

1 Lawrence E. Wilk, #006510
2 **JABURG & WILK, P.C.**
3 3200 North Central Avenue, Suite 2000
4 Phoenix, Arizona 85012
5 (602) 248-1000

6 Attorneys for James C. Sell, Receiver

7 SUPERIOR COURT OF ARIZONA

8 MARICOPA COUNTY

9 ARIZONA CORPORATION COMMISSION,

10 Plaintiff,

11 v.

12 AMERICAN NATIONAL MORTGAGE
13 PARTNERS, L.L.C., et al.

14 Defendants.

Case No: CV2003-005724

**FIRST APPLICATION FOR INTERIM
COMPENSATION BY ANDERSON &
ROTTENBERG, P.C., SPECIAL
COUNSEL FOR DEBTOR AND
DEBTOR IN POSSESSION**

(Assigned to the Honorable J. Richard Gama)

15 Anderson & Rottenberg, P.C. and staff, now known as, and doing business as Anderson,
16 Rottenberg & Ochs, P.C., the duly appointed Special Counsel for Debtor and Debtor in
17 Possession (hereinafter "Anderson & Rottenberg"), hereby makes this First Application for
18 Interim Compensation as follows:

19 1. By order of the Court, Anderson & Rottenberg, P.C. and staff were appointed to
20 serve as Special Counsel for Debtor and Debtor in Possession in this case. Anderson &
21 Rottenberg has been retained to represent the debtor ANMP entities.

22 2. Attached hereto as **Exhibit "A"** is a detailed statement of the services which
23 Anderson & Rottenberg has performed and the clerical expense incurred in connection herewith.
24 All of the services performed were necessary and proper and were charged at hourly rates
25 approved by the Court.

26 3. This Application covers the period from July 25, 2003, through December 29,
27 2003 (the "Application Period"). Applicant's First Application for Interim Compensation requests
28 fees in the amount of \$42,045.00 and disbursements in the amount of \$2,661.44.

JABURG & WILK, P.C.
ATTORNEY AT LAW
3200 NORTH CENTRAL AVENUE
SUITE 2000
PHOENIX, ARIZONA 85012

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4. Pursuant to a previous order of the Court, which allowed Applicant to be paid eighty percent (80%) of his fees and one hundred percent (100%) of its disbursements, Applicant was paid \$2,500.00 toward fees during the Application Period, leaving a current unpaid balance for fees and disbursements in the amount of \$42,206.44;

WHEREFORE, Applicant requests that the Court enter an Order:

A. Approving Anderson & Rottenberg, P.C.'s fees for the period from July 25, 2003 through December 29, 2003 in the total amount of \$42,045.00 and disbursements in the amount of \$2,661.44;

B. Authorizing and directing the Receiver to pay the unpaid balance of fees and clerical expenses in the amount of \$42,206.44 to the Special Counsel for Debtor and Debtor in Possession at such time as the Receivership Estate has sufficient funds.

DATED this 16th day of April, 2004.

ANDERSON & ROTTEMBERG, P.C.
By [Signature]
Its: Member of the firm

JABURG & WILK, P.C.
[Signature]
Lawrence E. Wilk
3200 North Central, Suite 2000
Phoenix, Arizona 85012
Attorneys for Receiver

FEES/COSTS SUMMARY

January 28, 2004

ANDERSON & ROTTENBERG, P.C.
369 Lexington Avenue, Sixteenth Floor
New York, NY 10017
(212) 661-3080

RE: ANMP

Legal Services rendered December 2, 2003 through December 29, 2003

<u>TOTAL FEES:</u>	<u>\$ 2,658.75</u>
80% FEES:	\$ 2,127.00
<u>COSTS</u>	<u>\$ 92.37</u>
TOTAL DUE	\$ 2,219.37

ANDERSON ROTTENBERG & OCHS, P.C.

369 LEXINGTON AVENUE
 SIXTEENTH FLOOR
 NEW YORK, NY 10017
 TELEPHONE (212) 661-3080
 TELECOPIER (212) 867-1914

Jaburg & Wilk

Attention: Mr. Roger Cohen, Esq.
 3200 No. Central Avenue
 Suite 2000
 Phoenix AZ 85012

Invoice No.: 120040130
 Date: January 05, 2004
 Client Code: 0001716

Page No.: 1

		<u>Hours</u>	<u>Amount</u>
<u>Lis Pendens</u>			
12/2/03	HWL	0.25	81.25
	TEC	2.00	500.00
	DD	1.10	110.00
12/5/03	HWL	0.20	65.00
12/15/03	HWL	0.10	32.50
	DMP	0.60	138.00
12/16/03	HWL	0.50	162.50
	DMP	0.20	46.00
12/18/03	HWL	0.50	162.50
12/19/03	HWL	0.10	32.50
	TEC	0.50	125.00

	<u>Hours</u>	<u>Amount</u>
12/24/03 HWL Reviewed and revised motion papers; finalized same and prepared for service on opposing counsel; coordination service on opposing counsel; email to R. Cohen re: same; calendared opposition dates.	1.75	568.75
12/26/03 DMP Revised and finalized pro hac vice papers. Finalized and copied exhibits.	1.00	230.00
12/29/03 HWL Reviewed pro hac vice papers; provided for service on opposing counsel; drafted cover letter to Judge Preska enclosing courtesy copies of pro hac vice and summary judgment motion papers.	0.75	243.75
DMP Revisions/finalized/proofed pro hac vice papers. Spoke with H. Lipman. Arranged for service and filing of motion.	0.70	161.00
Subtotal:	[10.25	2,658.75]
Total Fees	10.25	\$2,658.75
 <u>Lis Pendens</u>		
12/3/03 Federal Express		23.87
12/4/03 Messenger Service		12.50
12/18/03 Copying Cost.		56.00
Subtotal:		[92.37]
Total costs		\$92.37
Total amount of this bill		\$2,751.12
Previous balance		\$41,321.44
Balance due		<u>\$44,072.56</u>

Attorney / Paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David M Powers	2.50	230.00	\$575.00
Douglas Distefano - Paralegal	1.10	100.00	\$110.00
Harry W. Lipman	4.15	325.00	\$1,348.75
Thomas E. Chase	2.50	250.00	\$625.00

FEES/COSTS SUMMARY

December 29, 2003

ANDERSON & ROTTENBERG, P.C.
369 Lexington Avenue, Sixteenth Floor
New York, NY 10017
(212) 661-3080

RE: ANMP
Legal Services rendered through November 22, 2003

<u>TOTAL FEES:</u>	<u>\$ 2,503.25</u>
80% FEES:	\$ 2,002.60
<u>COSTS</u>	<u>\$ 34.45</u>
TOTAL DUE	\$ 2,037.05

ANDERSON & ROTTENBERG, P.C.

369 LEXINGTON AVENUE
SIXTEENTH FLOOR
NEW YORK, NY 10017
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

Jaburg & Wilk

Attention: Mr. Roger Cohen, Esq.
3200 No. Central Avenue
Suite 2000
Phoenix AZ 85012

Invoice No.: 12030088
Date: December 01, 2003
Client Code: 0001716

Page No.: 1

		<u>Hours</u>	<u>Amount</u>
<u>Lis Pendens</u>			
11/3/03	DMP	Various telephone calls and emails to/from T. Chase re: deposition status. Drafted and sent letter to Patricia Graham.	0.40 92.00
11/7/03	DMP	Emails to/from T. Chase and H. Lipman Brief meeting and telephone calls with H. Lipman.	0.30 69.00
11/11/03	HWL	Emails with T. Chase re: status and strategy for Kennedy deposition.	0.20 65.00
	DMP	Emails to/from T. Chase and H. Lipman.	0.10 23.00
11/13/03	HWL	Reviewed pro hac vice papers for admission of Roger Cohen.	0.25 81.25
	DMP	Teleconference with court reporter to arrange for deposition coverage. Emails to/from H. Lipman. Teleconference with Patricia Graham. Reviewed UCC filing re: artworks. Email to Roger Cohen.	0.40 92.00
11/14/03	DMP	Various emails to/from H. Lipman. Teleconference with Roger Cohen's assistant re: deposition dates. Teleconference with Patricia Graham re: deposition date. Drafted and sent letter to Graham. Teleconference with H. Lipman re: update on case status. Emails to Roger Cohen.	1.00 230.00
11/17/03	DMP	Two teleconferences with Larry Weiss re: deposition schedule, appearance of witnesses and discovery dispute. Email to H. Lipman re: same. Several meetings and telephone calls with T. Chase. Meeting with M. Ochs re: dispute with counsel. Drafted and sent letter to Weiss re: depositions. Two teleconferences with Pat Graham confirming date and time of Wolfer deposition. Two	5.40 1,242.00

	<u>Hours</u>	<u>Amount</u>
<p>telephone conversations with Roger Cohen. Several emails to Roger Cohen and his assistant. Several teleconferences with court reporters confirming 11/18 depo and cancelling 11/19 depo. Various emails to/from M. Ochs, H. Lipman and T. Chase.</p>		
11/18/03 HWL Teleconferences with D. Powers re: deposition issues; review draft of letter from him to opposing counsel.	0.40	130.00
DMP Two telephone calls with R. Cohen. Drafted and faxed letter to Larry Weiss demanding an answer regarding whether his witness will appear tomorrow. Teleconference with Larry Weiss re: deposition and producing his witness. Emails to/from H. Lipman. Several telephone calls and meetings with H. Lipman. Drafted and sent second fax to Weiss confirming cancellation of tomorrow's deposition. Teleconference with court reporter.	1.80	414.00
11/22/03 HWL Email to T. Chase re: correcting certificate of good standing problem.	0.20	65.00
Subtotal:	[10.45	2,503.25]
Total Fees	10.45	\$2,503.25
 <u>Lis Pendens</u>		
10/31/03 Copying Cost.		5.40
11/3/03 Copying Cost.		0.40
11/13/03 Copying Cost.		1.40
Federal Express		21.25
11/14/03 Copying Cost.		6.00
Subtotal:		[34.45]
Total costs		\$34.45
Total amount of this bill		\$2,537.70

Jaburg & Wilk

Invoice No.: 12030088

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	<u>Amount</u>
Previous balance	\$38,783.74
Balance due	<u><u>\$41,321.44</u></u>

Attorney / Paralegal Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David M Powers	9.40	230.00	\$2,162.00
Harry W. Lipman	1.05	325.00	\$341.25

Gary J. Jaburg
Roger L. Cohen
Mitchell Reichman***
Kathi M. Sandweiss
Lauren L. Garner
Scott J. Richardson
Valerie L. Marciano
Jennifer S. Lee
James B. Reed
Kelly Brown
Peter M. Gennrich



Jaburg & Wilk, P.C.

ATTORNEYS AT LAW

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Maria C. Speth
Mark D. Bogard
Kevin S. Rattay
Gregory S. Fisher

* ARIZONA CERTIFIED SPECIALIST, BANKRUPTCY
** ARIZONA CERTIFIED SPECIALIST, TAX LAW
*** ARIZONA CERTIFIED SPECIALIST, FAMILY LAW

Writer's Direct Line

602 / 248-1008

Writer's E-mail

lew@jaburgwilk.com

November 25, 2003

Trudy Nowak
U.S. Trustee's Office
P.O. Box 36170
Phoenix, AZ 85067-6710

Wendy Coy
Arizona Corporation Commission
1300 W. Washington
Phoenix, Az 85007

*Re: ANMP/James C. Sell, Mike Carmel, Jaburg & Wilk, Bob Hubbard and
Anderson & Rottenberg, P.C., costs and fees*

Dear Trudy and Wendy:

Enclosed herewith you will find the most recent billings for Jim Sell, Jaburg & Wilk, Mike Carmel and Bob Hubbard. The time periods covered are shown below. The enclosed fee statements are being delivered pursuant to the Amended Order.

James Sell	10/01/03 thru 10/31/03
Jaburg & Wilk, P.C.	10/22/03 thru 11/24/03
Mike Carmel	10/20/03 thru 11/14/03
Bob Hubbard	09/26/03 thru 10/13/03
Anderson & Rottenberg, P.C.	09/03/03 thru 10/31/03

Should you have any questions regarding the enclosures, please feel free to contact me.

Sincerely,

JABURG & WILK, P.C.

Lawrence E. Wilk

Enclosure

FEES/COSTS SUMMARY

November 24, 2003

ANDERSON & ROTTENBERG, P.C.
369 Lexington Avenue, Sixteenth Floor
New York, NY 10017
(212) 661-3080

RE: ANMP
Legal Services rendered through October 31, 2003

<u>TOTAL FEES:</u>	<u>\$32,259.25</u>
80% FEES:	\$25,807.40
<u>COSTS</u>	<u>\$ 1,966.34</u>
TOTAL DUE	\$27,773.74

LEW

ANDERSON & ROTTENBERG, P.C.

369 LEXINGTON AVENUE
SIXTEENTH FLOOR
NEW YORK, NY 10017
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

Jaburg & Wilk

Attention: Mr. Roger Cohen, Esq.
3200 No. Central Avenue
Suite 2000
Phoenix AZ 85012

Invoice No.: 112003031
Date: October 01, 2003
Client Code: 0001716

Page No.: 1

			<u>Hours</u>	<u>Amount</u>
<u>Lis Pendens</u>				
9/3/03	TEC	Send documents to defendants' counsel; review complaint and documents re: issues for conference; call to Roger Cohen.	1.60	400.00
9/10/03	TEC	Call to Roger Cohen; letter to Larry Weiss; calls to Kennedy Funding.	1.30	325.00
9/11/03	TEC	Research re: status of foreclosure proceedings; calls to Kennedy Funding; discussion with attorneys at Herrick Feinstein; research re: filings on-line; review of ACRIS NYC encumbrance filings; call to title search companies.	2.50	625.00
9/15/03	TEC	Preparation for and attend court status conference with Judge Preska and defendants' attorney; research re: rights of junior mortgagee and rights of notice of pendency; discussion with Mitchel Ochs; call to Roger Cohen re: status conference.	7.00	1,750.00
9/16/03	TEC	Discussions with Charles Rich re: rights of junior mortgagees; recording mortgages; call to Dov Goldman re: NYC townhouse market; cost of appraisal; call to title search company re: liens on townhouse; initial bankruptcy research re: involuntary bankruptcy.	2.80	700.00
	MHO	Various meetings to discuss status and strategy.	0.40	140.00
9/17/03	CSR	Conference with Tom Chase re: NY mortgage foreclosure issues, effect of recording statutes, exercise of remedies	1.00	350.00
	TEC	Call to Roger Cohen with Mitchel Ochs; research re: standing to intervene in foreclosure action; standing to object to bona fides of foreclosure sale.	2.70	675.00

		<u>Hours</u>	<u>Amount</u>
9/17/03	MHO	0.40	140.00
			Speak to Arizona counsel re: status and strategy. Follow up discussions re: possible discovery demands and intervention actions.
9/18/03	TEC	3.70	925.00
			Research re: involuntary bankruptcy; prepare task memorandum; discussion with Roger Cohen; call to title agencies.
9/19/03	MHO	0.50	175.00
			Internal discussions re: status and strategy. Review action items.
	TEC	3.30	825.00
			Prepare notice to admit; review documents for further document requests; order full lien and judgment search on properties and defendant entities; letter to plaintiff's counsel with notice to admit.
9/22/03	TEC	1.00	250.00
			Discuss foreclosure proceedings with Charles Rich; review Dutchess County complaints.
9/23/03	DMP	6.40	1,472.00
			Meeting with H. Lipman, M. Ochs and T. Chase re: case background, issues, and assignments. Reviewed pleadings in this and related actions. File review. Drafted document request to defendants. Numerous meetings and teleconferences with T. Chase.
	TEC	4.50	1,125.00
			Review background of case with Harry Lipman; Mitchel Ochs and David Powers; Edgar research re: related entities of General Media; research re: appointment of receiver; research re: calculation of deficiency judgment; draft document requests; call to Roger Cohen.
	MHO	0.40	140.00
			Internal discussions re: status and strategy.
9/24/03	MHO	0.40	140.00
			Review document requests. Internal discussions re: same.
	TEC	1.00	250.00
			Draft document requests in subpoena with David Powers; identify witness at Kennedy funding.
	DMP	6.20	1,426.00
			Reviewed additional pleadings. Prepared form for subpoena. Drafted and revised schedule of documents for production. Numerous meetings with T. Chase re: documents being sought, mortgage issues, etc. Research re: issuance of mortgage and encumbrances. Reviewed documents received from client. Began drafting response to document request.
9/25/03	DMP	7.60	1,748.00
			Reviewed documents received from client, prepared for production. Various meetings and telephone calls with T. Chase. Meeting with T. Chase and H. Lipman. Arranged for copies of pleadings and other documents. Revised subpoena. Finished drafting/revising response to document request. Drafted summary judgment letter to Judge Preska.

			<u>Hours</u>	<u>Amount</u>
		Research re: loan agreements and delivery of executed mortgages as collateral. Teleconference with Scott Tross, attorney for Kennedy Funding.		
9/25/03	TEC	Preparation of subpoena; research re: subpoena requirements under federal rules; discussion with David Powers.	1.00	250.00
	HWL	Conferences and emails with D. Powers re: research and tasks to do.	0.40	130.00
9/26/03	TEC	Review and make changes to letter brief; e-mail to Roger Cohen.	1.50	375.00
	HWL	Reviewed and revised subpoena; review and revised letter to Judge Preska; studied guaranty issues and prospects of suing thereon; reviewed all litigation papers.	2.50	812.50
	DMP	Legal research re: specific performance and summary judgment. Revise letter to Judge Preska. Revise subpoena to Kennedy Funding. Revise resposne to document requests. Various meeting, teleconferences with and emails to/from H. Lipman and T. Chase. Finalized documents and arraigned for service. Teleconference with New Jersey Lawyer Service re: service of subpoena. Drafted letter to NJLS and faxed subpoena.	5.10	1,173.00
9/28/03	DMP	Research re: mortgages and foreclosure actions in New York state. Reviewed treatise/manual.	1.00	230.00
9/29/03	DD	Assembled all of the exhibits to a letter to Judge Preska.	0.70	70.00
	HWL	Further revisions to Preska letter; emails with D. Powers re: various research and other issues.	1.00	325.00
	DMP	Legal research re: mortgages and foreclosure actions in New York state, claims against guarantors, and standing to intervene. Revised and finalized letter to Preska. Reviewed documents and prepared exhibits to accompany letter. Reviewed Individual Rules of Judge Preska. Numerous emails, meetings, and telephone conversations with T. Chase and H. Lipman.	4.10	943.00
9/30/03	MHO	Speak to R. Cohen re: status and strategy. Internal discussions re: various tasks and timetables.	0.40	140.00
	TEC	Preparation for court appearance; organize file; meeting with Harry Lipman; David Powers; Mitchel Ochs.	1.50	375.00
	HWL	Conferences with T. Chase, D. Powers and M. Ochs regarding overall status and strategy, guaranty issues, conference with Judge Preska; revised and sent out Preska letter requesting appearance of R. Cohen by telephone.	1.50	487.50

	<u>Hours</u>	<u>Amount</u>
9/30/03 DMP Teleconference with Judge Preska's chambers re: arranging for Roger Cohen to appear telephonically at tomorrow's court conference. Emails to/from T. Chase and H. Lipman. Drafted letter to J. Preska re: telephonic appearance. Meeting with M. Ochs, T. Chase, and H. Lipman re: case/assignments/court appearance. Separate meeting with H. Lipman re: preliminary research findings. Further legal research re: NY 30-day summons rule for notices of pendency. Second meeting with H. Lipman re: conclusions regarding 30-day rule. Drafted pro hac vice papers. Research/reviewed articles re: recent appraisal of townhouse and sale of artworks.	8.20	1,886.00

Subtotal:	[83.60	20,778.00]
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Total Fees		83.60	\$20,778.00
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Lis Pendens

8/1/03 Copying Cost.	0.80
8/6/03 Copying Cost.	16.40
Copying Cost.	0.20
Copying Cost.	0.40
8/7/03 Copying Cost.	3.20
8/12/03 Copying Cost.	0.80
Copying Cost.	2.60
9/5/03 Fax Charges.	12.85
9/15/03 Service Fees.	125.60
9/17/03 Copying Cost.	6.40
9/19/03 Copying Cost.	33.20
Copying Cost.	9.60

Subtotal:	[212.05]
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Total costs		\$212.05
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	<u>Amount</u>
Total amount of this bill	\$20,990.05
Previous balance	\$4,516.41
Balance due	<u>\$25,506.46</u>

Attorney / Paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles S. Rich	1.00	350.00	\$350.00
David M Powers	38.60	230.00	\$8,878.00
Douglas Distefano - Paralegal	0.70	100.00	\$70.00
Harry W. Lipman	5.40	325.00	\$1,755.00
Mitchel H. Ochs	2.50	350.00	\$875.00
Thomas E. Chase	35.40	250.00	\$8,850.00

ANDERSON & ROTTENBERG, P.C.

369 LEXINGTON AVENUE
SIXTEENTH FLOOR
NEW YORK, NY 10017
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

Jaburg & Wilk

Attention: Mr. Roger Cohen, Esq.
3200 No. Central Avenue
Suite 2000
Phoenix AZ 85012

Invoice No.: 11030032
Date: November 03, 2003
Client Code: 0001716

Page No.: 1

		<u>Hours</u>	<u>Amount</u>
	<u>Lis Pendens</u>		
10/1/03	TEC Court Appearance: prepare for and attend court appearance with Harry Lipman.	3.80	950.00
	DMP Extensive research re: various issues, including foreclosure proceedings, mortgages, equitable mortgages and liens, intervening in foreclosure proceedings, parallel foreclosure actions, extinguishing claims, and related issues. Several meetings with T. Chase. Numerous emails to/from H. Lipman, M. Ochs and T. Chase. Teleconference with United Lawyers Service re: arranging for copies of legal files in current foreclosure proceedings involving the Townhouse and the Duches County property. Drafted and sent fax to United with instructions. Reviewed documents, correspondence.	6.00	1,380.00
	HWL Attended pre-motion conference before Judge Preska; began drafting subpoena; conferences and emails with D. Powers and M. Ochs re: research and procedural issues.	1.80	585.00
10/2/03	DMP Further research re: various issues, including foreclosure proceedings, mortgages, equitable mortgages and liens, intervening in foreclosure proceedings, parallel foreclosure actions, extinguishing claims, and related topics. Several meetings with T. Chase. Numerous emails to/from H. Lipman, M. Ochs and T. Chase. Updated internal docket and organized files. Reviewed documents re: proceedings involving the Townhouse and the Duches County property.	6.00	1,380.00

			<u>Hours</u>	<u>Amount</u>
		Reviewed draft of 30(b)(6) topics. Internet research re: General Media bankruptcy, sale of Townhouse, and sale of Art collection. Drafted pro hac vice papers. Met with H. Lipman re: all of the above.		
10/2/03	TEC	Research re: usurious interest law.	0.50	125.00
	HWL	Drafting 30(b)(6) subpoena; conferred with D Powers re: research; emails with R. Cohen re: deposition; emails with D. Powers re: pro hac vice motion.	1.40	455.00
10/3/03	HWL	Revised 30(b)(6) subpoena and attended to service of same.	0.40	130.00
	DMP	Further research re: foreclosure proceedings, mortgages, priority and extinguishing claims. Several meetings and telephone calls with T. Chase re: same. Reviewed documents received from United Lawyers. Met with Charles Rich re: foreclosure, priority and recording issues. Email to H. Lipman with research and meeting summary. Reviewed UCC statements re: artworks.	5.30	1,219.00
10/7/03	DMP	Further internet research re: artworks. Downloaded materials from Sotheby's archives re: sale of Guccione owned artworks. Cross referenced sales with UCC documents and calculated amounts earned by Guccione on these items. Additional research re: guarantor liability, guarantee for payment and guarantee for collection. Review of documents from received from United.	4.50	1,035.00
10/8/03	DMP	Revisions to calculations re: sale of artworks. Compared UCC's from separate lien holders. Updated and organized files.	1.00	230.00
	HWL	Emails with D. Powers re: research re: foreclosure proceedings, and re: consent of opposing counsel to pro hac vice motion; reviewed and revised pro hac vice motion papers; emailed pro hac affidavit to R. Cohen.	1.60	520.00
10/9/03	DMP	Teleconference with L. Hart of Herrick (attorney for Kennedy) re: document production and scheduling deposition. Several emails to/from H. Lipman and T. Chase re: research. Met with H. Lipman. Emails to Hart arranging for delivery of documents.	0.50	115.00
10/10/03	HWL	Teleconference with L. Hart re: Kennedy document production.	0.25	81.25
	TEC	Review documents produced by Kennedy Funding; calls to schedule depositions.	2.25	562.50

			<u>Hours</u>	<u>Amount</u>
10/13/03	DMP	Meeting with H. Lipman. Reviewed documents from L. Hart. Met with T. Chase.	0.30	69.00
10/14/03	TEC	Calls re: scheduling deposition.	0.30	75.00
10/15/03	DMP	Two meetings with T. Chase re: status of proceedings, assignments, etc. Drafted letters to Roger Cohen and Larry Weiss. Prepared documents and arranged for delivery to Cohen and Weiss.	1.50	345.00
10/16/03	DMP	Two meetings with T. Chase. Reviewed documents from Kennedy Funding.	1.00	230.00
10/17/03	DMP	Reviewed documents from New York County court files. Met with H. Lipman. Emails, telephone calls and brief meeting with T. Chase. Teleconferences with L. Hart's office re: document production and deposition scheduling. Drafted and sent letter to Hart.	1.50	345.00
10/20/03	DMP	Two teleconferences with L. Hart re: scheduling depositions. Several emails to/from Hart re: same. Several emails and teleconferences with T. Chase re: scheduling depositions and related issues. Drafted and sent letter to Roger Cohen with additional documents from United.	1.50	345.00
10/21/03	DMP	Several teleconferences with L. Hart. Teleconferences and emails with T. Chase. Teleconference with Patricia Graham, new attorney for Kennedy. Teleconference with Roger Cohen. Fax to L. Hart with copy of subpoena.	1.20	276.00
10/22/03	DMP	Various telephone calls and emails with Tom Chase. Reviewed recently received documents from Dutchess County files.	1.50	345.00
10/23/03	DMP	Email to Roger Cohen with update re: deposition scheduling. Reviewed emails from Roger and T. Chase.	0.20	46.00
10/27/03	DMP	Teleconference with Patricia Graham, attorney for Joe Wolfer/Kennedy Funding re: finalizing date for deposition. Several emails to/from T. Chase and Roger Cohen. Teleconference with Larry Weiss.	0.70	161.00
10/28/03	DMP	Reviewed pleadings from related foreclosure actions. Drafted chart re: summaries of parties and counsel in related actions. Emails to/from T. Chase.	0.40	92.00
10/29/03	DMP	Emails to/from T. Chase.	0.10	23.00
10/30/03	HWL	Emails with D. Powers, T. Chase, and R. Cohen re: problems with scheduling Guccione deposition; teleconference with R. Cohen re: same.	0.40	130.00

	<u>Hours</u>	<u>Amount</u>
10/30/03 DMP Teleconference with Larry Weiss. Meeting with H. Lipman. Emails to/from Roger Cohen, H. Lipman and T. Chase.	0.30	69.00
10/31/03 HWL Finalized letter and revised 30(b)(6) notice; conferred with T. Chase re: dates; email to client confirming that letter and notice were sent.	0.50	162.50
Subtotal:	[46.70	11,481.25]

Total Fees	46.70	\$11,481.25
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10/15/03 Federal Express		42.19
Subtotal:		[42.19]

Lis Pendens

9/19/03 Federal Express		24.19
9/23/03 Copying Cost.		1.80
9/25/03 Copying Cost.		17.60
9/26/03 Copying Cost.		1.40
Copying Cost.		7.20
Copying Cost.		0.80
Copying Cost.		0.20
Federal Express		13.85
9/29/03 Copying Cost.		7.40
Copying Cost.		30.40
Messenger Service		12.50
Messenger Service		14.80
9/30/03 Copying Cost.		1.20
10/2/03 Copying Cost.		84.20
Copying Cost.		15.80
Copying Cost.		2.00
10/3/03 Copying Cost.		5.60
Copying Cost.		1.60
Transcript Costs.		939.50
Federal Express		15.84
Federal Express		13.54

	<u>Amount</u>
10/7/03 Copying Cost.	0.20
10/9/03 Copying Cost.	0.80
10/14/03 Copying Cost.	120.17
10/15/03 Federal Express	44.85
Messenger Service	12.50
Copying Cost.	0.40
10/20/03 Federal Express	29.75
Copying Cost.	55.80
10/22/03 Copying Cost.	47.71
Copying Cost.	174.84
Copying Cost.	55.40
Subtotal:	[1,753.84]
Total costs	<u>\$1,796.03</u>
Total amount of this bill	<u>\$13,277.28</u>
Previous balance	<u>\$25,506.46</u>
Balance due	<u><u>\$38,783.74</u></u>

Attorney / Paralegal Summary

Name	Hours	Rate	Amount
David M Powers	33.50	230.00	\$7,705.00
Harry W. Lipman	6.35	325.00	\$2,063.75
Thomas E. Chase	6.85	250.00	\$1,712.50

Gary J. Jaburg
Roger L. Cohen
Mitchell Reichman***
Kathi M. Sandweiss
Lauren L. Garner
Scott J. Richardson
Valerie L. Marciano
Jennifer S. Lee
James B. Reed
Kelly Brown
Peter M. Gennrich



Jaburg & Wilk, P.C.

ATTORNEYS AT LAW

3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

Lawrence E. Wilk
*Randy Nussbaum
**Beth S. Cohn
Mervyn T. Braude
Susan R. Gilman
Kraig J. Marton
Maria C. Speth
Mark D. Bogard
Kevin S. Rattay
Gregory S. Fisher

* ARIZONA CERTIFIED SPECIALIST, BANKRUPTCY
** ARIZONA CERTIFIED SPECIALIST, TAX LAW
*** ARIZONA CERTIFIED SPECIALIST, FAMILY LAW

Tel 602
F-

*Joined -
Law says
don't need
this one.
... 2003*

Writer's Direct Line
602/248-1008

Writer's E-mail
lew@jaburgwilk.com

Trudy Nowak
U.S. Trustee's Office
P.O. Box 36170
Phoenix, AZ 85067-6710

Wendy Coy
Arizona Corporation Commission
1300 W. Washington
Phoenix, Az 85007

Re: ANMP/James C. Sell, Mike Carmel, Jaburg & Wilk and Bob Hubbard costs and fees

Dear Trudy and Wendy:

Enclosed herewith you will find a copy of the Order which has appointed, nunc pro tunc, the law firm of Anderson & Rottenberg to represent the receivership estate in the Robert Guccione proceedings. I am enclosing herewith the billing statements that have been received to date from these entities for your review pursuant to the prior Order.

Should you have any questions regarding the enclosures, please feel free to contact me.

Sincerely,

JABURG & WILK, P.C.

Lawrence E. Wilk

Enclosures
LEW:trs
cc: Michael Ochs

ANDERSON & ROTTENBERG, P.C.

369 LEXINGTON AVENUE
SIXTEENTH FLOOR
NEW YORK, NY 10017
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

RECEIVED BY
SEP 09 2003
JABURG & WILK, P.C.

Jaburg & Wilk

Attention: Mr. Roger Cohen, Esq.
3200 No. Central Avenue
Suite 2000
Phoenix AZ 85012

Invoice No.: 92003029
Date: September 02, 2003
Client Code: 0001716
Page No.: 1

		<u>Hours</u>	<u>Amount</u>
	<u>Lis Pendes</u>		
8/1/03	TEC Arrange for service of summons and complaint on defendants; discussions with firm in Poughkeepsie re: filing of notice of pendency against Dutchess County properties.	2.00	500.00
8/20/03	TEC Calls to defense counsel; fax lis pendens to counsel; call to client; Internet search re: status of foreclosure sale of townhouse.	0.50	125.00
8/21/03	TEC Calls to defense counsel; fax to lead counsel; calls to lead counsel re: extension of time.	0.80	200.00
8/22/03	TEC Calls to defense counsel re: extension; discussion with lead counsel; calls to chambers re: extension; conference call with Judge Preska re: adjournment.	1.25	312.50
	Subtotal:	[4.55	1,137.50]
	Total Fees	4.55	\$1,137.50

Lis Pendes

7/31/03 Federal Express 13.78
8/6/03 Federal Express 12.14
8/7/03 Federal Express 24.19

	<u>Amount</u>
Subtotal:	[50.11]
Total costs	\$50.11
Total amount of this bill	\$1,187.61
Previous balance	\$3,328.80
Balance due	<u>\$4,516.41</u>

Attorney / Paralegal Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Thomas E. Chase	4.55	250.00	\$1,137.50

ANDERSON & ROTTENBERG, P.C.

369 LEXINGTON AVENUE
SIXTEENTH FLOOR
NEW YORK, NY 10017
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

Jaburg & Wilk

Attention: Mr. Roger Cohen, Esq.
3200 No. Central Avenue
Suite 2000
Phoenix AZ 85012

Invoice No.: 82002014
Date: August 01, 2003
Client Code: 0001716

Page No.: 1

		<u>Hours</u>	<u>Amount</u>
	<u>Lis Pendes</u>		
7/25/03	MHO Conference. with counsel to Receiver re: matter. Review draft complaint and underlying documentation.	1.80	630.00
7/28/03	MHO Review transaction documents. Internal discussions re: complaint and lis pendens filing.	1.20	420.00
	TEC Review draft complaint; research re: citizenship of receiver for diversity purposes; review master trust documents and promissory notes.	2.20	550.00
7/29/03	TEC Preparation of pleadings: draft changes to complaint; prepare exhibits; prepare notice of pendency; research re: validity of unrecorded security interest.	3.00	750.00
7/30/03	MHO Review and revise complaint. Speak to Arizona counsel re: filing. Internal discussions re: same.	1.20	420.00
	TEC Finalize complaint; finalize notices of pendency; prepare summons and civil cover sheet; get filing fees; file complaint in federal court; file notice of pendency in state clerk's office for Manhattan property; call to client with Mitchel Ochs.	6.00	1,500.00
7/31/03	TEC Preparation of pleadings: find firm and title agency in Dutchess County to file lis pendens; prepare Notice of Pendency in appropriate form; obtain correct lot and block addresses from title company and confirm ownership by Locust on Hudson; Fed Ex materials to Poughkeepsie for filing.	5.10	1,275.00

	<u>Hours</u>	<u>Amount</u>
Subtotal:	[20.50	5,545.00]

Total Fees	20.50	\$5,545.00
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Lis Pendes

7/30/03 Filing Fees.		150.00
Filing Fees.		35.00
Copying Cost.		54.60
Copying Cost.		5.60
Copying Cost.		2.20
7/31/03 Filing Fees. - Dutchess County		35.00
Copying Cost.		1.40
Subtotal:	[283.80]

Total costs		\$283.80
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Total amount of this bill		\$5,828.80
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7/31/03 Payment - thank you. Check No. 3586		(\$2,500.00)
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Total payments and adjustments		(\$2,500.00)
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Balance due		\$3,328.80
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Attorney / Paralegal Summary

Name	Hours	Rate	Amount
Mitchel H. Ochs	4.20	350.00	\$1,470.00
Thomas E. Chase	16.30	250.00	\$4,075.00

NEW JERSEY OFFICE:
PARK 80 WEST, PLAZA ONE
SADDLE BROOK, NEW JERSEY 07663
TELEPHONE (201) 490-2022
TELECOPIER (201) 490-2040

ANDERSON & ROTTENBERG, P.C.
369 LEXINGTON AVENUE
SIXTEENTH FLOOR
NEW YORK, NEW YORK 10017
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

RECEIVED BY
SEP 02 2003
WWW.AR-LAW.COM
JABURG & WILK
THOMAS E. CHASE
ASSOCIATE
TCHASE@AR-LAW.COM

August 26, 2003

VIA FIRST CLASS MAIL

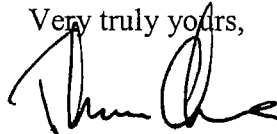
Roger L. Cohen, Esq.
Jaburg & Wilk, P.C.
3200 North Central Avenue
Suite 2000
Phoenix, Arizona 85012

Re: Sell v. General Media International, et al.

Dear Roger:

Enclosed is an invoice from Corbally, Gartland and Rappleyea, LLP for their assistance in filing the Notice of Pendancy against the Dutchess County property. Please pay this invoice directly to Corbally, Gartland and Rappleyea, LLP.

Very truly yours,



Thomas E. Chase

TEC/kk
Enclosure
1716.01

FOUNDED 1876
CORBALLY, GARTLAND AND RAPPLEYEA, LLP

Attorneys and Counselors at Law

Bardavon Building • 35 Market Street • Poughkeepsie, New York 12601-3285
Tel: 914-454-1110 • Fax: 914-454-4857 • Fax: 914-471-4593
E-Mail: info@cgrlaw.com

Thomas E. Chase, Esq.
Anderson & Rottenberg, P.C.
369 Lexington Avenue
Sixteenth Floor
New York, New York 10017

Date: August 5, 2003
Re: 133-139 Old Post Road
Client Name: Anderson & Rottenberg,
P.C.
File#: 11014/1 ACC

INVOICE FOR LEGAL SERVICES RENDERED

in connection with filing a Notice of Pendency in the Dutchess County Clerk's Office including review of Notice of Pendency and Summons and Complaint, phone conferences with attorney for Plaintiff; phone conference and meetings with title company and Dutchess County Clerk personnel, obtain Deeds to prepare descriptions; Review title searches; preparation of Index Number application; filing Notice of Pendency and Index Number Application with Dutchess County Clerk on August 1, 2003.

\$600.00

Disbursements:

To Dutchess County Clerk for Index Number Application \$210.00

To Poughkeepsie Abstract Company for research 75.00

285.00

Total Due: \$885.00

BALANCE DUE IN FULL UPON RECEIPT
TO INSURE PROPER CREDIT, PLEASE IDENTIFY FILE # ON YOUR PAYMENT
Interest charged at rate of 1% per month on all balances 30 days past due

Branch Offices

Franklin Avenue
PO Box 679
Millbrook, NY 12545
Tel: 914-677-5539
Fax: 914-677-6297

611 Druid Road East, Suite 107
PO Box 10213
Clearwater, FL 34617
Tel: 813-461-3144

38 Montgomery Street
PO Box 366
Rhinebeck, NY 12572
Tel: 914-876-4091
Fax: 914-876-7192