

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.)	

FOURTH 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 fourth notice of draw with respect to the billings by the Firm for services rendered from December 1, 2013 through and including December 31, 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 December 1, 2013 through and including December 31, 2013, 80% of the Firm’s fees total \$25,840.00 (\$32,300.00 x .8) and 100% of the Firm’s expenses total \$35.10. 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: January 22, 2014

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

/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
Telephone: (317) 713-3500
Facsimile: (317) 713-3699
Email: jancel@taftlaw.com
mreich@taftlaw.com
jgraham@taftlaw.com
enave@taftlaw.com

2016513.1

Taft/

One Indiana Square, Suite 3500
 Indianapolis, IN 46204-2023
 Tel: 317.713.3500 / Fax: 317.713.3699
 www.taftlaw.com

JANUARY 13, 2014

INVOICE# 2561909 JIAN
 OUR FILE# MPC10
 BILLING THROUGH DECEMBER 31, 2013

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

00004 RE: Case Administration

12/02/13	JIAN	Sent e-mail to Rob Spaulding regarding Effective Date planning.	.30	HRS	550/HR	165.00
12/06/13	EDPO	Sent email to MR regarding title insurance issues; reviewed filed rates.	.30	HRS	395/HR	118.50
12/19/13	JIAN	Reviewed claims and developed strategy for claims objections, and reviewed weekly budget.	1.00	HRS	550/HR	550.00
12/19/13	JIAN	Had teleconference with Rob Spaulding and sent follow-up e-mail.	.50	HRS	550/HR	275.00
12/24/13	JIAN	Reviewed pleadings filed by US Trustee.	.20	HRS	550/HR	110.00
12/24/13	JJGR	Reviewed notice issues.	.20	HRS	395/HR	79.00

TOTAL FEES FOR THIS MATTER

1,297.50

00005 RE: Claims Administration & Objections

12/02/13	JIAN	Reviewed OSK claim.	.40	HRS	550/HR	220.00
12/10/13	MREI	Sent transmittals to and from R. Spaulding regarding taxes (0.3); participated in telephone conference with R. Spaulding regarding taxes (0.2).	.50	HRS	495/HR	247.50
12/19/13	JJGR	Reviewed issues regarding claim objections.	.30	HRS	395/HR	118.50
12/19/13	MREI	Determined claims to which objections will be filed.	.80	HRS	495/HR	396.00
12/20/13	JJGR	Drafted claim objection to Rubin & Betty Barnes claim and proposed order regarding same.	1.00	HRS	395/HR	395.00
12/23/13	JJGR	Finalized claim objections, draft orders and notices and arranged for filing of same.	2.10	HRS	395/HR	829.50
12/24/13	JIAN	Reviewed B. Bentley e-mail.	.20	HRS	550/HR	110.00

Taft/

One Indiana Square, Suite 3500
 Indianapolis, IN 46204-2023
 Tel: 317.713.3500 / Fax: 317.713.3699
 www.taftlaw.com

12/24/13	JIAN	Reviewed Objections to Claims.	.20	HRS	550/HR	110.00
12/24/13	MREI	Reviewed claim objections.	.20	HRS	495/HR	99.00

TOTAL FEES FOR THIS MATTER 2,525.50

00007 RE: Fee/Employment Applications

12/05/13	JJGR	Prepared third notice of draw for Taft's September and October fees.	.30	HRS	395/HR	118.50
12/19/13	JJGR	Drafted third notice of draw for Hamernik and arranged for filing of same.	.30	HRS	395/HR	118.50
12/23/13	JJGR	Drafted third notice of draw for Taft.	.20	HRS	395/HR	79.00
12/23/13	MREI	Worked on Notice of Draw.	.40	HRS	495/HR	198.00

TOTAL FEES FOR THIS MATTER 514.00

00009 RE: Financing

12/02/13	KRMO	Obtained Certificate of Existence and certified Articles from the Indiana Secretary of State for Madison Park Church of God, Inc.	.10	HRS	205/HR	20.50
12/02/13	MOHU	Prepared board resolutions and secretary certificate authorizing the consummation of the transactions contemplated by the bankruptcy plan.	1.20	HRS	280/HR	336.00
12/06/13	MREI	Followed-up on title endorsement status (.3); sent transmittals to and from B. Bentley and R. Spaulding regarding title endorsement (.2); sent transmittals to and from D. Williams regarding title endorsement (.2).	.70	HRS	495/HR	346.50
12/07/13	MREI	Reviewed and responded to D. Whitmoyer transmittal regarding title endorsement (.2); telephone conference with D. Whitmoyer regarding title endorsement (.1).	.30	HRS	495/HR	148.50
12/09/13	CLTA	Discussed the mortgagor's affidavit with M. Hubbard and M. Reich, reviewed the relevant documentation and drafted the same.	1.80	HRS	265/HR	477.00
12/10/13	CLTA	Discussed revisions to the mortgagor's affidavit with M. Reich and revised the same.	.80	HRS	265/HR	212.00
12/11/13	MREI	Sent transmittal to C. O'Malley regarding delivery of documents under loan agreement.	.80	HRS	495/HR	396.00
12/12/13	MREI	Reviewed revised title endorsement (0.3);	.70	HRS	495/HR	346.50

Taft/

One Indiana Square, Suite 3500
 Indianapolis, IN 46204-2023
 Tel: 317.713.3500 / Fax: 317.713.3699
 www.taftlaw.com

sent transmittal to D. Williams regarding endorsement (0.2); sent transmittal to T. Scherer and C. O'Malley regarding endorsement (0.2).

12/13/13	MREI	Reviewed and responded to T. Scherer transmittal regarding title endorsement issues (0.40); reviewed existing title policies (0.3).	.70	HRS	495/HR	346.50
12/16/13	MREI	Reviewed and responded to T. Scherer transmittal regarding adequate protection payments (0.2); sent transmittals to and from R. Spaulding regarding adequate protection payments (0.2).	.40	HRS	495/HR	198.00
12/17/13	MREI	Analyzed OSK claim balance (0.8); participated in telephone conference with B. Bentley regarding OSK claim balance (0.2).	1.00	HRS	495/HR	495.00
12/18/13	MREI	Sent transmittal to T. Scherer regarding title endorsement comments (0.1); prepared OSK documents for execution (0.7).	.80	HRS	495/HR	396.00
12/23/13	MREI	Participated in telephone conference with B. Bentley regarding distributions (0.2); sent transmittal to B. Bentley regarding Land's fees (0.2) reviewed response to T. Landis transmittal regarding release (0.2).	.60	HRS	495/HR	297.00

TOTAL FEES FOR THIS MATTER 4,015.50

00012	RE: Plan and Disclosure Statements					
12/02/13	JIAN	Reviewed the Covenant Resolution and other documents regarding the Effective Date claims.	2.00	HRS	550/HR	1,100.00
12/02/13	JIAN	Had teleconference with Rob Spaulding regarding Resolutions for execution of Plan documents.	.20	HRS	550/HR	110.00
12/02/13	JIAN	Had teleconference with Mark Waterfill, counsel for developer whose contract will be assumed.	.20	HRS	550/HR	110.00
12/03/13	JIAN	Prepared for Confirmation Hearing.	1.50	HRS	550/HR	825.00
12/03/13	JJGR	Reviewed and revised confirmation order and notice of effective date and distribution date.	1.70	HRS	395/HR	671.50
12/04/13	JIAN	Continued preparation for Confirmation Hearing.	3.00	HRS	550/HR	1,650.00

Taft/

One Indiana Square, Suite 3500
 Indianapolis, IN 46204-2023
 Tel: 317.713.3500 / Fax: 317.713.3699
 www.taftlaw.com

12/04/13	JIAN	Reviewed draft Balloting Agent report.	.50	HRS	550/HR	275.00
12/04/13	JJGR	Reviewed and revised confirmation order.	1.10	HRS	395/HR	434.50
12/05/13	JIAN	Prepared certificate and declaration of the balloting.	.50	HRS	550/HR	275.00
12/05/13	JJGR	Reviewed bidding procedures and draft ballot report and affidavit and commented on same.	1.30	HRS	395/HR	513.50
12/06/13	JIAN	Prepared Confirmation Order.	1.00	HRS	550/HR	550.00
12/06/13	JJGR	Finalized initial draft of confirmation order based upon tabulation certification and voting report.	1.20	HRS	395/HR	474.00
12/06/13	MREI	Reviewed draft Confirmation Order.	.50	HRS	495/HR	247.50
12/09/13	JIAN	Had conference with Client and OSK in preparation for Effective Date closing.	1.50	HRS	550/HR	825.00
12/09/13	JIAN	Finalized final draft of Confirmation Order.	.40	HRS	550/HR	220.00
12/09/13	JJGR	Reviewed comments to order and issues regarding unsecured class (.7); analyzed issues regarding confirmation (1.0).	1.70	HRS	395/HR	671.50
12/09/13	MREI	Participated in two telephone conferences with R. Spaulding regarding execution of documents (0.2); sent transmittal to R. Spaulding regarding secretary certificate (0.2); made revisions to Confirmation Order (1.5).	1.90	HRS	495/HR	940.50
12/09/13	MREI	Met with client regarding confirmation hearing and plan documents (1.5); sent transmittal to D. Whitmoyer regarding resolutions and secretary certificates (0.3); prepared Release of Mortgage (1.0).	2.80	HRS	495/HR	1,386.00
12/09/13	MREI	Sent transmittal to T. Landis regarding Release of Mortgage (0.2); prepared Mortgagor's Affidavit (0.5); reviewed title search regarding documents to be released, amended (0.8); sent transmittal to T. Scherer regarding title issues (0.3).	1.80	HRS	495/HR	891.00
12/10/13	JIAN	Prepared for Confirmation Hearing.	3.00	HRS	550/HR	1,650.00
12/10/13	JJGR	Finalized confirmation order and exhibits thereto.	2.10	HRS	395/HR	829.50
12/10/13	JJGR	Prepared for confirmation hearing.	.70	HRS	395/HR	276.50
12/10/13	MREI	Worked on Mortgagor's Affidavit (0.8); worked on Confirmation Order (0.5); Reviewed B. Bentley transmittal regarding fee payables (0.3).	1.60	HRS	495/HR	792.00

Taft/

One Indiana Square, Suite 3500
 Indianapolis, IN 46204-2023
 Tel: 317.713.3500 / Fax: 317.713.3699
 www.taftlaw.com

12/10/13	MREI	Participated in telephone conference with B. Bentley regarding expenses in connection with plan (0.2); sent transmittals to and from D. Williams regarding title endorsement (0.2); reviewed draft endorsement and transmittal to Scherer & O'Malley (0.8).	1.20	HRS	495/HR	594.00
12/11/13	JIAN	Finalized draft Confirmation Order and prepared for and attended Confirmation Hearing.	5.00	HRS	550/HR	2,750.00
12/11/13	JJGR	Prepared for and attended confirmation hearing.	2.50	HRS	395/HR	987.50
12/11/13	MREI	Reviewed plan documents regarding completion and execution.	1.00	HRS	495/HR	495.00
12/12/13	JIAN	Had teleconference with reporter for The Deal regarding Plan Confirmation.	.20	HRS	550/HR	110.00
12/12/13	MREI	Reviewed executed secretary certificate (0.10); sent transmittal to R. Spaulding regarding certificate (0.10); sent transmittals to and from D. Whitmoyer regarding resolutions (0.20).	.40	HRS	495/HR	198.00
12/13/13	MREI	Reviewed Order confirming Chapter 11 plan.	.20	HRS	495/HR	99.00
12/16/13	JIAN	Reviewed the Confirmation Order, calculated the Effective Date, and e-mailed client regarding same.	.50	HRS	550/HR	275.00
12/16/13	JIAN	Had teleconference with Tom Scherer regarding Distribution Date issue.	.20	HRS	550/HR	110.00
12/16/13	JJGR	Reviewed and researched effective date and application of Rule 9006 (1.0); calculated various dates and revised notice of effective date (.5).	1.50	HRS	395/HR	592.50
12/16/13	MREI	Analyzed effective date and distribution date (1.3); participated in telephone conference with T. Scherer regarding plan dates (0.2).	1.50	HRS	495/HR	742.50
12/17/13	JIAN	Reviewed projected OSK Effective Date payment and had teleconference with Barry Bentley regarding same.	.50	HRS	550/HR	275.00
12/17/13	MREI	Worked on documents for execution.	1.00	HRS	495/HR	495.00
12/19/13	MREI	Followed-up on notice of confirmation and deadlines (0.4); reviewed and responded to B. Bentley's transmittal regarding closing date (0.1).	.50	HRS	495/HR	247.50
12/26/13	JIAN	Reviewed Barry Bentley e-mail to Reliance regarding Effective Date balances.	.20	HRS	550/HR	110.00



One Indiana Square, Suite 3500
 Indianapolis, IN 46204-2023
 Tel: 317.713.3500 / Fax: 317.713.3699
 www.taftlaw.com

12/26/13	MREI	Reviewed B. Bentley transmittal to B. Cook regarding Effective Date payments.	.10	HRS	495/HR	49.50
12/30/13	MREI	Reviewed and responded to B. Bentley transmittal regarding Effective Date.	.20	HRS	495/HR	99.00

TOTAL FEES FOR THIS MATTER 23,947.50

00013 RE: Relief from Stay Proceedings

THIS MATTER TOTAL N/C

00021 RE: Valuation

FOR OTHER CHARGES

12/20/13	Copying/printing	35.10
----------	------------------	-------

TOTAL OTHER CHARGES FOR THIS MATTER 35.10

TIMEKEEPER SUMMARY

TIMEKEEPER SUMMARY

EDPO	Erick D. Ponader	Partner	.30	395.00	118.50
JJGR	Jeffrey J. Graham	Partner	18.20	395.00	7,189.00
MREI	Marlene Reich	Partner	22.60	495.00	11,187.00
CLTA	Christopher L. Tazzi	Associate	2.60	265.00	689.00
KRMO	Kristen R. Moon	Paralegal	.10	205.00	20.50
JIAN	Jerald I. Ancel	Partner	23.20	550.00	12,760.00
MOHU	Michelle O'Brien Hub	Paralegal	1.20	280.00	336.00
	TIMEKEEPER TOTAL		68.20		32,300.00

Taft/

One Indiana Square, Suite 3500
Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com

BILLING SUMMARY

TOTAL FEES	\$32,300.00
TOTAL OTHER CHARGES	\$35.10
CURRENT CHARGES FOR THIS BILL	\$32,335.10