

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case No.: 04-60573-CIV-MORENO

IN RE:

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

MUTUAL BENEFITS CORP.,  
JOEL STEINGER a/k/a JOEL  
STEINER, LESLIE STEINGER  
a/k/a LESLIE STEINER and  
PETER LOMBARDI,

Defendants,

and

VIATICAL BENEFACTORS, LLC,  
VIATICAL SERVICES, INC.,  
KENSINGTON MANAGEMENT, INC.  
RAINY CONSULTING CORP.,  
TWIN GROVES INVESTMENTS, INC.,  
P.J.L. CONSULTING, INC.,  
SKS CONSULTING, INC., and  
CAMDEN CONSULTING, INC.

Relief Defendants.

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**SEVENTEENTH INTERIM APPLICATION FOR COMPENSATION OF FEES  
AND COSTS OF ACCOUNTANTS FOR RECEIVER**

**Pursuant to Court Order, any objections to this Application  
must be filed on or before ten days from the date of service  
indicated on the Certificate of Service attached hereto.**

Berkowitz Dick Pollack & Brant, Certified Public Accountants and Consultants,  
LLP ("BDPB"), accountant to Roberto Martínez, court-appointed receiver (the  
"Receiver") of Mutual Benefits Corp. ("MBC"), Viatical Benefactors, LLC ("VBLLC") and

Viatical Services, Inc. ("VSI"), (collectively the "Receivership Entities"), hereby requests the Court to enter an order authorizing the Receiver to pay the reasonable accountant's fees and costs incurred by BDPB for the two-month period, from May 1, 2008 through June 30, 2008, inclusive from the receivership estate, and in support thereof states the following.

By this Seventeenth Interim Application, BDPB requests compensation for services rendered May 1, 2008 through June 30, 2008 (the "Application Period") in the amount of \$213,765.75 for fees and \$0.00 for expenses to be paid by the Receivership Entities. This fee application includes fees of approximately \$54,000.00 incurred by BDPB's information technology professionals in connection with the design, development, testing, implementation and documentation of a Premium Billing and Tracking System, created to enable VSI to allocate the billing of administrative fees and policy premiums to investors, track the collection of these fees and premiums, and reallocate fees and premiums among investors as required. Creating this system has required the continued development and programming of the following:

- (a) a database module used to merge policy information (maintained by VSI pre-receivership) and investor information (maintained by MBC pre-receivership), identify all investor interests on each policy, and create a case file that identifies all relevant policy and investor data;
- (b) a billing module used to create invoices and bill each investor for the VSI administrative fee required to service policy interests;
- (c) auditing modules used by VSI to verify all investor and policy data maintained in the premium billing and tracking process;
- (d) a cash receipts module used to track the billing of investors and receipt of administrative fees remitted by investors;

- (e) a billing module used to create invoices and bill each investor for their pro-rata portion of insurance premiums payable on each policy.
- (f) a cash receipts module used to track the billing of investors, the receipt of premium payments remitted by investors, and the allocation of premium payments to insurance companies for future amounts due to the Receiver for reimbursement of prior premium payments made by the Receiver on behalf of investors;
- (g) an express mail module used to generate mailing invoices and coordinate the shipment of correspondence to overseas investors between VSI and third party carriers;
- (h) an investor policy interest reallocation module used to determine the premium shortfall for each policy, identify the remaining investors on the policy, and reallocate the premium shortfall to the remaining investors based on their pro-rata ownership interest;
- (i) a billing module used to create shortfall notices and bill remaining investors on a policy for their pro-rata share of the premium shortfall;
- (j) a cash receipts module used to track the shortfall noticing of investors, the receipt of shortfall payments remitted by investors, the identification of excess shortfall funds received and the identification of refunds due investors to return excess shortfall funds;
- (k) sub-modules used to make changes to investor / policy data;
- (l) security / user rights module used to grant / limit access of various PBTS modules to individual users based on management authorization;
- (m) an import / export module used to export data directly from the PBTS to VSI's MAS 200 financial accounting system;
- (n) an archiving module used to store and access all invoices / notices sent by VSI to investors;
- (o) a policy servicing module used by VSI's customer service representatives to access investor / policy information in order to respond to investor inquiries;
- (p) a premium payment module that assists VSI with the identification and payment of premiums due on policies; and

- (q) reports used by management to monitor and track all policy and investor activity.

This work continues to represent a significant additional expenditure of time by BDPB in order to create the necessary framework for the disposition process going forward and for VSI to be able to continue to function after the Receivership is concluded. This request reflects the application of a ten percent (10%) discount to our standard rates for all professionals and paraprofessionals working on this matter totaling \$23,752.

#### **DESCRIPTION OF SERVICES**

During the Application Period, BDPB has rendered extensive and necessary services for and on behalf of the receivership estate. BDPB was particularly involved in assisting the Receiver with the implementation of this Court's Disposition Order, which continues to require BDPB's assistance with the design of information systems to administer the billing, collection and payment of insurance premiums. In addition, BDPB rendered the following services:

- a) the analysis and preparation of death benefits for distribution to investors;
- b) posting of journal entries in accounting system, reconciling of books and records to bank accounts, reconciliation of policy / investor data between Premium Billing and Tracking System and financial accounting system, selecting and printing of checks, payment of bills for Receivership entities;
- c) analysis of tax issues and impacting Receivership entities and preparation of tax forms distributed to investors receiving death benefits;

- d) analysis relating to issues impacting claims process; and
- e) providing regular and ongoing advice and assistance to Receiver, counsel to Receiver and management of Receivership entities in connection with numerous other issues that impact this Receivership.

**COMPENSATION:**

The determination of fees to be awarded is largely within the discretion of the trial court. *Monaghan v. Hill*, 140 F.2d 31 (9th Cir. 1944). This discretion is, however, predicated on the assumption that careful consideration is given to all evidence of the value of the accountants' services in the light of the factors relevant to a determination. These factors are set forth in *In re Gypsum Cases*, 386 F.Supp. 959 (N.D. Cal. 1974) and *In re Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988), as follows: (1) the time and labor properly employed in the servicing of the case; (2) the quality of services rendered; (3) the scope of the activity and conspiracy under attack; (4) the financial risk involved; (5) the magnitude, complexity and novelty of the issues involved; (6) the beneficial results obtained; and (6) the degree to which, if any, efforts were supported by prior governmental action. BDPB requests the Court to consider these factors in determining reasonable compensation for the services rendered to date by BDPB, as summarized below:

- a. Time and Labor Required - The exhibits attached to this application include: The Summary of Fourteenth Interim Application for Compensation of Fees and Costs of Accountants for the Receiver (Exhibit 1); Summary of Professional and Paraprofessional Time (Exhibit 2); Summary of Professional and Paraprofessional Time

by Activity Code Category (Exhibit 3) and Detail of Professional and Paraprofessional Time by Activity Code Category (Exhibit 4).

b. Novelty and Difficulty of Services and Skills Requisite to the Accounting.

The issues presented in this case are novel given the size of the Receivership entities, the difficulty of dealing with the records and the unique nature of the Receivership Entities' businesses. Additionally, certain key accounting staff left the employ of MBC prior to or in connection with the appointment of the Receiver, and were not available to assist the Receiver during this application period.

The extensive experience and capabilities of the professionals involved with this case possess the accounting, financial analysis, tax and consultation skills required for the successful completion of the objectives of the Receiver.

c. The Skill Requisite to Perform the Services Properly. BDPB has staffed the engagement with personnel experienced in accounting, auditing, financial analysis, reporting and disclosure, tax compliance and information technology.

d. The Preclusion of Other Employment by the Professional Due to Acceptance of this Case. BDPB has not been precluded from any other employment due to the acceptance of this case.

e. The Customary Fee. The customary fee for services of the type rendered herein -- BDPB charges commercial clients on one or more of the following criteria: reasonable fee for services rendered, hourly charges, or fixed fee. To the extent hourly charges are relevant, BDPB commands from commercial clients hourly rates ranging from \$95 an hour to \$420 per hour depending on the level of professional skill required.

f. Whether the Fee is Fixed or Contingent. The fee is contingent inasmuch as the Receiver relies upon a Court Order approving the fee. BDPB has not entered into any agreement to fix a fee.

g. Time Limitations Imposed by the Client or Other Circumstances. BDPB was directed to commence work by the Receiver on May 4, 2004 to assist the Receiver as forensic accountants with respect to any and all litigation consulting services, investigatory accounting services, forecasts, advise on the accounting aspects of litigation matters, tax considerations, valuations and other services as required.

h. The Amount Involved and the Results Obtained - The above summary, together with exhibits, details the time, nature and extent of the professional services rendered by BDPB for the benefit of the investors and creditors.

i. The Experience, Reputation, and Ability of the Professional. BDPB is an established accounting firm comprised of fifteen directors and over 100 personnel. Its professionals and staff working on this case are experienced in matters of this kind.

j. Undesirability of Case. This case is not undesirable. BDPB is privileged to have the opportunity to serve the Receiver and appear before the Court in this proceeding.

k. Nature and Length of Professional Relationship With Client. BDPB's relationship with the Receiver began on May 4, 2004.

l. Awards in Similar Cases. The amount requested by BDPB is reasonable in terms of awards in cases of similar magnitude and complexity. The compensation which BDPB requests comports with the mandate of the Bankruptcy Code, which directs that services be evaluated in light of comparable services performed in non-bankruptcy cases in the community. Considering the results obtained thus far, this fee

request is appropriate. Likewise, as with all major accounting firms, BDPB's overhead expenses are substantial. Much of the fee, which the Court awards BDPB, will merely defray such significant overhead expenses already incurred and paid during the pendency of this case.

k. Government Support - Although the SEC investigated and filed the initial pleadings in this case, BDPB has assisted the Receiver to secure and protect the assets of the Receivership Entities and investigate the operations of the Receivership Entities through investigation and analysis.

#### CONCLUSION

The Applicant respectfully requests that this Court authorize the Receiver to compensate BDPB for their accountants' fees for reasonable and necessary services rendered during the Application Period in the amount of \$213,765.75 to be paid by the estate of the Receivership Entities.

Respectfully submitted,

Berkowitz Dick Pollack & Brant  
Certified Public Accountants and Consultants, LLP  
*Accountants for the Receiver*  
200 South Biscayne Boulevard, Sixth Floor  
Miami, FL 33131  
Tel: (305) 379-7000 Fax: (305) 379-8200



Scott M. Bouchner

Case No. 04-60573 CIV-MORENO

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16<sup>th</sup> day of October, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel of parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Curtis B. Miner

Curtis B. Miner

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*Counsel for Receiver Roberto Martinez*

## SERVICE LIST OF RECEIVER

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# EXHIBIT 1

Case No. 04-60573-Civ-Moreno

**EXHIBIT 1**

**SUMMARY OF SEVENTEENTH INTERIM APPLICATION  
FOR COMPENSATION OF FEES AND COSTS OF  
BERKOWITZ DICK POLLACK & BRANT**

1	Name of applicant	Berkowitz Dick Pollack & Brant Certified Public Accountants & Consultants, LLP
2	Role of applicant	Accountants for Receiver
3	Name of certifying professional	Scott Bouchner
4	Date Receiver appointed	May 4, 2004
5	Date of application for employment	May 26, 2004
6	Date of Order approving employment	June 3, 2004
7	Dates of services rendered	May 1, 2008 through June 30, 2008
8	Total Fees requested for this period	\$ 213,765.75
9	Total expenses requested for this period	\$ -
10	Total fees and expenses requested to be awarded	\$ 213,765.75

**HISTORY OF FEE APPLICATIONS**

Application Number	Application Period	Date Submitted	Amount Requested	Amount Awarded	Date Awarded
1	05/04/04 - 06/18/04	07/02/04	\$ 228,589.43	\$ 228,589.43	10/22/04
2	06/18/04 - 09/30/04	12/15/04	\$ 193,806.45	\$ 193,806.45	08/01/05
3	10/01/04 - 01/31/05	03/16/05	\$ 266,723.10	\$ 266,723.10	06/01/05
4	02/01/05 - 05/31/05	07/20/05	\$ 201,553.00	\$ 180,107.00	08/18/05
5	06/01/05 - 09/30/05	11/04/05	\$ 168,136.20	\$ 120,000.00	01/10/06
6	10/01/05 - 12/31/05	03/09/06	\$ 177,969.25	\$ 150,000.00	03/26/06
7	01/01/06 - 09/30/06	10/25/06	\$ 563,457.83	\$ 490,000.00	02/21/07
8	10/01/06 - 12/31/06	03/22/07	\$ 251,193.98	\$ 250,000.00	05/07/07
9	01/01/07 - 05/31/07	07/06/07	\$ 659,815.88	\$ 500,000.00	09/04/07
10	06/01/07 - 09/30/07	11/06/07	\$ 498,807.00	\$ 300,000.00	01/08/08
11	10/01/07 - 11/30/07	03/14/08	\$ 240,319.13	\$ 200,000.00	08/27/08
12	12/01/07 - 12/31/07	05/14/08	\$ 101,080.13	\$ 100,000.00	08/27/08
13	01/01/08 - 01/31/08	06/03/08	\$ 158,592.38	\$ 150,000.00	08/27/08
14	02/01/08 - 02/29/08	07/03/08	\$ 144,219.38	\$ 120,000.00	08/27/08
15	03/01/08 - 03/31/08	07/28/08	\$ 134,784.68	\$ 100,000.00	08/27/08
16	04/01/08 - 04/30/08		\$ 155,401.88		
<b>TOTAL</b>			<b>\$ 4,144,449.70</b>	<b>\$ 3,349,225.98</b>	

## EXHIBIT 2

**SUMMARY OF PROFESSIONAL AND PARAPROFESSIONAL TIME**  
**FROM MAY 1, 2008 THROUGH JUNE 30, 2008**  
**EXHIBIT 2**

<b>Name</b>	<b>Director, Associate Or Paraprofessional</b>	<b>Total Hours</b>	<b>Standard Hourly Rate</b>	<b>Agreed-Upon Hourly Rate</b>	<b>Discounted Fee</b>
Jeffrey Mutnik	Director	9.00	\$400.00	\$360.00	\$3,240.00
Scott Bouchner	Director	53.25	\$395.00	\$355.50	\$18,930.38
Art Dichter	Associate	1.00	\$365.00	\$328.50	\$328.50
Andreea Cioara	Associate	28.25	\$300.00	\$270.00	\$7,627.50
Joe Schirra	Associate	301.50	\$265.00	\$238.50	\$71,907.75
Roger Vizcaino	Associate	129.00	\$175.00	\$157.50	\$20,317.50
Gregory Brogna	Associate	73.00	\$175.00	\$157.50	\$11,497.50
Aaron Smith	Associate	82.00	\$175.00	\$157.50	\$12,915.00
Juan Bernal	Associate	61.00	\$175.00	\$157.50	\$9,607.50
Jose Cuneo	Associate	294.00	\$150.00	\$135.00	\$39,690.00
Susan DiNardo	Associate	28.00	\$150.00	\$135.00	\$3,780.00
Dustin Grizzle	Associate	112.00	\$130.00	\$117.00	\$13,104.00
Julio Modia	Associate	3.75	\$115.00	\$103.50	\$388.13
Leigh Flanders	Para Professional	6.00	\$80.00	\$72.00	\$432.00
<b>TOTAL</b>		<b><u>1,181.75</u></b>			<b><u>\$213,765.75</u></b>

## EXHIBIT 3

**SUMMARY OF PROFESSIONAL AND PARAPROFESSIONAL TIME  
BY ACTIVITY CODE CATEGORY  
FROM MAY 1, 2008 THROUGH JUNE 30, 2008  
EXHIBIT 3**

Name	Director or Associate	Hours	Agreed-Upon Hourly Rate	Discounted Fee
<b>Accounting Assistance</b>				
Scott Bouchner	Director	5.00	\$355.50	\$1,777.50
Susan DiNardo	Associate	28.00	\$135.00	\$3,780.00
Dustin Grizzle	Associate	108.00	\$117.00	\$12,636.00
Jose Cuneo	Associate	294.00	\$135.00	\$39,690.00
Leigh Flanders	Para Professional	6.00	\$135.00	\$432.00
<b>Accounting Assistance Total</b>		<b>441.00</b>		<b>\$58,315.50</b>
<b>Information Technology</b>				
Gregory Brogna	Associate	73.00	\$157.50	\$11,497.50
Aaron Smith	Associate	82.00	\$157.50	\$12,915.00
Juan Bernal	Associate	61.00	\$157.50	\$9,607.50
Roger Vizcaino	Associate	129.00	\$157.50	\$20,317.50
<b>Information Technology Total</b>		<b>345.00</b>		<b>\$54,337.50</b>
<b>Fee Applications</b>				
Scott Bouchner	Director	13.25	\$157.50	\$4,710.38
<b>Fee Applications Total</b>		<b>13.25</b>		<b>\$4,710.38</b>
<b>Receivership Operations</b>				
Scott Bouchner	Director	20.00	\$355.50	\$7,110.00
Joe Schirra	Associate	301.50	\$238.50	\$71,907.75
<b>Receivership Operations Total</b>		<b>321.50</b>		<b>\$79,017.75</b>
<b>Tax Issues</b>				
Jeffrey Mutnik	Director	9.00	\$360.00	\$3,240.00
Scott Bouchner	Director	15.00	\$355.50	\$5,332.50
Andreea Cioara	Associate	28.25	\$270.00	\$7,627.50
Dustin Grizzle	Associate	4.00	\$117.00	\$468.00
Dustin Grizzle	Associate	3.75	\$117.00	\$388.13
<b>Tax Issues Total</b>		<b>60.00</b>		<b>\$17,056.13</b>
<b>Grand Total</b>		<b>1,180.75</b>		<b>\$213,437.25</b>

## EXHIBIT 4

DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY  
FROM MAY 1, 2008 THROUGH JUNE 30, 2008  
Exhibit 4

Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
<b>Accounting Assistance</b>						
Jose Cuneo	5/1/2008	150.00	135.00	8.50	1,147.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/2/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	5/5/2008	130.00	117.00	8.00	936.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/5/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Susan DiNardo	5/5/2008	150.00	135.00	8.00	1,080.00	Prepared refund checks and continued to work on bank reconciliations.
Dustin Grizzle	5/6/2008	130.00	117.00	8.00	936.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/6/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Susan DiNardo	5/6/2008	150.00	135.00	6.50	877.50	Prepared refund checks and bank reconciliations.
Jose Cuneo	5/7/2008	150.00	135.00	9.25	1,248.75	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Susan DiNardo	5/7/2008	150.00	135.00	8.00	1,080.00	Prepared checks for operating expenses. Exported Invoices and Investors from Premium Billing and Tracking System.
Dustin Grizzle	5/8/2008	130.00	117.00	7.00	819.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/8/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	5/9/2008	130.00	117.00	8.00	936.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	5/12/2008	130.00	117.00	7.00	819.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.

DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY  
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Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Jose Cuneo	5/12/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	5/13/2008	130.00	117.00	7.00	819.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/13/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/14/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	5/15/2008	130.00	117.00	8.00	936.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/15/2008	150.00	135.00	9.00	1,215.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Scott Bouchner	5/15/2008	395.00	355.50	1.00	355.50	Finalize analysis of professional fees owed by VSI to MBC.
Susan DiNardo	5/15/2008	150.00	135.00	5.50	742.50	Prepared checks for operating expenses. Completed operating account bank reconciliation. Tested Import Administrative Fee and Premium Invoices for April.
Dustin Grizzle	5/16/2008	130.00	117.00	6.50	760.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/16/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/19/2008	150.00	135.00	8.75	1,181.25	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/20/2008	150.00	135.00	8.25	1,113.75	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	5/21/2008	130.00	117.00	8.00	936.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.

**DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY**  
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Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Jose Cuneo	5/21/2008	160.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	5/22/2008	130.00	117.00	4.00	468.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/22/2008	150.00	135.00	8.25	1,113.75	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/23/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/27/2008	150.00	135.00	6.00	810.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/28/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Scott Bouchner	5/28/2008	395.00	355.50	0.75	266.63	Review of 2007 financial statements.
Dustin Grizzle	5/29/2008	130.00	117.00	6.00	702.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/29/2008	150.00	135.00	9.50	1,282.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Scott Bouchner	5/29/2008	395.00	355.50	0.75	266.63	Review draft December 31, 2007 financial statements.
Dustin Grizzle	5/30/2008	130.00	117.00	7.00	819.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	5/30/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/2/2008	150.00	135.00	9.50	1,282.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Scott Bouchner	6/2/2008	395.00	355.50	2.50	888.75	Review of year end financial statements. Discussions with MBC/VSJ management regarding year end financial statements.

DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY  
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Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Jose Cuneo	6/3/2008	150.00	135.00	9.75	1,316.25	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/4/2008	150.00	135.00	10.00	1,350.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	6/5/2008	130.00	117.00	6.00	702.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/5/2008	150.00	135.00	8.75	1,181.25	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/8/2008	150.00	135.00	8.50	1,147.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/7/2008	150.00	135.00	4.00	540.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/9/2008	150.00	135.00	8.50	1,147.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/10/2008	150.00	135.00	9.00	1,215.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/11/2008	150.00	135.00	9.50	1,282.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/12/2008	150.00	135.00	9.75	1,316.25	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	6/13/2008	130.00	117.00	7.00	819.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/13/2008	150.00	135.00	8.50	1,147.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Leigh Flanders	6/13/2008	80.00	72.00	6.00	432.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.

**DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY**  
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Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Dustin Grizzle	6/19/2008	130.00	117.00	7.00	819.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Dustin Grizzle	6/23/2008	130.00	117.00	3.50	409.50	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/23/2008	150.00	135.00	9.00	1,215.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/24/2008	150.00	135.00	9.00	1,215.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/27/2008	150.00	135.00	8.00	1,080.00	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
Jose Cuneo	6/30/2008	150.00	135.00	8.75	1,181.25	Detailed analysis and reconciliation of general ledger, cash receipt, and Premium Billing and Tracking system data to verify premium funds owed to insurance companies, investors and the Receivership for reimbursement of premiums paid on behalf of investors.
<b>Total: Accounting Assistance</b>				<b>441.00</b>	<b>58,315.50</b>	

**Information Technology**

Aaron Smith	6/1/2008	175.00	157.50	9.25	1,458.80	Development of claims process module - resending investors claims forms due to address change or investor requests resend.
Gregory Brogna	6/1/2008	175.00	157.50	4.00	630.00	Continued development of Claims Process module. Provide updates regarding the transfer of funds. Provided daily support to VSI employees.
Juan Bernal	6/1/2008	175.00	157.50	3.00	472.50	Investor requests resend
Aaron Smith	6/2/2008	175.00	157.50	9.75	1,535.63	Update Financial Summary report. Modifications to Cycle 2 billing module. Development of claims process module.
Gregory Brogna	6/2/2008	175.00	157.50	6.00	945.00	Continued development of Claims Process. Completed update of transfer of funds functionality. Made modifications and updates to address wizard. Provided daily support to VSI employees.
Juan Bernal	6/2/2008	175.00	157.50	2.00	315.00	Supported VSI staff in connection with processing of cash receipts.
Roger Vizcaino	6/3/2008	175.00	157.50	6.00	945.00	Development of program update function of policy database.
Roger Vizcaino	6/4/2008	175.00	157.50	4.00	630.00	Development of program update function of policy database.
Aaron Smith	6/5/2008	175.00	157.50	6.50	1,338.75	Meeting with VSI management and information technology team regarding fractional interest auction project plan received from LSI. Development of security for auction module.
Gregory Brogna	6/5/2008	175.00	157.50	6.50	1,023.75	Trouble shooting of auction template.
Juan Bernal	6/5/2008	175.00	157.50	2.00	315.00	System development in connection with transfers and security profile. Troubleshooting in connection with errors on printing reports and development of system forms.

**DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY**  
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**Exhibit 4**

Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Aaron Smith	5/6/2008	175.00	157.50	8.50	1,338.75	Development of claims process module. Update Garden City claims reports. Update claims database to reflect new investors, address changes and resend requests made by investors.
Gregory Brogna	5/6/2008	175.00	157.50	8.50	1,338.75	Development of auction database structure and views. Assisted in development of ASP forms and Java programming.
Juan Bernal	5/6/2008	175.00	157.50	3.00	472.50	System development in connection with policy audit and to allow reversal of payments.
Aaron Smith	5/7/2008	175.00	157.50	9.75	1,535.63	Continued development of claims process module. Modify programming to allow for transfer of basis to investors without investor numbers. Meeting with Information technology team to discuss administrative fee and premium reshuffle.
Gregory Brogna	5/7/2008	175.00	157.50	8.00	1,280.00	Development of auction database structure and views. Provided support to VSI employees for claims module.
Juan Bernal	5/7/2008	175.00	157.50	3.00	472.50	System development in connection with policy audit and to allow reversal of payments.
Roger Vizcaino	5/7/2008	175.00	157.50	4.00	630.00	Development of program update function of policy database.
Aaron Smith	5/8/2008	175.00	157.50	9.25	1,456.88	Continued development of claims process module. Addition of Trade Creditors to Claims Process Database. Import of new unique investor numbers.
Gregory Brogna	5/8/2008	175.00	157.50	4.00	630.00	Continued development of auction module. Troubleshooting in connection with data integrity, consistency and reliability.
Juan Bernal	5/8/2008	175.00	157.50	3.00	472.50	Reviewed payment system and testing with staff. Designed and communicated pending modifications.
Roger Vizcaino	5/8/2008	175.00	157.50	4.00	630.00	Development of program update function of policy database.
Aaron Smith	5/9/2008	175.00	157.50	8.75	1,378.13	Continued development of claims process module - Exporting updated new investor information to Garden City Group. Meeting with representative of Garden City Group.
Gregory Brogna	5/9/2008	175.00	157.50	6.00	945.00	Continued development of auction module. Troubleshooting in connection with data integrity, consistency and reliability.
Roger Vizcaino	5/9/2008	175.00	157.50	4.00	630.00	Development of program update function of policy database.
Aaron Smith	5/10/2008	175.00	157.50	2.00	315.00	Continued development of claims process module - Add search by unique investor number capability.
Roger Vizcaino	5/10/2008	175.00	157.50	7.00	1,102.50	Development of program update function of policy database.
Roger Vizcaino	5/11/2008	175.00	157.50	5.00	787.50	Development of program update function of policy database.
Aaron Smith	5/12/2008	175.00	157.50	8.00	1,260.00	Enhance firewall/SQL Security/Premium Billing and Tracking System security updates for LSI to have capability to access Premium Billing and Tracking System 1.5 in order to run reports for auction process.
Gregory Brogna	5/12/2008	175.00	157.50	6.50	1,023.75	Continued development of auction module. Troubleshooting in connection with data integrity, consistency and reliability. Researched the Invoice table and corrected inconsistencies in administrative fee and premium invoices.
Juan Bernal	5/12/2008	175.00	157.50	3.00	472.50	Development and improvement in functionality of printing modules within Premium Billing and Tracking System.
Aaron Smith	5/13/2008	175.00	157.50	8.25	1,299.38	Meeting with representative of LSI regarding auction information and to produce reports via Premium Billing and Tracking System access. Development of Auction module- First Step page creation and view. Initial data entry and audit.

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Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Gregory Brogna	5/13/2008	175.00	157.50	7.50	1,181.25	Worked on Administrative Fee and Premium Reshuffle module. Continued development and refinement of auction module.
Juan Bernal	5/13/2008	175.00	157.50	3.00	472.50	Development and improvement in functionality of printing modules within Premium Billing and Tracking System.
Gregory Brogna	5/14/2008	175.00	157.50	8.00	1,260.00	Worked on Administrative Fee and Premium Reshuffle module. Continued development and refinement of auction module.
Juan Bernal	5/14/2008	175.00	157.50	2.00	315.00	Development and improvement in functionality of printing modules within Premium Billing and Tracking System.
Gregory Brogna	5/15/2008	175.00	157.50	8.00	1,260.00	Worked on Administrative Fee and Premium Reshuffle module. Continued development and refinement of auction module.
Juan Bernal	5/15/2008	175.00	157.50	3.00	472.50	Development and improvement in functionality of printing modules within Premium Billing and Tracking System.
Juan Bernal	5/16/2008	175.00	157.50	2.00	315.00	Development and improvement in functionality of printing modules within Premium Billing and Tracking System.
Roger Vizcaino	5/16/2008	175.00	167.50	6.00	945.00	Programming in connection with screen used to audit and reverse payments inserted in system.
Roger Vizcaino	5/17/2008	175.00	157.50	6.00	945.00	Programming in connection with screen used to audit and reverse payments inserted in system.
Roger Vizcaino	5/18/2008	175.00	157.50	6.00	945.00	Programming in connection with screen used to audit and reverse payments inserted in system.
Juan Bernal	5/19/2008	175.00	157.50	3.00	472.50	Modified basic auction screens based on meeting with MBC.
Roger Vizcaino	5/21/2008	175.00	157.50	6.00	945.00	Programming in connection with screen used to audit and reverse payments inserted in system.
Roger Vizcaino	5/23/2008	175.00	157.50	4.00	630.00	Development and programming of new version of cash receipts module.
Roger Vizcaino	5/24/2008	175.00	157.50	7.00	1,102.50	Development and programming of new version of cash receipts module.
Roger Vizcaino	5/25/2008	175.00	157.50	6.00	945.00	Development and programming of new version of cash receipts module.
Roger Vizcaino	5/26/2008	175.00	157.50	6.00	945.00	Development and programming of new version of cash receipts module.
Juan Bernal	5/29/2008	175.00	157.50	3.00	472.50	Import group database information (history, reimbursement and credits) being tracked by VSI into Premium Billing and Tracking System.
Roger Vizcaino	5/29/2008	175.00	167.50	6.00	945.00	Development and programming of new version of cash receipts module.
Juan Bernal	5/30/2008	175.00	157.50	2.00	315.00	Import group database information (history, reimbursement and credits) being tracked by VSI into Premium Billing and Tracking System.
Juan Bernal	6/2/2008	175.00	157.50	2.00	315.00	Development of Step 1 of auction process.
Roger Vizcaino	6/2/2008	175.00	157.50	1.00	157.50	Development of Step 1 of auction process.
Juan Bernal	6/3/2008	175.00	157.50	2.00	315.00	Development of Step 1 of auction process.
Roger Vizcaino	6/3/2008	175.00	157.50	3.00	472.50	Development of Step 1 of auction process.
Juan Bernal	6/4/2008	175.00	157.50	3.00	472.50	Development of Step 2 of auction process.
Juan Bernal	6/5/2008	175.00	157.50	4.00	630.00	Development of Step 2 of auction process.
Roger Vizcaino	6/5/2008	175.00	157.50	3.00	472.50	Development of Step 2 of auction process.
Juan Bernal	6/6/2008	175.00	157.50	3.00	472.50	Development of Step 3 of auction process.
Roger Vizcaino	6/6/2008	175.00	167.50	4.00	630.00	Development of Step 2 of auction process.
Juan Bernal	6/8/2008	175.00	157.50	2.00	315.00	Development of Step 3 of auction process.
Roger Vizcaino	6/9/2008	175.00	157.50	2.00	315.00	Development of Step 2 of auction process.
Juan Bernal	6/10/2008	175.00	157.50	3.00	472.50	Development of Step 2 of auction process.
Roger Vizcaino	6/10/2008	175.00	157.50	4.00	630.00	Development of Step 2 of auction process.
Roger Vizcaino	6/11/2008	175.00	157.50	3.00	472.50	Development of Step 2 of auction process.
Roger Vizcaino	6/18/2008	175.00	157.50	3.00	472.50	Development of Step 2 of auction process.

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Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Roger Vizcaino	6/19/2008	175.00	157.50	2.00	315.00	Development of Step 2 of auction process.
Roger Vizcaino	6/20/2008	175.00	157.50	6.00	945.00	Development of Step 1 of auction process.
Roger Vizcaino	6/23/2008	175.00	157.50	2.00	315.00	Development of Step 2 of auction process.
Roger Vizcaino	6/24/2008	175.00	157.50	4.00	630.00	Development of Step 3 of auction process.
Roger Vizcaino	6/25/2008	175.00	157.50	1.00	167.50	Development of Step 3 of auction process.
Roger Vizcaino	6/26/2008	175.00	157.50	4.00	630.00	Development of Step 2 of auction process.
Juan Bernal	6/27/2008	175.00	167.50	3.00	472.50	Create new database structure for Premium Billing and Tracking System 2.0
Juan Bernal	6/30/2008	175.00	167.50	2.00	315.00	Create new database structure for Premium Billing and Tracking System 2.0
<b>Total: Information Technology</b>				<b>345.00</b>	<b>54,337.50</b>	

**Fee Applications**

Scott Bouchner	5/2/2008	395.00	355.50	2.50	888.75	Preparation of Twelfth Interim Fee Application.
Scott Bouchner	5/5/2008	395.00	355.50	2.00	711.00	Preparation of Twelfth Interim Fee Application.
Scott Bouchner	5/8/2008	395.00	355.50	1.75	622.13	Preparation of Twelfth Interim Fee Application.
Scott Bouchner	5/13/2008	395.00	355.50	1.00	355.50	Preparation of Twelfth Interim Fee Application.
Scott Bouchner	5/22/2008	395.00	355.50	2.00	711.00	Preparation of Thirteenth Interim Fee Application
Scott Bouchner	5/27/2008	395.00	355.50	0.75	266.63	Preparation of Thirteenth Interim Fee Application
Scott Bouchner	5/28/2008	395.00	355.50	0.50	177.75	Preparation of Thirteenth Interim Fee Application.
Scott Bouchner	5/30/2008	395.00	355.50	1.50	533.25	Preparation of Thirteenth Interim Fee Application
Scott Bouchner	6/2/2008	395.00	355.50	0.50	177.75	Preparation of Thirteenth Interim Fee Application
Scott Bouchner	6/30/2008	395.00	355.50	0.75	266.63	Preparation of Fourteenth Interim Fee Application
<b>Total: Fee Applications</b>				<b>13.25</b>	<b>\$ 4,710.38</b>	

**Receivership Operations**

Joe Schirra	5/1/2008	265.00	238.50	6.00	1,431.00	Prepare death benefit disbursement spreadsheets for April payments.
Joe Schirra	5/2/2008	265.00	238.50	4.00	954.00	Analyze Acheron premium payments. Prepare reconciliation of investor premium cash and receivables to amounts owed to insurance companies and receiver.
Joe Schirra	6/3/2008	265.00	238.50	4.00	954.00	Analyze VSI expense accounts. Reverse previous allocation of expenses. Analyze general ledger liability accounts.
Joe Schirra	5/5/2008	265.00	238.50	6.00	1,431.00	Research questions from customer services on status of death benefit disbursements, 2006 and 2007 tax reporting forms, etc. Prepare analysis of investor premium and shortfall funds and related interest income. Prepare analysis of remaining accounts receivable balances
Joe Schirra	5/8/2008	265.00	238.50	6.00	1,431.00	Preparation of VBL, LC and VSI financial statements.
Joe Schirra	5/7/2008	265.00	238.50	5.00	1,192.50	Prepare analysis of MBC's general ledger accounts and create adjusting journal entries. Process death benefit check voids and reissues.
Joe Schirra	5/8/2008	265.00	238.50	6.50	1,550.25	Analyze MBC general ledger accounts. Reverse allocated operating expenses. Analyze balances due to other receivership entities.
Joe Schirra	5/9/2008	265.00	238.50	7.00	1,669.50	Prepare analysis of Acheron premium disbursements and analysis of April 30, 2008 working capital balances. Update MBC financial statements.
Joe Schirra	5/10/2008	265.00	238.50	5.00	1,192.50	Working on Financial statements and footnotes.
Joe Schirra	5/12/2008	265.00	238.50	6.00	1,431.00	Continued analysis in connection with the preparation of financial statements for 12/31/2007 and footnotes.
Scott Bouchner	5/12/2008	395.00	355.50	2.00	711.00	Status meeting with Receiver, counsel and MBC/VSI management.
Joe Schirra	5/13/2008	265.00	238.50	7.00	1,669.50	Prepare reconciliation of inter-receivership balances. Update footnotes to financial statement schedules.

DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY  
FROM MAY 1, 2008 THROUGH JUNE 30, 2008  
Exhibit 4

Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Joe Schirra	5/14/2008	265.00	238.50	7.00	1,669.50	Continued analysis in connection with the preparation of financial statements for 12/31/2007 and footnotes. Attend meeting to discuss professional fees allocation.
Scott Bouchner	5/14/2008	395.00	355.50	1.75	622.13	Meeting with VSI / MBC management to discuss ongoing projects, financial statements and allocation of professional fees.
Joe Schirra	5/15/2008	265.00	238.50	7.00	1,669.50	Analyze Acheron premium payments. Attend meeting to discuss reconciliation of investor paid premiums by policy and continued analysis in connection with preparation of financial statements and footnotes.
Joe Schirra	5/16/2008	265.00	238.50	3.00	715.50	Reconcile death benefit bank accounts to master spreadsheets.
Joe Schirra	5/17/2008	265.00	238.50	6.00	1,431.00	Reconcile death benefit bank accounts to master spreadsheets. Reconcile tax withholdings to general ledger.
Joe Schirra	5/18/2008	265.00	238.50	7.00	1,669.50	Reconcile investor paid premium funds and create related journal entries to reimburse death benefit account and finalize investor subaccount balances. Update death benefit master spreadsheets for checks and voids.
Joe Schirra	5/19/2008	265.00	238.50	8.00	1,908.00	Process death benefit disbursements for May 2008.
Joe Schirra	5/20/2008	265.00	238.50	7.00	1,669.50	Process death benefit disbursements and prepare premium refund analysis
Joe Schirra	5/21/2008	265.00	238.50	7.00	1,669.50	Process death benefit and premium refund disbursements. Attend meeting to discuss premium reimbursement on sold policies.
Joe Schirra	5/22/2008	265.00	238.50	7.00	1,669.50	Process death benefit and premium refund disbursements.
Joe Schirra	5/23/2008	265.00	238.50	6.00	1,431.00	Processing death benefit disbursements.
Joe Schirra	5/24/2008	265.00	238.50	5.00	1,192.50	Processing death benefit disbursements. Attend meeting to discuss financial statements.
Joe Schirra	5/27/2008	265.00	238.50	8.00	1,908.00	Process death benefit and premium refund disbursements.
Joe Schirra	5/28/2008	265.00	238.50	7.00	1,669.50	Process death benefit and premium refund disbursements.
Joe Schirra	5/29/2008	265.00	238.50	8.00	1,908.00	Process death benefit and premium refund disbursements.
Joe Schirra	5/30/2008	265.00	238.50	8.00	1,908.00	Process death benefit and premium refund disbursements.
Joe Schirra	5/31/2008	265.00	238.50	5.00	1,192.50	Process death benefit disbursements. Analyze Acheron premium payments.
Joe Schirra	6/2/2008	265.00	238.50	8.00	1,908.00	Process death benefit disbursements and premium refunds. Attend meeting to discuss administration fees and financial statements.
Scott Bouchner	6/2/2008	395.00	355.50	2.25	799.88	Review Court Order and discussions with MBC/VSI management regarding Motion to Show Cause Order.
Joe Schirra	6/3/2008	265.00	238.50	8.00	1,908.00	Process death benefit disbursements. Attend various meetings to address premium issues.
Scott Bouchner	6/3/2008	395.00	355.50	2.00	711.00	Analysis in connection with Courts Order to Show Cause.
Joe Schirra	6/4/2008	265.00	238.50	5.00	1,192.50	Process death benefit disbursements. Attend meeting with information technology personnel to go over system issues.
Scott Bouchner	6/4/2008	395.00	355.50	1.25	444.38	Analysis in connection with Motion to Show Cause.
Joe Schirra	6/5/2008	265.00	238.50	7.00	1,669.50	Process death benefit disbursements, voids and releases.
Joe Schirra	6/6/2008	265.00	238.50	6.00	1,431.00	Process death benefit disbursements and premium refunds. Attend meeting to discuss reconciliation of premium funds received from investors.
Scott Bouchner	6/6/2008	395.00	355.50	2.25	799.88	Analysis in connection with Motion to Show Cause.
Scott Bouchner	6/6/2008	395.00	355.50	1.00	355.50	Analysis of 1042 withholding issues.
Joe Schirra	6/7/2008	265.00	238.50	5.00	1,192.50	Process death benefit disbursements and premium refunds.
Joe Schirra	6/9/2008	265.00	238.50	6.00	1,431.00	Process death benefit disbursements. Assist on reconciliation of investor premium funds.
Scott Bouchner	6/9/2008	395.00	355.50	5.50	1,955.25	Prepare response to Motion for Cause.

**DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY**  
**FROM MAY 1, 2008 THROUGH JUNE 30, 2008**  
**Exhibit 4**

Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
						Process death benefit disbursements, voids and reissues.
Joe Schirra	6/10/2008	265.00	238.50	6.00	1,431.00	Analyze Acheron premium payments. Reconcile investor paid premiums on matured policies.
Scott Bouchner	6/10/2008	395.00	355.50	1.00	355.50	Finalize response to Motion for Cause.
Joe Schirra	6/11/2008	265.00	238.50	6.00	1,431.00	Reconcile premium investor funds on matured policies and create journal entries for VSI.
Joe Schirra	6/12/2008	265.00	238.50	6.50	1,550.25	Reconcile investor premium funds on matured policies. Create entries to record intercompany balances due and clear investor premium funds received.
Joe Schirra	6/13/2008	265.00	238.50	6.50	1,550.25	Prepare account reconciliations for investor paid premiums and create entries on VSI to reflect final reconciliation. Coordinate changes needed in order to process death benefits deposited into VSI checking account.
Joe Schirra	6/16/2008	265.00	238.50	7.00	1,669.50	Reconcile investor funds and general ledger balances for matured policies. Create journal entries to correct and reclass balances.
Joe Schirra	6/17/2008	265.00	238.50	7.00	1,669.50	Prepare analysis of investor paid premiums on matured policies and create journal entries for final reconciliation of these balances. Prepare adjustments to VSI death benefit disbursements and obtain new investor id number.
Scott Bouchner	6/18/2008	395.00	355.50	0.25	88.88	Review Receiver's Response to Motion to Show Cause
Joe Schirra	6/20/2008	265.00	238.50	6.00	1,431.00	Reconcile investor paid premium funds per Premium Billing and Tracking System to general ledger. Create journal entries to adjust for premium refunds, amounts due to premium account and administration fees to be collected. Analyze Acheron premium payments.
Joe Schirra	6/21/2008	265.00	238.50	6.00	1,192.50	Reconcile investor paid premium funds per Premium Billing and Tracking System to general ledger. Create journal entries to adjust for premium refunds, amounts due to premium account and administration fees to be collected.
Joe Schirra	6/23/2008	265.00	238.50	8.00	1,908.00	Reconcile premium funds from investors on matured policies. Create journal entries to record final disposition of funds. Assist in calculation of reimbursements of premiums on sale policies.
Joe Schirra	6/24/2008	265.00	238.50	8.00	1,908.00	Reconcile investor paid premium amounts on matured policies. Adjust general ledger balances to reflect final disposition of funds. Attend meeting with potential buyers of VSI.
Joe Schirra	6/25/2008	265.00	238.50	7.00	1,669.50	Reconcile investor paid premiums to general ledger accounts. Create journal entries to reflect final disposition of the funds.
Joe Schirra	6/26/2008	265.00	238.50	4.00	954.00	Analyzing Acheron premium payments.
Joe Schirra	6/27/2008	265.00	238.50	6.00	1,192.50	Analysis and preparation of journal entries for investor paid premiums.
Scott Bouchner	6/27/2008	395.00	355.50	0.50	177.75	Process death benefit disbursement voids and reissues. Prepare reconciliation of investor received premium funds.
Scott Bouchner	6/27/2008	395.00	355.50	0.25	88.88	Review Premium Billing and Tracking System - MAS reconciliation template and analysis.
Joe Schirra	6/30/2008	265.00	238.50	6.00	1,431.00	Discussion with Receiver's operational representative regarding fractional interest auction.
						Prepare analysis of disposition of investor premium amounts received.
<b>Total: Receivership Operations</b>				<b>321.50</b>	<b>79,017.75</b>	

**Tax Consulting**

Scott Bouchner	5/1/2008	395.00	355.50	1.50	533.25	Analysis of professional fees and operating expenses for tax allocation.
Andreea Cloara	5/5/2008	300.00	270.00	1.00	270.00	2007 tax planning in connection with preparation of federal tax returns.
Scott Bouchner	5/5/2008	395.00	355.50	1.75	622.13	Complete analysis of professional fees and shared operating expenses.

**DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY**  
**FROM MAY 1, 2008 THROUGH JUNE 30, 2008**  
**Exhibit 4**

Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
Andreea Cloara	5/7/2008	300.00	270.00	6.00	1,620.00	Meeting with tax counsel regarding open tax issues.
Dustin Grizzle	5/7/2008	130.00	117.00	0.75	87.75	Prepared 1120 tax return for the year ended 12/31/2007
Jeffrey Mutnik	5/7/2008	400.00	360.00	5.50	1,980.00	Meetings with staff and tax counsel regarding open tax issues.
Scott Bouchner	5/7/2008	395.00	355.50	5.50	1,955.25	Meetings with tax counsel and BDPB tax team in order to finalize issues impacting tax returns of Receivership entities.
Scott Bouchner	6/4/2008	395.00	355.50	1.25	444.38	Analysis of withholding issues.
Art Dichter	6/5/2008	385.00	328.50	1.00	328.50	Review and discussions regarding IRS notice assessing deposit penalties.
Andreea Cloara	6/6/2008	300.00	270.00	1.00	270.00	Review Texas franchise tax forms.
Andreea Cloara	6/8/2008	300.00	270.00	2.00	540.00	Review and analysis of issues regarding withholding tax notice sent by IRS.
Dustin Grizzle	6/6/2008	130.00	117.00	1.50	175.50	Prepared Texas corporation franchise tax returns for the year ended 12/31/2007
Julio Modia	6/6/2008	115.00	103.50	2.25	232.88	Research in connection with IRS Notice regarding tax withholding issues.
Andreea Cloara	6/9/2008	300.00	270.00	1.75	472.50	Draft memorandum regarding tax withholding issues, research on reasonable cause, various conference calls with counsel and Receiver's representative.
Andreea Cloara	6/10/2008	300.00	270.00	3.00	810.00	Draft memorandum regarding tax withholding issues, research on reasonable cause, various conference calls with counsel and Receiver's representative.
Scott Bouchner	6/10/2008	395.00	355.50	1.25	444.38	Discussion of various tax issues with tax counsel and tax manager.
Andreea Cloara	6/11/2008	300.00	270.00	1.50	405.00	Preparation of Texas franchise tax extension.
Andreea Cloara	6/11/2008	300.00	270.00	2.00	540.00	Finalize memorandum discussing tax withholding issues.
Dustin Grizzle	6/11/2008	130.00	117.00	1.00	117.00	Prepared Texas Franchise tax return for the year ended 12/31/2007
Andreea Cloara	6/12/2008	300.00	270.00	1.00	270.00	Preparation of withholding tax notice.
Andreea Cloara	6/12/2008	300.00	270.00	1.00	270.00	Meeting with tax counsel to discuss resolution of tax issues.
Dustin Grizzle	6/12/2008	130.00	117.00	0.75	87.75	Prepared Texas Franchise tax returns for the year ended 12/31/2007
Jeffrey Mutnik	6/12/2008	400.00	360.00	0.50	180.00	Preparation of response to IRS assessments of late payment penalties.
Jeffrey Mutnik	6/12/2008	400.00	360.00	2.50	900.00	Meetings with staff and tax counsel regarding open tax issues.
Scott Bouchner	6/12/2008	395.00	355.50	2.25	799.88	Meeting with tax counsel and tax partner to discuss final resolution of tax issues.
Andreea Cloara	6/13/2008	300.00	270.00	1.00	270.00	Prepare power of attorney forms for Mutual Benefits Corp.
Andreea Cloara	6/16/2008	300.00	270.00	2.00	540.00	Review memorandum prepared by tax counsel, prepare power of attorney, research on tax cases with withholding issues.
Julio Modia	6/16/2008	115.00	103.50	1.50	155.25	Prepare power of attorney and tax form 8821.
Andreea Cloara	6/17/2008	300.00	270.00	1.00	270.00	Continued discussions with tax council regarding withholding tax issues.
Andreea Cloara	6/17/2008	300.00	270.00	1.00	270.00	Analysis in connection with VSI tax provision.
Andreea Cloara	6/18/2008	300.00	270.00	1.00	270.00	Analysis in connection with Mutual Benefits tax provision.
Andreea Cloara	6/23/2008	300.00	270.00	1.00	270.00	Continued discussions with tax council regarding withholding tax issues.
Scott Bouchner	6/23/2008	395.00	355.50	1.25	444.38	Conference call with tax counsel and tax manager to discuss withholdings issue and edits to correspondence to IRS.
Andreea Cloara	6/27/2008	300.00	270.00	1.00	270.00	Call with IRS agent regarding hold on account.
Jeffrey Mutnik	6/30/2008	400.00	360.00	0.50	180.00	Review letter to IRS and underlying issues regarding penalty assessments.
<b>Total: Tax Issues</b>				<b>60.75</b>	<b>\$ 17,295.75</b>	

Case No. 04-60573-Civ-Moreno

DETAIL OF PROFESSIONAL AND PARAPROFESSIONAL TIME BY ACTIVITY CODE CATEGORY  
FROM MAY 1, 2008 THROUGH JUNE 30, 2008  
Exhibit 4

Name	Date	Standard Rate	Agreed-Upon Hourly Rate	Hours	Discounted Fee	Time Description
GRAND TOTAL				1,181.50	\$ 213,676.88	

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573 CIV-MORENO

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MUTUAL BENEFITS CORP.,  
JOEL STEINGER a/k/a JOEL STEINER,  
LESLIE STEINGER a/k/a LESLIE STEINER,  
and PETER LOMBARDI,

Defendants,

VIATICAL BENEFACTORS, LLC,  
VIATICAL SERVICES, INC.,  
KENSINGTON MANAGEMENT, INC.,  
RAINY CONSULTING CORP.  
TWIN GROVES INVESTMENTS, INC.,  
P.J.L. CONSULTING, INC.,  
SKS CONSULTING, INC., and  
CAMDEN CONSULTING, INC.,

Relief Defendants.

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**ORDER GRANTING  
BERKOWITZ DICK POLLACK & BRANT'S  
SEVENTEENTH INTERIM APPLICATION FOR COMPENSATION**

**THIS CAUSE** came before the Court on Berkowitz Dick Pollack & Brant, Certified Public Accountants and Consultants, LLP's Seventeenth Interim Application for Fees and Costs of Accountants for Receiver (D.E. No. \_\_\_\_\_) filed on October 16, 2008. The Court has carefully reviewed the Petition and case file and is otherwise fully advised in the premises.

**ORDERED** and **ADJUDGED** that Berkowitz Dick Pollack & Brant, Certified Public Accountants and Consultants, LLP's Seventeenth Interim Application for Fees and Costs is hereby

CASE NO. 04-60573 CIV-MORENO/Garber

**GRANTED** and Receiver, Roberto Martínez is hereby authorized to pay Berkowitz Dick Pollack & Brant, Certified Public Accountants and Consultants, LLP the sum of \$ \_\_\_\_\_ which represents reasonable fees of \$ \_\_\_\_\_ and costs of \$ \_\_\_\_\_ incurred during this Application Period.

**DONE** and **ORDERED** in Chambers at Miami, Florida this \_\_\_\_ day of \_\_\_\_\_, 2008.

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HON. FEDERICO A. MORENO  
United States District Judge

Copies furnished to all counsel of record