

Fill in this information to identify the case:

Debtor 1 Limetree Bay Refining, LLC
Debtor 2 _____
(Spouse, if filing)
United States Bankruptcy Court for the: Southern District of Texas, Houston Division
Case number 21-32354

E-Filed on 09/19/2021
Claim # 69

Official Form 410
Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor? Law Office of Roberta M. Rossi
Name of the current creditor (the person or entity to be paid for this claim)
Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else? No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
<u>Roberta M. Rossi</u> Name	_____ Name
<u>83 Windward Cove</u> Number Street	_____ Number Street
<u>The Woodlands TX 77381</u> City State ZIP Code	_____ City State ZIP Code
Contact phone <u>(832) 928-7925</u>	Contact phone _____
Contact email <u>robbi@robbirossi.com</u>	Contact email _____
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	

4. Does this claim amend one already filed? No
 Yes. Claim number on court claims registry (if known) _____ Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim? No
 Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ 126,725.00. Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.
Services Performed

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.
Nature of property:
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____
Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ 0.00

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check one:

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ 0.00

\$ 0.00

\$ 0.00

\$ 0.00

\$ 0.00

\$ 0.00

* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09/19/2021
MM / DD / YYYY

Roberta M. Rossi

Signature

Print the name of the person who is completing and signing this claim:

Name Roberta M. Rossi
First name Middle name Last name

Title Partner

Company Law Office of Roberta Rossi
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code

Contact phone _____ Email _____

Attachment 1 - Summary of invoices.pdf

Description -

Month of Legal Services	Invoice Number	Invoice Amount
January 2021	33	\$30,020.00
February 2021	34	\$33,967.50
March 2021	35	\$15,592.50
April 2021	35B	17,272.50
May 2021	36	14,175.00
June 2021	37	15,697.50
Total		126,725.00

Attachment 2 - LBR Jan. 2021.pdf

Description -

LAW OFFICES OF ROBERTA M. ROSSI

Roberta M. Rossi
719 Sawdust Rd.
Suite 112
The Woodlands, TX 77380
www.robbirossi.com
Tax Id: 039-42-3097

LIMETREE BAY REFINING, LLC

Invoice Date: Feb. 2, 2021

Attn: LBREFINING@AVIDBILL.COM

LBEnergyInvoiceCapture@conkursolutions.com

Matter: St. Croix Refinery Project

Billing Period: January 2021

Billing Rate: \$495/hr.

Invoice Number: 33

Date:	Task	Time
1/4/2021	Revised and distributed NAES Contract; conference call with Franklin on Pinnacle Addendum; conference call with Franklin on NAES; revised and distributed NIS Addendum; correspondence with Chris Coleman and Franklin on environmental issues on NAES.	2.4
1/5/2021	Conference call with internal team on insurance issues; numerous conference calls on consent decree with Franklin and Lee Ann; provided language for templates	3.1
1/6/2021	Conference call with Franklin on NAES; revised and distributed NAES contract; correspondence on insurance matters	0.7
1/8/2021	Reviewed and revised Amendment 6 to Savage O&M Agreement; revised and distributed PO3 for Bollinger	3.0
1/12/2021	Conference call on NAES; prepared summary of indemnity and limitation on liability; reviewed and revised new draft of Bollinger contract; correspondence on consent decree	3.9
1/13/2021	Correspondence on Infrared Thermal imaging and review of contract; drafted Novation and Assignment; correspondence on NAES environmental matters.	3.2
1/14/2021	Finalized and distributed Novation and Assignment for Infrared Thermal; correspondence on NAES	0.6
1/15/2021	Reviewed execution copy of Imodco and correspondence re: same	0.4
1/19/2021	Conference call with Steve DeGracia at NAES and correspondence with internal team; conference call on OCIP Addendums; conference call on Scaffolding Proposal and review of correspondence on same.	3.5
1/20/2021	Revised and distributed Bollinger Contract; correspondence on Scaffolding Project; telephone conference with Franklin re: monitors; drafted Access and Use Agreement for Scaffolding; reviewed and revised VI Industrial Services Work Order; drafted form of access Agreement.	7.0

1/21/2021	Conference call on Scaffolding and NIS and VISS contracts; correspondence on amendments to Analytical Stress TSA; correspondence on NAES	2.1
1/22/2021	Review of VISS and prepared new addendum for work release no. 8; began drafting revised template to incorporate auditor's comments.	7.2
1/25/2021	Revised VISS to include new comments received. Drafted Addendum No. 4 to Pinnacle Contract for partial reinstatement of OCIP; correspondence on Imodco and NAES; telephone conference with Franklin on power of attorney and prepared template; prepared form of bill of sale for scaffolding.	5.9
1/26/2021	Conference call with Rocco and Mary on NIS and VISS; prepared Addendum 2 to LTS -010; prepared revisions to templates to include auditor's comments.	4.2
1/27/2021	Correspondence on Imodco; correspondence or revisions to TSA for audit provision; prepared amendment to LBR-016 with NIS for scaffolding; revised and distributed VIIS Work Release; prepared revised amendment for audit provisions to TSA template and correspondence re: same; reviewed and revised Helicopter Charter Agreement	7.2
1/28/2021	Telephone call with Ashley and Mary on templates and OCIP addendum; reviewed AG Equipment Letter of credit and correspondence re: same; distributed Analytic Stress documents; finalized changes to TSA template.	4.9
1/29/2021	Revised and distributed NIS Addendum, Drafted and distributed Excel Addendum, correspondence on Imodco; correspondence on NAES; conference call with Franklin; conference call with Mary on OCIP amendments.	3.9
Total		63.2

Outstanding Fees.....\$30,020.00

Total.....\$30,020.00

Please remit payment to:

Law Offices of Roberta M. Rossi
719 Sawdust Rd., Suite 112
The Woodlands, Texas 77380

CC/ whector@lbterminals.com

Attachment 3 - LBR March 2021.pdf

Description -

LAW OFFICES OF ROBERTA M. ROSSI

Roberta M. Rossi
719 Sawdust Rd.
Suite 112
The Woodlands, TX 77380
www.robrossi.com
Tax Id: 039-42-3097

LIMETREE BAY REFINING, LLC

Invoice Date: April 7, 2021

Attn: LBREFINING@AVIDBILL.COM

LBEnergyInvoiceCapture@conkursolutions.com

Matter: St. Croix Refinery Project

Billing Period: March 2021

Billing Rate: \$525/hr.

Invoice Number: 35

Date:	Task	Time
3/1/2021	Correspondence on NRI and Nemsco	0.4
3/5/2021	Conference call on NRI.	0.3
3/8/2021	Reviewed new draft from NAES and correspondence re: same	1.6
3/10/2021	Further revised NAES O&M Agreement to incorporate new comments received and correspondence re: same; revised and distributed Teledyne contract and correspondence re: same.	3.1
3/12/2021	Correspondence on Engineering Services Agreement template; correspondence on Pinnacle TSA; revised and distributed Pinnacle Agreement	4.5
3/15/2021	Revised and distributed FMC TSA	4.3
3/16/2021	Review of NRI Draft and correspondence on same.	0.3
3/18/2021	Revised and distributed Teledyne Agreement.	0.4
3/22/2021	Reviewed and Revised Elliot TSA; began reviewing and revising Flexcrew Staffing agreement.	4.8
3/23/2021	Finalized and distributed Flexcrew Staffing Agreement; drafted Brokerage Agreement for Sale of Modular Dorm Units	4.5
3/25/2021	Correspondence on Advisian.	0.3
3/26/2021	Conference call on Advisian and revised and distributed same; reviewed and revised NAES O&M Agreement and correspondence re: same.	4.9
3/29/2021	Correspondence on Scaffolding Contract.	0.3
Total		29.7

Outstanding Fees.....\$15,592.50

Total.....\$15,592.50

Please remit payment to:

Law Offices of Roberta M. Rossi
719 Sawdust Rd., Suite 112
The Woodlands, Texas 77380

CC/ whector@lbterminals.com

Attachment 4 - LBR May 2021.pdf

Description -

LAW OFFICES OF ROBERTA M. ROSSI

Roberta M. Rossi
719 Sawdust Rd.
Suite 112
The Woodlands, TX 77380
www.robbirossi.com
Tax Id: 039-42-3097

LIMETREE BAY REFINING, LLC
Attn: LBREFINING@AVIDBILL.COM
LBEnergyInvoiceCapture@conkursolutions.com
Matter: St. Croix Refinery Project
Billing Period: May 2021
Billing Rate: \$525/hr.
Invoice Number: 36

Invoice Date: June 2, 2021

Date:	Task	Time
5/4/2021	Revised and distributed SVC MSA for Ashley Scotland; Revised and distributed Excel Addendum.	4.7
5/6/2021	Revised and distributed AMETECK agreement and correspondence re: same.	2.9
5/7/2021	Review of ASTM contract and revisions to same.	2.5
5/10/2021	Correspondence on TTC Labs and Antilles Power; revised and distributed Emerson Contract.	1.2
5/12/2021	Revised and distributed TTC Labs Agreement; correspondence on AMETECK and NASE.	2.3
5/13/2021	Conference call with Ametec.	0.5
5/16/2021	Correspondence on NAES and review of comments; correspondence on AMETECK	0.7
5/17/2021	Correspondence on NAES and revisions re: same; revised and distributed Antilles Power TSA.	2.9
5/18/2021	Correspondence on Bechtel license issue.	0.6
5/26/2021	Conference call on Bechtel with Ashley and Mike McGill, conference call with Franklin, reviewed and revised Bechtel Agreement.	4.7
5/27/2021	Conference call on NAES and review of indemnification provisions.	0.6
5/28/2021	Numerous conference calls on Bechtel, revised and distributed Bectel documents.	3.4
Total		27

Outstanding Fees.....\$14,175.00

Total.....\$14,175.00

Please remit payment to:

Law Offices of Roberta M. Rossi
719 Sawdust Rd., Suite 112
The Woodlands, Texas 77380

CC/ whector@lbterminals.com

Attachment 5 - LBR April 2021 35B.pdf

Description -

LAW OFFICES OF ROBERTA M. ROSSI

Roberta M. Rossi
719 Sawdust Rd.
Suite 112
The Woodlands, TX 77380
www.robbirossi.com
Tax Id: 039-42-3097

LIMETREE BAY REFINING, LLC
Attn: LBREFINING@AVIDBILL.COM
LBEnergyInvoiceCapture@conkursolutions.com
Matter: St. Croix Refinery Project
Billing Period: April 2021
Billing Rate: \$525/hr.
Invoice Number: 35B

Invoice Date: May 3, 2021

Date:	Task	Time
4/5/2021	Conference call on NIS scaffolding documentation; and review of documents re: same; reviewed and revised RTI Term Services Agreement and conference calls re: same	4.6
4/6/2021	Conference calls and correspondence on RTI; reviewed and revised Compass ASTM License Agreement.	4.9
4/7/2021	Reviewed new draft of RTI TSA received in AM and revised and distributed same; conference call on labor rates and Vivot dispute; conference call with Franklin on MOU for WAPA; reviewed new draft of RTI received in PM and correspondence re: same.	4.8
4/8/2021	Redrafted and distributed WAPA letter; telephone conference with Mary Thomas on loaned employees; prepared execution copy of RTI TSA; finalized and distributed Worley amendment	4.4
4/12/2021	Reviewed and distributed NAES contract and correspondence re same; reviewed and revised Excel addendum	2.4
4/16/2021	Reviewed and Revised Ametek Services Agreement	4.9
4/20/2021	Revised and distributed Ametek Services Agreement.	2.9
4/26/2021	Review of Ametek and conference call on same.	0.8
4/27/2021	Revised and distributed Used Modulars brokerage agreement.	2.2
4/28/2021	Reviewed new draft of NAES O&M Agreement.	0.5
4/30/2021	Correspondence on NAES and review of new budget.	0.5
Total		32.9

Outstanding Fees.....\$17,272.50

Total.....\$17,272.50

Please remit payment to:

Law Offices of Roberta M. Rossi
719 Sawdust Rd., Suite 112
The Woodlands, Texas 77380

CC/ whector@lbtterminals.com

Attachment 6 - LBR June 2021.pdf

Description -

LAW OFFICES OF ROBERTA M. ROSSI

Roberta M. Rossi
 719 Sawdust Rd.
 Suite 112
 The Woodlands, TX 77380
www.robbirossi.com
 Tax Id: 039-42-3097

LIMETREE BAY REFINING, LLC
 Attn: LBREFINING@AVIDBILL.COM
LBEnergyInvoiceCapture@concur solutions.com
 Matter: St. Croix Refinery Project
 Billing Period: June 2021
 Billing Rate: \$525/hr.
 Invoice Number: 37

Invoice Date: July 5, 2021

Date:	Task	Time
6/1/2021	Correspondence on Coker.com MSA and revisions re: same; correspondence on Sunbelt MSA and began review of same.	4.1
6/2/2021	Review of new draft from Coker.com and correspondence re: same.	0.9
6/3/2021	Correspondence on Sunbelt and Spirit Environmental; review of scope of work of Spirit; reviewed and revised Clean Harbor MSA	2.8
6/4/2021	Finalized and distributed Clean Harbors MSA; reviewed and revised Sprint MSA and distributed same.	5.9
6/5/2021	Reviewed and revised Clean Air's terms and conditions	1.7
6/8/2021	Reviewed and revised ioMosack MSA.	2.9
6/9/2021	Correspondence on ioMosack MSA, correspondence on Clean Harbors.	0.3
6/10/2021	Review of Clean Harbors contract with Mary Thomas.	1.0
6/14/2021	Conference call on Clean Harbors and review of LNTP; review of new draft of NAES contract;	2.1
6/15/2021	Reviewed Pace Agreement and correspondence re: same; reviewed and revised Clean Harbors Agreement; reviewed and revised Philadelphia Gear Agreement;	5.9
6/16/2021	Conference call with ASTM and revised and distributed the ASTM License Agreement.	2.3
Total		29.9

Outstanding Fees.....\$15,697.50

Total.....\$ 15,697.50

Please remit payment to:

Law Offices of Roberta M. Rossi
719 Sawdust Rd., Suite 112
The Woodlands, Texas 77380

CC/ whector@lbterminals.com

Attachment 7 - LBR Feb. 2021.pdf

Description -

LAW OFFICES OF ROBERTA M. ROSSI

Roberta M. Rossi
719 Sawdust Rd.
Suite 112
The Woodlands, TX 77380
www.robbirossi.com
Tax Id: 039-42-3097

LIMETREE BAY REFINING, LLC

Invoice Date: March 7, 2021

Attn: LBREFINING@AVIDBILL.COM

LBEnergyInvoiceCapture@conkursolutions.com

Matter: St. Croix Refinery Project

Billing Period: February 2021

Billing Rate: \$525/hr.

Invoice Number: 34

Date:	Task	Time
2/1/2021	Reviewed Jacobs documents and contract history and began preparing amendment; correspondence on NAES; correspondence on UPS and OCIP Amendments.	2.2
2/2/2021	Finalized and distributed Jacobs/Worley amendment; correspondence on NAES; prepared OCIP Reinstatement Addendum for UPS and review of contract history; conference call with Franklin and Rocco on NAES; correspondence on UPS.	5.1
2/3/2021	Finalized and distributed UPS Addendum; reviewed and compared execution copy of Imodco; conference call with NAES; revised and distributed Jacobs/Worley Amendments	3.9
2/4/2021	Telephone conference with Mike McGill on sale of excess inventory; review of NRI proposal and began drafting agreement for sale of excess inventory.	3.1
2/5/2021	Reviewed Trecora proposal and revised and distributed related GTCs; conference call with Ashley and Mary on Work Releases; reviewed and revised FMC Agreement and terms; reviewed changes to Services Agreement with FMC Technologies.	6.7
2/6/2021	Continued drafting NRI Agreement, proofed, finalized and distributed same.	4.4
2/8/2021	Revised and distributed Pinnacle Amendment; drafted Amendment and Joinder for Vivot; drafted Termination for Vivot LBR TSA; review of Vivot Work Release.	4.5
2/9/2021	Conference call with Mike McGill on NRI Agreement; redrafted and distributed same; correspondence on Vivot Amendment; review of new draft received from NAES; drafted new Addendum for ETS.	6.1
2/10/2021	Revised certain provisions of NAES Agreement and correspondnece re: same; reviewed Consignment Agreement provided by NRI and redrafting of same.	4.3
2/11/2021	Finalized and distributed revisions to NRI Consignment Agreement; began review and revisions to Advisian Digital	6.2

	Agreement	
2/12/2021	Revised and distributed NAES comments	0.7
2/24/2021	Conference call on NRI and review and revisions to new draft; correspondence on Intertek cameras	1.9
2/25/2021	Conference call with Mike McGill on NRI contract, review of same and preparation of issues list.	4.0
2/26/2021	Conference call with NRI and Mike McGill; reviewed and revised Teledyne contract; began revising NRI contract to incorporate comments discussed; prepared indemnity for Intertek.	6.1
2/28/2021	Revised and distributed NRI contract; correspondence on Nemsco and review of same.	5.5
Total		64.7

Outstanding Fees.....\$33,967.50

Total.....\$33,967.50

Please remit payment to:

Law Offices of Roberta M. Rossi
719 Sawdust Rd., Suite 112
The Woodlands, Texas 77380

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