

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

IN RE:)	
)	Chapter 7
ULRICH FELIX ANTON ENGLER;)	CASE NO. 9:08-bk-04360-MGW
PRIVATE COMMERCIAL OFFICE, INC.;)	
and PCO CLIENT MANAGEMENT, INC.)	
)	
Debtors.)	
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**SUMMARY OF FINAL APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES BY THOMAS A. TUCKER
RONZETTI, ESQ. AND KOZYAK TROPIN & THROCKMORTON, P.A.,
AS SPECIAL LITIGATION COUNSEL FOR TRUSTEE**

1.	Name of Applicant:	Thomas A. Tucker Ronzetti, Esq. and Kozyak Tropin & Throckmorton, P.A.
2.	Role of Applicant:	Special Litigation Counsel for Chapter 7 Trustee
3.	Name of certifying professional;	David A. Samole
4.	Date case filed:	March 31, 2008
5.	Date of application for employment:	December 22, 2010
6.	Date of order approving employment:	January 3, 2011
7.	Date of Disclosure of Compensation form:	N/A
8.	Date of this application:	September 26, 2013
9.	Dates of services covered:	May 1, 2013 to September 19, 2013
10.	If case is Chapter 7, amount trustee has on hand:	\$8,397,654.24
	Fees...	
11.	Total fee requested for this period (from Exhibit 1)	\$ 5,175.00
12.	Balance remaining in fee retainer account, not yet awarded	(\$ 0.00)
13.	Fees paid or advanced for this period, by other sources	(\$ 0.00)
14.	Net amount of fee requested for this period	\$ 5,175.00
	Expenses...	
15.	Total expense reimbursement requested for this period	\$ 11.01
16.	Balance remaining in expense retainer account, not yet received	(\$13,044.03)
17.	Expenses paid or advanced for this period, by other sources	(\$ 0.00)
18.	Net amount of expense reimbursements requested for this period	\$ 11.01
19.	Gross award requested for this period (#11 + #15)	\$ 5,186.01
20.	Net award requested for this period (#14 + #18)	\$ 5,186.01
21.	If <u>Final</u> Fee Application, amounts of net awards requested in interim applications but <u>not previously awarded</u> (total from History of Fees and Expenses, following pages):	\$ 0.00
22.	Final fee and expense award requested (#20 + #21)	\$ 5,186.01

History of Fees and Expenses on Following Page

History of Fees and Expenses.

1. Dates, sources, and amounts of retainers received:

<u>Dates</u>	<u>Sources</u>	<u>Amounts</u>	<u>For fees or costs?</u>
2/08/2011	Trustee	\$15,000.00	Expense

2. Dates, sources, and amounts of third party payments received:

<u>Dates</u>	<u>Sources</u>	<u>Amounts</u>	<u>For fees or costs?</u>
None			

3. Prior fee and expense awards.

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
First Interim Application...		
Dates covered by application: 12/25/10 to 3/31/11		
Amount of fees requested:	\$13,090.00	\$
Amount of expenses requested:	\$	\$672.75
Amount of fees awarded:	\$13,090.00	\$
Amount of expenses awarded:	\$	\$672.75
Amount of fee retainer authorized to be used:	\$	
Amount of expense retainer authorized to be used:		\$

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
Fee award, net of retainer:	\$	\$
Expense award, net of retainer:		\$
Date of first award: 7/13/11		
Amount of fees actually paid:	\$13,090.00	
Amount of expense reimbursement actually paid:		\$672.75
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application: \$0.00		
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:		\$0.00

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
Second Interim Application...		
Dates covered by application: 2/1/11 to 11/30/11		
Amount of fees requested:	\$73,578.50	\$
Amount of expenses requested:	\$	\$5,924.96
Amount of fees awarded:	\$73,578.50	\$
Amount of expenses awarded:	\$	\$5,924.96
Amount of fee retainer authorized to be used:	\$	
Amount of expense retainer authorized to be used:		\$

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
Fee award, net of retainer:	\$	\$
Expense award, net of retainer:		\$
Date of second award: 2/6/12		

Amount of fees actually paid:	\$73,578.50	
Amount of expense reimbursement actually paid:		\$5,924.96
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application: \$0.00		
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:		\$0.00

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
Third Interim Application...		
Dates covered by application: 12/1/11 to 7/31/12		
Amount of fees requested:	\$73,525.00	\$
Amount of expenses requested:	\$	\$5,234.33
Amount of fees awarded:	\$73,525.00	\$
Amount of expenses awarded:	\$	\$5,234.33
Amount of fee retainer authorized to be used:	\$	
Amount of expense retainer authorized to be used:		\$

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
Fee award, net of retainer:	\$	\$
Expense award, net of retainer:		\$
Date of third award: 9/25/12		
Amount of fees actually paid:	\$73,525.00	
Amount of expense reimbursement actually paid:		\$5,234.33
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application: \$0.00		
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:		\$0.00

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
Fourth Interim Application...		
Dates covered by application: 8/31/12 to 4/30/13		
Amount of fees requested:	\$7,480.00	\$
Amount of expenses requested:	\$	\$44.09
Amount of fees awarded:	\$7,480.00	\$
Amount of expenses awarded:	\$	\$44.09
Amount of fee retainer authorized to be used:	\$	
Amount of expense retainer authorized to be used:		\$

	<u>Prior Fee Awards</u>	<u>Prior Expense Awards</u>
Fee award, net of retainer:	\$	\$
Expense award, net of retainer:		\$
Date of fourth award: 6/18/13		
Amount of fees actually paid:	\$7,480.00	
Amount of expense reimbursement actually paid:		\$40.09
Portion of fees requested but not awarded, which applicant wishes to defer to final fee application: \$0.00		
Portion of expenses requested but not awarded, which applicant wishes to defer to final fee application:		\$0.00

Summary of All Prior Applications and Awards

Total fees requested	\$167,673.50
Total fees awarded	\$167,673.50
Prior fees awarded but not yet paid, if any (Do not include holdbacks in this number)	\$ 0.00
Total prior fees requested but not awarded, Deferred to final fee application	\$ 0.00
Total expenses requested	\$ 11,876.13
Total expenses awarded	\$ 11,872.13
Prior expenses awarded but not yet paid, if any (Do not include holdbacks in this number)	\$ 0.00
Total prior expenses requested but not awarded, Deferred to final fee application	\$ 0.00

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
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ULRICH FELIX ANTON ENGLER;)	Chapter 7
PRIVATE COMMERCIAL OFFICE, INC.;)	CASE NO. 9:08-bk-04360-MGW
and PCO CLIENT MANAGEMENT, INC.)	
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Debtors.)	
	/	

FINAL FEE APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES BY THOMAS A. TUCKER RONZETTI, ESQ. AND KOZYAK TROPIN & THROCKMORTON, P.A., AS SPECIAL LITIGATION COUNSEL FOR TRUSTEE

Thomas A. Tucker Ronzetti and Kozyak Tropin & Throckmorton, P.A. (the “Applicant”), as special litigation counsel for Robert E. Tardif, Jr., the Chapter 7 Trustee (the “Trustee”), hereby apply for final allowance and payment of compensation for professional services rendered and reimbursement of expenses pursuant to Sections 328, 330, 331 and 503(b) of Title 11 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and the United States Trustee’s Guidelines as set forth in 11 U.S.C. § 330 (the “Guidelines”). KT&T also seeks a final award of all interim fees and expenses previously awarded in this case on KT&T’s prior interim fee applications. KT&T requests to apply the retainer of \$13,044.03 to its final fees and expenses awarded by the Court and return the balance to the Trustee.

In accordance with the Guidelines, the following exhibits are attached to this application:

- Exhibit "1" - Summary of Professional and Paraprofessional Time who have provided services to the Trustee during the Application Period;
- Exhibit "2" - Summary of Requested Reimbursements of Expenses; and
- Exhibit "3" - The Applicant's complete time records during the Application Period.

**I. RETENTION OF APPLICANT, DISCLOSURE OF
COMPENSATION AND REQUESTED AWARD**

1. On January 3, 2011, this Court approved the retention of KT&T as special litigation counsel to the Trustee (Doc. No. 549).

2. KT&T filed four interim fee applications prior to the filing of this Application. The total amount awarded was \$167,673.50 in fees and \$11,876.13 for expenses.

3. This is Applicant's final fee application filed in this case. Applicant seeks a final fee award of \$5,175.00 in fees for services rendered and \$11.01 for reimbursement of expenses. The fees and expenses were incurred in the period May 1, 2013 through September 19, 2013 (the Application Period"). KT&T also seeks a final allowance of all fees and expenses for the entire case.

II. DESCRIPTION AND SUMMARY OF SERVICES RENDERED

4. The Debtors involved in this case, through its primary principal, perpetrated a massive Ponzi scheme. Two of the Debtors' primary banking institutions were SunTrust Bank and Wells Fargo Bank, N.A. (the "Banks"). Applicant's special counsel services involved the Trustee's ongoing investigation as to the Debtors' separate prepetition relationships and activities by, through and with the Banks, including but not limited to, (a) pre-litigation and post-litigation discovery disputes propounded on the Banks; (b) propounded and conducted extensive discovery on the Banks; (c) reviewed briefed legal issues relating to SAR documents and conferred with the Trustee regarding the disposition of documents and litigation hold requests, (d) addressed the separate e-discovery protocol and performed due diligence regarding same; (e) conferred with the Trustee regarding supplemental Wells Fargo discovery matters; (f) monitored the appeals case; and (g) preparation of Special Litigation Counsel's fee applications, including

the fourth interim fee application and the instant fee application. Special Litigation Counsel provided the above-described services, and an itemized listing of the services rendered is attached to this Application as Exhibit 3.

**III. EVALUATION OF SERVICES RENDERED;
FIRST COLONIAL CONSIDERATIONS**

KT&T believes that the requested fee of \$5,175.00 for 22.3 hours worked is reasonable considering the twelve factors enumerated in Johnson v. Georgia Highway Express, Inc., 488 F.2d 714 (5th Circuit 1974), made applicable to bankruptcy proceedings by In re First Colonial Corp. of America, 544 F.2d 1291 (5th Cir. 1977), as follows:

The Time and Labor Required:

The time and labor required in the rendition of services to the Trustee are reflected in Exhibits “1”, “2”, and “3” to this Application. KT&T’s professionals and paralegals devoted a total of 22.3 hours to providing services to the Trustee for the period from May 1, 2013 through September 19, 2013. All attorneys and paralegals of KT&T record the time expended in rendition of professional services in this case by recording a detailed description of the services rendered, and diligently attempt to avoid duplication of effort.

The Novelty and Difficulty of the Services Rendered:

Thomas A. Tucker Ronzetti and David A. Samole are primarily responsible for this matter and are experienced commercial litigation and bankruptcy practitioners, respectively. All such KT&T professionals have the knowledge, experience and skills necessary to handle the issues, analysis, tasks performed and related services required in this case.

The Skill Requisite to Perform the Services Properly:

In order to perform the services and obtain the results required in its representation of the Trustee, KT&T's legal skill and experience in the areas of bankruptcy and commercial litigation was required.

The Preclusion of Other Employment by the Professional Due to the Acceptance of the Case:

KT&T did not turn away representation that was proffered during the Application Period.

The Customary Fee:

KT&T's customary hourly rates for the level of attorneys working on this case range from \$250.00 to \$500.00. The rates charged by the attorneys providing services to the Trustee are well within the reasonable range for hourly rates charged by most commercial litigation and bankruptcy firms in South Florida capable of handling litigation matters.

Whether the Fee is Fixed or Contingent:

KT&T's compensation in this matter is contingent in that it is subject to Court approval, and the availability of funds in the estate for payment of same.

Time Limitations Imposed by the Client or Other Circumstances:

The circumstances of this case did not impose certain time constraints on the Applicant. KT&T was required to respond expeditiously upon commencing with Suntrust and Wachovia in order to gather necessary factual and legal information.

The Experience, Reputation, and Ability of the Professional:

KT&T is a well known law firm in South Florida with a national reputation for commercial litigation and bankruptcy law, and its members and associates working on this case are experienced in matters of this kind. KT&T and its attorneys possess extensive knowledge, expertise, and experience in the areas of law relevant to these cases, including complex

commercial litigation, bankruptcy, fraudulent transfer actions, fraud litigation in the context of Ponzi schemes, banking litigation, complexities of unwinding leveraged buy-outs in bankruptcy, secured transactions, and professional malpractice.

The Undesirability of the Case:

KT&T does not deem this case undesirable in any way.

The Nature and Length of the Professional Relationship of the Client:

This is the first engagement KT&T has performed for the Trustee.

Awards in Similar Cases:

The Bankruptcy Code, pursuant to 11 U.S.C. § 330, provides that the extent of compensation to professionals shall be reasonable compensation that may be awarded to professionals based on the nature, the extent and value of such services, the time spent on such services, and the cost of comparable services in other cases under Title 11 of the United States Code, and for the reimbursement of actual and necessary expenses incurred on behalf of the Trustee.

The Applicant further represents that the fees applied for are in conformity with the fees allowed in similar proceedings for similar services rendered and results obtained. The hourly rates requested by KT&T are the ordinary and usual hourly rates billed by KT&T to both bankruptcy and non-bankruptcy clients

CONCLUSION

WHEREFORE, KT&T seeks: (1) a final award of fees in the amount of \$5,175.00 and expenses in the amount of \$11.01 for the period of May 1, 2013 through September 19, 2013, for a total of \$5,186.01, (2) a final allowance and award of all fees and expenses in the aggregate amount of \$172,848.50 in fees and \$11,887.14 in expenses for the entire case; (3) directing the

Trustee to pay the amount of \$5,175.00 in fees and \$11.01 in expenses to Applicant from the funds held in retainer account (which represents the final awarded amount minus all payments which have been made to date); and (4) granting such other and further relief as is just and proper. KT&T reserves the right to file a supplement to its Application.

CERTIFICATION

1. I have been designated by KT&T as the professional with responsibility in this case for compliance with the Guidelines.

2. I have read KT&T's Application, which complies with the Guidelines, and the fees and expenses sought fall within the Guidelines.

3. The fees and expenses sought are billed at rates and in accordance with practices customarily employed by the Applicant and generally accepted by the Applicant's clients.

4. In seeking reimbursement for the expenditures described on Exhibit 2, the Applicant is seeking reimbursement only for the actual expenditure and has not marked up the actual cost to provide a profit or to recover the amortized cost of investment in staff time or equipment or capital outlay (except to the extent that the Applicant has elected to charge for in-house photocopies and outgoing facsimile transmissions at the maximum rates permitted by the Guidelines).

5. In seeking reimbursement for any service provided by a third party, the Applicant is seeking reimbursement only for the amount actually paid by the Applicant to the third party.

6. The following are the variances with the provisions of the Guidelines, the date of each court order approving the variance, and the justification for the variance: NONE.

SERVICE LIST

**IN RE ULRICH FELIX ANTON ENGLER
CASE NO. 08-bk-04360-MGW**

9:08-bk-04360-MGW Notice will be electronically mailed to:

C Stephen Allen on behalf of Defendant Mississippi Realty Trust
csapal@msn.com

Kirsten I. Baier on behalf of Trustee Robert Tardif
kbaier@fowler-white.com

Jeffrey P Bast on behalf of Defendant Fort Myers Lincoln Mercury, Inc.
jbast@bastamron.com, jdepina@bastamron.com; jeder@bastamron.com

Steven M Berman on behalf of Creditor FIDELITY NATIONAL FINANCIAL, INC.
sberman@slk-law.com

Alexandra D Blye on behalf of Plaintiff Robert E. Tardif, Jr., as Trustee for the Chapter 7
Bankruptcy Estates of Ulrich Felix Anton Engler and Private Commercial Office, Inc.
ablye@gjb-law.com

David C Cimo on behalf of Plaintiff Robert Tardif
dcimo@gjb-law.com, gjbecf@gjb-law.com

Roberta A Colton on behalf of Attorney Ronald Neiwirth
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William Lazenby on behalf of Defendant Monex Deposit Company, L.P.
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Stephen R Leslie on behalf of Defendant Angelika Neumeier-Fuchs
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Peter H Levitt on behalf of Creditor JPMorgan Chase Bank, N.A.
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David T Lupo on behalf of Defendant Reiner Straub
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Helge Naber on behalf of Creditor Renate ZINK
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Ronald G Neiwirth on behalf of Petitioning Creditor Anneliese Schmitt
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Cory J Person on behalf of Defendant St. John the Evangelist Catholic Church
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Heather L Ries on behalf of Interested Party Wells Fargo Bank, N.A.
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Norman L Schroeder on behalf of Creditor ALVION AG
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Elliot D Schuler on behalf of Creditor Markus Hermanek
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Darrin R Schutt on behalf of Defendant Finduconsult AG
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Scott A. Stichter on behalf of Defendant Angelika Neumeier-Fuchs
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Douglas B Szabo on behalf of Creditor Diamond District, LLC
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Robert E Tardif

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Robert E Tardif, Attorney for Trustee on behalf of Plaintiff Robert Tardif

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Seth P. Traub on behalf of Creditor FIDELITY NATIONAL FINANCIAL, INC.

straub@slk-law.com, khobolth@slk-law.com

United States Trustee - FTM7

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John L Urban on behalf of Creditor Congro Finanz AG

urban@urbanthier.com, bryan@urbanthier.com; abosi@urbanthier.com; deliz@urbanthier.com;
menichiello@urbanthier.com

Mark David Schellhase on behalf of Interested Party SunTrust Bank

mark.schellhase@gray-robinson.com, fiona.johnson@gray-robinson.com

Noticed by first-class U.S. mail to:

Ulrich Felix Anton Engler

Private Commercial Office, Inc.

and PCO Client Management, Inc. (Non-Debtor)

1217 Cape Coral Parkway, Apt. 121

Cape Coral, FL 33904

(undeliverable)

Dr. Wolfgang Obrecht, LLM, LLD

A-4020 Linz

Lederergasse 21/P

Austria

Amy W. Potter, Esq.

Sean Moulton, Esq.

Moulton Law Office

PO Box 631

60 E. Wallace

Driggs, ID 83422

EXHIBIT 1

KOZYAK TROPIN AND THROCKMORTON, P.A.

Summary of Professional and Paraprofessional TimePROFESSIONALS:

ATTORNEY'S NAME	YEAR LICENSED	TOTAL HOURS	HOURLY RATE	TOTAL FEE
D. Samole	2002	10.5	\$350.00	\$3,675.00
D. Samole	2002	1.2	N/C	\$0.00
Subtotals:		11.7		\$3,675.00

PARAPROFESSIONALS:

PARALEGAL'S NAME	YEAR LICENSED	TOTAL HOURS	HOURLY RATE	TOTAL FEE
Y. Castro	N/A	10	\$150.00	\$1,500.00
Y. Castro	N/A	0.6	N/C	\$0.00
Subtotals:		10.6		\$1,500.00

TOTALS:

Total Hours By Professionals and Paraprofessionals: 22.3

"Blended" Hourly Rate: 232.06

Total Professionals and Paraprofessionals Fees: \$5,175.00

Rate Changes: None

EXHIBIT 2
Summary of Requested Reimbursement Of Expenses
for this Time Period Only

1.	Filing Fees	\$0.00
2.	Process Service Fees	\$0.00
3.	Witness Fees	\$0.00
4.	Court Reporter & Transcripts	\$0.00
5.	Lien and Title Searches	\$0.00
6.	Photocopies	\$7.65
	(a) In-house copies and imaging (51 @ \$.15)	
	(b) Outside copies (\$0.00)	
7.	Postage	\$0.00
8.	Overnight Delivery Charges	\$0.00
9.	Outside Courier/Messenger Service.....	\$0.00
10.	Long Distance Telephone Charges	\$0.00
11.	Long Distance Fax Transmissions	\$0.00
12.	Computerized Research	\$3.36
	Choicepoint - \$0.00	
	Westlaw - \$0.00	
	Pacer - \$3.36	
13.	Out of Southern District of Florida Travel	\$0.00
	(a) _____ (\$____)	
	(b) _____ (\$____)	
14.	Other (Not specifically disallowed; must specify and justify).....	\$0.00
	(a) _____ (\$0.00)	
TOTAL EXPENSE REIMBURSEMENT REQUESTED.....		\$11.01

EXHIBIT 3



KOZYAK • TROPIN
THROCKMORTON
ATTORNEYS AT LAW

Tax ID 59-2240304

Robert E. Tardif, Jr., Trustee
P.O. Box 2140
Fort Myers, FL 33902

September 26, 2013
Reference No. 121991

CLIENT: 4097 IN RE: ULRICH FELIX ANTON ENGLER
MATTER: 4097-101 WACHOVIA BANK/SUNTRUST BANK

Date	SERVICES	Atty	Hours	Amount
05/01/13	Confer with J. Elliott re: KTT time records for fee application.	YCC	0.10	15.00
05/02/13	Confer with trustee's proposed litigation counsel to provide background and status of pending matters and respond to other inquiries (.3)	DAS	0.30	105.00
05/06/13	Receive and review SunTrust's notice of non-appeal (.1); receive and review trustee's counter-notice of non-appeal (.1).	DAS	0.20	70.00
05/08/13	Review KTT's bill in preparation for fourth interim fee application; confer with D. Samole; review fee application filed by retained professional; review and address email re: fee application.	YCC	0.90	135.00
05/08/13	Receive and review fee app for trustee's general counsel and circulate to team as to need for redaction of certain time records like counsel had in his application (.2).	DAS	0.20	70.00
05/10/13	Review notice of hearing re interim fee application and calendar same.	YCC	0.10	15.00

IN RE: ULRICH FELIX ANTON ENGLER
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September 26, 2013
Reference No.: 121991

Date	SERVICES	Atty	Hours	Amount
05/10/13	Receive and review order on SAR documents and receive and review trustee's correspondence to SunTrust regarding same and follow up emails with Ms. Elliott as to such materials (.4); receive and review exchange of correspondence between SunTrust's counsel and Trustee's counsel regarding disposition of documents and litigation hold request (.2)	DAS	0.60	210.00
05/13/13	Prepare KTT's fourth interim fee application with exhibits; confer with D. Samole re: same; revise accordingly.	YCC	1.80	270.00
05/13/13	Receive and review application to retain expert witness (.1); receive and review response to motion for judicial notice and review response to amended motion to compel discovery (.3)	DAS	0.40	140.00
05/13/13	Receive and review notice of hearing on GJB application (.1); receive and review draft KTT fee app and make comments and check into status of reviewing bills and redactions (.2).	DAS	0.30	105.00
05/16/13	Confer with D. Samole re: revisions to KTT's invoice; finalize KTT's 4th interim fee application and transmit to Trustee for approval.	YCC	0.50	75.00
05/16/13	Continue working with Ms. Yamile Castro on interim fee application (.3).	DAS	0.30	105.00
05/20/13	Receive and review motion to file reply brief in support of amended motion to compel production of documents (.2).	DAS	0.20	70.00
05/24/13	Receive and review notice of appeal of order on in camera review (.1).	DAS	0.10	35.00
06/04/13	Follow up with Trustee on submission of KTT's 4th interim fee application.	YCC	0.10	15.00
06/05/13	Correspondence with Trustee about e-discovery protocol (.1); follow up with KTT team regarding same (.4); perform due diligence regarding same (.6).	DAS	1.10	385.00
06/06/13	Finalize KTT's 4th interim fee application.	YCC	0.20	30.00

IN RE: ULRICH FELIX ANTON ENGLER
Page 3

September 26, 2013
Reference No.: 121991

Date	SERVICES	Atty	Hours	Amount
06/06/13	Follow up phone calls with team about e-discovery protocol and search terms pleadings(.3); draft correspondence to trustee's counsel enclosing certain materials (.1); follow up with him regarding same and receive and more referenced materials to track down and confer with paralegal regarding same (.6).	DAS	0.60	210.00
06/07/13	E-file KTT's 4th interim fee application.	YCC	0.30	45.00
06/07/13	Continue to review correspondence files and records as to e-discovery protocol and search terms (.5); work with IT department and file room clerk to review archived case records and correspondence (.7); follow-up phone call with Ms. Elliott (.2); receive and review Wells Fargo's response to motion for leave to file further reply to renewed motion to compel (.1); receive and review notice of consent orders between Wells Fargo and regulators (.1); receive and review Trustee's notice of appeal, statement of issues and appellant records designation (.2); receive and review filed version of KTT's 4th interim fee application (.1).	DAS	1.90	665.00
06/10/13	Confer with D. Samole re: document production.	YCC	0.10	15.00
06/13/13	Receive and review order granting plaintiffs' motion to filed reply brief (.1).	DAS	0.10	35.00
06/14/13	Confer re: proposed order awarding KTT's 4th interim fee application; review clerk's rejection of draft order and correct same; confer with D. Samole re: service of fee order; review order limiting notice and follow up on proposed order.	YCC	0.60	90.00
06/14/13	Receive and review correspondence from court approving fee app and work with paralegal to get order prepared/finalized and uploaded (.2).	DAS	0.20	70.00
06/18/13	Confer with D. Samole re: fee order; review same.	YCC	0.10	15.00
06/18/13	Receive and review order granting KTT fee application (.1).	DAS	0.10	35.00
06/20/13	Review docket sheet for requests for appearances; update service list; prepare and efile certificate of service of order awarding KTT's 4th interim fee application; serve fee order.	YCC	0.80	120.00

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Date	SERVICES	Atty	Hours	Amount
06/20/13	Phone conference with trustee's counsel about pending Wells Fargo discovery matters (.1); receive request from investors' counsel for certain related materials (.1); retrieve and circulate batch of requested materials with cover letter and advise more materials would be forthcoming going forward after more in-depth search (.4); receive and review brief in reply in support of amended motion to compel (.2)	DAS	0.80	280.00
06/26/13	Review correspondence from trustee's counsel about providing more document production materials (.1); continue searching records, correspondence and materials (.5)	DAS	0.60	210.00
06/27/13	Continue searching archived records for document production-related request from trustee's counsel and draft responsive correspondence to counsel summarizing information and materials requested (.6)	DAS	0.60	210.00
07/05/13	Receive and review exchange of correspondence between counsel as to extension of time to file appellate brief (.1)	DAS	0.10	35.00
07/12/13	Follow up on payment of KTT's fees/costs awarded in 4th interim fee application.	YCC	0.10	15.00
07/22/13	Receive and review notice of new discovery deadlines and trial dates in WF litigation (.1).	DAS	0.10	35.00
07/30/13	Receive and review memorandum opinion and order granting in part motion to compel discovery from bank (.3).	DAS	0.30	105.00
08/01/13	Receive and review Wells Fargo's motion to extend time to file responses to pending discovery (.1).	DAS	0.10	35.00
08/02/13	Receive and review endorsed order entry providing WF more time to respond to discovery; follow up as to prior discovery materials produced to KTT (.2).	DAS	0.30	105.00
08/05/13	Receive and review motion to for extension of time to file appellate brief and separate notice of withdrawal of extension motion as being filed in wrong court (.1) (N/C).	DAS	0.10	0.00
08/06/13	Confer with D. Samole re: preparing final fee application.	YCC	0.10	15.00

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Date	SERVICES	Atty	Hours	Amount
08/09/13	Receive and review Wells Fargo's motion for protective order and related relief (.2).	DAS	0.20	70.00
08/16/13	Receive and review objection to, and motion for reconsideration of, magistrate judge's discovery order and memorandum of law (.3) (N/C).	DAS	0.30	0.00
08/26/13	Receive and review Plaintiffs' 24-page brief in response and memorandum of law opposing Wells Fargo's motion for protective order (.4) (N/C).	DAS	0.40	0.00
08/30/13	Receive and review Wells Fargo's unopposed motion to extend time to file response brief re motion for reconsideration (.1) (N/C); review endorsed order granting same (.1) (N/C).	DAS	0.20	0.00
09/03/13	Review and revise KTT's bill.	YCC	0.30	45.00
09/09/13	Work on final fee application and exhibits (3.1) (initial document corrupted. (.6 N/C).	YCC	2.50	375.00
09/10/13	Email to D. Samole re: final fee application.	YCC	0.10	15.00
09/10/13	Receive and review narrative background for KTT final fee application and make preliminary comments with more discussion needed with Ms. Castro as to updating same (.2),	DAS	0.20	70.00
09/13/13	Receive and review Wells Fargo's response and memorandum of law opposing motion for reconsideration (.2) (N/C)	DAS	0.20	0.00
09/16/13	Confer with D. Samole re: revisions to final fee application; revise accordingly.	YCC	0.20	30.00
09/16/13	Continue to revise and supplement narrative portion of fee application for Ms. Castro to incorporate to materials she is working on (.2).	DAS	0.20	70.00
09/18/13	Confer with D. Samole re: further changes to final fee application; revise accordingly.	YCC	0.10	15.00
09/18/13	Revise and supplement final fee application and provide additional comments for Ms. Yamile Castro to incorporate (.4).	DAS	0.40	140.00
09/19/13	Finalize KTT's final fee application and exhibit.	YCC	1.00	150.00

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SUMMARY OF SERVICES

Hours		Rate	Amount
10.00	YAMILE C. CASTRO	150.00	1,500.00
1.20	DAVID A. SAMOLE	0.00	0.00
10.50	DAVID A. SAMOLE	350.00	3,675.00
	TOTAL FOR SERVICES		----- \$ 5,175.00

Date	EXPENSES	Amount
05/31/13	Digital Images - Equitrac	3.45
06/30/13	Digital Images - Equitrac	4.20
07/31/13	Pacer Service Center	3.36
	TOTAL FOR EXPENSES	----- \$ 11.01

TOTAL AMOUNT DUE		----- \$ 5,186.01
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