

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: JOHN COLEMAN
Debtor

CHAPTER 11
CASE NO. 21-11833-SDM

FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF NECESSARY EXPENSES
FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC

COMES NOW the Law Offices of Craig M. Geno, PLLC (“Applicant”), and files this its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the “Application”), counsel for the Debtor, and in support thereof, would show as follows:

1. On September 29, 2021, the Debtor herein filed with this Court his Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code (the “Petition”). Subsequent thereto, the Debtor has been in possession and control of the assets of the Debtor-in-possession and is operating his business.

2. On June 2, 2022, an Order [DK #192] approving the employment of the Law Offices of Craig M. Geno, PLLC, as attorneys for the Debtor was entered by the Court.

3. The substantial services rendered to the Debtor and the expenses incurred by Applicant benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as **Exhibit “A”**. The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as **Exhibit “B”** and incorporated by reference.

4. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by Applicant to the Debtor in all matters which are

anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel's obligations herein; and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases. The time, skill and experience utilized by counsel for the Debtor justify the approval of the Application.

5. This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from September 28, 2021, to and including July 13, 2022, and is for the sum of \$34,181.08 (\$32,183.25 in fees and \$1,997.83 in expenses), less any retainer balance remaining.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing the Debtor to pay said attorneys' fees and expenses from funds Debtor's counsel has in trust. Applicant prays for general relief.

THIS, the 13th day of July, 2022.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: /s/ Craig M. Geno

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

N:\Firm Data\Users\Bankrupt\Coleman, John\Fee Apps\CMG1stApplication.wpd

CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to the following:

Abigail M. Marbury, Esq.
abigail.m.marbury@usdoj.gov

THIS, the 13th day of July, 2022.

/s/ Craig M. Geno _____
Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JOHN COLEMAN
Debtor**

**CHAPTER 11
CASE NO. 21-11833-SDM**

EXHIBIT “A”

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: JOHN COLEMAN
Debtor

CHAPTER 11
CASE NO. 21-11833-SDM

AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the "Application"), Debtor's counsel, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.

/s/ Craig M. Geno
Craig M. Geno

STATE OF MISSISSIPPI
COUNTY OF Madison

SWORN TO AND SUBSCRIBED BEFORE ME, this the 13th day of July, 2022.



Kathryn Carter
NOTARY PUBLIC

MY COMMISSION EXPIRES June 21, 2025

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JOHN COLEMAN
Debtor**

**CHAPTER 11
CASE NO. 21-11833-SDM**

EXHIBIT "B"

Law Offices of Craig M. Geno, PLLC
587 Highland Colony Parkway
Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048

Fax:601-427-0050

John Coleman
1107 Robert E. Lee Drive
Greenwood, MS-Mississippi
38930 USA

July 13, 2022

Attention:

File #: 321014

Inv #: 347669

RE: Chapter 11

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Sep-28-21	Numerous telephone conferences with client, Charlie Swayze (Jr. & III) re case background, decisions to file bankruptcy re receivership; Telephone conference with counsel for bank	1.00	400.00	CMG
Sep-29-21	Dictation of petition; Review and revision of same	0.30	120.00	CMG
	Receipt and review of Deficiency Notice; calendar deadline to file Matrix, Verification and Statement of Social Security Number	0.10	19.50	KLC
	Receipt and review of Deficiency Notice; calendar deadline to file Schedules, SOFA, Attorney Disclosure Statement, List of 20 Largest Unsecured Creditors, and Statement of Current Monthly Income	0.10	19.50	KLC
	Assist CMG setting up file, drafting and revising Petition, New Client Data Sheet, IDI documents, Statement of Social Security Number	0.75	146.25	KLC
Oct-01-21	Assist CMG drafting Motion for Additional Time to File Matrix, Verification and Order re same	0.20	39.00	KLC
Oct-02-21	Review notice from UMB Bank	0.20	80.00	CMG

Oct-04-21	Review order extending time to file matrix	0.05	20.00	CMG
	Review memos to/from Abby Marbury re possible dates for 341 meeting of creditors	0.20	80.00	CMG
	Review memos to/from Brad Alexander re dates for Initial Debtor Interviews and related matters	0.20	80.00	CMG
Oct-05-21	Telephone conference with Charles Swayze, III re sale of home	0.20	80.00	CMG
	Receipt and review of Order on Motion for Additional Time to File Matrix and Verification; calendar deadline to file matrix and verification	0.10	19.50	KLC
	Assist CMG drafting and revising Matrix	0.30	58.50	KLC
Oct-06-21	Assist CMG revising Matrix	0.10	19.50	KLC
Oct-07-21	Review memos to/from Abby Marbury re initial debtor interview times and dates	0.20	80.00	CMG
	Review 341 notice	0.20	80.00	CMG
Oct-08-21	Review memos to/from Brad Alexander re initial debtor interviews; Review memos to/from client re same	0.20	80.00	CMG
	Review notice of appearance for State of Mississippi - E. Lawler	0.10	40.00	CMG
	Review notice from First South Farm Credit	0.10	40.00	CMG
	Review notice from Bank of Commerce	0.10	40.00	CMG
	Receipt and review of Notice of Meeting of Creditors; calendar various deadlines and meeting of creditors date	0.15	29.25	KLC
	Receipt and review of letter from UST scheduling IDI; calendar IDI date and deadline to submit IDI documents	0.10	19.50	KLC
Oct-11-21	Review numerous notices and admission motions	0.25	100.00	CMG
Oct-13-21	Review memos to/from Mr. Coleman re	0.20	80.00	CMG

closing existing personal bank account or removing his name from it and opening new DIP account

	Review notice from Staple Cotton Discount	0.25	100.00	CMG
	Dictation of motion/order re time to file schedules; Review and revision of same	0.45	180.00	CMG
	Assist CMG drafting and revising Motion for Additional Time to File Schedules, etc. and Order re same	0.15	29.25	KLC
	Assist CMG drafting Application to Employ CMG, Certificate of Service and Order re same	0.20	39.00	KLC
Oct-15-21	Review memos from Brad Alexander re reset IDI	0.10	40.00	CMG
	Assist CMG performing UCC search	0.10	19.50	KLC
Oct-17-21	Telephone conference with Charles Swayze, III re case status, sale of home	0.25	100.00	CMG
Oct-18-21	Review MDOR POC	0.25	100.00	CMG
Oct-21-21	Review memos to/from B. Alexander, client regarding IDI documents	0.20	80.00	CMG
	Review IDI documents	1.00	400.00	CMG
	Review Chase Proofs of Claim No. 2 & 3	0.35	140.00	CMG
	Review Chase Proofs of Claim No. 4 & 5	0.35	140.00	CMG
	Assist CMG preparing IDI documents	0.15	29.25	KLC
Oct-24-21	Review notice from State of MS - K. Foreman	0.10	40.00	CMG
	Review notice from Stone X	0.20	80.00	CMG
Oct-26-21	Assist CMG revising Application to Employ CMG and drafting Attorney Disclosure Statement	0.15	29.25	KLC
Oct-29-21	Receipt and review of Order on Motion for Additional Time to File Required Documents;	0.10	19.50	KLC

calendar deadline to Schedules, SOFA,
 Attorney Disclosure Statement, List of 20
 Largest Unsecured Creditors and Statement of
 Current Monthly Income

Nov-01-21	Telephone conference with C. Swayze regarding sale of home	0.20	80.00	CMG
	Review Motion to Sell	0.05	20.00	CMG
	Review memos to/from A. Marbury; Mr. Coleman regarding DIP account; Sale Motion	0.25	100.00	CMG
Nov-02-21	Review and revision of 20 Largest Unsecured Creditor list	0.20	80.00	CMG
	Review memos to/from Mr. Coleman; Katie Carter regarding unsecured creditor list	0.20	80.00	CMG
	Assist CMG drafting List of 20 Largest Unsecured Creditors	0.10	19.50	KLC
Nov-04-21	Assist CMG revising Attorney Disclosure Statement and Application to Employ CMG	0.15	29.25	KLC
Nov-05-21	Assist CMG drafting 2nd Motion to Extend Time to File Schedules, etc.	0.10	19.50	KLC
Nov-08-21	Assist CMG drafting Order on 2nd Motion to Extend Time to File Schedules, etc.	0.10	19.50	KLC
Nov-09-21	Assist CMG drafting and revising Schedules, SOFA, Statement of Current Monthly Income	1.75	341.25	KLC
Nov-10-21	Review and revision of Schedules and SOFA	1.75	700.00	CMG
	Assist CMG drafting and revising Schedules, SOFA, Statement of Current Monthly Income	1.80	351.00	KLC
Nov-16-21	Review Notice of Hearing on Motion to Sell Assets	0.20	80.00	CMG
	Receipt and review of hearing notice re Motion to Sell Real Property; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
Nov-19-21	Review memos to/from Mr. Coleman regarding telephonic appearance rather than subpoena on 11/30 hearing	0.20	80.00	CMG

Nov-24-21	Dictation of motion to dismiss case	0.65	260.00	CMG
	Receipt and review of hearing notice re Motion to Dismiss Case; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Receipt and review of Order to File Certificate of Service re hearing notice on Motion to Dismiss Case; calendar deadline to file certificate and notice out materials	0.15	29.25	KLC
	Assist CMG drafting Motion to Dismiss Case	0.10	19.50	KLC
Nov-29-21	Assist CMG drafting Certificate of Service re Motion to Dismiss Case	0.10	19.50	KLC
	Organize and supervise mailout of Motion to Dismiss Case	0.20	39.00	KLC
Dec-10-21	Review memos to/from Mr. Coleman regarding Scheduling Order	0.20	80.00	CMG
Dec-17-21	Review objections and joinders to Motion to Dismiss; telephone conference with Mr. Coleman regarding dismissals, leaving sale proceeds with Chapter 11 estate to pay off claims of corporate debtor	1.50	600.00	CMG
Jan-03-22	Review notice - Farm Group I	0.15	60.00	CMG
	Review Farm Group I joinders	0.35	140.00	CMG
Jan-05-22	Review file and court docket re: 1/6/22 hearing on Motion to Dismiss Case; prepare hearing folder for same	0.75	146.25	KLC
Jan-06-22	Review minute entry from Dismissal Hearing	0.20	80.00	CMG
Jan-26-22	(UMB v.) Receipt and review of Summons; calendar deadline to file Answer to Complaint	0.10	19.50	KLC
Jan-28-22	Receipt and review of Agreed Order Extending Deadline for Creditors to File POCs; calendar POC deadline	0.10	19.50	KLC
Jan-31-22	Dictation of letter to John Coleman re converting case to Chapter 7	0.25	100.00	CMG

	Assist CMG drafting letter to John Coleman re converting case to Chapter 7	0.15	29.25	KLC
Feb-01-22	Dictation of motion to convert case to Chapter 7	0.30	120.00	CMG
	Assist CMG drafting Motion to Convert Case to Chapter 7 and Order re same	0.20	39.00	KLC
Feb-02-22	Receipt and review of hearing notice re Motion to Convert Case to Ch. 7; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Receipt and review of Order to File Certificate of Service re hearing notice on Motion to Convert Case to Ch. 7; calendar deadline to file certificate and notice out materials	0.15	29.25	KLC
	Receipt and review of Notice of Rescheduled Meeting of Creditors; calendar meeting of creditors date	0.10	19.50	KLC
	Assist CMG drafting Certificate of Service re Motion to Convert Case to Chapter 7	0.10	19.50	KLC
	Organize and supervise mailout of Motion to Convert Case to Chapter 7	0.10	19.50	KLC
Feb-18-22	Receipt and review of Order on Examiner's Motion to Expedite Hearing on Application to Employ Attorneys; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
Mar-02-22	Receipt and review of Order on Examiner's Motion to Expedite Hearing on Motion to Convert Case to Ch. 7; calendar hearing date to trigger preparation of hearing folder	0.10	19.50	KLC
Mar-03-22	Receipt and review of Amended Order on Examiner's Motion to Expedite Hearing on Motion to Convert Case to Ch. 7; calendar hearing date to trigger preparation of hearing folder	0.10	19.50	KLC
	Receipt and review of Order on Examiner's Motion to Expedite Hearing on Motion to Modify Agreed Order Approving Sale; calendar hearing date and objection to trigger preparation of hearing folder	0.15	29.25	KLC

Mar-08-22	Review memos to/from Mr. Coleman regarding attendance at creditors' meetings and related matters	0.20	80.00	CMG
	Review additional memos to/from Mr. Coleman regarding asserting Fifth Amendment privilege, persons who will likely be at 341 meeting and numerous related matters	0.20	80.00	CMG
	Review memos to/from court personnel regarding resetting of various hearings due to scheduling conflicts	0.20	80.00	CMG
	Receipt and review of Order on Motion to Expedite Hearing on UST's Motion to Compel Debtor's Appearance at Meeting of Creditors; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
Mar-09-22	Review potential exhibits, work on exhibits, dictation of letter to court regarding exhibits for upcoming hearings	1.00	400.00	CMG
	Review numerous memos to/from Spencer Clift regarding status of pleadings, court clerk efforts to advance agenda and docket	0.55	220.00	CMG
	Review memos to/from Mr. Coleman regarding order compelling appearance at creditors meeting	0.25	100.00	CMG
	Assist CMG drafting letter re exhibits for 3/11 hearings and preparing exhibits for same	1.00	195.00	KLC
Mar-10-22	Review U.S. Trustee motion to compel	0.25	100.00	CMG
	Dictation of response to U.S. Trustee motion to compel	0.25	100.00	CMG
	Review and revision of response to U.S. Trustee motion to compel	0.10	40.00	CMG
	Review file and court docket re: 3/11/22 hearing on Motion to Convert Case to Ch. 7; prepare hearing folder for same	0.40	78.00	KLC
	Review file and court docket re: 3/11/22 hearing on UST's Motion to Compel Debtor's Appearance at Meeting of Creditors; prepare hearing folder for same	0.25	48.75	KLC

	Review file and court docket re: 3/11/22 hearing on Examiner's Motion to Modify Agreed Order on Motion to Sell; prepare hearing folder for same	0.25	48.75	KLC
	Assist CMG drafting and revising Answer, Response to Examiner's Motion to Modify Agreed Order on Motion to Sell	0.35	68.25	KLC
	Assist CMG drafting and revising Answer, Response to UST's Motion to Compel Appearance at Meeting of Creditors	0.10	19.50	KLC
	Assist CMG revising letter re exhibits for 3/11 hearings and preparing exhibits for same	0.30	58.50	KLC
Mar-11-22	Review file, statutes regarding appearance at creditors meetings and prepare for hearing	0.75	300.00	CMG
	Attended hearing on motion to convert and related matters	1.00	400.00	CMG
	Review exhibit witness list re 3/11 hearings	0.20	80.00	CMG
	Receipt and review of minute entry re Examiner's Motion to Modify Agreed Order on Motion to Sell; calendar deadline to submit proposed order	0.10	19.50	KLC
	Receipt and review of Minutes from Meeting of Creditors; calendar continued Meeting of Creditors	0.10	19.50	KLC
	(UMB v.) Receipt and review of Agreed Order Granting Extension of Time to answer Complaint; calendar deadline to answer Complaint	0.10	19.50	KLC
Mar-15-22	Review Order to Compel as to creditors' meeting	0.20	80.00	CMG
Mar-16-22	Review Chapter 11 proceeding memo as to 341 meeting	0.20	80.00	CMG
	Dictation of letter to client regarding attendance at 341 meeting	0.20	80.00	CMG
Mar-17-22	Review memo from client regarding case update, creditor submitting related matters	0.20	80.00	CMG
	Dictation of additional letter to client	0.25	100.00	CMG

	regarding requirement to appear at 341 meeting, advice from defense lawyers and testimony at 341 meeting			
	Assist CMG drafting letter to John Coleman re order on motion to convert, 341 meeting	0.10	19.50	KLC
Mar-20-22	Review memos to/from Mr. Coleman regarding attendance at 341 meeting	0.45	180.00	CMG
Mar-21-22	Dictation of memo to KLC, review memo to Mr. Coleman regarding adjourned and ordered 341 meeting	0.25	100.00	CMG
	Review notice of appearance from Patrick Roberts	0.15	60.00	CMG
	Review MDA Proof of Claim	0.50	200.00	CMG
Mar-22-22	Review memos to/from Mr. Coleman regarding 341 logistics	0.20	80.00	CMG
	Assist CMG drafting Order on Examiner's Motion to Modify Order on Motion to Sell	0.20	39.00	KLC
Mar-23-22	Attended 341 meeting	1.75	700.00	CMG
	Review Notice of Continuance of 341 meeting	0.20	80.00	CMG
	Receipt and review of Minutes from Meeting of Creditors; calendar continued date to trigger preparation of hearing folder and deadline to cure deficiencies	0.10	19.50	KLC
Mar-24-22	Review memos to/from Mr. Coleman regarding terms, conditions and issues concerning sale of home and proceeds derived therefrom	0.25	100.00	CMG
	Review order to submit paperwork for default re UMB litigation	0.25	100.00	CMG
	Review memos to/from Mr. Coleman regarding amount of funds borrowed from Express Grain to construct homestead property	0.20	80.00	CMG
Mar-25-22	Telephone conference with Frank Childress, Mr. Clift regarding Order on Dischargability Adversary	0.20	80.00	CMG

	Review memos to/from Frank Childress regarding Status Conference on Adversary Proceeding	0.20	80.00	CMG
Mar-27-22	Review and revision of draft order on Motion to Modify, dictation of memo to Sarah Beth Wilson and KLC re same	0.20	80.00	CMG
Mar-29-22	Receipt and review of Order for CMG to Submit Proposed Order re Examiner's Motion to Modify Agreed Order Approving Sale; calendar deadline to submit order	0.10	19.50	KLC
Mar-30-22	Review memos to/from KLC, Garrett Anderson regarding revisions to order on prior motion	0.20	80.00	CMG
Mar-31-22	Review memos to/from client, Charlie Swayze re offer on home and related matters	0.25	100.00	CMG
Apr-01-22	Review memos to/from Mr. Coleman re TD Ameritrade account	0.25	100.00	CMG
Apr-05-22	Review applications for default submitted by UMB Bank	0.45	180.00	CMG
Apr-06-22	Review list of documents to be produced; Compare to schedules and review additional memos to/from Mr. Anderson, Mr. Coleman re document production	0.65	260.00	CMG
	Review memos from Garrett Anderson; Review document production request list	0.50	200.00	CMG
	Review memo from client re document production	0.20	80.00	CMG
Apr-07-22	Review memos to/from Dennis Gerrard re response to Garrett Anderson on request for documents in John Coleman examination from Express Grain	0.25	100.00	CMG
	Review motion for default judgment in UMB litigation	0.40	160.00	CMG
Apr-11-22	Review memo from Mr. Coleman re assistance on monthly operating reports	0.25	100.00	CMG
Apr-12-22	Dictation of application to employ	1.00	400.00	CMG
	Review and revision of application to employ	0.25	100.00	CMG

	Review entry from clerk re service in compliance with Rule 7004 in UMB litigation	0.20	80.00	CMG
	Assist CMG revising Application to Employ CMG and Order re same	0.25	48.75	KLC
Apr-13-22	Review entry of default and judgment of non-dischargeability in UMB litigation	0.25	100.00	CMG
	Telephone conference with Mr. Coleman re judgment and its effect, exempt property	0.25	100.00	CMG
	Review numerous additional memos to/from Mr. Coleman re judgment eventualities and waiver of discharge	0.20	80.00	CMG
	Review memos to/from Mr. Coleman re retirement account issues and general questions on exemptions	0.20	80.00	CMG
	Review memos to/from Abby Marbury; Dictation of memo to Mr. Coleman re 341 deficiencies	0.20	80.00	CMG
	Review memos to/from Mr. Coleman re credit issues/waiver of discharge	0.25	100.00	CMG
	Assist CMG revising Application to Employ CMG and Order re same	0.10	19.50	KLC
Apr-18-22	Review memo from, telephone conference with, Charlie Swayze re home sale, use of proceeds	0.25	100.00	CMG
Apr-19-22	Review memo from Mr. Coleman re ownership of EGT State Fund; Review operating agreement	0.65	260.00	CMG
Apr-20-22	Review memos to/from John Coleman re appealing or inability to appeal default judgment due to issues re testimony	0.25	100.00	CMG
Apr-21-22	Review memos to/from Garrett Anderson, Mr. Gerrard re executed NDA and future steps	0.25	100.00	CMG
	Review motion to clarify	0.75	300.00	CMG
	Review memos to/from John Coleman, UST re	0.50	200.00	CMG

	insurance; Review numerous insurance documents to reflect current coverage			
	Review memo from client re Travelers claim and retirement funds	0.25	100.00	CMG
	Dictation of memo to client re default judgment	0.35	140.00	CMG
Apr-22-22	Review order for certificate of service re application to employ	0.15	60.00	CMG
	Review memos to/from John Coleman re analysis of default judgment and underlying issues relating thereto	0.65	260.00	CMG
	Telephone conference with Charles Kelley re default judgment and considerations associated with it	0.55	220.00	CMG
	Review memos to/from Abby Marbury re insurance coverages and expiration dates	0.25	100.00	CMG
Apr-25-22	Review memos to/from Garrett Anderson, John Coleman re document production and coordination of same with the examiner	0.25	100.00	CMG
Apr-26-22	Review memos to/from KLC; Review instructions for monthly operating report forms for client to do himself	0.25	100.00	CMG
	Review memos to/from John Coleman, Abby Marbury re cryptocurrency revelation	0.20	80.00	CMG
	Review memos to/from KLC; Review secretary of state's information as to various corporate entities	0.25	100.00	CMG
	Review numerous statements re cryptocurrency accounts, brokerage accounts, Big Sand Properties financial information, credit card statements and monthly bank statements	1.00	400.00	CMG
	Receipt and review of hearing notice re Application to Employ CMG; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Receipt and review of Order to File Certificate of Service re hearing notice on Application to	0.15	29.25	KLC

Employ CMG; calendar deadline to file certificate and notice out materials

	Receipt and review of hearing notice re Examiner's Motion to Clarify Order Appointing Examiner; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Assist CMG drafting and revising Amended Schedule A/B, H, I, J, Amended SOFA and September 2021 MOR	1.60	312.00	KLC
Apr-27-22	Review memos to/from KLC, John Coleman re transportation costs, funds expended out of DIP account, funds repaid to Express Grain	0.25	100.00	CMG
	Review numerous memos to/from KLC, John Coleman, Abby Marbury re amendments to schedules, insurance, cost of living, financial report; Review draft revised schedules and numerous related matters	1.50	600.00	CMG
	Assist CMG revising Amended Schedule A/B, H, I, J, Amended SOFA and September 2021 MOR	0.10	19.50	KLC
Apr-28-22	Review memos to/from John Coleman; Review initial draft of September 2021 monthly operating report	0.65	260.00	CMG
Apr-29-22	Review memos to/from John Coleman re loan deposits and repayment; Review of extensive spreadsheet re same	0.75	300.00	CMG
May-02-22	Dictation of motion to continue hearing on Examiner's motion to clarify and order re same	0.25	100.00	CMG
	Assist CMG drafting Motion to Continue Hearing on Examiner's Motion to Clarify and Order re same	0.15	29.25	KLC
May-03-22	Review notice of telephonic hearing and memos to/from Mr. Coleman explaining motion to clarify	0.20	80.00	CMG
	Review memos to/from Abby Marbury re IDI/341 deficiencies	0.20	80.00	CMG
May-04-22	Review memos to/from Garrett Anderson re moving hearing to May 17 on motion to clarify	0.25	100.00	CMG

	Review and revision of draft amended statement of financial affairs, schedules, insurance information and related efforts to comply with IDI and 341 alleged deficiencies	0.85	340.00	CMG
	Review memos to/from client, KLC re amount of reporting in pre- and post-petition bank accounts	0.20	80.00	CMG
	Review proof of insurance on house and house appraisal	0.75	300.00	CMG
	Review memos to/from KLC re additional issues that have not been addressed in response to IDI and 341 deficiencies	0.30	120.00	CMG
	Assist CMG revising Amended Schedule A/B, H, I, J, Amended SOFA	0.30	58.50	KLC
	Assist CMG reviewing and revising September 2021 MOR	0.75	146.25	KLC
May-05-22	Review memos to/from John Coleman, KLC re additional information on schedule updates	0.35	140.00	CMG
	Review order on expedition of examiner issues	0.25	100.00	CMG
	Receipt and review of hearing notice re Application to Employ CMG; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Receipt and review of Order re Motion to Expedite Hearing on Examiner's Motion to Clarify Appointment Order; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Assist CMG drafting Certificate of Service re Application to Employ CMG	0.10	19.50	KLC
	Organize and supervise mailout of Application to Employ CMG	0.15	29.25	KLC
May-06-22	Review memo from UST re funds owed for UST fees	0.25	100.00	CMG
	Review and revision of monthly operating report due to vagaries in checking account; Review memo from KLC re same	0.50	200.00	CMG

May-09-22	Review memos to/from Jace Ferraez, KLC; Review order on motion to continue hearing on Examiner's motion to clarify	0.20	80.00	CMG
	Work on MOR and account balances	0.35	140.00	CMG
	Assist CMG revising September 2021 MOR	0.70	136.50	KLC
	Assist CMG drafting Order withdrawing Motion to Continue Hearing on Examiner's Motion to Clarify	0.10	19.50	KLC
May-10-22	Review memos to/from KLC re fee line item, MOR submission	0.10	40.00	CMG
	Review memos to/from Charlie Swayze re issues on sale of home and related matters for timing	0.25	100.00	CMG
	Assist CMG revising September 2021 MOR	0.20	39.00	KLC
May-11-22	Review memos to/from Charlie Swayze; Review most recent contract for sale of home	0.55	220.00	CMG
May-12-22	Review memos to/from client, Charlie Swayze re survey and cost of same on home sale	0.20	80.00	CMG
	Review memos to/from Charles Swayze; Review flood certificate and invoice representing costs to be paid/incurred from sale proceeds	0.25	100.00	CMG
May-16-22	Review motion of examiner for clarification	0.35	140.00	CMG
	Dictation of response to examiner motion for clarification	0.45	180.00	CMG
	Review and revision of response to motion for clarification	0.15	60.00	CMG
	Review Examiner's exhibits and review Debtor's exhibits to prepare for hearing	0.35	140.00	CMG
	Assist CMG drafting Limited Response to Examiner's Motion to Clarify	0.20	39.00	KLC
	Review file and court docket re: 5/17/22 hearing on Examiner's Motion to Clarify Appointment Order; prepare hearing folder for same	0.35	68.25	KLC

May-17-22	Attended hearing on motion for clarification	0.40	160.00	CMG
	Review minute entry from this morning's hearing on motion for clarification	0.15	60.00	CMG
	Review memos to/from John Coleman re Examiner's request for information and Mr. Coleman's compliance thereto	0.25	100.00	CMG
May-18-22	Review memo from Mr. Coleman; Review Chase credit card statements submitted to counsel for the Examiner	0.65	260.00	CMG
May-20-22	Review memos to/from Abby Marbury, Charlie Swayze re insurance notification and establishment of Regions separate account	0.25	100.00	CMG
May-24-22	Review memos to/from Abby Marbury; Review draft order for scheduling	0.30	120.00	CMG
May-25-22	Assist CMG drafting and revising October 2021 MOR	0.25	48.75	KLC
May-26-22	Review real estate contract	0.85	340.00	CMG
	Dictation of sale motion	1.25	500.00	CMG
	Review memo to John Coleman re sale motion	0.20	80.00	CMG
	Review memos to/from Charlie Swayze, Abby Marbury re transmission of funds from house sale	0.20	80.00	CMG
	Review memos to/from Katie Carter; Review draft October monthly operating report and related matters	0.25	100.00	CMG
	Finalize; Review and revision of sale motion	1.00	400.00	CMG
	Dictation of motion, order to expedite hearing on motion to sell; Review and revision of same	0.65	260.00	CMG
	Assist CMG drafting Motion to Sell 1107 Robert E. Lee Ext.	0.10	19.50	KLC
	Assist CMG revising October 2021 MOR	0.60	117.00	KLC
May-27-22	Review memos to/from John Coleman approving sale motion	0.25	100.00	CMG

	Review October MOR	0.45	180.00	CMG
	Review order for COS re motion to sell	0.15	60.00	CMG
	Review hearing notice re motion to sell	0.25	100.00	CMG
	Receipt and review of hearing notice re Motion to Sell 1107 Robert E. Lee Ext.; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Receipt and review of Order to File Certificate of Service re hearing notice re Motion to Sell 1107 Robert E. Lee Ext.; calendar deadline to file certificate and notice out materials	0.15	29.25	KLC
	Assist CMG revising Motion to Sell 1107 Robert E. Lee Ext.	0.10	19.50	KLC
May-31-22	Review memos to/from Abby Marbury re terms of sale order	0.20	80.00	CMG
	Assist CMG drafting Certificate of Service re Motion to Sell 1107 Robert E. Lee Ext.	0.10	19.50	KLC
Jun-01-22	Review numerous and extensive memos to/from Garrett Anderson; Review draft order seeking significant information from FBI documents	0.65	260.00	CMG
	Review notice of appearance from MDA	0.20	80.00	CMG
	Review memo from clerk's office re certificate of service	0.20	80.00	CMG
	Review new notice of sale hearing	0.20	80.00	CMG
	Dictation of certificate of service re revised sale date	0.15	60.00	CMG
Jun-02-22	Review memos to/from Erin McManus re discovery order	0.25	100.00	CMG
	Review memos to/from John Coleman re closing of house sale and related issues	0.25	100.00	CMG
	Review memos to/from Garrett Anderson re status conference	0.10	40.00	CMG

	Review memos to/from Erin McManus, Garrett Anderson re request for status conference	0.25	100.00	CMG
	Dictation of response to request for reasons for delay in requesting status conference	0.25	100.00	CMG
	Receipt and review of hearing notice re Motion to Sell 1107 Robert E. Lee Ext.; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	29.25	KLC
	Assist CMG revising Certificate of Service re Motion to Sell 1107 Robert E. Lee Ext.	0.05	9.75	KLC
	Organize and supervise mailout of Motion to Sell 1107 Robert E. Lee Ext.	0.40	78.00	KLC
Jun-03-22	Attended telephonic status conference re Examiner motion to clarify	0.75	300.00	CMG
	Review minute entry re Examiner motion to clarify	0.20	80.00	CMG
	Assist CMG drafting and revising letter to Judge Maddox re status conference on Examiner issues	0.30	58.50	KLC
Jun-06-22	Review memos to/from Regions re DIP savings account	0.25	100.00	CMG
Jun-07-22	Review order on motion to clarify	0.20	80.00	CMG
Jun-08-22	Review letter from UST re MORs	0.20	80.00	CMG
	Dictation of letter to client re late MORs	0.20	80.00	CMG
	Review memo from client and review MOR data for MORs other than May	0.40	160.00	CMG
Jun-14-22	Review November - February monthly operating reports	0.75	300.00	CMG
	Assist CMG drafting and revising November - December 2021, January - March 2022 MORs	0.25	48.75	KLC
Jun-15-22	Review and revision of draft MORs from November - March	0.55	220.00	CMG

	Assist CMG drafting and revising November - December 2021, January - March 2022 MORs	1.10	214.50	KLC
Jun-16-22	Review memos to/from client, KLC re MOR draft approvals	0.20	80.00	CMG
Jun-22-22	Review memos to/from Andrea Chase re deadline for objections to motion to sell, reasons for accepting purchase price for home that is less than list price	0.25	100.00	CMG
	Additional review of memos to/from Andrea Chase; Telephone conference with Andrea Chase re sale price on home, objection deadline	0.25	100.00	CMG
Jun-23-22	Telephone conference with Andrea Chase (vm) re home sale	0.10	40.00	CMG
Jun-27-22	Review memos to/from Carmen Marshall, CCT re account ID and tax ID information	0.25	100.00	CMG
	Review memos to/from Abigail Marbury, CCT re 2nd DIP account details	0.20	80.00	CMG
Jun-28-22	Dictation of sale order; Review and revision of same	1.00	400.00	CMG
	Review notice of terminated hearing re motion to sell house	0.15	60.00	CMG
	Review order to submit order re motion to sell house	0.15	60.00	CMG
	Final review and revision of sale order	0.35	140.00	CMG
	Review memos to/from Abby Marbury approving sale order	0.20	80.00	CMG
	Review memos to/from Regions, Abby Marbury, Cookie Thomas re signature card for DIP account	0.25	100.00	CMG
	Assist CMG drafting Order on Motion to Sell 1107 Robert E. Lee	0.25	48.75	KLC
Jun-30-22	Conference with John Coleman re sale of home, distribution of proceeds, income and related matters	0.75	300.00	CMG

	Review filed sale order	0.10	40.00	CMG
	Review memos to/from Charles Swayze re timing of sale of former residence	0.20	80.00	CMG
	Review and revision of itemizations	0.55	220.00	CMG
	Dictation of draft application for compensation	0.75	300.00	CMG
Jul-01-22	Review memo from Garrett Anderson re report of intent of Examiner to review books and records	0.20	80.00	CMG
Jul-04-22	Review memos to/from Sarah Kerner, general counsel for Forbis, re release of subpoenaed information	0.20	80.00	CMG
Jul-06-22	Telephone conference with Charlie Swayze re homestead exemption	0.15	60.00	CMG
Jul-07-22	Receipt and review of Order on Motion to Sell 1107 Robert E. Lee; calendar deadline to file report of sale	0.10	19.50	KLC
	Assist CMG drafting Report of Sale for 1107 Robert E. Lee	0.10	19.50	KLC
	Assist CMG reviewing and revising itemizations	0.60	117.00	KLC
	Assist CMG drafting March - May 2022 MORs	0.35	68.25	KLC
Jul-08-22	Assist CMG reviewing and revising itemizations	0.40	78.00	KLC
Jul-13-22	Assist CMG drafting and revising CMG's 1st Fee Application, Certificate of Service and Order re same	0.45	87.75	KLC
	Totals	93.45	<u>\$32,183.25</u>	

DISBURSEMENTS

Oct-05-21	Long Distance	3.00
Oct-20-21	COURTS/USBC-MS-N	1,738.00
Nov-02-21	Long distance	2.13
Nov-29-21	Photocopies 5 @ \$.25 re mailout	1.25

	Postage 1 @ \$.53 re mailout	0.53
Dec-31-21	Pacer 7/1-12/31/21	0.10
Feb-02-22	Photocopies 5 @ \$.25 re mailout	1.25
	Postage 1 @ \$.53 re mailout	0.53
Feb-17-22	COURTS/USBC-MS-N	15.00
Mar-25-22	Long Distance	2.13
Apr-13-22	Long Distance	3.13
Apr-18-22	Long Distance	2.13
Apr-22-22	Photocopies 12 @ \$.25 re Appl to Employ	3.00
May-05-22	Photocopies 8 @ \$.25 re mailout	2.00
	Postage 1 @ \$.53 re mailout	0.53
Jun-02-22	Photocopies 98 @ \$.25 re mailout	24.50
	Postage 13 @ \$.73 re mailout	9.49
Jun-19-22	COURTS/USBC-MS-N	188.00
Jul-06-22	Long Distance	1.13
	Totals	\$1,997.83

Total Fee & Disbursements	\$34,181.08
Balance Now Due	\$34,181.08

SUMMARY BY TIMEKEEPER

TIMEKEEPER	RATE	HOURS	AMOUNT
Craig M. Geno	\$400.00	68.10	\$27,240.00
Kathryn L. Carter	\$195.00	25.35	\$4,943.25

TAX ID Number 45-4013160