

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

In re:

Ingersoll Financial, LLC

Debtor.

---

Chapter 11

Case no. 6:17-bk-07077-KSJ

**SECOND MOTION FOR ORDER AUTHORIZING FRANK  
MARTIN WOLFF P.A. TO BILL AGAINST POST-PETITION RETAINER**

The Debtor, Ingersoll Financial, LLC, files this second motion for an order authorizing Frank Martin Wolff, P.A. (“FMWPA”) to bill against a post-petition retainer and states as follows:

1. On November 16, 2017, this court entered its Order Authorizing Employment of Attorney (the “Order”) (Doc. No. 13). The Order permits FMWPA to bill against the initial retainer and, after the retainer is depleted, to file interim applications for payment of fees and expenses. The initial retainer has been exhausted.
2. On January 25, 2018, FMWPA filed its first Motion for Order Authorizing Frank Martin Wolff, P.A. (“FMWPA”) to Bill Against Post-Petition Retainer (Doc. No. 46) (the “First Motion”) received in the amount of \$15,000.00 (the “First Post-Petition Retainer”).
3. On February 20, 2018, this court entered its Order Granting the First Motion (Doc. No. 61). The First Post-Petition Retainer has been exhausted.
4. Since the filing of the First Motion, an additional retainer of \$4,500.00 (the “Second Post-Petition Retainer”) has been received and placed in the trust account of FMWPA. The source of the Second Post-Petition Retainer is: \$2,000 from Keith Ingersoll, principal of Debtor; and \$2,500.00 from KI Consulting Group, LLC, an entity wholly owned by Keith Ingersoll, principal

of the Debtor.

5. The scope of this case has become very different from what was initially anticipated, requiring more of a retainer to cover the fees and expenses under the new situation.

6. The Second Post-Petition Retainer has not been paid out of property of the estate, and there is no commitment by the Debtor to repay either Keith Ingersoll or KI Consulting Group, LLC for the Second Post-Petition Retainer.

Wherefore, FMWPA requests that this court order that it may bill against the Second Post Petition Retainer.

/s/ Frank M. Wolff  
Frank M. Wolff  
Florida Bar No. 319521  
Frank Martin Wolff, P.A.  
1851 West Colonial Drive  
Orlando, FL 32804  
Telephone (407) 648-0058  
Facsimile (407) 648-0681  
[fwolff@fmwpa.com](mailto:fwolff@fmwpa.com)

Attorney for the Debtor

### **CERTIFICATE OF SERVICE**

I certify that a copy of this motion was served on February 23, 2018 to: (i) all filing users through the CM/ECF system; and (ii) by first class United States mail to all non-filers as listed on Local Rule 1007-s Parties in Interest List attached to the original of this document filed with the court.

/s/ Frank M. Wolff  
Frank M. Wolff

Label Matrix for local noticing  
 113A-6  
 Case 6:17-bk-07077-KSJ  
 Middle District of Florida  
 Orlando  
 Tue Feb 20 09:50:36 EST 2018

Ingersoll Financial, LLC  
 2 South Orange Avenue, Suite 202  
 Orlando, FL 32801-2634

Frank M Wolff +  
 Frank Martin Wolff, P.A.  
 19 E. Central Blvd  
 Orlando, FL 32801-2468

United States Trustee - ORL +  
 Office of the United States Trustee  
 George C Young Federal Building  
 400 West Washington Street, Suite 1100  
 Orlando, FL 32801-2210

Andrew V Layden +  
 Baker & Hostetler LLP  
 Suntrust Center - Suite 2300  
 200 S. Orange Avenue  
 Orlando, FL 32801-3432

Christopher R Thompson +  
 200 S Orange Ave, Ste 800  
 Orlando, FL 32801-6404

Wendy L Mummaw +  
 Office of General Counsel  
 117 West Duval Street  
 Jacksonville, FL 32202-3734

Audrey M Aleskovsky +  
 Office of the United States Trustee  
 George C. Young Federal Building  
 400 West Washington St, Suite 1100  
 Orlando, FL 32801-2210

Donald W Fitzgerald +  
 Felderstein Fitzgerald Willoughby  
 400 Capitol Mall, Suite 1750  
 Sacramento, CA 95814-4432

Jennifer E Niemann +  
 Felderstein Fitzgerald Willoughby  
 400 Capitol Mall, Suite 1750  
 Sacramento, CA 95814-4432

Note: Entries with a '+' at the end of the  
 name have an email address on file in CMECF

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Karen S. Jennemann  
 Orlando

End of Label Matrix	
Mailable recipients	10
Bypassed recipients	1
Total	11

RS Lending, Inc.  
501 Second St., Ste 700  
San Francisco, CA  
94107

Chipco Group, LLC  
Successor to PMSG, LLC  
625 Waltham Ave  
Orlando, FL 32809-4205

Alexandra Krot  
169 Bassett Place  
Bloomfield Hills, MI  
48301-3463