

Office of the United States Attorney (who on several occasions has specifically told the Trustee he will never recover any money for creditors of this estate), Palmetto, as well as a myriad of other claimants, to date, the Trustee has recovered in excess of \$560,000.00. The Trustee has obtained an initial approval for the payment of an additional \$1,200,000.00, and has caused additional litigation to be brought against the United States to recover that money, as well as additional funds.

6. Copies of the fee bills reflecting the extensive time by Applicant are attached hereto. A total of 432.35 hours were expended. At the approved hourly rate of \$125.00 per hour, the balance due is \$54,043.75. The hourly rate is below similar hourly rates for the services rendered in this District.

7. No prior compensation has been sought nor has any been paid. The services rendered by Applicant are very extensive, include extensive research regarding extensive federal administrative procedures, federal labor laws, Department of Health and Human Services rules and regulations; researching and defending various subpoenas issued by a grand jury, defending the loss of records which the Department of Health and Human Services is now attempting to use as a basis not to pay the claims of the estate, and a myriad of issues involved with the liquidation of a company with gross annual income of several million dollars.

8. The services rendered clearly benefitted the estate. The interim request is less than 10% of the amount recovered. In a normal contingency fee arrangement, a comparable fee would be from 33% to 40%. Considering that this case was originally a no-asset case, the fees incurred to date are very reasonable. The majority of time was incurred before there was any indication that the case was an asset case or any property would be available at all. In effect, the work was performed on a contingency basis, since there was no apparent assets from which counsel fees could be paid. Applicant is unaware of any attorney who would take what would appear to be a no-asset case on a 10% contingency rate, which is in effect what the compensation requested herein works out to be..

9. Consistent with Bankruptcy Rule 2016, the Applicant would state as follows:

a. No prior payments have been made and none have been promised to Applicant.