

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE: )  
 )  
MADISON PARK CHURCH OF GOD, INC., ) Case No. 13-07430-RLM-11  
d/b/a MADISON PARK CHURCH OF GOD, )  
 )  
Debtor. )

**THIRD NOTICE OF DRAW FILED BY TAFT STETTINIUS & HOLLISTER LLP**

Taft Stettinius & Hollister LLP (the “Firm”), bankruptcy counsel for Madison Park Church of God, Inc., d/b/a Madison Park Church of God, as debtor and debtor-in-possession (the “Debtor”) hereby files its third notice of draw with respect to the billings by the Firm for services rendered from November 1, 2013 through and including November 30, 2013.

Pursuant to the *Order Granting Application To Employ Taft Stettinius & Hollister LLP As Debtors’ Counsel And Establishing Interim Compensation Procedures* [Doc. 61] entered August 22, 2013 and the Firm’s engagement letter, the Firm is entitled to receive, on an interim basis, payment of 80% fees incurred and 100% of expenses advanced. For the period of November 1, 2013 through and including November 30, 2013, 80% of the Firm’s fees total \$16,199.20 (\$20,249.00 x .8) and 100% of the Firm’s expenses total \$12.60. A copy of the relevant billing statement is attached to the notice of draw filed with the Court as **Exhibit A**,

and can be reviewed at the Office of the Clerk of the Bankruptcy Court, online via PACER at <http://www.insb.uscourts.gov>, or by contacting counsel for the Debtor.

Dated: December 24, 2013

MADISON PARK CHURCH OF GOD, INC.,  
d/b/a MADISON PARK CHURCH OF GOD,  
as debtor and debtor-in-possession,

By: /s/ Jeffrey J. Graham  
Jeffrey J. Graham, one of their counsel

Jerald I. Ancel  
Marlene Reich  
Jeffrey J. Graham  
Erin C. Nave  
TAFT STETTINIUS & HOLLISTER LLP  
One Indiana Square, Suite 3500  
Indianapolis, IN 46204  
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# Taft/

Taft Stettinius & Hollister LLP

One Indiana Square, Suite 3500 / Indianapolis, IN 46204- 2023 / Tel: 317.713.3500 / Fax: 317.713.3699 / www.taftlaw.com  
 Cincinnati / Columbus / Cleveland / Dayton / Indianapolis / Northern Kentucky / Phoenix

TAXPAYER I.D. NUMBER: 31 054175

DECEMBER 6, 2013

INVOICE# 2549088 JIAN  
 OUR FILE# MPC10  
 BILLING THROUGH NOVEMBER 30, 2013

F. Rob Spaulding  
 Madison Park Church Of God, Inc.  
 2200 Madison Square  
 Anderson, IN 46018

**00003 RE: Business Operations**

FOR PROFESSIONAL SERVICES RENDERED

11/04/13	JIAN Sent e-mail to Rob Spaulding regarding Tim Landis.	.20 HRS 550/HR	110.00
11/13/13	JIAN Reviewed title insurance cases.	.20 HRS 550/HR	110.00
11/14/13	JIAN Reviewed and responded to Rob Spaulding e-mail regarding audit letter.	.40 HRS 550/HR	220.00
11/14/13	JIAN Had teleconference Richard Lindley regarding audit letter and sent e-mail regarding same.	.50 HRS 550/HR	275.00
11/14/13	PLMC Drafted update to audit response letter.	.50 HRS 440/HR	220.00

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TOTAL FEES FOR THIS MATTER 935.00

**00004 RE: Case Administration**

FOR PROFESSIONAL SERVICES RENDERED

11/01/13	JIAN Reviewed and responded to Kevin Martin regarding wire for Broadridge wire transfer.	1.00 HRS 550/HR	550.00
11/18/13	JIAN Had teleconference with Barry Bentley regarding calculation of payments due on the Effective Date.	.20 HRS 550/HR	110.00
11/19/13	JIAN Reviewed e-mail from Barry Bentley.	.20 HRS 550/HR	110.00

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11/20/13	JIAN	Reviewed BMC e-mail regarding Notice to those who have filed claims and reviewed BR 2002) (g).	1.00	HRS	550/HR	550.00
11/20/13	JJGR	Reviewed monthly operating report.	.20	HRS	395/HR	79.00
11/27/13	JIAN	Reviewed and responded to Rob Spaulding's e-mail.	.20	HRS	550/HR	110.00
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TOTAL FEES FOR THIS MATTER						1,509.00

**00005 RE: Claims Administration & Objections**FOR PROFESSIONAL SERVICES RENDERED

11/15/13	MREI	Sent transmittal to T. Scherer regarding status of series A bondholder claim.	.10	HRS	495/HR	49.50
11/18/13	JJGR	Reviewed summary of trustee charges.	.10	HRS	395/HR	39.50
11/19/13	JIAN	Addressed proof of claim bar date issue.	1.50	HRS	550/HR	825.00
11/19/13	MREI	Reviewed bondholder claims filed and reconcile with Trustee claims (.8); sent transmittal to J. Reinholds regarding claim documentation (.2); analyzed issues related to claims bar date (1.5); sent transmittal to K. Martin regarding creditor claims (.2).	2.70	HRS	495/HR	1,336.50
11/20/13	MREI	Reviewed and responded to K. Martin's transmittal regarding treatment of claims (0.4); sent transmittal to J. Reinhold regarding claims (.2).	.60	HRS	495/HR	297.00
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TOTAL FEES FOR THIS MATTER						2,547.50

**00007 RE: Fee/Employment Applications**FOR PROFESSIONAL SERVICES RENDERED

11/11/13	JJGR	Finalized second notice of draw of Hamernik	.10	HRS	395/HR	39.50
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for filing.

TOTAL FEES FOR THIS MATTER

39.50

00009

**RE: Financing**FOR PROFESSIONAL SERVICES RENDERED

11/07/13	MREI Sent transmittal to D. Williams regarding title endorsement.	.10	HRS 495/HR	49.50
11/11/13	MREI Followed up on title endorsement.	.10	HRS 495/HR	49.50
11/12/13	MREI Had telephone conference with D. Williams regarding title endorsement.	.20	HRS 495/HR	99.00
11/13/13	MREI Reviewed D. Williams transmittal regarding title endorsement.	.10	HRS 495/HR	49.50
11/14/13	MREI Sent transmittals to and from D. Williams regarding mortgage amendment and endorsement.	.30	HRS 495/HR	148.50
11/20/13	MREI Sent transmittal to and from D. Williams regarding endorsement cost.	.20	HRS 495/HR	99.00

TOTAL FEES FOR THIS MATTER

495.00

00012

**RE: Plan and Disclosure Statements**FOR PROFESSIONAL SERVICES RENDERED

11/01/13	MREI Reviewed K. Martin transmittal regarding Broadridge payment.	.10	HRS 495/HR	49.50
11/04/13	MREI Reviewed and responded to K. Knapp transmittal regarding Series B bondholder ballot (.2); transmittal to and from V. Bahkshian regarding package (.2).	.40	HRS 495/HR	198.00
11/06/13	JIAN Prepared final draft of Confirmation Order.	1.00	HRS 550/HR	550.00
11/11/13	JJGR Reviewed plan in preparation for drafting of	1.00	HRS 395/HR	395.00

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		proposed confirmation order.			
11/12/13	MREI	Sent transmittal to and received transmittal from T. Landis regarding ballots (.3); had telephone conference with K. Martin regarding ballots (.2).	.50	HRS 495/HR	247.50
11/13/13	JIAN	Had teleconference with investment advisor regarding terms of Plan.	.50	HRS 550/HR	275.00
11/13/13	JIAN	Reviewed report from Trust Depository together with the proxies.	.50	HRS 550/HR	275.00
11/13/13	JJGR	Drafted confirmation order.	3.20	HRS 395/HR	1,264.00
11/13/13	MREI	Reviewed DTC correspondence regarding authority to vote ballots (.20); sent transmittal to and from K. Martin regarding DTC report (.20).	.40	HRS 495/HR	198.00
11/14/13	JIAN	Prepared for Confirmation Hearing.	1.20	HRS 550/HR	660.00
11/14/13	JJGR	Revised confirmation order and notice of confirmation.	1.10	HRS 395/HR	434.50
11/14/13	MREI	Worked on confirmation order.	.50	HRS 495/HR	247.50
11/15/13	JIAN	Continued preparation for the Confirmation Hearing.	1.50	HRS 550/HR	825.00
11/15/13	MREI	Reviewed vote tabulation report.	.30	HRS 495/HR	148.50
11/18/13	JIAN	Reviewed the BMC Ballot Tabulation Report.	.40	HRS 550/HR	220.00
11/18/13	JJGR	Reviewed issues regarding plan testimony.	.20	HRS 395/HR	79.00
11/18/13	MREI	Prepared schedule of fees payable on Effective Date (0.7); telephone conference with B. Bentley regarding fees payable (0.3); sent transmittal to B. Bentley regarding schedule of fees (0.2); reviewed and responded to K. Knapp regarding series B bondholder ballot (0.2); sent transmittals to and from K. Martin regarding series B bondholder ballot (0.3).	1.70	HRS 495/HR	841.50
11/19/13	JIAN	Had conference call with T. Scherer regarding various Confirmation issues.	.50	HRS 550/HR	275.00
11/19/13	JIAN	Reviewed e-mail from T. Scherer regarding OSK Ballot.	.20	HRS 550/HR	110.00
11/20/13	JIAN	Had teleconference with Rob Spaulding and	2.00	HRS 550/HR	1,100.00

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Barry Bentley in preparation for  
Confirmation Hearing.

11/20/13	JJGR	Reviewed noticing issues.	.80	HRS	395/HR	316.00
11/20/13	MREI	Conference with B. Bentley and R. Spaulding regarding confirmation issues (1.2); analyzed service of solicitation package on bondholders (1.0); telephone conference with K. Martin and V. Bahkshian regarding service of solicitation package (0.5); reviewed status of ballots (0.1).	2.80	HRS	495/HR	1,386.00
11/21/13	JIAN	Reviewed and responded to bondholder regarding Plan.	.40	HRS	550/HR	220.00
11/21/13	JIAN	Reviewed BMC Ballot Summary as of November 20, 2013.	.30	HRS	550/HR	165.00
11/21/13	JIAN	Continued preparation for Confirmation Hearing.	2.00	HRS	550/HR	1,100.00
11/21/13	MOHU	Reviewed delivery requirements under the definitive agreement and certain provisions in the constituent documents.	.30	HRS	280/HR	84.00
11/21/13	MREI	Reviewed K. Martin transmittal regarding status of ballots (.1); followed up with MOH regarding resolutions to implement chapter 11 plan (.3).	.40	HRS	495/HR	198.00
11/25/13	JIAN	Had teleconference with Tom Scherer; sent e-mail to Barry Bentley and Rob Spaulding regarding Plan implementation.	.50	HRS	550/HR	275.00
11/25/13	JIAN	Had teleconference with bondholder regarding Solicitation Package and voting.	.20	HRS	550/HR	110.00
11/26/13	JIAN	Had teleconference with bondholder and sent e-mail to BMC regarding Ballot.	.40	HRS	550/HR	220.00
11/26/13	JIAN	Had teleconference with bondholder regarding Ballot questions.	.20	HRS	550/HR	110.00
11/26/13	JIAN	Reviewed Ballot Tabulation Report of BMC.	.40	HRS	550/HR	220.00
11/27/13	JIAN	Prepared Plan Closing Document Check List.	3.00	HRS	550/HR	1,650.00
11/27/13	JIAN	Had teleconference with bondholder regarding Ballot.	.40	HRS	550/HR	220.00
11/27/13	MOHU	Gave attention to ancillary documentation	.20	HRS	280/HR	56.00

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TAXPAYER I.D. NUMBER: 31 054175

for the loan closing.

TOTAL FEES FOR THIS MATTER	14,723.00
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00021 RE: Valuation

FOR OTHER CHARGES

11/14/13	Copying/printing	12.60
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TOTAL OTHER CHARGES FOR THIS MATTER	12.60
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TIMEKEEPER SUMMARY

TIMEKEEPER SUMMARY

JIAN	Jerald I. Ancel	Partner	21.00	550.00	11,550.00
JJGR	Jeffrey J. Graham	Partner	6.70	395.00	2,646.50
MREI	Marlene Reich	Partner	11.50	495.00	5,692.50
PLMC	Philip L. Mccool	Partner	.50	440.00	220.00
MOHU	Michelle O'Brien Hub	Paralegal	.50	280.00	140.00
TIMEKEEPER TOTAL			40.20		20,249.00



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BILLING SUMMARY

TOTAL FEES	\$20,249.00
TOTAL OTHER CHARGES	\$12.60
CURRENT CHARGES FOR THIS BILL	\$20,261.60
TOTAL BALANCE DUE NOW	\$20,261.60

JIAN