 755-9500 / Fax: (305) 714-4340

By: _____

~~JAMES D. CASSENHEIMER~~

Florida Bar No. 959987

cc: The Honorable Thomas Wilson, Jr. *(via Hand-Delivery)*
Michael Goldberg, Esq., as Receiver *(via e-mail)*
The Investor(s)/Lender(s) Group *(via e-mail)*

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BERGER SINGERMAN, PA
ATTORNEYS AT LAW
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FT LAUDERDALE FL 33301
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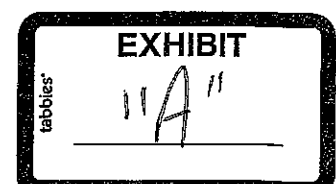
AKERMANSENERFITT
MICHAEL I. GOLDBERG, RECEIVER
350 EAST LAS OLAS BLVD
16TH FLOOR
FT. LAUDERDALE, FLORIDA 33301-2229

INVOICE DATE: 11/13/2008
INVOICE NO. 56306

NORMANDY HOLDINGS II, LLC

MATTER ID: 12293-0018

PROFESSIONAL FEES RENDERED THROUGH: 10/31/2008			HOURS
2/5/2008	JG1	REVIEW ORDERS; TELEPHONE CALL FROM COMPANY ON AVANTI SALE; MOTION FOR COURT ORDER APPROVING SALE OF AVANTI UNIT; LETTER TO PINECREST TITLE; REVIEW CORPORATE STRUCTURE.	1.50
2/6/2008	JG1	EMAILS REGARDING AVANTI SALE; TELEPHONE CONFERENCE WITH COUNSEL.	1.00
2/11/2008	JG1	REVIEW HUD-1 FOR 163-5 AT AVANTI AND EMAIL TO CLOSING AGENT; EMAIL EXCHANGES REGARDING SALE.	1.00
3/18/2008	JG1	REVIEW SUKUFF MOTION TO INTERVENE; EMAIL TO M. GOLDBERG.	0.40
4/14/2008	LP	DRAFTED AND SENT EMAIL TO CRISTINA SAENZ, ASSISTANT GENERAL COUNSEL STATE OF FLORIDA OFFICE OF FINANCIAL REGULATION, REGARDING AND INCLUDING IRA SUKOFF'S MOTION TO INTERVENE.	0.20
4/16/2008	JG1	ATTEND HEARING ON MOTION ON IRA SUKOFF MOTION TO INTERVENE.	2.40
4/17/2008	LBS	REVIEW PROPERTY MANAGEMENT AGREEMENT, AVANTI, PREPARE PROVISION LIMITING RECEIVER LIABILITY.	1.50
4/22/2008	JG1	LETTER ON AVANTI MANAGEMENT CONTRACTS.	0.50
5/1/2008	JG1	ANALYSIS OF AVANTI MANAGEMENT AGREEMENTS AND I. SUKOFF'S POSITION.	1.00
5/2/2008	LBS	REVIEW NORMANDY LOAN PROPOSAL AND COMMENTS TO HAL.	0.50
5/27/2008	JG1	TELEPHONE CONFERENCE WITH CLIENT; MOTION TO APPEAR; SALE OF NH II UNITS 155-1 AND 155-5; REVIEW EMAILS REGARDING UNIT 155-7 AND AVANTI; REVIEW ABANDONMENT ISSUES; EMAIL EXCHANGE WITH M. GOLDBERG.	1.20



5/27/2008	LP	PREPARED RECEIVER'S MOTION FOR COURT APPROVAL TO OF A SALE AND PURCHASE OF CERTAIN ASSETS OF NORMANDY HOLDINGS II, LLC.	0.50
5/27/2008	LP	PREPARED NOTICE OF HEARING ON RECEIVER'S MOTION FOR COURT APPROVAL TO OF A SALE AND PURCHASE OF CERTAIN ASSETS OF NORMANDY HOLDINGS II, LLC TO BE ADDED ON TO MAY 29, 2008 MOTION CALENDAR.	0.30
5/28/2008	JG1	ANALYSIS OF MOTION ON AVANTI UNITS.	0.90
5/28/2008	LP	EDITED AND FINALYZED NOTICE OF HEARING ON RECEIVER'S MOTION FOR COURT APPROVAL OF A SALE AND PURCHASE OF CERTAIN ASSETS OF NORMANDY HOLDINGS II, LLC.	0.20
5/29/2008	JG1	TELEPHONE CONFERENCE WITH GAIL C. ON AVANTI; EMAIL EXCHANGE WITH M. MENDIOLA ON AVANTI ISSUES; TELEPHONE CONFERENCE WITH M. GOLDBERG REGARDING STRATEGY.	1.60
5/29/2008	JG1	MULTIPLE EMAILS - TELEPHONE CONFERENCE REGARDING AVANTI/NHII SALES AND FOLLOW-UP EMAILS (.8); REVIEW AND EDIT CLAIM MEMO (1.2).	2.00
5/29/2008	GAH	ANALYZE AVANTI CLOSING DOCUMENTS; PREPARING MOTIONS RELATED THERETO. .	3.70
5/30/2008	JG1	EMAILS REGARDING IRA SUKOFF AND NH II; TELEPHONE CONFERENCE WITH KAHN .	0.80
6/2/2008	JG1	MEETING AT MAMC TO REVIEW NEW AVANTI CONTRACT; REVIEW SALES OF UNITS 155-1 AND 155-5 AVANTI; TELEPHONE CONFERENCE WITH TITLE COMPANY ON AVANTI; REVIEW AND EXECUTE CONTRACTS.	2.00
6/3/2008	JG1	REVIEW AND EXECUTE SELLER DOCUMENT FOR AVANTI; 155-5; EMAILS.	0.50
6/4/2008	LP	PREPARED CLOSING DOCUMENTS FOR THE SELL NORMANDY HOLDINGS II, LLC'S UNIT 155-5 AT AVANTI; EXECUTED, NOTARIZED, SCANNED, EMAILED AND PREPARED ORIGINALS FOR PICK-UP TO BE DELIVERED TO THE TITLE COMPANY.	0.50
6/13/2008	JG1	EMAIL TO H. KAHN; EMAILS WITH M. GOLDBERG ON MORAN AFFIDAVIT; MEETING WITH D. BROWN.	0.70
6/16/2008	JG1	REVIEW AND EXECUTE AVANTI CONTRACT.	0.20
6/18/2008	JG1	REVIEW MOTION ON AVANTI UNIT.	0.80
6/23/2008	JG1	ATTEND HEARING ON NHII CONTRACTS.	1.00
6/23/2008	LP	DRAFTED, PREPARED, EDITED AND FINALYZED PROPOSED ORDER GRANTING RECEIVER'S MOTION FOR COURT APPROVAL OF SALE AND PURCHASE OF CERTAIN ASSETS OF NORMANDY HOLDINGS, LLC AND RECEIVER'S MOTION AUTHORIZING THE	0.50

Date	Initials	Description	Hours
		RECEIVER TO EXECUTE DOCUMENTS THAT ARE REQUIRED FOR THE SALE OF CERTAIN RECEIVERSHIP ASSETS NUNC PRO TUNC.	
7/1/2008	LP	PREPARED, FILED AND SERVED NOTICE OF HEARING ON RECEIVER'S MOTION TO APPROVE THE SALE OF CERTAIN RECEIVERSHIP ASSETS HELD BY RELIEF DEFENDANT NORMANDY HOLDINGS II, LLC.	0.30
7/2/2008	GAH	PREPARE EMERGENCY MOTION REGARDING SALE OF ASSETS OF NORMANDY HOLDINGS.	1.30
7/2/2008	LP	PREPARED LETTER TO JUDGE THOMAS WILSON, JR. ENCLOSING RECEIVER'S EMERGENCY MOTION TO APPROVE THE SALE OF CERTAIN RECEIVERSHIP ASSETS HELD BY RELIEF DEFENDANT NORMANDY HOLDINGS II, LLC, IN ORDER TO OBTAIN AN EMERGENCY HEARING PRIOR TO JULY 15, 2008, WHICH IS THE CLOSING DATE ON UNIT 187-1, AS PER CLIENT'S REQUEST.	0.30
7/2/2008	LP	PREPARED FACSIMILE TO J. ANDREW BALDWIN AT THE SOLOMON LAW GROUP ENCLOSING A COPY OF THE EMERGENCY MOTION TO APPROVE THE SALE OF CERTAIN RECEIVERSHIP ASSETS HELD BY RELIEF DEFENDANT NORMANDY HOLDINGS II, LLC; AND PREPARED FAX TO JUDGE WILSON REQUESTING EMERGENCY HEARING ON THE SAME.	0.30
7/2/2008	LP	EDITED, PREPARED AND FINALIZED RECEIVER'S EMERGENCY MOTION TO APPROVE THE SALE OF CERTAIN RECEIVERSHIP ASSETS HELD BY RELIEF DEFENDANT NORMANDY HOLDINGS II, LLC.	0.30
7/3/2008	LP	PREPARED E-MAIL TO ALL COUNSEL OF RECORD IN ORDER TO CLEAR HEARING DATE FOR RECEIVER'S EMERGENCY MOTION TO APPROVE THE SALE OF CERTAIN RECEIVERSHIP ASSETS HELD BY RELIEF DEFENDANT NORMANDY HOLDINGS II, LLC.	0.20
7/3/2008	LP	PREPARED, FINALIZED SERVED AND FILED REGARDING-NOTICE OF HEARING ON RECEIVER'S EMERGENCY MOTION TO APPROVE THE SALE OF CERTAIN ASSETS HELD BY RELIEF DEFENDANT NORMANDY HOLDINGS II, LLC.	0.30
7/7/2008	GAH	PREPARE FOR HEARING ON NORMANDY HOLDINGS II.	0.80
7/8/2008	GAH	PREPARE FOR HEARING ON MOTION TO APPROVE THE SALE OF NORMANDY HOLDINGS II, LLC'S ASSETS.	0.90
7/9/2008	GAH	ATTEND HEARING ON MOTION TO APPROVE SALE OF NORMANDY HOLDINGS II'S ASSETS.	2.60
7/11/2008	GAH	PREPARE, FINALIZE, AND ENGAGE IN VARIOUS CORRESPONDENCE WITH OPPOSING COUNSEL	1.10

Date	Initials	Description	Hours
		REGARDING NORMANDY HOLDINGS II ORDER ON MOTION TO SELL ASSETS.	
7/21/2008	JG1	CONFERENCE CALL WITH G. HAILE ON NHII .	0.40
7/21/2008	GAH	CONSIDER STRATEGY AND ANALYZE DOCUMENTS REGARDING SUKOFF MATTERS.	3.10
7/25/2008	JG1	SETTLEMENT CONFERENCE WITH H. KAHN; TELEPHONE CONFERENCE WITH M. GOLDBERG ON SETTLEMENT OF NHII; REVIEW DRAFT MOTION FOR FILING.	2.40
7/28/2008	GAH	ANALYZE PREVIOUS ORDERS FOR NORMANDY HOLDINGS TO ENSURE REQUISITE LANGAUGE WAS PRESENT.	0.80
7/29/2008	GAH	RESEARCH REGARDING SUKOFF MATTER AND CONSIDER STRATEGY REGARDING DISCOVERY RELATED THERETO; NHII DISCOVERY.	6.00
7/29/2008	GAH	REVIEW KEY DOCUMENTS, PREPARE ANSWER, AND CONSIDER STRATEGY REGARDING AFFIRMATIVE DEFENSES.	4.40
7/29/2008	LP	EDITED AND FINALIZED REVISED ORDER ON RECEIVER'S EMERGENCY MOTION TO APPROVE THE SALE OF CERTAIN RECEIVERSHIP ASSETS HELD BY RELIEF DEFENDANT NORMANDY HOLDINGS II, LLC ; DRAFTED, PREPARED, EDITED AND FINALIZED LETTER TO JUDGE WILSON REQUESTING THE REVISED ORDER BE ENTERED, WHICH ONLY REFLECTS THE UNIT NO., AS REQUIRED BY THE TITLE COMPANY IN ORDER TO CLOSE THIS DEAL THIS WEEK.	0.50
7/30/2008	GAH	RESEARCH REGARDING SUKOFF MATTER; ANALYZE LOAN SERVICING AGREEMENT.	3.00
8/13/2008	JG1	ANALYSIS OF EMAILS REGARDING NORMANDY HOLDINGS DAMAGES CLAIM; TELEPHONE CONFERENCE WITH CLIENT ON NHII.	0.90
8/19/2008	GAH	REVIEW DOCUMENTS TO BE PRODUCED TO SUKOFF.	5.70
8/20/2008	GAH	REVIEW DOCUMENTS TO BE PRODUCED TO SUKOFF PER HIS DISCOVERY REQUEST.	7.80
8/26/2008	LP	EDITED, FINALIZED AND SERVED RECEIVER'S MOTION TO APPROVE THE RETENTION OF ACCOUNTANT.	0.50
8/26/2008	LP	EDITED, FINALIZED AND SERVED RECEIVER'S RESPONSE TO INTERVENOR IRA SUKOFF'S FIRST REQUEST FOR PRODUCTION.	0.50
9/4/2008	LP	ELECTRONIC CORRESPONDENCE BACK AND FORTH WITH THE RECEIVER AND HIS OFFICE REGARDING AND CONFIRMING MEETING AND LOCATION TODAY	0.10

		WITH MARTIN ROSENBLOOM, COMPLETE PROPERTY MANAGEMENT REGARDING MARBELLA, BISCAYNE PARK AND AVANTI.	
9/9/2008	LP	DRAFTED AND PREPARED FOLLOW-UP LETTER TO MARTIN ROSENBLOOM REGARDING CONFERENCE CONCERNING MARBELLA, AVANTI AND BISCAYNE PARK ASSOCIATIONS.	0.20
9/10/2008	GAH	REVIEW AND RESPOND TO CORRESPONDENCE FROM OPPOSING COUNSEL IN NORMANDY REGARDING DISCOVERY AND WHEN THE MAMC LOAN WAS MADE.	1.40
9/10/2008	LME	UPDATE MASTER LIST OF ASSIGNMENTS TO REFLECT REQUEST BY INTERVENOR, I. SUKOFF'S REQUEST FOR DOCUMENT PRODUCTION TO RECEIVER'S RESPONSE TO HIS REQUEST FOR PRODUCTION AND UPDATE STATUS CHART.	0.50
9/18/2008	JG1	EMAILS ON NHII CONTRACT REVISE AND EXECUTE.	0.50
10/15/2008	JG1	EMAILS AND TELEPHONE CONFERENCE; REVISE MORTGAGE AND MOTION ON DEFENSES (.4); [RE: NHII] CONFERENCE CALL WITH M. GOLDBERG ON STRATEGY FOR SETTLEMENT OF DISPUTE WITH I. SOKOFF (.4); EMAILS TO AND FROM H. KAHN ON SETTLEMENT (.4).	1.20
10/16/2008	JG1	EMAILS TO AND FROM H. KAHN; REVISE NOTICE OF DEPOSITION DUCES TECUM REGARDING M. GOLDBERG; EMAIL REGARDING REVIEW FEE PAID; REVISE SECOND REQUEST FOR PRODUCTION.	1.20
10/16/2008	GAH	STRATEGY REGARDING RESPONSES TO SUKOFF INTERROGATORIES AND RESEARCH.	2.00
10/16/2008	GAH	[RE: NHII] CONFERENCE CALL WITH M. GOLDBERG AND H. KAHN ON SETTLEMENT.	0.50
10/20/2008	GAH	RESEARCH REGARDING STANDING ISSUES AND STATUTE OF LIMITATIONS ISSUES; REVIEW DOCUMENTS RELATING TO SUKOFF COMPLAINT.	3.70
10/20/2008	MAH	ANALYZE ISSUES FOR SUKOFF COMPLAINT.	0.40
10/21/2008	MAH	REVIEW AND ANALYZE PPM FOR SUKOFF COMPLAINT.	0.90
10/22/2008	LP	DRAFTED, EDITED, PREPARED, FILED AND SERVED RECEIVER'S MOTION FOR PROTECTIVE ORDER REGARDING IRA SUKOFF'S NOTICE OF TAKING DEPOSITION.	0.50
10/24/2008	JG1	ATTEND HEARING ON MOTION TO DISMISS NHII.	1.50
10/28/2008	GAH	CONSIDER STRATEGY REGARDING PREPARATION OF SUKOFF COMPLAINT; TELEPHONE CONFERENCE WITH HAL GASSENHEIMER REGARDING PREPARATION OF SUKOFF COMPLAINT.	1.30

10/30/2008	GAH	REVIEW AND REVISE ORDER DIRECTING CLERK TO TRANSFER BOND, EX-PARTE MOTION TO TRANSFER BOND, ORDER DIRECTING CLERK TO TRANSFER EVIDENCE, MOTION TO TRANSFER EVIDENCE; PREPARE EMERGENCY MOTION TO EXECUTE PURCHASE AGREEMENT; PREPARE MOTION TO VACATE ORDER GRANTING SUPPLEMENTAL RELIEF FROM STAY; CONSIDER STRATEGY REGARDING RESPONSES TO SUKOFF INTERROGATORIES; CONSIDER STRATEGY REGARDING COMPLAINT AGAINST SUKOFF;.	4.90
10/31/2008	GAH	ATTEND HEARINGS ON MOTION TO VACATE JERICO ORDER GRANTING SUPPLEMENTAL RELIEF FROM STAY AND FLORIDA SPORTSDANCE MOTION TO AUTHORIZE EXECUTION OF PURCHASE AGREEMENT; CONSIDER STRATEGY REGARDING PREPARATION OF ANSWERS TO SUKOFF INTERROGATORIES; CONSIDER STRATEGY REGARDING COMPLAINT AGAINST SUKOFF AND ANALYZE CORRESPONDENCE FROM HAL GASSENHEIMER; TELEPHONE CONFERENCE WITH HAL GASSENHEIMER REGARDING SUKOFF COMPLAINT.	5.10
10/31/2008	AH1	FINALIZE ANSWERS TO IRA SUKOFF'S FIRST SET OF INTERROGATORIES; CONFER WITH HAROLD GASSENHEIMER AND GREG HAILE REGARDING SAME.	4.20

SUB-TOTAL FEES: 101.90 32,298.00

RATE SUMMARY

JAMES GASSENHEIMER	27.60 HOURS	390.00/HR	10,764.00
GREGORY A. HAILE	60.10 HOURS	310.00/HR	18,631.00
ARIADNA HERNANDEZ	4.20 HOURS	250.00/HR	1,050.00
MELANIE HINES	1.30 HOURS	410.00/HR	533.00
LISSETTE MERIDA	0.50 HOURS	170.00/HR	85.00
LOURDES PONCE	6.20 HOURS	75.00/HR	465.00
LAWRENCE STEINBERG	2.00 HOURS	385.00/HR	770.00
TOTAL		101.90	

EXPENSES

10/20/2008	DEPO OF IRA SUKOFF ON 10/20.	100.00
		SUB-TOTAL 100.00

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TOTAL CURRENT BILLING:	32,398.00
PREVIOUS BALANCE DUE:	0.00
CREDITS/PAYMENTS	0.00
TOTAL NOW DUE:	<u>32,398.00</u>

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.