

Jul 27 2005

CLARENCE MADDOX
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S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573 CIV-MORENO
Magistrate Judge Garber

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.

**KOZYAK TROPIN & THROCKMORTON, P.A.'S FOURTH
REQUEST FOR INTERIM COMPENSATION TO PAY ATTORNEYS'
FEES AND COSTS AND MEMORANDUM IN SUPPORT
(February 1, 2005 - June 30, 2005)**

**Pursuant to Court Order, all objections to this Fourth
Application must be filed and served within ten (10) days of
this Fourth Application.**

David P. Milian, a Shareholder of Kozyak Tropin & Throckmorton, P.A. ("KTT") submits this Fourth Application for an award of interim attorney's fees and costs incurred by KTT as counsel to the Receiver, Roberto Martínez (the "Receiver") for the period February 1, 2005 through June 30, 2005 (the "Application Period").

KTT submits this Fourth Application at the request of the Receiver. This Application reflects KTT's agreement to reduce its fees by \$36,062.25 based on the reduction of KTT's billing rates from the firm's normal hourly rates (which reductions were reflected in the original fee application). This reduction is without prejudice to KTT making a future application to recover the reduction based on results obtained and the success of the Receivership.

In support of this Fourth Application, the undersigned submits the following:

1. Attached as **Exhibit "1"** is a Summary of the Fees incurred by KTT in its representation of the Receiver for the Application Period. Costs are posted through June 30, 2005.
2. Attached as **Exhibit "2"** is a summary of all KTT timekeepers, their billing rates¹ and the total hours that were charged by each timekeeper. **Exhibit "3"** is a summary of each timekeeper broken down by category. All time has been billed at the reduced agreed upon rate.² All partners are billed at \$350.00/hour. All non-partner timekeepers are billed at 15% below their regular hourly billing rate. As set forth above, savings to the receivership reflected in these negotiated discounts for this time period is approximately \$36,062.25. In certain instances, time

¹As of January 1, 2005, KT&T's hourly rates increased for each timekeeper.

²KTT maintains detailed time records that are kept contemporaneously with the services performed. KTT will file, within 10 days, these detailed time records under seal with the Court for review *in camera* and *ex-parte*.

billed to one category could have been appropriately billed to a different category or several different categories, however, in some instances it was very difficult, if not impossible, to divide the time between categories.

3. Attached as **Exhibit “4”** is the summary of costs. Total costs for which KTT seeks reimbursement are \$11,383.42.³ This reflects a voluntary write-off of out-of-pocket costs advanced by KTT of \$98.18.

4. The services rendered in each major category can be summarized as follows:

a. Asset Analysis and Recovery. [\$50,899.25]. Time included in this category reflects the efforts of KTT professionals to continue to identify and locate assets. KTT professionals continued the identification, review and analysis of pertinent documents and law, and, where appropriate, issued demand letters for return of funds or assets. A great deal of time was spent on research and analysis prepared in connection with the Motion to Approve Disposition of Policies filed April 22, 2005, which research was used by the Receiver in determining the recommendations included in the Motion to Approve Disposition. A number of Objections were filed to the Motion to Approve Disposition. KTT was required to prepare and file the Receiver’s Reply addressing the issues raised in these objections.

b. Asset Disposition. [\$5,603.25]. KTT, as well as other Receiver professionals, continue to receive inquiries regarding the disposition of assets. KTT also worked on issues relating to lease termination and disposition of other, unnecessary assets, including issues associated with liability insurance, water main break damages and escrow deposit issues. KTT also continued to

³Actual costs incurred was \$11,408.42, less a credit reduction of \$25.00.

assist co-counsel and the Receiver with issues relating to the pre-petition escrowed funds, and attended the April 15, 2005 hearing on the Receiver's Joint Proposed Disbursement Plan.

c. Business Operations. [\$36,300.00]. The efforts of KTT personnel in this area focused on the continued assistance in the management of the operations of the Receivership Entities, meeting with banks, resolving account issues, working on IRA issues, and, most significantly, continuing to assure the uninterrupted payment of premiums for the policies. Additionally, KTT has handled all issues relating to termination of old leases and negotiations and drafting of letter of intent and the final Commercial Lease for the new premises lease, and documentation of new premises lease.

KTT timekeepers worked on every aspect of business operations and operational logistics at MBC and VSI, including interface with, and coordination of, employees, bonding issues, continued banking issues, collection of death benefits, dealing with IRA transfer and rollover issues, interfacing with insurance companies on a variety of issues and reviewing payment of administrative expenses.

d. Investor and Agent Communications. [\$8,131.50]. KTT continues to assist the Receiver with investor communications, including preparing responses to investor inquiries, speaking to investors or their counsel, and assisting with the preparation or editing of material to be included on the website.

e. Case Administration. [\$8,106.75]. Time billed to this category includes the efforts associated with the administration of the Receivership including leasing, case staffing and general database issues, as well as preparing, or assisting in the preparation of, motions to modify

the Receiver's authority as necessary and appropriate. Time in this category also includes the actual website construction and maintenance which work is done by KTT paraprofessionals.

f. Claims Administration and Objection. [\$105.00]. Minimal time was charged in this category.

g. Employee Matters. [\$1,062.50]. KTT addressed issues concerning employee matters, including 401-K Plan and Cobra issues.

h. Fee/Employment Applications (Professionals). [\$5,006.00]. Time in this category includes preparation of KTT's Third and Fourth Interim Fee Applications and pleadings associated with the Receiver's Motion to Retain Sam Ullman.

i. General Litigation. [\$315.00]. Minimal time was charged to this category.

j. Litigation SEC. [\$28,467.25]. All time associated directly to the pending SEC litigation is included in this category including review of pleadings, preparation of pleadings relating to administration of the receivership, and attendance at hearings when requested by the Receiver, as well as preparation for, and attendance at, depositions relating to the pre-purchase escrow account.

KTT prepared the Motion to Clarify Order Appointing Receiver relative to the maintenance of the policies and utilizing the funds held in escrow. In addition, KTT addressed with the Receiver matters concerning this Court's May 20, 2004 Order Amending Order Appointing Receiver Regarding Maintenance of Insurance Policies and Benefits [D.E. #48].

k. Litigation Third-Party. [\$1,698.75]. Timekeepers at KTT have assisted the Receiver and co-counsel at Colson Hicks Eidson in coordinating outside litigation, including analysis and review of third party interpleader actions, and intervention requests.

1. Litigation - Administrative. [\$770.00]. KTT timekeepers have assisted, as requested, in efforts to abate regulatory actions during the Receivership, as well as assist in responding to requests for information from administrative agencies.

5. For the Application Period, KTT seeks reimbursement for 514.60 hours of attorney and paraprofessional time. The total amount of fees sought during the application period is \$146,465.25, reflecting the negotiated discounts totaling approximately \$36,062.25. Total expenses sought by KTT for the application period are \$11,383.42.

6. I have carefully reviewed the attached exhibits and I am responsible for supervising all of the attorneys in my firm on the case. I certify that the hours expended and the costs incurred were necessary and reasonable to represent the Receiver during the Application Period.

MEMORANDUM OF LAW

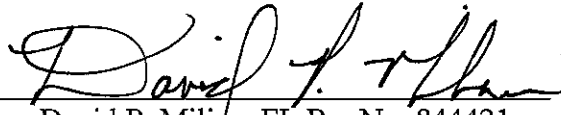
When determining the award of attorneys' fees, the Court should give consideration to the factors for compensation that the 11th Circuit articulated in *In re Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988) - (1) the time and labor properly employed by the attorneys in processing 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, effort were supported by prior governmental action. KTT respectfully suggests that its application meets all of the criteria for this interim request for compensation. The Receiver, with the assistance of KTT, has stabilized operations, secured assets, and, to the extent possible, maintained the status quo, while communicating regularly with all parties in interest, especially investors.

WHEREFORE, KOZYAK, TROPIN & THROCKMORTON, by and through the undersigned counsel, respectfully requests that this Court enter an Order Authorizing the Payment of \$146,465.25 in fees and reimbursement of \$11,383.42 in costs for the Application Period. A proposed form of Order is attached.

Dated: July 27, 2005

Respectfully submitted,

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By: 
David P. Milian, FL Bar No. 844421
Laurel M. Isicoff, FL Bar No. 350923
Carmen Contreras-Martinez, FL Bar No. 0093475

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail and U.S. Mail this 27th day of July, 2005 to all parties on the attached Service List.

By: 
David P. Milian

3298/101/252990.1

SERVICE LIST OF RECEIVER

December 10, 2004

Case No.: 04-60573 CIV-Moreno

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Peter Lombardi and PJJ Consulting*

EXHIBIT 1

SUMMARY OF FOURTH REQUEST FOR INTERIM COMPENSATION OF FEES AND COSTS OF KOZYAK TROPIN & THROCKMORTON, P. A.

1	Name of Applicant	Kozyak Tropin & Throckmorton, P. A.
2	Role of Applicant	Co-Counsel for Receiver
3	Name of certifying professional	David P. Milian
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	February 1, 2005 through June 30, 2005
8	Total fees requested for this period	\$146,465.25
9	Total expenses requested for this period	\$11,383.42
10	Total fees and expenses requested to be awarded	\$157,848.67

HISTORY OF FEE APPLICATIONS

Application Number	Application Period	Date Submitted	Amount Requested	Amount Awarded	Date Awarded
1 (as amended)	5/4/04 – 6/18/04	07/08/04	\$376,040.99	\$376,065.00	10/27/04; 12/16/04
2	6/19/04 – 9/30/04	12/07/04	\$225,468.06	\$200,000.00	06/01/05
3	10/1/04 – 1/31/05	03/11/05	\$112,200.17	\$100,000.00	06/01/05
4	2/1/05 – 6/30/05	07/15/05	\$157,848.67	Pending	Pending
TOTAL			\$871,557.89	\$676,065.00	

EXHIBIT 2

Summary of Professionals And Paraprofessional Time

Attorney Name		Licensed	Hours	Rate	Fee
CONTRERAS-MARTINEZ, CARMEN	Associate	1996	163.60	212.50	34,765.00
THROCKMORTON, CHARLES	Senior Partner	1979	21.80	350.00	7,630.00
MILIAN, DAVID P.	Senior Partner	1990	23.90	350.00	8,365.00
SHAW-WILDER, DETRA P	Partner	1994	0.20	350.00	70.00
KEVA J. LABOSSIÈRE	Paralegal	n/a	0.30	127.50	38.25
HARTMANN, KENNETH R.	Senior Partner	1987	31.90	350.00	11,165.00
ALMESTICA, LIZA	Paralegal	n/a	3.50	127.50	446.25
ISICOFF, LAUREL M.	Senior Partner	1982	210.10	350.00	73,535.00
KUBS, MINDY	Associate	1995	34.00	212.50	7,225.00
PAZ, YAMILE C.	Paralegal	n/a	25.30	127.50	3,225.75
Total Hours by Professionals and Paraprofessionals:					514.60
"Blended" Hourly Rate:					284.62
Total Professionals and Paraprofessionals Fees:					146,465.25

* Indicate any changes in hourly rates during this Application and the date of such change

** Indicate "blended" hourly rate.

EXHIBIT 3

Summary of Professional And Paraprofessional Time by Activity Code Category

Attorney Name	Licensed	Hours	Rate	Fee
THROCKMORTON, CHARLES	1979	17.10	350.00	5,985.00
MILIAN, DAVID P.	1990	0.20	350.00	70.00
HARTMANN, KENNETH R.	1987	0.80	350.00	280.00
ALMESTICA, LIZA	n/a	0.30	127.50	38.25
ISICOFF, LAUREL M.	1982	110.80	350.00	38,780.00
KUBS, MINDY	1995	26.80	212.50	5,695.00
PAZ, YAMILE C.	n/a	0.40	127.50	51.00
		-----	-----	-----
Total for Category ASSET ANALYSIS AND RECOVERY		156.40	325.44	50,899.25
-				
MILIAN, DAVID P.	1990	1.50	350.00	525.00
ISICOFF, LAUREL M.	1982	14.40	350.00	5,040.00
PAZ, YAMILE C.	n/a	0.30	127.50	38.25
		-----	-----	-----
Total for Category ASSET DISPOSITION		16.20	345.88	5,603.25
-				
CONTRERAS-MARTINEZ, CARMEN	1996	105.30	212.50	22,376.25
HARTMANN, KENNETH R.	1987	24.60	350.00	8,610.00
ALMESTICA, LIZA	n/a	0.20	127.50	25.50
ISICOFF, LAUREL M.	1982	15.00	350.00	5,250.00
PAZ, YAMILE C.	n/a	0.30	127.50	38.25
		-----	-----	-----
Total for Category BUSINESS OPERATIONS		145.40	249.66	36,300.00

CONTRERAS-MARTINEZ, CARMEN	1996	27.50	212.50	5,843.75
MILIAN, DAVID P.	1990	0.80	350.00	280.00
HARTMANN, KENNETH R.	1987	0.20	350.00	70.00
ISICOFF, LAUREL M.	1982	5.50	350.00	1,925.00
PAZ, YAMILE C.	n/a	0.10	127.50	12.75
		-----	-----	-----
Total for Category		34.10	238.46	8,131.50
INVESTOR AND AGENT COMMUNICATIONS				

THROCKMORTON, CHARLES	1979	4.60	350.00	1,610.00
MILIAN, DAVID P.	1990	1.00	350.00	350.00
SHAW-WILDER, DETRA P	1994	0.20	350.00	70.00
KEVA J. LABOSSIERE	n/a	0.30	127.50	38.25
HARTMANN, KENNETH R.	1987	0.20	350.00	70.00
ALMESTICA, LIZA	n/a	1.10	127.50	140.25
ISICOFF, LAUREL M.	1982	14.60	350.00	5,110.00
KUBS, MINDY	1995	2.60	212.50	552.50
PAZ, YAMILE C.	n/a	1.30	127.50	165.75
		-----	-----	-----
Total for Category		25.90	313.01	8,106.75
CASE ADMINISTRATION				

ISICOFF, LAUREL M.	1982	0.30	350.00	105.00
		-----	-----	-----
Total for Category		0.30	350.00	105.00
CLAIMS ADMINISTRATION AND OBJECTIONS				

CONTRERAS-MARTINEZ, CARMEN	1996	5.00	212.50	1,062.50
		-----	-----	-----
Total for Category		5.00	212.50	1,062.50
EMPLOYEE MATTERS/PENSION				

MILIAN, DAVID P.	1990	3.00	350.00	1,050.00
ALMESTICA, LIZA	n/a	0.10	127.50	12.75
ISICOFF, LAUREL M.	1982	4.60	350.00	1,610.00
PAZ, YAMILE C.	n/a	18.30	127.50	2,333.25
		-----	-----	-----
Total for Category FEE/EMPLOYMENT APPLICATIONS (PROFESSIONALS)		26.00	192.54	5,006.00

-				
HARTMANN, KENNETH R.	1987	0.90	350.00	315.00
		-----	-----	-----
Total for Category LITIGATION		0.90	350.00	315.00

-				
CONTRERAS-MARTINEZ, CARMEN	1996	23.90	212.50	5,078.75
THROCKMORTON, CHARLES	1979	0.10	350.00	35.00
MILIAN, DAVID P.	1990	12.40	350.00	4,340.00
HARTMANN, KENNETH R.	1987	5.20	350.00	1,820.00
ALMESTICA, LIZA	n/a	1.80	127.50	229.50
ISICOFF, LAUREL M.	1982	44.00	350.00	15,400.00
KUBS, MINDY	1995	4.60	212.50	977.50
PAZ, YAMILE C.	n/a	4.60	127.50	586.50
		-----	-----	-----
Total for Category LITIGATION - SEC		96.60	294.68	28,465.25

-				
CONTRERAS-MARTINEZ, CARMEN	1996	1.90	212.50	403.75
MILIAN, DAVID P.	1990	2.80	350.00	980.00
ISICOFF, LAUREL M.	1982	0.90	350.00	315.00
		-----	-----	-----
Total for Category LITIGATION - THIRD PARTY		5.60	303.35	1,698.75

MILIAN, DAVID P.	1990	2.20	350.00	770.00
		-----	-----	-----
Total for Category		2.20	350.00	770.00
LITIGATION - ADMINISTRATIVE				
-				
Grand Total		514.60	284.62	146,465.25

EXHIBIT 4

**Summary of Requested Reimbursement Of Expenses
for this Time Period Only**

1.	Filing Fees	\$0.00
2.	Process Service Fees	\$0.00
3.	Witness Fees	\$0.00
4.	Court Reporter & Transcripts	\$290.00
5.	Lien and Title Searches	\$0.00
6.	Photocopies	\$558.90
	(a) In-house copies (3,726 @ \$.15)	
	(b) Outside copies - actual costs (\$0.00)	
7.	Postage	\$67.13
8.	Overnight Delivery Charges	\$0.00
9.	Outside Courier/Messenger Service	\$539.00
10.	Long Distance Telephone Charges	\$963.92
11.	Fax Transmissions ..	\$364.00
12.	Computerized Research	\$8,589.47
	Westlaw - \$7,879.79	
	Pacer - \$47.68	
	ChoicePoint Search Engine - \$662.00	
	(locate viators)	
13.	Travel Expenses	\$0.00
	(a) _____ (\$0.00)	
14.	Other	\$36.00
	(a) Renewal of domain name for MBC (\$36.00)	
	SUBTOTAL EXPENSE REIMBURSEMENT REQUESTED	\$11,408.42
	LESS CREDIT REDUCTION	(\$25.00)
	TOTAL EXPENSE REIMBURSEMENT REQUESTED	\$11,383.42

253108.1/3298-101

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573 CIV-MORENO
Magistrate Judge Garber

SECURITIES AND EXCHANGE COMMISSION,

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

Relief Defendants.

ORDER GRANTING FEES

THIS CAUSE came before the Court on Kozyak Tropin and Throckmorton, P.A.'s Fourth Interim Application for Fees and Costs. The Court has heard comments by interested parties, carefully reviewed the Application and case file and is otherwise fully advised in the premises.

THE COURT notes that by prior Order this Court authorized the Receiver to "appoint one or more special agents, employ legal counsel, actuaries, accountants, claims administrators, clerks,

consultants and assistants as the Receiver deems necessary and to fix and pay their reasonable compensation and expenses”subject to the approval by this Court at the time the Receiver accounts to the Court for such expenditures and compensation.

Pursuant to that provision, by prior Order the Court approved Receiver’s application to employ Kozyak Tropin and Throckmorton, P.A. (“KTT”) as Receiver’s counsel in this action. In the instant Application, KTT seeks to have the Court authorize the Receiver to compensate KTT for services rendered for the period from February 1, 2005 through June 30, 2005. In total, the Application seeks approval of the payment of \$157,848.67 consisting of \$146,465.25 in fees and \$11,383.42 in costs, which reflect negotiated reductions totaling \$36,062.25.

Accordingly, after due consideration, it is

ORDERED and **ADJUDGED** that Kozyak Tropin and Throckmorton P.A.’s Fourth Interim Application for Fees and Costs is hereby **GRANTED** and Receiver, Roberto Martínez is hereby authorized to pay Kozyak Tropin & Throckmorton, P.A. the sum of \$ _____ which represents reasonable fees and costs incurred during the Application Period.

DONE and **ORDERED** in Chambers in the Southern District this ____ day of _____, 2005, in Miami, Florida.

Copies furnished to:

All parties on the attached service list.

SERVICE LIST

SEC v. MBC, et al.

Case No. 04-60573-CIV-MORENO/Garber

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SERVICE LIST

SEC V. MBC, et al.

Case No. 04-60573-CIV-MORENO/Garber

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