

IN THE CIRCUIT COURT OF THE  
ELEVENTH 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, et al.,

Relief Defendants.

THE ORIGINAL  
FILED ON:

DEC 09 2008

IN THE OFFICE OF  
CIRCUIT COURT DADE CO. FL.

**RECEIVER'S MOTION TO AUTHORIZE PAYMENT<sup>1</sup>  
OF RECEIVERSHIP FEES AND DISTRIBUTION OF  
ATTORNEYS' FEES AND COSTS IN NORMANDY HOLDINGS, II, LLC**

Receiver, Michael I. Goldberg, by and through undersigned counsel, as Receiver  
over M.A.M.C. Incorporated ("MAMC") and Relief Defendant Normandy Holdings, II,  
LLC ("NH II"), hereby moves this Court for entry of an Order authorizing the payment

<sup>1</sup> Please note, that the Berger Singerman, P.A. bills are attached to the original Motion filed with the Court and to the Motion posted on the website at: <http://www.bermanmortgageinfo.com/berman.htm>; but not attached to the copies of the Motion distributed to all counsel of record, in order to reduce copying costs for the Receivership estate.

of attorneys' fees and receivership fees in association with the administration of this asset, and as grounds therefore states:

1. This Court has under consideration a Motion to authorize a settlement and distribution of the NH II assets.
2. Attached hereto and made a part hereof are the Berger Singerman, P.A. bills regarding the work performed on NH II, in the amount of \$49,557.06.
3. If the settlement is approved, NH II shall have sufficient funds to pay attorneys' fees and receivership fees.
4. The proposed settlement authorizes the payment of \$7,500.00, for administrative expenses which the Receiver seeks to apply to the Berger Singerman bills.
5. The Receiver seeks to pay the remaining Berger Singerman bills from the settlement proceeds as set forth in the Motion. The payment will not result in the current payments of fees to exceeding the 80% previously authorized by this Court.
6. The Receiver seeks to pay the receivership fees of \$10,000.00.

**WHEREFORE**, the Receiver respectfully moves this Honorable Court for the aforementioned relief.

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. GASSENHEIMER  
Florida Bar No. 959987

**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 **9<sup>th</sup> day of December 2008**, to: **Cristina Saenz, Assistant General Counsel**, STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION, 401 N.W. 2<sup>nd</sup> 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. 191<sup>st</sup> 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 **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, 9<sup>th</sup> 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**, 12555 Biscayne Boulevard, Unit #930, North Miami, Florida 33181; to **Norman Malinski, Esquire**, *Counsel for Giles Construction*, 2875 NE 191<sup>st</sup> 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 2<sup>nd</sup> 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,

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By: 

JAMES D. GASSENHEIMER  
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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AKERMAN SENTERFITT  
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

		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	<u>101.90</u>		

**EXPENSES**

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

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

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

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FID # 59-2725802

AKERMAN SENTERFITT  
MICHAEL I. GOLDBERG, RECEIVER  
350 EAST LAS OLAS BLVD  
16TH FLOOR  
FT. LAUDERDALE, FLORIDA 33301-2229

INVOICE DATE: 12/4/2008  
INVOICE NO. 56819

NORMANDY HOLDINGS II, LLC

MATTER ID: 12293-0018

PROFESSIONAL FEES RENDERED THROUGH: 11/30/2008			HOURS
11/2/2008	JG1	REVIEW ANSWERS TO INTEROGATORIES IN NH II.	0.50
11/3/2008	AH1	REVIEW REVISIONS TO ANSWERS TO INTERROGATORIES; TELEPHONE CALL WITH MICHAEL GOLDBERG TO DISCUSS INTERROGATORY ANSWERS; PREPARE NOTICE OF FILING SAME.	0.80
11/3/2008	LME	TELEPHONE CONFERENCE WITH G. HAILE TO COORDINATE DOCUMENT PRODUCTION REVIEW REGARDING RESPONSE TO INTERVENOR, I. SUKOFF'S REQUEST FOR PRODUCTION OF DOCUMENTS.	0.10
11/5/2008	AH1	REVIEW MOTION TO COMPEL LIST OF INVESTORS FILED BY IRA SUKOFF; CONFER WITH GREG HAILE AND ANALYZ ISSUES REGARDING SAME; REVIEW EMAIL CORRESPONDENCE REGARDING SAME; REVIEW AND ISSUE NOTICE OF TAKING DEPOSITION OF IRA SUKOFF.	0.80
11/5/2008	LP	DRAFTED, EDITED, PREPARED, FINALIZED AND SERVED NOTICE OF TAKING DEPOSITION DUCES TECUM OF IRA SUKOFF (NORMANDY HOLDINGS, II, LLC).	0.30
11/7/2008	JG1	REVISE STRATEGY ON DISTRIBUTION.	0.40
11/10/2008	JG1	TELEPHONE CONFERENCE WITH CLIENT ON NHII DEPOSITION.	0.20
11/10/2008	GAH	CONSIDER STRATEGY REGARDING PRODUCTION TO KAHN/SUKOFF DISCOVERY REQUESTS.	0.80
11/10/2008	AH1	PREPARE FOR AND ATTEND PRODUCTION OF DOCUMENTS TO INTERVENOR IRA SUKOFF PURSUANT TO FIRST REQUEST FOR PRODUCTION; CONFER WITH COUNSEL FOR SUKOFF REGARDING SUFFICIENCY OF RESPONSES TO INTERROGATORIES; REVIEW MOTION TO COMPEL FILED BY INTERVENOR, IRA SUKOFF; DRAFT CORRESPONDENCE TO HOWARD KAHN REGARDING	2.10

CONFIDENTIALITY OF INVESTOR LIST.			
11/10/2008	IMM	RESEARCH AND DRAFTING OF MEMO FOR JAMES GASSENHEIMER REGARDING APPLICABILITY OF WARRANTIES.	3.50
11/10/2008	LME	DOCUMENT REVIEW IN REGARDS TO RECEIVER'S RESPONSE TO INTERVENOR, I. SUKOFF'S REQUEST FOR PRODUCTION OF DOCUMENTS.	1.80
11/10/2008	LME	TELEPHONE CONFERENCE WITH INTERVENOR, I. SUKOFF'S COUNSEL H. KAHN TO ADVISE THE COST FOR THE DOCUMENTS HE SELECTED DURING THE DOCUMENT REVIEW AND HIS AUTHORIZATION TO HAVE THE SAME COPIED.	0.10
11/10/2008	LME	PREPARE LETTER TO H. KAHN, COUNSEL FOR INTERVENOR, I. SUKOFF ADVISING OF THE BATES STAMPED DOCUMENTS PROVIDED AND LIMITED USE TO THIS LITIGATION ONLY DUE TO THE CONFIDENTIAL NATURE OF THESE DOCUMENTS.	0.30
11/11/2008	AH1	REVIEW ISSUES RELATING TO PRODUCTION OF CERTAIN DOCUMENTS TO INTERVENOR IRA SUKOFF WITH LISSETTE MERIDA; ANALYZE ISSUES REGARDING SAME; CONFER WITH GREG HAILE REGARDING COMPLAINT FOR FRAUDULENT INDUCEMENT.	0.50
11/11/2008	AH1	DRAFT MOTION FOR PAYMENT OF RECEIVER'S FEES AND COSTS IN RELATION TO NORMANDY HOLDINGS I, LLC.	2.00
11/12/2008	JG1	CONFERENCE CALL WITH H. GASSENHEIMER (.7); REVISE MOTION (.4).	1.10
11/13/2008	JG1	REVIEW RESPONSES TO ANSWERS TO INTERROGATORIES.	0.50
11/13/2008	AH1	ANALYZE ISSUES RELATED TO DEPOSITIONS OF HAL GASSENHEIMER AND MICHAEL GOLDBERG.	1.20
11/13/2008	LME	CONTINUE TO ORGANIZATION AND REVIEW OF THE DOCUMENTS SET ASIDE BY H. KAHN, COUNSEL FOR INTERVENOR, I. SUKOFF TO ORGANIZE SAME PRIOR TO HAVING THE DOCUMENTS COPIED AND SEPARATE PRIVILEGED DOCUMENTS.	2.00
11/14/2008	AH1	REVIEW AND COMPILE DOCUMENTS IN PREPARATION FOR DEPOSITIONS OF RECEIVER MICHAEL GOLDBERG AND HAL GASSENHEIMER.	9.20
11/14/2008	LME	COMPILE KEY DOCUMENTS FOR ATTORNEY.	0.60
11/14/2008	LME	COMMENCE PREPARATION OF RECEIVER'S LIST OF BATES DOCUMENTS PRODUCED TO I. SUKOFF INTERVENER.	3.50
11/14/2008	LME	COMPILE AND PREPARE KEY DOCUMENTS NOTEBOOK SUMMARY.	1.60

11/14/2008	LME	REVIEW ALL RECEIVER'S BATES DOCUMENTS BINDER FOR ACCURACY AND MADE NOTATIONS REGARDING SAME.	0.60
11/17/2008	JG1	MEETING WITH H. GASSENHEIMER AND M. GOLDBERG TO PREPARE TEAM FOR DEPOSITION.	2.50
11/17/2008	AH1	PREPARE FOR AND ATTEND MEETING WITH RECEIVER, HAL GASSENHEIMER AND JAMES GASSENHEIMER TO PREPARE FOR DEPOSITIONS TAKEN BY INTERVENOR, IRA SUKOFF; CONTINUED PREPARATIONS FOR DEPOSITIONS DUCES TECUM OF HAL GASSENHEIMER AND RECEIVER.	6.60
11/17/2008	LME	REVISION TO BATES DOCUMENTS LOG.	0.20
11/17/2008	LME	TELEPHONE CONFERENCE WITH H. KAHN'S OFFICE REGARDING STATUS OF THE DOCUMENTS.	0.10
11/17/2008	LME	PER ATTORNEYS' MEETING, PULLED VARIOUS DOCUMENTS FROM PRODUCTION TO SUKOFF.	0.80
11/17/2008	LME	PREPARE LETTER TO H. KAHN COUNSEL FOR INTERVENOR, SUKOFF PROVIDING INVOICE FOR COPY PRODUCITON OF BATES STAMPED DOCUMENTS PRODUCED IN RESPONSE TO REQUEST FOR PRODUCTION.	0.30
11/17/2008	LME	PREPARE SEPARATE BATES LOG REFERENCING THE MASTER BATES DOCUMENTS, THE BATES DOCUMENTS PRODUCED, THE PRIVILEGED DOCUMENTS, AND THE BATES DOCUMENTS NON-RESPONSIVE TO SUKOFF'S REQUEST FOR PRODUCTION.	2.00
11/18/2008	JG1	ATTEND DEPOSITION OF G. GOLDBERG; SETTLEMENT NEGOTIATION.	4.00
11/18/2008	AH1	PREPARE FOR AND ATTEND DEPOSITIONS OF RECEIVER AND HAL GASSENHEIMER TAKEN BY INTERVENOR IRA SUKOFF RELATED TO NORMANDY HOLDINGS II PROJECT; ANALYZE RESEARCH ISSUES RELATED TO TREATMENT FEES NOT TAKEN AT CLOSING BY PRINCIPALS OF NORMANDY HOLDINGS.	4.20
11/18/2008	LME	REVISE THE BATES DOCUMENTS LOGS OF THE DOCUMENTS PRODUCED TO COUNSEL FOR I. SUKOFF (.20); AND UPDATE THE LIST OF BATES DOCUMENTS PERTAINING TO THE BINDERS CONTAINING THE DOCUMENTS SET ASIDE BY H. KAHN, COUNSEL FOR I. SUKOFF (.30).	0.50
11/19/2008	JG1	SETTLEMENT CALLS WITH H. KAHN (2X).	0.60
11/24/2008	JG1	PREPARE SETTLEMENT DOCUMENT.	1.00
11/24/2008	JG1	PREPARE DETAILED MOTION AND BAR ORDER.	1.00
11/25/2008	JG1	CONFERENCE CALL WITH M. GOLDBERG AND H. KAHN (.3); REVIEW SETTLEMENT AGREEMENT (2.0).	2.30

11/25/2008	JG1	REVISE SETTLEMENT AGREEMENT.	1.00	
11/25/2008	JG1	CONFERENCE CALL WITH H. KAHN ON SETTLEMENT ACCOUNTS.	0.40	
11/25/2008	JG1	CONFERENCE CALL WITH M. GOLDBERG.	0.20	
11/25/2008	JG1	REVISE NEW DISTRIBUTION CHARTS; CONFERENCE CALL WITH H. GASSENHEIMER.	0.20	
11/26/2008	JG1	REVIEW EMAILS AND REVIEW REVISIONS FROM H. KAHN; EVALUATE STRATEGY.	1.00	
			SUB-TOTAL FEES:	63.40
				<u>16,929.00</u>

**RATE SUMMARY**

JAMES GASSENHEIMER	16.90 HOURS	390.00/HR	6,591.00
GREGORY A. HAILE	0.80 HOURS	310.00/HR	248.00
ARIADNA HERNANDEZ	27.40 HOURS	250.00/HR	6,850.00
ISAAC M. MARCUSHAMER	3.50 HOURS	215.00/HR	752.50
LISSETTE MERIDA	14.50 HOURS	170.00/HR	2,465.00
LOURDES PONCE	0.30 HOURS	75.00/HR	22.50
TOTAL	<u>63.40</u>		

**EXPENSES**

	PHOTOCOPIES	2.50
	FACSIMILE	200.00
	LONG DISTANCE TELEPHONE	4.25
10/15/2008	COURIER SERVICES.	23.31
		SUB-TOTAL <u>230.06</u>

TOTAL CURRENT BILLING:	17,159.06
PREVIOUS BALANCE DUE:	32,398.00
CREDITS/PAYMENTS	0.00
<b>TOTAL NOW DUE:</b>	<u><b>49,557.06</b></u>

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