#### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF FLORIDA BROWARD DIVISION

www.flsb.uscourts.gov

In r	<b>2</b> :	Case No. 22-15714-PDR
	MPANO SENIOR SQUADRON YING CLUB, INC.,	Chapter 11 (Subchapter V)
	Debtor.	
SU	MMARY TO FIRST AND FINAL APPLICATION FO BY LORIUM, PLLC AS COUNSEL FOR T	
1.	Name of Applicant:	LORIUM, PLLC
2.	Role of Applicant:	Counsel for the Debtor
3.	Name of certifying professional:	Craig A. Pugatch, Esq
4.	Date case filed:	July 26, 2022
5.	Date of Application for Employment:	July 27, 2022
6.	Date of Order Approving Employment:	September 8, 2022
7.	If Debtor's counsel, date of Disclosure of Compensation	form:July 27, 2022
8.	Date of this Application:	December 1, 2022
9.	Dates of services covered:	July 27, 2022 through November 30, 2022
10.	Total fees requested for this period (from Exhibit A):	\$24,588.00
11.	Balance remaining in fee retainer account, not yet award	led: \$15,000.00
12.	Fees paid or advanced for this period, by other sources:	\$0.00
13.	Net amount of fee requested for this period:	\$24,588.00
14.	Total expense reimbursement requested for this period:	\$4,907.95
15.	Balance remaining in expense retainer account, not yet r	eceived: \$0.00
16.	Expenses paid or advanced for this period, by other sour	rces:\$0.00
17.	Net amount of expense reimbursements requested for	r this period:\$4,907.95
18.	Gross award requested for this period (#10 + #14):	\$29,495.95
19.	Net award requested for this period (#13 + #17):	\$29,495.95
20.	If <u>Final</u> Fee Application, amounts of net awards requeste <u>but not previously awarded</u> (total from History of Fees as	

21. Total fee and expense award requested (#19 + 20):.....\$29,495.95

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### **History of Fees and Expenses**

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

10/20/	22	\$15,000 pursuant to Court Order (ECl					
<u>Dates</u>		<u>Sources</u>	<u>Amounts</u>	For fees or costs?			
2.	Dates	s, sources, and amounts of third par	rty payments received:	Not Applicable			
3.	Prior	fee and expense awards:					
Date		Source		Amount	For Fees or Costs?		

#### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF FLORIDA BROWARD DIVISION

www.flsb.uscourts.gov

In re:	Case No. 22-15714-PDR
POMPANO SENIOR SQUADRON FLYING CLUB, INC.,	Chapter 11 (Subchapter V)
Debtor.	

# FIRST AND FINAL APPLICATION FOR COMPENSATION AND EXPENSES BY LORIUM, PLLC AS COUNSEL FOR THE CHAPTER 11 DEBTOR PURSUANT TO 11 U.S.C. § 330

Lorium, PLLC ("Lorium"), as counsel for the Subchapter V Chapter 11 Debtor and debtor-in possession, Pompano Senior Squadron Flying Club, Inc. ("PSSFC" or "Debtor"), through counsel, applies for compensation for fees, for services rendered and costs incurred in this proceeding in connection with the representation of the Debtor. <sup>1</sup>

This Application is filed pursuant to 11 U.S.C. § 330 and Rule 2016, Federal Rules of Bankruptcy procedure, and meets all of the requirements set forth in the Guidelines incorporated in Local Rule 2016-1 (B). The exhibits attached to this Application, pursuant to the Guidelines, are:

Exhibits "1-A" and "1-B" – Summary of Professional and Paraprofessional time.

Exhibit "2" – Summary of Requested Reimbursements of Expenses.

Exhibit "3" – Lorium's complete time records, in chronological order, by activity code category, for the time period covered by this Application. The requested fees are itemized to the tenth of an hour.

Lorium believes that the requested fee of \$24,588 for 62.90 hours worked for the period of July 27, 2022 through November 30, 2022, is reasonable considering the twelve factors enumerated in *Johnson v. Georgia Highway Express, Inc.*, 488 F. 2d 714 (5<sup>th</sup> Cir. 1974), made applicable to bankruptcy proceedings by *In re First Colonial Corp. of America*, 544 F. 2d 1291 (5<sup>th</sup> Cir. 1977), as follows:

1. The General Nature of the Services Rendered; the Amounts involved and the results obtained. The services performed by Applicant are described in detail in Exhibit 3 attached hereto. In general, the Applicant's services are all related to the following:

<sup>&</sup>lt;sup>1</sup> Lorium shall supplement its application for fees from the date of this application through confirmation.

- a. Applicant has prepared Debtor's schedules, statement of financial affairs, Chapter 11 Case Management Summary, and Subchapter V Pre-Status Conference Report, and attended the United States Trustee IDI meeting, 341 Meeting of Creditors and Subchapter V Status Conference;
  - b. Applicant has filed motions and attended various hearings;
- c. Applicant has assisted and advised the Debtor in performing his duties as Debtor in Possession and the Subchapter V bankruptcy process;
- d. Applicant has continued negotiations with the Debtor and proposed plan treatment and resolution of various cash-flow issues;
- e. Applicant has advised the Debtor in formulating his Subchapter V Chapter 11 Plan or Reorganization;
- f. Applicant prepared and timely filed Debtor's Subchapter V Chapter 11 Plan of Reorganization;
- g. Applicant had multiple discussions with the Creditors, Subchapter V Trustee and United States Trustee regarding the Subchapter V Chapter 11 case, including the proposed Plan of Reorganization and treatment to creditors.
- h. Applicant assisted with the preparation, review and filing of Debtor's Monthly Operating Reports; and
- Applicant has taken all actions necessary to achieve the confirmation of the Debtor's Subchapter V Chapter 11 Plan or Reorganization.
- 2. <u>Time and Labor Required</u>. The time and labor that were required in this case were necessary to Lorium's ability to represent the Debtor. Attached is a detailed record of services outlining the hours expended by Lorium in performing professional legal services on behalf of the Debtor. The records merely paraphrase the time devoted to the many aspects of this matter and do not fully convey the quality, character or importance of the services provided.
- 3. <u>Novelty and Difficulty of Legal Questions</u>. Applicant has not encountered any other novel and difficult questions of fact and/or law in this matter.
- 4. <u>Skill Requisite to Perform Legal Service</u>. Applicant's specialized skills and experience were necessary to be able to assist and advise the Debtor. In rendering services to the Debtor, the Applicant at all times emphasized the importance of economy of time and effort, thereby eliminating,

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where possible, the likelihood of duplicitous expenditures of time and effort.

5. <u>Preclusion of Other Employment</u>. Applicant was not precluded from the opportunity to

secure new employment due to the volume of services required by this case.

6. <u>Customary Fee</u>. Applicant bases this application on an hourly rate for Attorney Pugatch

of \$475.00, other Lorium attorney's at a rate of \$375 and an hourly rate for paralegal services of \$160.00.

7. Whether the Fee is Fixed or Contingent. The attorneys' fees requested in this Application

are based on hourly rates and are not contingent.

8. Time Limitations. This case did not involve any unusual devotion of time on short notice,

other than the usual exigencies of bankruptcy practice.

9. The Experience, Reputation and Ability of Counsel. The reputation, experience and

ability of Lorium and its attorneys have been a benefit to the Debtor and the estate. Craig A. Pugatch has

been practicing before the Bankruptcy Court for a substantial period of time and has demonstrated the

ability to successfully represent all types of interested persons in bankruptcy cases.

The Undesirability of the Case. This was not an "undesirable" case.

11. <u>Nature of the Professional Relationship</u>. The Applicant has not represented the Debtors

in any other bankruptcy cases, or otherwise except as disclosed in the retention application.

12. <u>Awards in Similar Cases</u>. The amount sought by Lorium is not unreasonable in terms of

awards in cases of like magnitude and complexity. The Applicant reflects that the fees requested are

manifestly reasonable. The fees and costs requested by Lorium comport with the standards set forth in 11

U.S.C. § 330 for compensation of professionals.

WHEREFORE, Lorium, PLLC seeks approval of final fees in the amount of \$24,588.00,

reimbursement of expenses in the amount \$4,907.95, for a total award of \$29,495.95, for the period of

through November 30, 2022.

LORIUM, PLLC

Attorneys for Pompano Senior Squadron Flying Club, Inc.

101 NE Third Avenue, Suite 1800

Fort Lauderdale, FL 33301

Telephone: (954) 462-8000

Facsimile:

(954) 462-4300

By: /s/ Craig A. Pugatch

CRAIG A. PUGATCH

Florida Bar No. 653381

capugatch@loriumlaw.com

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**CERTIFICATION** 

1. I have been designated by LORIUM, PLLC ("Lorium") as the professional with

responsibility in this case.

2. I have read Lorium's Application for compensation and reimbursement of expenses (the

"Application").

3. The fees and expenses sought are billed at rates in accordance with practices customarily

employed by Lorium and generally accepted by Lorium's clients.

4. In seeking reimbursement for the expenditures described on Exhibit "2" Lorium 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.

5. In seeking reimbursement for any service provided by a third party, Lorium seeks

reimbursement only for the amount actually paid by the Lorium to the third party.

LORIUM, PLLC

Attorneys for Pompano Senior Squadron Flying Club, Inc.

101 NE Third Avenue, Suite 1800

Fort Lauderdale, FL 33301

Telephone: (954) 462-8000

Facsimile: (954) 462-4300

By: /s/ Craig A. Pugatch

CRAIG A. PUGATCH

Florida Bar No. 653381

capugatch@loriumlaw.com

**CERTIFICATE OF SERVICE** 

I HEREBY CERTIFY that a true copy of this Application along with all the exhibits was served

via the Court's NextGen CM/ECF system on all parties receiving service by this method dated this 1<sup>st</sup> day

of December, 2022.

By: /s/ Craig A. Pugatch

Craig A. Pugatch

# Summary of Professional and Paraprofessional Time Total per Individual For First Compensation Period Only (EXHIBIT "1-A")

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Рr	ote	เกเรอ	nals

1 1 01C331011d13					
<u>Name</u>	<u>Shareholder/</u>	<u>Year</u>	<u>Total</u>	<b>Hourly</b>	<b>Total Fees</b>
	Partner/Associate	<b>Licensed</b>	<b>Hours</b>	Rate	
Craig A. Pugatch	Managing Member	2003	34.7	\$475.00	\$16,482.50
Jason Slatkin	Of-Counsel	1994	16.5	\$375.00	\$6,187.50
George Zinkler	Associate	2000	.4	\$300.00	\$120.00
Subtotal			51.6		\$22,790.00

**Paraprofessionals** 

		<u>Total</u>	<b>Hourly</b>	<b>Total Fees</b>
		<b>Hours</b>	Rate	
Jose Heredia	Paralegal	10.9	\$160.00	\$1,744.00
		.4	\$135.00	\$54.00
Subtotal		11.3		\$1,794.00

Total Hours by Professionals and Paraprofessionals

Total Professional and Paraprofessional Fees 62.9 \$24,588.00

# <u>Summary of Professional and Paraprofessional Time by</u> <u>Activity Code Category For First Compensation Period Only</u> (EXHIBIT "1-B")

### **Total for Tcode 1** Billable 0.50 187.50 **ASSET ANALYSIS AND RECOVERY** Subtotal for Timekeeper 20 Billable 0.50 187.50 Jason Slatkin

### Total for Tcode 2 Billable 0.20 75.00 ASSET DISPOSITION

Subtotal for Timekeeper 20 Billable 0.20 75.00 Jason Slatkin

#### Total for Tcode 4 Billable 21.10 7,543.50 CASE ADMINISTRATION

Subtotal for Timekeeper 7 Billable 6.60 1,056.00 Jose Heredia Subtotal for Timekeeper 20 Billable 4.00 1,500.00 Jason Slatkin Subtotal for Timekeeper 31 Billable 10.50 4,987.50 Craig A. Pugatch

#### Total for Tcode 5 Billable 3.20 974.50 CLAIMS ADMINISTRATION & OBJECTIONS

Subtotal for Timekeeper 7 Billable 1.70 272.00 Jose Heredia Subtotal for Timekeeper 20 Billable 0.10 37.50 Jason Slatkin Subtotal for Timekeeper 31 Billable 1.40 665.00 Craig A. Pugatch

#### Total for Tcode 7 Billable 9.20 3,524.50 FEE/EMPLOYMENT APPLICATIONS

Subtotal for Timekeeper 7 Billable 1.70 272.00 Jose Heredia Subtotal for Timekeeper 20 Billable 3.10 1,162.50 Jason Slatkin Subtotal for Timekeeper 31 Billable 4.40 2,090.00 Craig A. Pugatch

#### Total for Tcode 8 Billable 0.20 75.00 FEE/EMPLOYMENT OBJECTIONS

Subtotal for Timekeeper 20 Billable 0.20 75.00 Jason Slatkin

#### **Total for Tcode 10** Billable 7.90 3,332.50 **LITIGATION**

Subtotal for Timekeeper 20 Billable 4.20 1,575.00 Jason Slatkin Subtotal for Timekeeper 31 Billable 3.70 1,757.50 Craig A. Pugatch

#### Total for Tcode 12 Billable 11.20 5,180.00 PLAN & DISCLOSURE STATEMENT

Subtotal for Timekeeper 20 Billable 1.40 525.00 Jason Slatkin Subtotal for Timekeeper 31 Billable 9.80 4,655.00 Craig A. Pugatch

#### Total for Tcode 17 Billable 2.10 644.00 PREPARATION/REVIEW OF REPORTS

Subtotal for Timekeeper 7 Billable 0.90 144.00 Jose Heredia Subtotal for Timekeeper 22 Billable 0.40 120.00 George Zinkler Subtotal for Timekeeper 31 Billable 0.80 380.00 Craig A. Pugatch

#### **Total for Tcode 20** Billable 7.30 3,051.50

Subtotal for Timekeeper 20 Billable 2.80 1,050.00 Jason Slatkin Subtotal for Timekeeper 31 Billable 4.10 1,947.50 Craig A. Pugatch Subtotal for Timekeeper 39 Billable 0.40 54.00 Jenna Young

**GRAND TOTALS** Billable 62.90 24,588.00

## <u>Summary of Requested Reimbursement of Expenses For First Compensation Period</u> (EXHIBIT "2")

Date: 12/01/2022	Sumr	mary Cost Transaction File List LORIUM PLLC	Page: 1
		Amount	
Subtotal for Expense Type 0	Billable	721.26 Expense Type 0	
Total for Tcode 29	Billable	721.26 Postage.	
Subtotal for Expense Type 0	Billable	36.80 Expense Type 0	
Total for Tcode 39	Billable	36.80 Pacer	
Subtotal for Expense Type 0	Billable	68.45 Expense Type 0	
Total for Tcode 43	Billable	68.45 Lexis-Nexis	
Subtotal for Expense Type 0	Billable	1,271.64 Expense Type 0	
Total for Tcode 47	Billable	1,271.64 Photocopying (Outside)	
Subtotal for Expense Type 0	Billable	2,809.80 Expense Type 0	
Total for Tcode 64	Billable	2,809.80 Filing Fee	

#### **GRAND TOTALS**

Billable 4,907.95

Time Records, In Chronological Order, By Activity Code Category (EXHIBIT "3")

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LONIOWIFELE									
F	Client	Trans Date	Tkpr		Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	
Fees	7403.001	08/01/2022	JS	2 P	1	375.00	0.10	37.50	Email with Client, re: status of release of garnishment, under review by the bank, follow up request to speak re: UST guidelines and IDI Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/02/2022	JS	2 P	1	375.00	0.10	37.50	Email with Client, re: funds at Chase still frozen, Telephone conference with Homer and Bonner, left message Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/03/2022	JS	2 P	1	375.00	0.10	37.50	Telephone conference with Homer and Bonner, re: release of garnished funds, Email with G. Galyo, re: further request tor release funds being sent by Homer and Bonner Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/03/2022	JS	2 P	1	375.00	0.10	37.50	Email with Casey, re: funds still frozen, recent call with Chase's counsel Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/03/2022	JS	2 P	1	375.00	0.10	37.50	Email with G. Galyo, re: release of garnished funds, payment of insurance premium Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subto	otal for Tcode 1				Billable	0.50	187.50	ASSET ANALYSIS AND RECOVERY
	7403.001	08/04/2022	JS	2 P	2	375.00	0.10	37.50	Email with Client, re: payment of expenses following release of garnished funds Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/04/2022	JS	2 P	2	375.00	0.10	37.50	Telephone conference with G. Galyo, re: further discuss payment of post-petition expenses - leases versus unsecured loans Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subto	otal for Tcode 2				Billable	0.20	75.00	ASSET DISPOSITION
	7403.001	07/20/2022	CAP	2 P	4	475.00	0.80	380.00	review documents PBFC new chapter 11 Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/21/2022	CAP	2 P	4	475.00	0.80	380.00	PBFC board meeting bankruptcy analysis, prepare bankruptcy documents Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/26/2022	CAP	2 P	4	475.00	1.20	570.00	board meetings, petition, PBFC filing and resolutions Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/26/2022	CAP	2 P	4	475.00	3.20	1,520.00	prepare schedules, prepare first day motions and motion for turnover, corres re case filing, Correspondence regarding turnover, confer with creditor regarding turnover, prepare and file motion for turnover Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/27/2022	CAP	2 P	4	475.00	0.20	95.00	Correspondence re turnover order with creditor counsel Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/27/2022	CAP	2 P	4	475.00	0.80	380.00	case management summary

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F	Client	Trans <u>Date</u>	Tkpr		Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	
Fees									Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	07/28/2022	JS	2 P	4	375.00	0.10	37.50	Chapter 11, Sub Chapter V Preparation of and file notice of appearance Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/29/2022	CAP	2 P	4	475.00	0.30	142.50	idi compliance and Correspondence to client re same Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/29/2022	JS	2 P	4	375.00	0.40	150.00	Preparation of packet of UST materials for Client on advance of ID with list of priorities - insurance, Debtor in Possession account, etc. Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/01/2022	JS	2 P	4	375.00	0.10	37.50	Review file and Section 365 for deadline to assume or reject lease, Email with team, re: same Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/01/2022	JS	2 P	4	375.00	0.10	37.50	Receipt and review of notice of appearance of D. Stanish for Sunwood, revise service list Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/02/2022	JS	2 P	4	375.00	0.10	37.50	Receipt and review of order authorizing debtor to operate business and notice of corrective entry Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/02/2022	JS	2 P	4	375.00	0.10	37.50	Email with Officers, re: email of 7/29 to G. Galyo, re: items needed for IDI Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/02/2022	JS	2 P	4	375.00	0.30	112.50	Telephone conference with G. Galyo, re: review items needed before IDI, Revise IRS Notice and Limited Waiver and Email with G. Galyo re: same; Email with Casey, re: recent call with G. Galyo, re: IDI forms, etc. Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/02/2022	JS	2 P	4	375.00	0.10	37.50	Telephone call with G. Galyo, re: questions re: monthly operating reports Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/03/2022	JS	2 P	4	375.00	0.10	37.50	Email with G. Galyo, re: question re: limited waiver for UST Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	08/03/2022	JS	2 P	4	375.00	0.40	150.00	Chapter 11, Sub Chapter V Various emails with client, re: questions for IDI forms, Receipt and review of 2020 tax return, need to file 2021, Execute limited waiver and Notice re: IRS tax liability, Email with Jose Heredia re: items for IDI Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/04/2022	JS	2 P	4	375.00	0.10	37.50	Email with Client, re: questions regarding administative expense - advance of retainer Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/04/2022	JS	2 P	4	375.00	0.20	75.00	Receipt and review of various emails from Client, re: documents for IDI, questions regarding item 5 of financial checklist Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/05/2022	JS	2 P	4	375.00	0.30	112.50	Receipt and review of inventory, and other documents for IDI, Preparation of document package for IDI, Email with B Gonzalez, re: same Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	08/08/2022	JS	2 P	4	375.00	0.80	300.00	Chapter 11, Sub Chapter V Attend initial debtor interview and email with Client, re:

Date: 12/01/2022

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Eass	Client	Trans <u>Date</u>	Tkpr		Tcode/ Task Code	Stmt # <u>Rate</u>	Hours to Bill	Amount	
Fees	7403.001	11/29/2022	CAP	2 P	5	475.00	0.80	380.00	Chapter 11, Sub Chapter V draft objection to Guzman lien Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode 5	i			Billable	3.20	974.50	CLAIMS ADMINISTRATION & OBJECTIONS
	7403.001	07/27/2022	CAP	2 P	7	475.00	0.40	190.00	application to employ Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/01/2022	JS	2 P	7	375.00	1.00	375.00	Preparation of application to employ E Holodak as special counsel and Declaration Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	08/03/2022	JS	2 P	7	375.00	0.10	37.50	Chapter 11, Sub Chapter V Email with E. Holodak, re: employment as special litigation counsel, need for retainer agreement Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/16/2022	JS	2 P	7	375.00	0.10	37.50	Email with Attorney Craig Pugatch and Jose Heredia re: application to employ special counsel, Email with E. Holodak, re: same Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	08/18/2022	JS	2 P	7	375.00	0.10	37.50	Chapter 11, Sub Chapter V Receipt and review of of signed retainer from E. Holodak, re: request for signed declaration to accompany application to employ special litigation counsel Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/19/2022	JS	2 P	7	375.00	0.10	37.50	Receipt and review of signed declaration by E. Holodak Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	09/07/2022	JH	2 P	7	160.00	0.90	144.00	Prepare order approving final employment application of Craig A. Pugatch, Esq. and Lorium Law as Debtor's counsel; prepare and foward to counsel for review and approval.  Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	09/15/2022	CAP	2 P	7	475.00	0.40	190.00	Hearing on Special Counsel Application Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/13/2022	CAP	2 P	7	475.00	0.80	380.00	hearing on post-petition retainer Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/13/2022	CAP	2 P	7	475.00	0.30	142.50	Research re post petition retainer standards and objection Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/02/2022	JS	2 P	7	375.00	1.00	375.00	Preparation of ex-parte application to employ R. Cahill, Declaration and proposed order Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/02/2022	JS	2 P	7	375.00	0.30	112.50	Various emails with Attorney Craig Pugatch re: application to employ accountant, invoice for tax preparation, revise application and finalize for filing Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/21/2022	JH	2 P	7	160.00	0.80	128.00	Meeting with accounting re fee application; compile and review documents re same Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/22/2022	JS	2 P	7	375.00	0.40	150.00	Finalize and file application to employ R. Cahill and submit proposed order Pompano Senior Squadron Flying Club, Inc. et al

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Fees	Client	Trans Date	Tkpr		Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	
rees	7403.001	11/30/2022	CAP	2 P	7	475.00	0.80	380.00	Chapter 11, Sub Chapter V prepare CPA fee application Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/30/2022	CAP	2 P	7	475.00	0.90	427.50	prepare special counsel fee application Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	11/30/2022	CAP	2 P	7	475.00	0.80	380.00	Chapter 11, Sub Chapter V prepare and review/revise Lorium fee application Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode 7				Billable	9.20	3,524.50	FEE/EMPLOYMENT APPLICATIONS
	7403.001	09/13/2022	JS	2 P	8	375.00	0.20	75.00	Receipt and review of Sunwood's objection to the employment of E. Holodak, Email with E. Holodak, re: same Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode 8				Billable	0.20	75.00	FEE/EMPLOYMENT OBJECTIONS
	7403.001	08/24/2022	JS	2 P	10	375.00	1.20	450.00	Begin preparation of notice of removal with relevant state court filings Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	08/24/2022	JS	2 P	10	375.00	0.30	112.50	Chapter 11, Sub Chapter V Finalize notice of removal and exhibits Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/24/2022	JS	2 P	10	375.00	0.20	75.00	Prepare filing packet for notice of removal, instructions on filing and service, Email with E. Holodak, re: notice of filing of notice of removal in state court proceedings Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/25/2022	JS	2 P	10	375.00	0.20	75.00	Receipt and review of notice of filing of notice of removal in state court, Preparation of certificate of compliance Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/25/2022	JS	2 P	10	375.00	0.10	37.50	Various emails with E. Holodak and Attorney Craig Pugatch re: service of removal on state court service list, revisions to service list Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/26/2022	JS	2 P	10	375.00	0.20	75.00	Conference with Attorney Craig Pugatch re: amending removed complaint, possible causes of action, joinder of additional defendants Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	09/16/2022	JS	2 P	10	375.00	0.50	187.50	Chapter 11, Sub Chapter V Telephone conference with Attorney Craig Pugatch and E. Holodak, re: litigation strategy Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	09/16/2022	CAP	2 P	10	475.00	0.60	285.00	call re trial and summary judgment motions Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/06/2022	JS	2 P	10	375.00	0.10	37.50	Various emails with C. Pugatch and E. Holodak, removed action, litigation srategy Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/09/2022	JS	2 P	10	375.00	1.00	375.00	Finalize draft fourth amended complaint Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/03/2022	CAP	2 P	10	475.00	0.90	427.50	Call with Ron Kanuik, hearing on removed action Pompano Senior Squadron Flying Club, Inc. et al

_	Client	Trans Date	Tkpr		Task Code	Stmt # Rate	Hours to Bill	Amount	
Fees	7403.001	11/08/2022	JS	2 F	2 10	375.00	0.10	37.50	Chapter 11, Sub Chapter V Various emails with Attorney Craig Pugatch and E. Holodak, re: court's briefing order - abstention issue Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	11/14/2022	CAP	2 F	10	475.00	0.90	427.50	Chapter 11, Sub Chapter V Board meeting Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	11/28/2022	CAP	2 F	10	475.00	0.90	427.50	Chapter 11, Sub Chapter V draft brief on abstention of removed case Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/28/2022	JS	2 F	2 10	375.00	0.30	112.50	Review and revise brief opposing permissive abstention Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/29/2022	CAP	2 F	10	475.00	0.40	190.00	call with Kennedy counsel re lien and re abstention/plan treatment Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode 1	10			Billable	7.90	3,332.50	LITIGATION
	7403.001	10/12/2022	CAP	2 F	12	475.00	0.90	427.50	review projections, Correspondence with trustee re cash flow, prepare proposed plan treatments Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/18/2022	CAP	2 F	2 12	475.00	1.60	760.00	plan analysis and plan preparation Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/18/2022	CAP	2 F	12	475.00	0.80	380.00	claims and lien analysis, research regarding lien stripping and plan treatment Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/18/2022	JS	2 F	2 12	375.00	0.20	75.00	Various emails with Attorney Craig Pugatch re: plan treatment of certain claims, disputed claims and claim objections Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/19/2022	CAP	2 F	12	475.00	0.40	190.00	Corres with sunwood re claim treatment Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/21/2022	JS	2 F	12	375.00	0.20	75.00	Conference with C. Pugatch, re: treatment of certain claims, absolute priority issue Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/21/2022	CAP	2 F	12	475.00	3.40	1,615.00	draft and revise plan and projections Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/23/2022	JS	2 F	12	375.00	0.50	187.50	Review and revise draft plan Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/24/2022	JS	2 F	12	375.00	0.10	37.50	Review and revise liquidation analysis Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/24/2022	JS	2 F	12	375.00	0.40	150.00	Review and revise further revised proposed chapter 11 plan and Email with Attorney Craig Pugatch re: same with comments re: projections Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/24/2022	CAP	2 F	2 12	475.00	2.30	1,092.50	corres with client, Correspondence with Trustee, revise and draft plan, Correspondence with Sunwood counsel, file plan Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V

	Client	Trans Date	Tkpr	-	Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	
Fees	7403.001	10/25/2022	CAP	2 P	12	475.00	0.20	95.00	Correspondence re claims and confirmation procedures Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	10/26/2022	CAP	2 P	12	475.00	0.20	95.00	Chapter 11, Sub Chapter V Correspondence with Lasky re plan treatment Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode	12			Billable	11.20	5,180.00	PLAN & DISCLOSURE STATEMENT
	7403.001	08/10/2022	GZ	2 P	17	300.00	0.20	60.00	Emails regarding review of proposed Status Conference Report; Review 11 USC 1188(c) regarding requirements Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/11/2022	GZ	2 P	17	300.00	0.20	60.00	Review proposed Status Conference Report; Analyze issues with paralegal regarding same Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/18/2022	CAP	2 P	17	475.00	0.80	380.00	reporting and financial projections Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/21/2022	JH	2 P	17	160.00	0.90	144.00	Review documents and prepare Debtor in Possession report for October 2022; prepare, file and serve October's Debtor in Possession report; prepare and circulate to all members for review and approval. Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode	17			Billable	2.10	644.00	PREPARATION/REVIEW OF REPORTS
	7403.001	07/28/2022	CAP	2 P	20	475.00	0.40	190.00	Correspondence re funds release, prepare order and prepare for hearing Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/28/2022	CAP	2 P	20	475.00	2.30	1,092.50	bank account release hearing and negotiation re same, Correspondence re IDI and compliance Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	07/28/2022	CAP	2 P	20	475.00	0.30	142.50	call with Holodek re prepetition litigation removal Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/23/2022	CAP	2 P	20	475.00	0.80	380.00	lien analysis and Correspondence re lien litigation with special counsel, review lien records and docs supporting the claim of Sunwood and Kennedy Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/23/2022	CAP	2 P	20	475.00	0.30	142.50	341 prep and reminder Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/26/2022	JS	2 P	20	375.00	0.70	262.50	Begin amended adversary complaint in removed action Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	09/23/2022	JY	2 P	20	135.00	0.40	54.00	Prepare Debtor in Possession Report for July 2022. Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/22/2022	JS	2 P	20	375.00	1.70	637.50	Legal research on permissive abstention and begin preparation of brief on permissive abstention Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/28/2022	JS	2 P	20	375.00	0.40	150.00	Download state court docket, preparation of notice of filing of state court docket and file same Pompano Senior Squadron Flying Club, Inc. et al

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Fees	Client	Trans Date <u>Tkpr</u>	E/A H Tcode/ Cat P Task Code	Stmt # Rate	Hours to Bill	Amount  Chapter 11, Sub Chapter V	
	Subtotal	for Tcode 20		Billable	7.30	3,051.50	
Total for	r Fees			Billable	62 90	24 588 00	

CAP Thursday 12/01/2022 1:13 am

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	Client	Trans <u>Date</u>	Tkpr		Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	
Expens	7403.001	08/10/2022	CAP	ΕP	29			7.41	Postage. Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	08/10/2022	CAP	ΕP	29			7.98	Chapter 11, Sub Chapter V Postage. Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	08/11/2022	CAP	ΕP	29			14.70	Chapter 11, Sub Chapter V Postage.
	7403.001	08/11/2022	CAP	ΕP	29			7.98	Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V Postage.
		, ,							Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/24/2022	CAP	ΕP	29			60.99	Postage. Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	08/24/2022	CAP	ΕP	29			59.85	Postage. Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	09/08/2022	CAP	ΕP	29			106.05	Chapter 11, Sub Chapter V Postage. Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	09/08/2022	CAP	ΕP	29			2.16	Chapter 11, Sub Chapter V Postage.
	7403.001	09/15/2022	CAP	ΕP	29			62.70	Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V Postage.
									Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	10/13/2022	CAP	ΕP	29			0.57	Postage. Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	7403.001	11/17/2022	CAP	ΕP	29			390.87	7403.001 Mail out/Notice of Filing /Plan of Reorganization Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode 2	9			Billable	0.00	721.26	Postage.
	7403.001	10/11/2022	CAP	E P	39			36.80	Pacer court fees - Inv. #5405881 - Q0322 Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode 3	9			Billable	0.00	36.80	Pacer
	7403.001	09/01/2022	JS	ΕP	43			21.05	LexisNexis legal research/7403.001/lnv. #3094029901 (8/1/22 - 8/31/22) Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	11/08/2022	CAP	EΡ	43			47.40	Chapter 11, Sub Chapter V LexisNexis legal research/7403.001/Inv. #3094141599 (10/1/22 - 10/31/22) Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
	Subt	otal for Tcode 4	3			Billable	0.00	68.45	Lexis-Nexis
	7403.001	08/23/2022	CAP	E P	47			281.22	AMEX/7403.001/BK Attorney Services - CertificateofService.com/Photocopying (Outside) and mailout service for Application for Employment of Edward F. Holodak, Esq. ECF Docket Ref. No. 40; Notice of Hearing 41 Pompano Senior Squadron Flying Club, Inc. et al
	7403.001	09/16/2022	CAP	E P	47			196.47	Chapter 11, Sub Chapter V AMEX/7403.001/BK Attorney Services - CertificateofService.com/Photocopying (Outside) and mailout services for Debtor's Motion to Deposit ECF

Date: 12/01/2022						RIUM PLLC		rage. I
Client Expenses	Trans Date	Tkpr	-	Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	
7403.001	09/16/2022	CAP	ΕP	47			96.57	Docket Ref No. 49 Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V AMEX/7403.001/BK Attorney Services - CertificateofService.com/Photocopying (Outside) and mailout services for Notice of Hearing ECF Docket Ref
7403.001	09/23/2022	CAP	ΕP	47			97.44	No. 50 Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V AMEX/7403.001/BK Attorney Services - CertificateofService.com/Photocopying (Outside) and mailout services for Order approving application ECF Docket Ref. No. 52
7403.001	09/28/2022	CAP	ΕP	47			209.22	Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V AMEX/7403.001/BK Attorney Services - CertificateofService.com/Photocopying (Outside) and mailout service on 9/28/22 Pompano Senior Squadron Flying Club, Inc. et al
7403.001	10/18/2022	CAP	EΡ	47			97.89	Chapter 11, Sub Chapter V  AMEX/7403.001/BK Attorney Services - CertificateofService.com/Photocopying (Outside) and mailout service on 10/18/22  Pompano Senior Squadron Flying Club, Inc. et al
7403.001	10/20/2022	CAP	ΕP	47			102.83	Chapter 11, Sub Chapter V  AMEX/7403.001/BK Attorney Services - CertificateofService.com/Photocopying (Outside) and mailout service for Agreed Order ECF Docket Reference No. 58
7403.001	11/18/2022	CAP	ΕP	47			190.00	Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V ORCA/Preparation of Mail out/7403.001 Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
Subt	otal for Tcode 4	<b>1</b> 7			Billable	0.00	1,271.64	Photocopying (Outside)
7403.001	07/26/2022	CAP	ΕP	64			1,738.00	AMEX/7403.001/Florida Southern Bankruptcy Court/Ref A41201558 Pompano Senior Squadron Flying Club, Inc. et al
7403.001	08/10/2022	CAP	EΡ	64			32.00	Chapter 11, Sub Chapter V AMEX/7403.001/Southern Bankruptcy Court/Tracking # A41266260 Pompano Senior Squadron Flying Club, Inc. et al
7403.001	08/30/2022	CAP	ΕP	64			350.00	Chapter 11, Sub Chapter V AMEX/7403.001/Southern Bankruptcy Court/Ref # A41334038 Pompano Senior Squadron Flying Club, Inc. et al
7403.001	09/28/2022	CAP	ΕP	64			689.80	Chapter 11, Sub Chapter V 7403.001/Mail Out/Notice of Filing and Mail Out Pompano Senior Squadron Flying Club, Inc. et al Chapter 11, Sub Chapter V
Subt	otal for Tcode 6	54			Billable	0.00	2,809.80	Filing Fee

#### **GRAND TOTALS**

Billable

Billable 62.90 29,495.95

0.00

4,907.95

**Total for Expenses**