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Attorney for G. Grant Lyon, former Chapter 11 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA**

In re:

ARA MACAO HOLDING, L.P.,

Debtor.

(Chapter 11 Case)

No. 3:18-bk-03615-PS

**APPLICATION FOR PAYMENT OF FEES
AND COSTS TO LANE & NACH, P.C., THE
CHAPTER 11 TRUSTEE'S ATTORNEY**

I. GENERAL INFORMATION.

Lane & Nach, P.C., (hereinafter "Attorney") counsel for G. Grant Lyon, former Chapter 11 Trustee (hereinafter "Trustee"), herein presents this Application for Payment of Attorneys' Fees and Costs ("Application"). In support of this Application, Attorney submits its billing statements for services rendered during the period of June 29, 2018 through August 22, 2018, which are attached hereto and incorporated herein. In further support of its Application, Attorney respectfully represents as follows:

II. NARRATIVE SUMMARY.

A. Background.

1. This case was commenced by an involuntary Chapter 11 petition filed by approximately six creditors ("**Petitioning Creditors**") of Ara Macao Holdings, L.P. ("**Debtor**") on April 6, 2018 ("**Petition Date**").

2. On or about May 8, 2018, the order for relief was entered.

3. On June 21, 2018, the Court granted an Order Approving the *Appointment of Trustee (G. Grant Lyon)* [Dkt. No. 112] as the Chapter 11 Trustee.

4. Attorney's employment as counsel for the Chapter 11 Trustee was approved by Order of this Court dated July 18, 2018.

5. Attorney has expended in excess of 78.20 hours in its representation of the Trustee on matters affecting the Estate. Based upon Attorney's ordinary hourly rates in effect at the time services

1 were rendered, as detailed herein, Attorney's fees total \$22,657.50. Attorney has also incurred out-of-
2 pocket expenses for which it is seeking reimbursement in the sum of \$233.77. The blended hourly rate is
3 \$320.00. The total amount sought by Attorney is as follows:

Total Fees	\$22,657.50
Total Costs	\$ 233.77
Total	<u>\$22,891.27</u>

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6 6. The services for which compensation is requested were rendered on behalf of the
7 Trustee and compensation is sought pursuant to 11 U.S.C. §§330(a), 331 and 503(a) and (b) and Rule
8 2016(a), F.R.B.P. and in compliance with this Court's Order Authorizing Trustee to Employ Attorney, and
9 the Guidelines of the Office of the U.S. Trustee for the District of Arizona.

10 7. Except as Attorney may be entitled to receive compensation herein, Attorney has
11 no arrangements with any other parties whatsoever to pay Attorney for the services of Attorney to the
12 Estate, nor has Attorney received any funds from any parties whatsoever for the services rendered to the
13 Estate. Additionally, Attorney has not made any arrangements to share any compensation received by
14 Order of this Court with any other party, nor does Attorney have arrangements for sharing of any
15 compensation herein awarded, except as are normally divided among members and/or associates of its
16 firm.

17 8. The names of all of Attorney's professionals and paraprofessionals, their billing
18 code, and the hourly rate charged by each is set forth below. Attorney charges its non-bankruptcy clients
19 at the same rate or higher for similar services. The rates charged are reasonable and are commensurate
20 with fees for similar services charged by bankruptcy attorneys and other professionals of similar
21 experience in Phoenix, Arizona.

<i>Title</i>	<i>Name/Billing Code</i>	<i>Hourly Rate(s)</i>	<i>Year Admitted to Practice</i>
Partner	Adam B. Nach (ABN/Partner)	\$345	1991
Partner	Stuart B. Rodgers (SBR/Partner)	\$310.00	2007
Associate	Joel F. Newell (JFN/Associate)	\$305	2007
Paralegal	Maria B. Alcala (MBA/Paralegal)	\$150	N/A
Paralegal	Danica Acosta (DA/Paralegal)	\$95	N/A
Paralegal	Deb McKernan (DM/Paralegal)	\$125	N/A
Paralegal	Terie Turner (TT/Paralegal)	\$150	N/A

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27 9. Attorney understands that pursuant to 11 U.S.C. §331 further applications may not
28 be submitted in less than 120-day intervals.

B. Case Status.

1. To the best of Attorney's information and belief, the Trustee is not holding funds for the estate at this time. The Trustee is in the process of collecting amounts owed to the estate and anticipates receiving funds. Attorney has agreed, as of the date of this Application, to receive payment, upon the Chapter 11 Trustee's discretion, after receipt of outstanding funds owed to the estate.

2. Attorney is not aware of any other request for compensation pending before this Court. To the best of Attorney's information and belief, there are no other approved and unpaid administrative expenses other than those applied for herein.

3. To the best of Attorney's information, there are no encumbered funds in the Estate.

C. Project Summary.

The following are the descriptions of the projects for which fees and expenses were incurred, all of which were necessary and benefited the Estate, the number of hours spent and the amount of compensation requested for each professional and paraprofessional for each project.

1. Case Administration. As more fully set forth in **Exhibit A**, Attorney has performed professional services with respect to the general administration of this bankruptcy Estate. Time was incurred in correspondence with the Trustee regarding the status and activities involved in the case. Attorney reviewed Debtor's statements and schedules filed with the court, prepared for and attended a hearing on the appointment of an equity committee, reviewed documents and financial records. In addition, Attorney researched and analyzed issues regarding eligibility to vote, prepared a motion to dismiss request for election of chapter 11 trustee, filed responses to the motion to dismiss election, reviewed proxies, and attended the 341 meeting of creditors. In connection with this subject area, the following fees were incurred:

<i>Title</i>	<i>Name</i>	<i>Hourly Rate(s)</i>	<i>Hours</i>	<i>Dollar Amount</i>
Partner	Adam B. Nach	\$345	18.60	\$6,072.00
Partner	Stuart B. Rodgers	\$310	2.50	\$775.00
Associate	Joel F. Newell	\$305	17.00	\$5,185.00
Paralegal	Maria B. Alcala	\$150	1.90	\$285.00
Paralegal	Terie Turner	\$150	2.15	\$322.50
TOTAL				\$12,639.50

As detailed on **Exhibit A**, the costs for which Attorney seeks reimbursement total \$233.77.

2. Employment of Professionals. As more fully set forth in **Exhibit A**, Attorney has performed professional services with respect to employment of and payment of professionals, including the employment of Attorney as general counsel, the application for the appointment of special counsel and attendance at a hearing on appointment of general counsel and special counsel. In connection with this subject area, Attorney expended a total of:

<i>Title</i>	<i>Name</i>	<i>Hourly Rate(s)</i>	<i>Hours</i>	<i>Dollar Amount</i>
Partner	Adam B. Nach	\$345	7.70	\$2,656.50
Paralegal	Terie Turner	\$150	3.65	\$547.50
Paralegal	Maria B. Alcala	\$150	.10	\$15.00
Paralegal	Danica Acosta	\$95	1.20	\$114.00
TOTAL				\$3,333.00

3. Claims. As more fully set forth in **Exhibit A**, Attorney has performed professional services with respect to the analysis of claims in the case. In addition, Attorney prepared three omnibus objections to claims and reviewed claims submitted for voting purposes. In connection with the subject area, Attorney expended a total of:

<i>Title</i>	<i>Name</i>	<i>Hourly Rate(s)</i>	<i>Hours</i>	<i>Dollar Amount</i>
Partner	Adam B. Nach	\$345	4.20	\$1,449.00
Partner	Stuart B. Rodgers	\$310	3.00	\$930.00
Associate	Joel F. Newell	\$305	12.20	\$3,721.00
Paralegal	Terie Turner	\$150	.80	\$120.00
Paralegal	Maria Alcala	\$150	2.60	\$390.00
Paralegal	Deb McKernan	\$125	.60	\$75.00
TOTAL				\$6,685.00

III. EVALUATION STANDARDS.

A. Attorney certifies that it did, in fact, perform the services set forth herein and is entitled to the compensation requested; and, Attorney certifies that performance of the services has benefited the Estate.

B. Trustee has approved the requested fees and costs.

I. SUMMARY.

The Summary Sheet, as required by the Office of the U.S. Trustee, is attached hereto and incorporated herein.

V. CONCLUSION.

Based on the foregoing, Lane & Nach, P.C., respectfully requests that this Court enter its Order:

1 A. Approving and authorizing payment of fees to Lane & Nach, P.C. in the sum of
2 \$22,657.50 for services provided from through August 14, 2018 to be paid when estate funds become
3 available; and,

4 B. Approving and authorizing reimbursement of out-of-pocket expenses to Lane & Nach,
5 P.C., in the sum of \$233.77; and,

6 C. For such other and further relief as this Court deems just and proper.

7 RESPECTFULLY SUBMITTED this 5th day of September, 2018.

8 **LANE & NACH, P.C.**

9 By /s/ Adam. B. Nach - 013622
10 Adam B. Nach
11 Attorneys for Trustee

12 **CERTIFICATE OF MAILING**

13 **WITH A COPY** delivered via electronic notification to:

14 Alan A. Meda
15 Burch & Cracchiolo PA
16 702 E. Osborn Rd., Ste. 200
17 Phoenix, AZ 85014
18 Email: ameda@bcattorneys.com
19 Attorney for Debtor

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Attorneys for Petitioning Creditors

18 Scott B. Cohen
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22 email: sbc@engelmanberger.com
23 Attorneys for Petitioning Creditors

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Law Office of William J. Factor
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Chicago, IL 60602
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Attorneys for Petitioning Creditors

21 Sara E. Lorber
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23 105 W. Madison St., Ste. 1500
24 Chicago, IL 60602
25 Email: slorber@wfactorlaw.com
26 Attorneys for Petitioning Creditors

Christopher J. Pattock
Office of the U.S. Trustee
230 North First Avenue, Suite 204
Phoenix, AZ 85003-1706
Email: Christopher.J.Pattock@usdoj.gov

25 By /s/ Terie Flowers Turner

EXHIBIT A

LANE & NACH, P.C.

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Suite 103

PHOENIX, AZ 85016

Telephone: (602) 258-6000

Facsimile (602) 258-6003

TAX I.D. #86-0938074

G GRANT LYON
CHAPTER 11 TRUSTEE
943 TERRACE DR.
PROVO, UT 84604

Statement Date: September 5, 2018
Statement No. 67612
Account No. 12002.000

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RE: ARA MACAO HOLDINGS, L.P.

Fees

		Rate	Hours	
07/02/2018				
TT	REVIEW EMAILS REGARDING CHAPTER 11 INVOLUNTARY PETITION; REVIEW SAME; RECEIVE ELECTRONIC COURT FILED PROOF OF CLAIM AND INDEX/SAVE; SAVE TO FILE.	150.00	0.60	90.00
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING NEW CASE.	345.00	0.30	103.50
ABN	GENERAL REVIEW OF SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS.	345.00	1.00	345.00
ABN	GENERAL REVIEW MOTION FOR ELECTION; GENERAL REVIEW OF 702 AND 1104; .RULES 2003(b)(3); 2006; 2007.1.	345.00	1.70	586.50
07/03/2018				
ABN	CONFERENCE WITH ATTORNEY MEDA REGARDING STATUS OF CASE.	345.00	0.20	69.00
ABN	REVIEW EMIAL FROM ATTORNEY CARMEL TO UCC COUNSEL REGARDING INAPPROPRIATE COMMUNICATION. BY COMMITTEE MEMBERS.	345.00	0.20	69.00
07/05/2018				
ABN	REVIEW ORDER REGARDING TRUSTEE ELECTION; REVIEW UST NOTICE REGARDING ELECTION; REVIEW HEARING NOTICE REGARDING ATTORNEY APPLICATION.	345.00	0.50	172.50
ABN	REVIEW AND ANALYZE ORDER REGARDING TRUSTEE ELECTION.	345.00	0.20	69.00
07/09/2018				
ABN	REVIEW UST'S NOTICE OF 341(A) MEETING AND ELECTION.	345.00	0.20	69.00

ARA MACAO HOLDINGS, L.P.

			Rate	Hours	
07/11/2018	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING DIP LOAN (SEVERAL EMAILS).	345.00	0.30	103.50
07/12/2018	ABN	DRAFT JOINDER REGARDING EQUITY COMMITTEE; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING APPROVAL.	345.00	0.50	172.50
07/16/2018	ABN	REVIEW AND ANALYZE JOINDER'S TO LIMITED PARTNERSHIP COMMITTEE.	345.00	0.30	103.50
07/18/2018	ABN	PREPARE FOR HEARING REGARDING APPOINTMENT OF EQUITY COMMITTEE; REVIEW FILE AND MOTIONS AND OBJECTIONS; ATTEND HEARING.	345.00	2.20	759.00
	ABN	REVIEW AND ANALYZE MINUTE ENTRY; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING STATUS OF HEARINGS.	345.00	0.20	69.00
07/20/2018	ABN	CONTINUE TO RESEARCH 702; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING SAME.	345.00	1.00	345.00
	TT	REVIEW MULTIPLE EMAILS REGARDING CASE STATUS AND RECEIVE ELECTRONIC NOTIFICATION OF PLEADINGS FILED; INDEX PLEADINGS AND SEND EMAIL TO ATTORNEYS REGARDING SAME.	150.00	0.35	52.50
07/23/2018	SBR	TELEPHONE CONFERENCE WITH CLIENT AND TELEPHONE CONFERENCE WITH CREDITOR ATTORNEY.	310.00	0.60	186.00
	ABN	TELEPHONE CONFERENCE WITH TRUSTEE REGARDING STRATEGY; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING 510 SUBORDINATION CASES.	345.00	0.40	138.00
	SBR	TELEPHONE CONFERENCE WITH ATTORNEY FOR CREDITOR; REVIEW MEMBERSHIP BREAKDOWN OF LPS VERSUS DEPOSIT HOLDERS AND POSSIBILITY OF CONVERTED MEMBERSHIP TO DEPOSIT HOLDER.	310.00	0.40	124.00
	JFN	REVIEW DOCUMENTS REGARDING FORMATION OF LIMITED PARTNERSHIP, 2016 FINANCIAL RECORDS, ANNUAL REPORT TO LIMITED PARTNERS, AMENDMENT TO OPERATING AGREEMENT OF ARA MACAO MANAGEMENT AND BELIZE SUPREME COURT DECISION	305.00	2.50	762.50
	JFN	RESEARCH ISSUES REGARDING REQUEST FOR ELECTION OF CHAPTER 11 TRUSTEE AND ANALYZE SCHEDULED CREDITORS ELIGIBILITY TO VOTE IN REQUESTED ELECTION	305.00	2.60	793.00

ARA MACAO HOLDINGS, L.P.

		Rate	Hours	
JFN	DRAFT PROPOSED MOTION TO DISMISS REQUEST FOR ELECTION OF CHAPTER 11 TRUSTEE.	305.00	1.00	305.00
07/24/2018				
SBR	REVIEW, REVISE AND EDIT MOTION TO DISMISS.	310.00	0.40	124.00
SBR	REVIEW APPRAISAL AND MATERIALS.	310.00	0.80	248.00
SBR	REVIEW, REVISE AND EDIT OBJECTION.	310.00	0.30	93.00
JFN	REVIEW PRODUCTION OF DOCUMENTS OF SCHEDULED CREDITORS BASED ON PRE-PETITION JUDGMENTS [1.0]	305.00	1.00	305.00
07/25/2018				
ABN	REVIEW, REVISE AND EDIT MOTION TO DISMISS; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING MOTION TO DISMISS.	345.00	0.30	103.50
MBA	DOWNLOAD AND SAVE JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS TO FILE.	150.00	0.10	15.00
MBA	DOWNLOAD AND SAVE JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS BY JAY GUSTAFSON TO FILE. (.1) DOWNLOAD AND SAVE JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS BY DEBBIE MAUE TO FILE.(.1) DOWNLOAD AND SAVE JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS BY CORTON HORMS TO FILE.(.1)	150.00	0.30	45.00
MBA	DOWNLOAD AND SAVE NOTICE OF FILING ADDITIONAL JOINDERS IN SUPPORT OF MOTION TO APPOINT COMMITTEE OF LIMITED PARTNERS TO FILE.	150.00	0.10	15.00
JFN	REVIEW AND ANALYZE SCHEDULES AND DOCUMENTS RELATED TO LIMITED PARTNERS WITH PURPORTED REAL PROPERTY DEPOSITS [2.0]	305.00	2.00	610.00
JFN	CONTINUE RESEARCH REGARDING REQUIRES TO REQUEST AN ELECTION OF TRUSTEE IN CHAPTER 11 CASES.	305.00	0.80	244.00
ABN	REVIEW AND ANALYZE COMMENTS FROM TRUSTEE REGARDING MOTION TO DISMISS; REVIEW, REVISE AND EDIT; REVIEW, REVISE AND EDIT NOTICE; REVIEW AND ANALYZE LOCAL RULES.	345.00	1.00	345.00
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING MOTION TO DISMISS; ATTENTION TO FILING.	345.00	0.30	103.50
MBA	DOWNLOAD AND SAVE JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS FROM MICHAEL GOLDSTEIN TO FILE.	150.00	0.10	15.00
MBA	DOWNLOAD AND SAVE JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS FROM JANICE MOEN, MARIA GARRISON, CARLA ALONGI, FRANCESCO ALONGI, KERTH WEYLER AND JOSEPH CAMAIONI. (.5) DOWNLOAD AND SAVE COMMITTEE JOINDER IN UNITED STATES TRUSTEE'S RESPONSE IN OPPOSITION TO THE APPOINTMENT OF A COMMITTEE			

G GRANT LYON

Account No:
 Statement No:

ARA MACAO HOLDINGS, L.P.

		Rate	Hours	
MBA	DOWNLOAD AND SAVE JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS FROM KIMBERLY GAGLIANO AND ANTHONY GAGLIANO TO FILE.	150.00	0.20	30.00
TT	PREPARE DRAFT NOTICE REGARDING MOTION TO DISMISS.	150.00	0.20	30.00
07/26/2018				
TT	FINALIZE MOTION TO DISMISS ELECTION OF CHAPTER 11 TRUSTEE; FINALIZE NOTICE AND FILE MOTION AND NOTICE WITH THE COURT.	150.00	0.40	60.00
JFN	REVIEW AND ANALYZE PRODUCTION OF DOCUMENTS AND SCHEDULES REGARDING PURPORTED CREDITORS BASED ON PRE-PETITION PROMISSORY NOTES AND LIMITED PARTNER EQUITY HOLDERS	305.00	1.70	518.50
JFN	RESEARCH CASE LAW REGARDING SUBORDINATION OF DEBT CONVERTED TO EQUITY PRE-PETITION.	305.00	0.90	274.50
ABN	REVIEW ATTORNEY CARMEL'S MOTION TO WITHDRAW.	345.00	0.10	34.50
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING MOTION TO DISMISS ELECTION.	345.00	0.20	69.00
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING OBJECTION TO JUDGMENT CREDITORS CLAIMS.	345.00	0.20	69.00
07/30/2018				
MBA	DOWNLOAD AND SAVE RICHARD MUEHLFELT, JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS TO FILE.	150.00	0.10	15.00
MBA	DOWNLOAD AND SAVE EMMANUEL HATZ, JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS TO FILE. (.1) DOWNLOAD AND SAVE CANDIS MIXON, JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS TO FILE.	150.00	0.10	15.00
MBA	DOWNLOAD AND SAVE MARK RABIEJ, JOINDER IN MOTION TO APPOINT A COMMITTEE OF LIMITED PARTNERS TO FILE.	150.00	0.10	15.00
MBA	REVIEW EMAIL FROM JOEL NEWELL REGARDING INFORMATION ON COMPLAINTS FILED WITH THE COURT AND PROVIDE LIST OF THEM AND CASE INFORMATION.	150.00	0.10	15.00
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING UCC'S RESPONSE TO MOTION TO DISMISS ELECTION.	345.00	0.20	69.00
07/31/2018				
JFN	REVIEW UNSECURED CREDITOR'S COMMITTEE RESPONSE TO TRUSTEE'S MOTION TO DISMISS ELECTION	305.00	0.50	152.50
JFN	REVIEW CASE LAW CITED BY UNSECURED CREDITOR'S COMMITTEE IN RESPONSE TO TRUSTEE'S MOTION TO DISMISS ELECTION	305.00	1.00	305.00

G GRANT LYON

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ARA MACAO HOLDINGS, L.P.

		Rate	Hours	
JFN	REVIEW ISSUES REGARDING REQUESTING CHAPTER 11 TRUSTEE ELECTION AND NECESSITY OF VOTES REGARDING ELECTION	305.00	1.70	518.50
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING LAST OBJECTION TO CLAIMS - INSIDERS.	345.00	0.20	69.00
08/01/2018				
JFN	REVIEW CORRESPONDENCE(S) REGARDING PURSUING RULE 2004 EXAMINATION OF UNSECURED CREDITOR'S COMMITTEE	305.00	0.20	61.00
JFN	REVIEW DECLARATION FILED BY UNSECURED CREDITOR'S COMMITTEE AND PROXIES REGARDING PROSPECTIVE VOTING FOR ELECTION OF CHAPTER 11 TRUSTEE.	305.00	0.50	152.50
MBA	DOWNLOAD AND SAVE ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL FOR EUGENE INGLES TO FILE.	150.00	0.10	15.00
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING LOGISTICS WITH THE ELECTION.	345.00	0.20	69.00
08/02/2018				
JFN	DRAFT MEMORANDUM TO FILE REGARDING PROXIES OBTAINED BY UNSECURED CREDITOR'S COMMITTEE IN RELATION TO REQUESTED ELECTION FOR CHAPTER 11 TRUSTEE.	305.00	0.30	91.50
ABN	PREPARE FOR THE MEETING; ATTEND THE 341(A) MEETING AND ELECTION; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING ELECTION (2).	345.00	3.10	1,069.50
ABN	REVIEW NOTICE OF APPEARANCE BY ATTORNEY CARMEL REGARDING EUGENE INGLES.	345.00	0.10	34.50
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING PROXIES.	345.00	0.20	69.00
08/03/2018				
JFN	REVIEW AND ANALYZE ISSUES REGARDING POST ELECTION REPORTING.	305.00	0.30	91.50
ABN	REVIEW AND ANALYZE FILE; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING ELECTION ISSUES; TELEPHONE CONFERENCE WITH ATTORNEY FOR UCC REGARDING ELECTION AND MONDAY DEADLINE; REVIEW AND RESPOND TO E-MAIL WITH UST REGARDING ELECTION; TELEPHONE CONFERENCE WITH T. SALERNO.	345.00	0.80	276.00
08/06/2018				
ABN	MEMORANDUM TO UST- NO CONTEST; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE FORRESTER REGARDING NEW ASSIGNMENT.	345.00	0.20	69.00
TT	REVIEW EMAILS REGARDING MOTION TO DISMISS CHAPTER 11 ELECTION; PREPARE NOTICE OF WITHDRAWAL OF MOTION; FINALIZE AND FILE WITH THE COURT; SEND MAILINGS.	150.00	0.60	90.00

ARA MACAO HOLDINGS, L.P.

		Rate	Hours	
ABN	REVIEW AND RESPOND TO E-MAIL WITH UST REGARDING NO DISPUTE; REVIEW AND RESPOND TO E-MAIL WITH UCC REGARDING WITHDRAWAL MOTION TO DISMISS; REVIEW DRAFT OF WITHDRAWAL.	345.00	0.50	172.50
ABN	REVIEW UCC'S SUPPLEMENTAL RESPONSE TO EQUITY COMMITTEE.	345.00	0.20	69.00
ABN	REVIEW DEBTOR'S SUPPLEMENTAL BRIEF REGARDING EQUITY COMMITTEE- PROPERTY HAS VALUE.	345.00	0.20	69.00
ABN	REVIEW AND ANALYZE UST'S REPORT.	345.00	0.20	69.00
08/08/2018				
ABN	REVIEW NOTICE OF APPEARANCE FOR IOVEST BY ATTORNEY CROSS.	345.00	0.10	34.50
ABN	REVIEW NOTICE OF APPEARANCE BY ATTORNEY FOR TRUSTEE.	345.00	0.10	34.50
08/13/2018				
ABN	ATTEND HEARING REGARDING SPECIAL COUNSEL; EMAIL TO TRUSTEE FORRESTER REGARDING DOCUMENTS- NO CHARGE	345.00	1.00	0.00
	CASE ADMINISTRATION		42.15	12,639.50
06/29/2018				
DLA	REVIEW FILE FOR CONFLICTS; PREPARATION OF APPLICATION TO EMPLOY ATTORNEY FOR TRUSTEE, ATTORNEY DISINTERESTEDNESS DECLARATION AND FORM OF ORDER; ELECTRONIC COURT FILING.	95.00	1.00	95.00
ABN	REVIEW APPLICATION TO EMPLOY AND ORDER; REVIEW FILE FOR CONFLICTS.	345.00	0.60	207.00
07/02/2018				
DLA	FINALIZED AND FILED THE APPLICATION TO EMPLOY AND ORDER REGARDING SAME; ELECTRONIC NOTIFICATIONS TO DEBTOR ATTORNEY AND CREDITORS	95.00	0.20	19.00
ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING APPROVAL REGARDING APPLICATION TO EMPLOY.	345.00	0.20	69.00
07/03/2018				
ABN	REVIEW AND RESPOND TO E-MAIL WITH ATTORNEY SIMPSON REGARDING DUTIES BETWEEN SPECIAL COUNSEL AND GENERAL COUNSEL.	345.00	0.20	69.00
07/05/2018				
ABN	REVIEW AND ANALYZE NOTICE OF HEARING FOR APPLICATION TO EMPLOY	345.00	0.30	103.50

		Rate	Hours	
07/06/2018	TT			
	RECEIVE ELECTRONIC COURT FILING REGARDING NOTICE OF HEARING ON EMPLOYMENT OF COUNSEL FOR CREDITOR'S COMMITTEE; INDEX AND CALENDAR HEARING; SEND EMAIL REGARDING SAME.	150.00	0.35	52.50
07/11/2018	ABN			
	TELEPHONE CALL FROM ATTORNEY COHEN REGARDING SPECIAL COUNSEL; REVIEW AND RESPOND TO E-MAIL WITH CLIENT (SEVERAL EMAILS); REVIEW AND RESPOND TO E-MAIL WITH ATTORNEY COHEN SEVERAL EMAILS.	345.00	0.80	276.00
07/12/2018	ABN			
	PREPARE FOR CONFERENCE CALL WITH ATTORNEY FOR UCC; ATTEND CALL REGARDING DUTIES BETWEEN GENERAL COUNSEL AND SPECIAL COUNSEL.	345.00	0.50	172.50
07/13/2018	ABN			
	REVIEW AND ANALYZE UST'S OBJECTION TO SPECIAL COUNSEL APPLICATION; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING SAME.	345.00	0.30	103.50
	ABN REVIEW AND ANALYZE 328 ISSUES.	345.00	0.50	172.50
	ABN REVIEW UST'S OBJECTION TO SPECIAL COUNSEL APPLICATION; EMAIL TO TRUSTEE.	345.00	0.30	103.50
	ABN REVIEW AND RESPOND TO E-MAIL WITH ATTORNEY SALERNO REGARDING UST'S OBJECTION AND 328; REVIEW AND RESPOND TO E-MAIL WITH UST REGARDING MEETING REGARDING OBJECTION.	345.00	0.30	103.50
07/16/2018	ABN			
	REVIEW UCC'S JOINDER TO OBJECTION TO SPECIAL COUNSEL APPLICATION TO EMPLOY.	345.00	0.20	69.00
07/17/2018	ABN			
	PREPARE FOR MEETING WITH UST REGARDING SPECIAL COUNSEL; ATTEND TELEPHONIC MEETING.	345.00	0.50	172.50
07/18/2018	TT			
	REVIEW COURT DOCKET AND UPCOMING HEARING; PULL NOTICE OF HEARING AND DOCUMENTS FROM DOCKET; SEND EMAIL TO ATTORNEY REGARDING SAME.	150.00	0.40	60.00

G GRANT LYON

Account No:
 Statement No:

ARA MACAO HOLDINGS, L.P.

		Rate	Hours		
TT	REVIEW COURT DOCKET AND FILINGS; SAVE AND INDEX REQUIRED FILINGS; PREPARE COPIES OF MOTIONS FOR HEARING TODAY; DISCUSS SAME WITH COUNSEL; REVIEW DOCKET AND OBTAIN UST OBJECTION TO APPOINT EQUITY COMMITTEE LIMITED PARTNERS; SEND EMAIL REGARDING SAME; FINALIZE, NOTICE AND LODGE ORDER APPROVING AND AUTHORIZING LANE & NACH'S APPOINTMENT AS CHAPTER 11 TRUSTEE'S ATTORNEY.	150.00	1.40	210.00	
ABN	PREPARE FOR HEARING REGARDING SPECIAL COUNSEL AND COUNSEL; ATTEND HEARING; ATTENTION TO LODGING ORDER.	345.00	1.00	345.00	
07/31/2018	MBA	DOWNLOAD AND SAVE ORDER APPROVING CHAPTER 11 TRUSTEE'S APPLICATION AND AUTHORIZING EMPLOYMENT OF ATTORNEY TO FILE.	150.00	0.10	15.00
08/22/2018	TT	FINALIZE TRUSTEE ATTORNEY FEE APPLICATION AND RELATED DOCUMENTS.	150.00	1.50	225.00
08/31/2018	ABN	ATTENTION TO CASE ISSUES; REVIEW TRUSTEE ATTORNEY FEE APPLICATION	345.00	2.00	690.00
		PROFESSIONAL EMPLOYMENT/ FEES		12.65	3,333.00
07/20/2018	SBR	702 AND 1104 ANALYSIS; REVIEW CREDITOR MATRIX AND BASIS FOR CLAIMS; ANALYZE REGARDING INSIDER INTERESTS.	310.00	1.50	465.00
07/21/2018	ABN	REVIEW AND ANALYZE LAW REGARDING 510 AND LIMITED PARTNER'S CLAIM AS A CREDITOR.	345.00	1.50	517.50
	ABN	REVIEW AND ANALYZE RECHARACTERIZE CREDITOR CLAIM AS EQUITY.	345.00	1.50	517.50
07/22/2018	SBR	REVIEW CASE AND CODE IN PREPARATION FOR TELEPHONE CONFERENCE WITH TRUSTEE AND OBJECTIONS TO CLAIMS / MOTIONS TO SUBORDINATE.	310.00	1.20	372.00
07/23/2018	MBA	DOWNLOAD AND SAVE PROOF OF CLAIM FROM DANIEL DORGAN TO FILE.	150.00	0.10	15.00
	MBA	DOWNLOAD AND SAVE PROOF OF CLAIM FROM RICHARD UMBACH TO FILE.	150.00	0.10	15.00
	MBA	DOWNLOAD AND SAVE PROOF OF CLAIM FROM KRISTIN UMBACH TO FILE.	150.00	0.10	15.00

ARA MACAO HOLDINGS, L.P.

			Rate	Hours	
07/24/2018	JFN	RESEARCH ISSUES REGARDING SUBORDINATION OF CLAIMS BASED ON EQUITY OWNERSHIP [2.6] DRAFT OMNIBUS OBJECTION TO CLAIMS BASED ON JUDGMENT RELATED TO PRE-PETITION OWNERSHIP INTEREST IN LIMITED PARTNERSHIP [1.1]	305.00	3.70	1,128.50
07/25/2018	MBA	DOWNLOAD AND SAVE PROOF OF CLAIM EDGEWATER RESOURCES TO FILE.	150.00	0.10	15.00
	JFN	REVIEW AND REVISE FIRST OMNIBUS OBJECTION TO JUDGMENT CREDITORS.	305.00	0.30	91.50
	TT	REVIEW EMAILS REGARDING MOTION TO DISMISS AND OMNIBUS OBJECTIONS.	150.00	0.20	30.00
	SBR	REVIEW, REVISE AND EDIT OBJECTION.	310.00	0.30	93.00
	TT	PREPARE NOTICE REGARDING FIRST OMNIBUS OBJECTION TO CREDITORS CLAIMS; SEND EMAIL FOR REVIEW.	150.00	0.20	30.00
	JFN	DRAFT SECOND OMNIBUS OBJECTION TO CLAIMS OF LIMITED PARTNERS WITH PURPORTED REAL PROPERTY DEPOSITS [1.2]	305.00	1.20	366.00
07/26/2018	ABN	REVIEW, REVISE AND EDIT OBJECTION TO JUDGMENT CREDITOR CLAIMS; REVIEW, REVISE AND EDIT NOTICE; REVIEW AND ANALYZE LOCAL RULES REGARDING SAME.	345.00	1.00	345.00
	JFN	START DRAFTING OMNIBUS OBJECTION TO CLAIMS ASSERTED BY LIMITED PARTNERS WITH BASIS OF CLAIM AS PROMISSORY NOTE	305.00	0.50	152.50
	TT	SEND MAILING; FINALIZE FIRST OMNIBUS OBJECTION AND NOTICE; FILE OBJECTION AND NOTICE WITH THE COURT; SEND MAILING; CALENDAR FOR OBJECTIONS.	150.00	0.40	60.00
07/27/2018	JFN	REVIEW AND ADDRESS ISSUES REGARDING SECOND OMNIBUS OBJECTION TO CLAIMS RELATED TO PURPORTED REAL PROPERTY DEPOSIT BASIS	305.00	0.30	91.50
	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING OBJECTION TO DEPOSIT CLAIMANTS.	345.00	0.20	69.00
07/30/2018	JFN	RESEARCH AND ANALYZE ISSUES REGARDING LIMITED PARTNERS SCHEDULED AS BEING PROMISSORY NOTE HOLDERS.	305.00	1.50	457.50
	JFN	RESEARCH ISSUES REGARDING NATURE OF CLAIMS ALLEGED BY EDGEWATER RESOURCES, LLC AND IOVEST DEVELOPMENT, LLC [1.0] START DRAFTING OBJECTION TO CLAIMS REGARDING PENDING REQUEST FOR ELECTION OF CHAPTER 11 TRUSTEE [0.7]	305.00	1.70	518.50

ARA MACAO HOLDINGS, L.P.

		Rate	Hours	
07/31/2018	JFN			
	JFN	305.00	1.20	366.00
08/01/2018	JFN			
	JFN	305.00	0.30	91.50
	MBA			
	MBA	150.00	1.00	150.00
	MBA			
	JFN	150.00	1.00	150.00
	JFN	305.00	0.80	244.00
	DJM	125.00	0.30	37.50
	DJM	125.00	0.30	37.50
	MBA	150.00	0.10	15.00

ARA MACAO HOLDINGS, L.P.

		Rate	Hours	
08/02/2018	JFN			
	REVIEW AND ANALYZE DECLARATIONS FILED BY UNSECURED CREDITOR'S COMMITTEE AND ANALYZE ISSUES REGARDING CLAIMS SUBMITTED FOR PURPOSES OF VOTING	305.00	0.70	213.50
08/14/2018	MBA			
	DOWNLOAD AND SAVE AMENDED PROOF OF CLAIM FROM DANIEL DORGAN TO FILE.	150.00	0.10	15.00
	CLAIMS		<u>23.40</u>	<u>6,685.00</u>
	For Current Services Rendered		<u>78.20</u>	<u>22,657.50</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
ADAM B. NACH	1.00	\$0.00	\$0.00
ADAM B. NACH	29.50	345.00	10,177.50
JOEL F. NEWELL	29.20	305.00	8,906.00
DANICA ACOSTA	1.20	95.00	114.00
MARIA B ALCALA	4.60	150.00	690.00
DEB MCKERNAN	0.60	125.00	75.00
TERIE TURNER	6.60	150.00	990.00
STUART B. RODGERS	5.50	310.00	1,705.00

Expenses

07/26/2018	POSTAGE 3 @ \$.47	1.41
07/31/2018	POSTAGE 2 @ \$.68	1.36
08/27/2018	COPIES; POSTAGE AND PROCESSING	216.00
08/27/2018	PACER FEE	15.00
	Total Expenses	<u>233.77</u>
	Total Current Work	22,891.27
	Balance Due	<u>\$22,891.27</u>

		<u>Hours to Bill</u>	<u>Amount</u>	
Subtotal for Timekeeper 2	Billable	18.60	6,072.00	ADAM B. NACH
Subtotal for Timekeeper 4	Billable	17.00	5,185.00	JOEL F. NEWELL
Subtotal for Timekeeper 13	Billable	1.90	285.00	MARIA B ALCALA
Subtotal for Timekeeper 17	Billable	2.15	322.50	TERIE TURNER
Subtotal for Timekeeper 18	Billable	2.50	775.00	STUART B. RODGERS
Total for Category 101	Billable	42.15	12,639.50	CASE ADMINISTRATION
Subtotal for Timekeeper 2	Billable	7.70	2,656.50	ADAM B. NACH
Subtotal for Timekeeper 12	Billable	1.20	114.00	DANICA ACOSTA
Subtotal for Timekeeper 13	Billable	0.10	15.00	MARIA B ALCALA
Subtotal for Timekeeper 17	Billable	3.65	547.50	TERIE TURNER
Total for Category 102	Billable	12.65	3,333.00	PROFESSIONAL EMPLOYMENT/ FEES
Subtotal for Timekeeper 2	Billable	4.20	1,449.00	ADAM B. NACH
Subtotal for Timekeeper 4	Billable	12.20	3,721.00	JOEL F. NEWELL
Subtotal for Timekeeper 13	Billable	2.60	390.00	MARIA B ALCALA
Subtotal for Timekeeper 16	Billable	0.60	75.00	DEB MCKERNAN
Subtotal for Timekeeper 17	Billable	0.80	120.00	TERIE TURNER
Subtotal for Timekeeper 18	Billable	3.00	930.00	STUART B. RODGERS
Total for Category 103	Billable	23.40	6,685.00	CLAIMS
GRAND TOTALS				
	Billable	78.20	22,657.50	