

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

In re:

Laser Spine Institute, LLC ¹	Case No. 2019-CA-2762
CLM Aviation, LLC	Case No. 2019-CA-2764
LSI HoldCo, LLC	Case No. 2019-CA-2765
LSI Management Company, LLC	Case No. 2019-CA-2766
Laser Spine Surgery Center of Arizona, LLC	Case No. 2019-CA-2767
Laser Spine Surgery Center of Cincinnati, LLC	Case No. 2019-CA-2768
Laser Spine Surgery Center of Cleveland, LLC	Case No. 2019-CA-2769
Laser Spine Surgical Center, LLC	Case No. 2019-CA-2770
Laser Spine Surgery Center of Pennsylvania, LLC	Case No. 2019-CA-2771
Laser Spine Surgery Center of St. Louis, LLC	Case No. 2019-CA-2772
Laser Spine Surgery Center of Warwick, LLC	Case No. 2019-CA-2773
Medical Care Management Services, LLC	Case No. 2019-CA-2774
Spine DME Solutions, LLC	Case No. 2019-CA-2775
Total Spine Care, LLC	Case No. 2019-CA-2776
Laser Spine Institute Consulting, LLC	Case No. 2019-CA-2777
Laser Spine Surgery Center of Oklahoma, LLC	Case No. 2019-CA-2780

Assignors,

Consolidated Case No.
2019-CA-2762

to

Soneet Kapila,

Division L

Assignee.

**FIRST INTERIM APPLICATION OF RISK MANAGEMENT
SOLUTIONS, INC. FOR ALLOWANCE OF COMPENSATION
AS RISK MANAGEMENT CONSULTANT FOR ASSIGNEE
FOR THE PERIOD OF APRIL 11, 2019 THROUGH JUNE 30, 2019**

¹ On April 8, 2019, the Court entered an order administratively consolidating this case with the assignment cases of the following entities: LSI Management Company, LLC; Laser Spine Institute Consulting, LLC; CLM Aviation, LLC; Medical Care Management Services, LLC; LSI HoldCo, LLC; Laser Spine Surgical Center, LLC; Laser Spine Surgery Center of Arizona, LLC; Laser Spine Surgery Center of Cincinnati, LLC; Laser Spine Surgery Center of St. Louis, LLC; Laser Spine Surgery Center of Pennsylvania, LLC; Laser Spine Surgery Center of Oklahoma, LLC; Laser Spine Surgery Center of Warwick, LLC; Laser Spine Surgery Center of Cleveland, LLC; Total Spine Care, LLC; and Spine DME Solutions, LLC.

The Assignee seeks to take the action described herein. Objections must be filed and served within twenty-one (21) days from the service of this Application. In the event an objection is timely filed and served, the Court will hold a hearing on August 28, 2019 at 2:00 p.m. to consider any timely filed objections, and to consider the *First Interim Application of Risk Management Solutions, Inc. for Allowance of Compensation as Risk Management Consultant for Assignee for the Period of April 11, 2019 through June 30, 2019* before the Honorable Judge Steven Scott Stephens, Hearing Room 512, 800 East Twiggs Street, Tampa, Florida 33602.

If no objection is timely filed and served, then all creditors and parties in interest have consented to the relief sought in this Application and the Assignee shall submit a proposed order to the Court. The deadline to object is twenty-one (21) days from service of this Application.

Risk Management Solutions, Inc. (“**RMS**”), pursuant to the *Order Granting Assignee’s Motion for Order Establishing Procedures for Monthly and Interim Compensation and Reimbursement of Expenses for Professionals*, dated May 28, 2019 (the “**Interim Compensation Order**”), respectfully applies for allowance of compensation for services rendered as risk management consultant to the Assignee in the amount of **\$68,255.00** for the period of April 11, 2019 through June 30, 2019 (the “**Allowance Period**”). In support of its request, RMS states the following:

Background

1. On March 14, 2019, Laser Spine Institute, LLC (“**LSI**”) executed and delivered an assignment for the benefit of creditors to the Assignee. The Assignee filed a Petition with the Court on March 14, 2019, commencing an assignment for the benefit of creditors proceeding pursuant to Chapter 727 of the Florida Statutes (the “**LSI Assignment Case**”).

2. Simultaneous with the filing of the LSI Assignment Case, the Assignee filed fifteen other Petitions commencing assignment for the benefit of creditors proceedings for 15 affiliates of LSI (the “**Affiliated Assignment Cases**,” and together with the LSI Assignment Case, the “**Assignment Cases**”): LSI Management Company, LLC; Laser Spine Institute Consulting, LLC;

CLM Aviation, LLC; Medical Care Management Services, LLC; LSI HoldCo, LLC; Laser Spine Surgical Center, LLC; Laser Spine Surgery Center of Arizona, LLC; Laser Spine Surgery Center of Cincinnati, LLC; Laser Spine Surgery Center of St. Louis, LLC; Laser Spine Surgery Center of Pennsylvania, LLC; Laser Spine Surgery Center of Oklahoma, LLC; Laser Spine Surgery Center of Warwick, LLC; Laser Spine Surgery Center of Cleveland, LLC; Total Spine Care, LLC; and Spine DME Solutions, LLC (collectively with LSI, the “**Assignors**”).

3. On May 28, 2019, the Court entered the *Order Granting Assignee’s Motion for Order Establishing Procedures for Monthly and Interim Compensation and Reimbursement of Expenses for Professionals* (the “**Interim Compensation Order**”).

4. Pursuant to the Interim Compensation Order, RMS submitted its monthly statements for the Allowance Period. No objections were filed to the monthly statements for April and May. The deadline to object to the June monthly statement has not yet passed. Therefore, the sum of \$35,156.00 was paid to RMS, which represented eighty percent (80%) of the requested fees for the period of April 11, 2019 through May 31, 2019. No payment has been made to RMS as to the June 2019 monthly statement.

5. The Interim Compensation Order further authorized the professionals to file interim fee applications every 120 days, with the first interim fee application being filed on or after June 30, 2019, representing fees and costs incurred from March 14, 2019 through June 30, 2019.

Description of Services and Benefits

6. RMS was authorized by this Court to represent the Assignee as risk management consultant in the Assignment Cases.

7. During the Allowance Period, RMS expended a total of 160.6 hours in rendering necessary and beneficial services to the Assignee, and is owed fees in the amount of \$68,255.00.

8. Copies of RMS' invoices for the services rendered are attached hereto as

Composite Exhibit A.

9. RMS has provided valuable services as risk management consultant and has assisted the Assignee with insurance consulting services that have resulted in substantial savings for the Estate. Without limitation, RMS was instrumental in procuring general liability insurance that resulted in substantial savings to the Estates.

WHEREFORE, RMS respectfully requests that the Court allow compensation to RMS in the amount of **\$68,255.00** for services rendered to the Assignee during the Allowance Period and authorizing, after application of amounts paid pursuant to the Interim Compensation Order in the amount of \$35,156.00, payment in the amount of **\$33,099.00**.

/s/ Edward J. Peterson

Edward J. Peterson (FBN 0014612)
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[Email: epeterson@srbp.com](mailto:epeterson@srbp.com)
Counsel for Assignee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the a true and correct copy of the foregoing Application has been furnished on this 25th day of July, 2019 by the Court's electronic system to all parties receiving electronic service, and by either U.S. mail or electronic mail to the parties listed on the Limited Notice Parties list attached.

/s/ Edward J. Peterson _____

Edward J. Peterson

MASTER LIMITED NOTICE SERVICE LIST

July 16, 2019

Assignors and Assignor's Counsel: (via the Court's electronic servicing system)

CLM Aviation, LLC
LSI HoldCo, LLC
LSI Management Company, LLC
Laser Spine Surgery Center of Arizona, LLC
Laser Spine Surgery Center of Cincinnati, LLC
Laser Spine Surgery Center of Cleveland, LLC
Laser Spine Surgical Center, LLC
Laser Spine Surgery Center of Pennsylvania, LLC
Laser Spine Surgery Center of St. Louis, LLC
Laser Spine Surgery Center of Warwick, LLC
Laser Spine Institute, LLC
Medical Care Management Services, LLC
Spine DME Solutions, LLC
Total Spine Care, LLC
Laser Spine Institute Consulting, LLC
Laser Spine Surgery Center of Oklahoma, LLC
c/o Nicole Greensblatt, Esq.
Kirkland & Ellis, LLP
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New York, NY 10022
Email: [ngreensblatt@kirkland.com](mailto:n greensblatt@kirkland.com)

Assignee and Assignee's Counsel (via the Court's electronic servicing system)

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110 E. Madison Street, Suite 200
Tampa, Florida 33602

Soneet Kapila
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Email: pbattista@gjb-law.com, ggarno@gjb-law.com

Soneet Kapila
c/o Roche, McLean & Sbar, P.A.
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Secured Creditors:

CarePayment, LLC (MAIL RETURNED)
5300 Meadow Rd., #400
Lake Oswego, OR 97035

Steris Corporation
5960 Heisley Rd.
Mentor, OH 44060
CIT Bank, N.A.
10201 Centurion Pkwy., #400
Jacksonville, FL 32256

Medport Billing, LLC (MAIL RETURNED)
6352 S. Jones Blvd., #400
Las Vegas, NV 89118

U.S. Bank Equipment Finance
1310 Madrid St.
Marshall, MN 56258

Maricopa County Treasurer
c/o Peter Muthig, Esq.
222 N. Central Ave., #1100
Phoenix, AZ 85004
Email: muthigk@maco.maricopa.gov

Those Parties and Attorneys Formally Requesting Notice (via the Court's electronic servicing system unless otherwise noted)

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c/o Eric E. Ludin, Esq.
Tucker & Ludin, P.A.
5235 16th Street North
St. Petersburg, FL 33703-2611
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Terry and Sherry Legg
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Joe Bailey; Mark Miller; Ted Suhl; Laserscopic Spinal Centers of America, Inc.; Laserscopic Medical Clinic, LLC; Laserscopic Surgery Center of Florida, LLC; Laserscopic Diagnostic Imaging; Laserscopic Spinal Center of Florida, LLC; and Tim Langford
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MedPro Group
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Weiss Family Management, LLLP
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William P. Esping
James S. St. Louis, D.O.
Michael W. Perry
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EFO Holdings, L.P.,
EFO Genpar, Inc.
EFO Laser Spine Institute, Ltd.
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Dr. James St. Louis
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Laser Spine Institute, LLC
CLM Aviation, LLC
LSI HoldCo, LLC
LSI Management Company, LLC
Laser Spine Surgery Center of Arizona, LLC
Laser Spine Surgery Center of Cincinnati, LLC
Laser Spine Surgery Center of Cleveland, LLC
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Case No. 2019-CA-2762
Case No. 2019-CA-2764
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Case No. 2019-CA-2774
Case No. 2019-CA-2775
Case No. 2019-CA-2776
Case No. 2019-CA-2777
Case No. 2019-CA-2780

Assignors,

Consolidated Case No.
2019-CA-2762

to

Soneet Kapila,

Division L

Assignee.

COMPOSITE EXHIBIT A

**FIRST INTERIM APPLICATION OF RISK MANAGEMENT
SOLUTIONS, INC. FOR ALLOWANCE OF COMPENSATION
AS RISK MANAGEMENT CONSULTANT FOR ASSIGNEE
FOR THE PERIOD OF APRIL 11, 2019 THROUGH JUNE 30, 2019**

RISK MANAGEMENT SOLUTIONS, INC.

RICK FENSTERMACHER
PRINCIPAL
RFENSTERMACHER@BELLSOUTH.NET

INVOICE

June 5, 2019

Soneet R. Kapila, Assignee
Laser Spine Institute, LLC
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1000 South Federal Highway, Suite 200
Ft. Lauderdale, FL 33316

Toby L. Gerber, Esq.
Ryan E. Manns, Esq.
Norton Rose Fulbright US LLP
2200 Ross Avenue
Dallas, TX 75201-7932

Edward J. Peterson, Esq.
Stichter Riedel Blain & Postler P.A.
110 East Madison St., Suite 200
Tampa, FL 33602

RE: Laser Spine Institute, LLC
Case No. 2019-CA-2762

Professional Services rendered March 14, 2019 – April 30, 2019 per attached:

27.9 hours @ \$425.00	<u>\$ 11,857.50</u>
Total – Fees	\$ 11,857.50
Total – Expenses	<u>\$ 0.00</u>
Total Due - Professional Services & Expenses	\$ 11,857.50

Wire-Transfer Instructions:

Routing # 267084131

JP Morgan Chase Bank, N.A.
1025 71st Street
Miami Beach, FL 33141

For Credit To:

Account # 563612907
Risk Management Solutions, Inc.

CLIENT: Laser Spine Institute - Soneet Kapila Assignee

Time & Expenses

APRIL, 2019

DATE	TASK	HOURS
4/11/2019	Review various policies, proposals and lengthy correspondence for background; prep lengthy email to Kapila with initial comments on key issues	2.2
	Emails Kapila re MedPro insolvency provisions	1.1
	Conf call, Kapila, McCoy, counsel & broker	0.75
	Prep Retention letter & email	0.5
4/14/2019	Lengthy email Kapila re: MedPro issues	1.4
4/17/2019	T/C Kapila re priorities	0.2
	Review docs: property policy, Highwoods lease, policy summary & RCP issues;	1.45
	Review Premium Finance Agreement, email Kapila re cashflow impact;	0.6
4/18/2019	Review Assignee-Subcontractor agreement re HIPAA, identify errors & request revision from Peterson;	1.05
4/19/2019	Review revised agreement, sign & transmit to Peterson;	0.45
	Emails Pankotai re GL options & req to MedPro	0.8
4/21/2019	Emails Pankotai re conf call items; receive addl policies & PFA, initial review;	1.35
4/22/2019	Email exchange RCP re: carve-out GL from MedPro or procure separate policy	0.85
	Review RCP response to open items, prep email clarification of #7 & #8 re: PFA and MedPro loss runs; request addl policies;	2.2
	Review Empl Lawyer policy, prep email to Peterson with recommendations, addl emails Kapila expanding logic; T/C Ed for addl clarification;	1.8
	Emails McCoy re PFA payment due on 5/1; emails Kapila with recommendation;	0.95
	Email (lengthy) Riedel re MedPro tail issues, prep draft response to former employee re tail coverage [REDACTED]	1.75
4/23/2019	Misc emails re locations divesting;	0.1
	Review MedPro Loss Run; Emails Kapila re addl info to validate; Email Pankotai for clarification on format and follow-up on o/s items;	1.35
4/25/2019	Review internal financial exhibits re Medmal costs; attempt to reconcile to Loss Run	1.45
4/26/2019	Review ROR, compare to policy & Ex A to Loss Run, identify possible discrepancies;	1.6
	Misc emails re [REDACTED]	0.15
4/29/2019	T/C Kapila re [REDACTED]	0.25
	[REDACTED]	1.1
	Research GL for Tampa location; email McCoy to confirm details	0.45
	Emails Pankotai re o/s items;	0.25
4/30/2019	T/C Pankotai re outstanding requests, MedMal issues, GL status;	0.3
	Misc emails re Employed Lawyers	0.45
	Review policy summary, note issues re Cyber	1.05
	TOTAL	27.9
		27.9 HOURS @ \$425.00 \$ 11,857.50
	TOTAL DUE	\$ 11,857.50

RISK MANAGEMENT SOLUTIONS, INC.

RICK FENSTERMACHER
PRINCIPAL
RFENSTERMACHER@BELLSOUTH.NET

INVOICE

June 10, 2019

Soneet R. Kapila, Assignee
Laser Spine Institute, LLC
c/o KapilaMukamal
1000 South Federal Highway, Suite 200
Ft. Lauderdale, FL 33316

Toby L. Gerber, Esq.
Ryan E. Manns, Esq.
Norton Rose Fulbright US LLP
2200 Ross Avenue
Dallas, TX 75201-7932

Edward J. Peterson, Esq.
Stichter Riedel Blain & Postler P.A.
110 East Madison St., Suite 200
Tampa, FL 33602

RE: Laser Spine Institute, LLC
Case No. 2019-CA-2762

Professional Services rendered May 1, 2019 – May 31, 2019 per attached:

75.5 Hours @ \$425.00	<u>\$ 32,087.50</u>
Total – Fees	\$ 32,087.50
Total – Expenses	<u>\$ 0.00</u>
Total Due - Professional Services & Expenses	\$ 32,087.50

Wire-Transfer Instructions:

Routing # 267084131

JP Morgan Chase Bank, N.A.
1025 71st Street
Miami Beach, FL 33141

For Credit To:

Account # 563612907
Risk Management Solutions, Inc.

CLIENT: Laser Spine Institute - Soneet Kapila Assignee

Time & Expenses

MAY, 2019

DATE	TASK	HOURS
5/1/2019	Emails & doc exchange with Luis Arce re internal Medmal cost report; outline data req & format	1.6
	Prep WIP & email to McCoy;	0.25
	Receive & review addl policies from RCP;	1.8
	Misc emails re MedMal issues & D&O;	1.1
	Review Certs issued for former docs;	0.6
5/2/2019	T/C Insource re short-term replacement GL, prep submission & email;	2.3
	Misc emails re MedMal issues & D&O; review Starr tail endt.	1.45
5/6/2019	Prep for & conf call with Kapila & Peterson re MedMal, FAQ for website;	0.75
	Receive & review LSI internal cost MedMal report, integrate with 2017 Actuarial Report and MedPro Loss Runs; prep financial analysis re MedPro retention; begin drafting report;	4.8
	Misc emails re replacement GL;	0.9
5/7/2019	Review vacate dates & named insured schedule for repl GL, update submission;	1.3
	Review Tail endt for XS D&O;	0.25
	Emails Arce for clarification on missing claims cost data;	0.6
	Continue drafting MedMal report;	2.25
	Review proposed FAQ wording re MedMal;	0.3
	Review Starr ROR letter re WARN claim;	0.5
5/8/2019	Draft FAQ website language for MedMal & distribute for comment, misc . related emails;	1.15
	Emails RCP re GL declinations, follow-up Insource on quotes;	0.65
	Review MedPro revised Tail & GL offer	0.25
	Complete & release MedMal report with all supporting docs; email (lengthy) action plan for implementation;	3.6
	Follow-up RCP on WC & Prop r/p's	0.8
5/9/2019	Misc emails re MedMal report	0.5
	Email Kapila & McCoy re WC r/p's, impact on PFA and 6/1 payment	1.15
	Emails re loc vacate dates and address updates;	0.5
	Prep & Conf call with MedPro attys; follow-up emails;	1.35
5/10/2019	Conf call Kapila & attys.	0.5
	Emails Arce re incurred fees [REDACTED]	0.8
5/13/2019	Review & comment on req for coverage confirms & claims info;	0.85
	Follow-up on repl GL	
5/14/2019	Review & edit draft motion to cancel Medpro, emails & T/C Peterson & Hale;	1.2
	[REDACTED], calculate r/p's	0.95
	Follow-up with RCP on WC & Prop r/p's; transmit WC r/p endt to McCoy	1.1
	Conf call MedPro attys & SRBP; separate conf call with Riedel & Patterson;	1.45
5/15/2019	Review & edit Motion, email with comments to Hale	0.85
	Prep draft to MedPro attys, email to SRBP for approval; issue email to MedPro attys re claims assessments & cover verification issues;	1.25

5/16/2019	Review Prop endt deleting Bus Int cover, validate premium calculation, re-calculate impact on premium finance agreement, prep summary email to Kapila; req. addl details from Broker;	1.65
	Update repl GL exposure summary, email Insource;	0.5
	Receive property Statement of Values, compare to current prop schedule, note changes for next endt.	1.3
	Receive prop endt for prior policy term; advise RCP for payment of return premium, confirm payee & address with McCoy;	1.25
5/17/2019	Review atty changes to Motion, email SRBP	0.3
	Receive & review replacement GL proposal from Insource, prep & email summary & recs to Kapila & SRBP;	1.8
5/20/2019	Review req for cover from GE, need addl docs to process, req from RCP;	0.75
	Lengthy response to email from Stichter, research MedPro Loss Run and LSI internal report;	1.2
	Receive landlord details for repl GL, add to spreadsheet, confirm vacated locations; internet research on locs to eliminate need for Vacant suppl for replacement GL and email to Insource;	2.15
	[REDACTED]	0.4
5/21/2019	Receive & review Excess MedMal Binders, prep req to originating broker with legal authorities for original policies;	1.4
	Receive addl info re req for cover confirm; advise RCP to issue evidence of property cover;	1.15
	Review Assignee website for updates;	1.35
5/22/2019	Req & receive 4 Excess MedMal policies, review canc provisions to confirm return premium calculations for Motion;	2.35
	Prep docs for Kapila to implement canc of Med Mal & GL, incl draft letter to MedPro & 'no loss' letter, 4 Policy Release forms, GL applications, payment details for repl GL; prep email summary & distribute;	3.3
	Receive & review D&O ERP endts.	0.5
	Req docs from Ironwood	0.3
	Conf call SRBP re notice provisions for MedMal canc;	0.25
	Review req for coverage confirm, t/c Peterson re response	0.15
	Review info in audit notes, email Arce for addl info; email Kapila & SRBP	1.2
	Review 2017, 2016, 2015 Audited FS [REDACTED]	1.45
5/24/2019	MedMal cancellations & Replacement GL: process applications to Insource, Policy Releases to Ironwoods & RCP, misc emails;	1.8
	Detailed email to Shawna with FS's & other docs for research SIR costs, emails Kapila & McCoy re obtaining costs from defense counsel;	1.5
	Misc emails SRBP re notice & ERP	1.25
5/25/2019	Prep calculation of MedPro return premium, email doc;	1.3
5/28/2019	Review MedPro settlement correspondence, email cost report to counsel;	0.55
	Identify errors in PFA, req. info from Ironwoods to clarify;	0.25
5/30/2019	Analysis of Cyber policies, prep report & recommendations;	0.35
	Follow-up email & T/C Ironwoods on fee issues;	2.2
	T/C Shawna re accrued costs; review updates LSI internal report;	0.2
5/31/2019	Misc emails McCoy re PFA; follow-up Ironwoods re fees & commissions; RCP re fees & commissions, gen status of tail;	0.45
		1.3
	TOTAL	75.5
	75.5 HOURS @ \$425.00	\$ 32,087.50
	TOTAL DUE	\$ 32,087.50

RISK MANAGEMENT SOLUTIONS, INC.

RICK FENSTERMACHER
PRINCIPAL
RFENSTERMACHER@BELLSOUTH.NET

INVOICE

July 8, 2019

Soneet R. Kapila, Assignee
Laser Spine Institute, LLC
c/o KapilaMukamal
1000 South Federal Highway, Suite 200
Ft. Lauderdale, FL 33316

Toby L. Gerber, Esq.
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110 East Madison St., Suite 200
Tampa, FL 33602

RE: Laser Spine Institute, LLC
Case No. 2019-CA-2762

Professional Services rendered June 1, 2019 – June 30, 2019 per attached:

57.2 Hours @ \$425.00	<u>\$ 24,310.00</u>
Total – Fees	\$ 24,310.00
Total – Expenses	<u>\$ 0.00</u>
Total Due - Professional Services & Expenses	\$ 24,310.00

Wire-Transfer Instructions:

Routing # 267084131

JP Morgan Chase Bank, N.A.
1025 71st Street
Miami Beach, FL 33141

For Credit To:

Account # 563612907
Risk Management Solutions, Inc.

CLIENT: Laser Spine Institute - Soneet Kapila Assignee

Time & Expenses

JUNE, 2019

DATE	TASK	HOURS
6/3/2019	T/C Kapila re broker fees & commissions; prep addl info req to Ironwood & RCP brokers; review Ironwood fee contract, clarify req to RCP	1.25
6/4/2019	Review agreements for med records & billings, prep email McCoy re Cyber provisions (none) and rec for Cert of Ins to identify duplicate cover; Addl research re broker fees & comms	1.05
	Prep & submit fee statement for 3/14-4/30;	0.75
6/5/2019	Process replacement GL policies, transmit to Kapila with note re: eff date;	1.15
	Misc. email McCoy re payment; email Kapila re no change	0.2
	Emails RCP re verification of coverage, fwd to kapila & counsel with recs; research MedPro website, prep draft language for Assignee website;	1.65
6/6/2019	Review revised website language, add comments, emails Kapila & counsel;	0.6
	Follow-up RCP on property r/p's to premium finance co.	0.5
	Update prop schedule & distribute to Kapila & counsel;	0.75
	Research removed property coverage issues, various emails with Fugate & McCoy.	1.3
	Follow-up with RCP re excess Cyber policies, receive 1 policy & review for canc & tail provisions.	1.25
6/7/2019	Follow-up on property rp's and timing for transfer to Finance Co, emails McCoy with cashflow forecast.	0.8
	Emails Fugate re coverage limitations at auction warehouse and policy expirations.	0.75
6/10/2019	Prep statement for May fees, review for privileged content & transmit.	0.8
	Various emails re net auction proceeds to identify need for addl prop coverage; future plans for prop at other LSI facilities.	1.25
	Various emails re LSI file inventory for medmal cases, transmit Medpro inventory to assist in file identification.	0.95
6/12/2019	Review Brownstein correspondence, prep draft responses for Peterson; review MedPro loss run to identify any incident report.	1.3
	Req. Medpro PA policy from RCP.	
6/13/2019	Receive & review Medpro PA policy, transmit to McCoy & counsel; check status on website updates.	1.25
6/14/2019	Review Medpro inventory against Sharefile.	0.8
6/17/2019	Access sharefile medmal cases, review content & organization of info, email Peterson re extending access per Medpro "cooperation" clause.	1.85
	Review wording for website & draft to Medpro counsel, email recs to Peterson; misc email exchanges re changes.	1.9
	Follow-up emails on property at auction house.	0.45
6/19/2019	Emails re new MedMal claim (Tinelli), provide notice to broker and recs to Peterson	1.3
6/20/2019	Emails confirming claim report	0.75

6/24/2019	Emails SRBP re Winkler filings violation of FL self-insurance statutes; review Omnibus response. research Elstat [REDACTED]	2.25
	T/C Stichter re MedMal history and need for accurate history doc for status meeting in July, [REDACTED] begin prep of MedMal history doc, identify errors in LSI records, revert to actual source docs; review email from Shutz & filing	3.2
	Review & respond to Peterson re Constitution Life	0.25
	Follow-up on canc r/p's with RCP & Ironwood brokers;	0.3
6/25/2019	Email Arce re addl Actuarial Reports; receive Reports and review;	1.95
	Receive docs via Sharefile, identify key docs for MedMal history report and begin prep spreadsheets;	2
	Prep summary of Actuarial Reports for counsel, [REDACTED]	2.35
	[REDACTED]	
	Lengthy email to McCoy & Davis re MedMal history and change from Ded to SIR	0.95
6/26/2019	Contact Marsh DC for intro to rep in Atl office with LSI history;	0.25
	Continue review of docs in sharefile; identify LSI info of severe losses, thru notes & insurance proposals;	3.75
	Research MedPro cover for internal LSI legal salaries, identify endt on 2017 policy.	1.3
6/27/2019	[REDACTED]	1.4
	[REDACTED]	0.85
	Complete detailed MedMal history spreadsheets, email to SRBP	3.25
	Email Ironwood re WC dividend due status;	0.3
6/28/2019	[REDACTED]	2.85
	[REDACTED]	
	Addl review of LSI docs in Sharefile;	2.2
6/29/2019	[REDACTED]	2.7
	[REDACTED]	

TOTAL 57.2

57.2 HOURS @ \$425.00 \$ 24,310.00

TOTAL DUE \$ 24,310.00