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.	
/	

FOURTH INTERIM APPLICATION OF STICHTER, RIEDEL, BLAIN & POSTLER, P.A. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR ASSIGNEE FOR THE PERIOD OF APRIL 1, 2020 THROUGH JULY 31, 2020

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 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.

STICHTER, RIEDEL, BLAIN & POSTLER, P.A. ("Stichter Riedel"), 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 counsel to the Assignee in the amount of \$155,926.00 and reimbursement for expenses incurred in the amount of \$1,430.12 for a total allowance of \$157,356.12, for the period of April 1, 2020 through July 31, 2020 (the "Allowance Period"). In support of its request, Stichter Riedel 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: 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 the LSI Assignment Case, the "Assignment Cases").

- 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"). No payment has been made to Stichter Riedel for fees and costs incurred during the Allowance Period.
- 4. The Interim Compensation Order 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

- 5. Stichter Riedel was authorized by this Court to represent the Assignee as general counsel in the Assignment Cases.
- 6. During the Allowance Period, Stichter Riedel expended a total of 412.6 hours in rendering necessary and beneficial legal services to the Assignee, and is owed fees in the amount of \$155,926.00.
 - 7. Stichter Riedel incurred \$1,430.12 in expenses during the Allowance Period.
- 8. Copies of Stichter Riedel's time entries for the services rendered and a detailed list of the expenses are attached hereto as **Composite Exhibit A.**
- 9. For a summary of the services performed by the Assignee and Stichter Riedel, please see the Status Reports attached hereto as **Composite Exhibit B**.

WHEREFORE, Stichter Riedel respectfully requests that the Court allow compensation to Stichter Riedel in the amount of \$155,926.00 for professional services rendered during the Allowance Period and reimbursement of Stichter Riedel's expenses in the amount of \$1,430.12

incurred on behalf of the Assignee during the Allowance Period, for a total allowance of

\$157,356.12, and authorizing payment in the amount of \$157,356.12.

/s/ Edward J. Peterson

Edward J. Peterson (FBN 0014612) Stichter, Riedel, Blain & Postler, P.A.

110 E. Madison Street, Suite 200

Tampa, Florida 33602

Telephone: (813) 229-0144 Email: epeterson@srbp.com

Counsel for Assignee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Application has been

furnished on this 1st day of September, 2020 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

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MASTER LIMITED NOTICE SERVICE LIST January 14, 2020

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

601 Lexington Avenue

New York, NY 10022

Email: ngreenblatt@kirkland.com

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

Soneet Kapila

c/o Stichter Riedel, Blain & Postler, P.A.

Attn: Edward J. Peterson, Esq.

110 E. Madison Street, Suite 200

Tampa, Florida 33602

Soneet Kapila

c/o Genovese Joblove & Battista, P.A.

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Soneet Kapila

c/o Rocke, McLean & Sbar, P.A.

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Email: rrocke@rmslegal.com, aholder@rmslegal.com, jsbar@rmslegal.com

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: <u>muthigk@maco</u>.maricopa.gov

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

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Email: JGilbert@TheFloridaFirm.com; RGilbert@TheFloridaFirm.com; CertificateofService@TheFloridaFirm.com

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Laser Spine Institute, LLC 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 Consolidated Case No. Assignors, 2019-CA-2762 to Soneet Kapila, Division L Assignee.

COMPOSITE EXHIBIT A

FOURTH INTERIM APPLICATION OF STICHTER, RIEDEL,
BLAIN & POSTLER, P.A. FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES AS COUNSEL FOR ASSIGNEE FOR
THE PERIOD OF APRIL 1, 2020 THROUGH JULY 31, 2020

SRBP STICHTER RIEDEL BLAIN & POSTLER P.A.

ATTORNEYS AT LAW

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B. MICHAEL BACHMAN, JR. RUSSELL M. BLAIN JODI DANIEL DUBOSE BECKY FERRELL-ANTON DANIEL R. FOGARTY MATTHEW B. HALE AMY DENTON HARRIS BARBARA A. HART

MICHAEL J. HOOI ELENA PARAS KETCHUM STEPHEN R. LESLIE EDWARD J. PETERSON, III CHARLES A. POSTLER HARLEY E. RIEDEL, II MARK F. ROBENS SUSAN HEATH SHARP SCOTT A. STICHTER

G. CHRISTOPHER MEYER OF COUNSEL

REMIT PAYMENT TO TAMPA

June 24, 2020

Soneet Kapila Kapila-Laser Spine Kapila & Company 1000 South Federal Highway, Suite 200

Fort Lauderdale, FL 33316 USA

INVOICE

Matter: 1 Kapila-Laser Spine Client: 13857

For Professional Services Rendered:

04/01/2020	MBH	Call with Edward Peterson regarding injunction issues; receive and review email from Adam Alpert along with comments to motion	0.30
04/01/2020	MBH	Receive and respond to email regarding settlements; review settlement orders	0.20
04/01/2020	MBH	Call with Scott Stichter regarding revisions to injunction motion; further revisions ot injunction motion; receive and review emails throughout the day regarding same; further calls with Scott Stichter throughout the day regarding same	2.70
04/01/2020	SAS	Conference with Edward Peterson regarding client file issues; review of email from Edward Peterson to McCoy regarding same	0.20
04/01/2020	SAS	Telephone conference with Wagoner regarding next week's hearings; telephone conference with Schutz regarding filing of motion for preliminary injunction and next week's hearings	0.50
04/01/2020	SAS	Continued work on Langston motion, including review of email from Alpert enclosing revisions to motion; telephone conference with Matt Hale regarding revisions; review of revised draft and telephone conference with Matt Hale	1.10
04/01/2020	SAS	Review of email from Schutz regarding opposition to assignee being heard; review of emails regarding scheduling of hearing; review of emails from Alpert, Wagoner, Mosely, and Matt Hale regarding Langston motion; and review of email from Alpert	0.60
04/01/2020	DRF	Receive and respond to email from E. Peterson re: H&K files email from Altman	0.20
04/01/2020	EJP	Work on litigation matters	1.00
04/02/2020	MBH	Call with Scott Stichter regarding Langston matter; receive, review, and revise notice of filing; call with Khan Whiteside regarding filing; call with Scott Stichter	0.80
04/02/2020	HER	Emails with client and co-counsel; email to Stacy Blank with H&K regarding status of tolling	0.30

F 850.791.6545

Matter:	1	Bill # 44689 Page	2
		agreement.	
04/02/2020	SAS	Review of email from counsel regarding next week's hearings; exchange of emails with Alpert; review of email from Matt Hale enclosing draft of notice of filing; review of revised notice of filing; telephone conference with Matt Hale; and follow-up call with Matt Hale regarding next week's hearings	0.60
04/02/2020	SAS	Review of email from McCoy enclosing copy costs; dictated revisions to draft of email to Miller; and dictated email to co-counsel enclosing revised drafts	0.20
04/02/2020	SAS	Review of email from Fenstermacher regarding Langston issues; telephone conference with Fenstermacher regarding insurance issues	0.40
04/02/2020	EJP	Work on litigation matters	1.00
04/02/2020	SJ	Receipt and review CT Service of Process, download and circulate	0.20
04/03/2020	MBH	Receive, review, and respond to emails regarding hearing and injunction motion; review and edit letter to chambers	0.40
04/03/2020	HER	Electronic correspondence regarding cash collateral issue.	0.20
04/03/2020	SAS	Telephone conference with Alpert regarding next week's hearings and position to be taken by MedPro; dictated email to Edward Peterson and Matt Hale regarding same	0.30
04/03/2020	SAS	Telephone conference with Miller regarding proposal to resolve client file issues; dictated email to McCoy regarding availability of electronic files	0.30
04/03/2020	SAS	Review of draft letter to Stoddard enclosing documents for hearing; review of email from Matt Hale enclosing changes; and finalized letter	0.20
04/03/2020	SAS	Exchange of emails with Edward Peterson and Matt Hale regarding scheduling a hearing on the Langston injunction motion	0.20
04/03/2020	SAS	Conference with Edward Peterson regarding pending matters	0.20
04/03/2020	SAS	Review of follow-up emails from McCoy and Kapila; telephone conference with McCoy; and dictated follow-up emails	0.30
04/03/2020	EJP	Work on litigation matters	1.50
04/03/2020	BMB	Review of K&L documents	0.80
04/05/2020	HER	Electronic correspondence regarding litigation issues.	0.20
04/05/2020	SAS	Review of Langston's motion to strike; dictated email to Matt Hale and Edward Peterson regarding same	0.20
04/05/2020	BMB	Review of documents	1.70
04/06/2020	MBH	Call with Edward Peterson regarding hearing; work on summary outline of hearing materials	0.20
04/06/2020	MBH	Work on hearing outline; review pleadings	2.20
04/06/2020	MBH	Call with Edward Peterson and Scott Stichter regarding hearing on Langston matter	0.50
04/06/2020	HER	Electronic correspondence regarding litigation.	0.20
04/06/2020	SAS	Review of email from Edward Peterson regarding Langston issues; dictated response; and review of email from Matt Hale	0.20
04/06/2020	SAS	Review of LSI's and Francavilla's objection to Langston's motion to amend	0.40
04/06/2020	SAS	Work on Langston matters, including review of email from Matt Hale enclosing summary of arguments outline; telephone conference with Edward Peterson and Matt Hale regarding tomorrow's hearing; telephone conference with Edward Peterson and McLaughlin regarding tomorrow's hearing; dictated outline of argument; dictated revisions to Matt Hale's outline; and dictated email to Matt Hale and Edward Peterson enclosing revised outlines	4.10
04/06/2020	EJP	Work on Langston matter	2.50
04/07/2020	MBH	Revisions to memo; research of law; calls with Scott Stichter regarding injunction hearing	2.10
04/07/2020	MBH	Receive and review summary memoranda from Scott Stichter; respond to email	0.20
04/07/2020	MBH	Receive and review new complaint filed by Langstons	0.50
04/07/2020	SAS	Further revision of hearing outlines; dictated email to McLaughlin; and telephone conference with Matt Hale	0.60
04/07/2020	SAS	Preparation for hearing, including telephone conference with McLaughlin; numerous calls with Matt Hale; review of recently filed pleadings; attended first portion of hearing; telephone conference with McLaughlin; telephone conference with Matt Hale; continued preparation; participation in continued hearing; telephone conference with Wagoner; telephone conference with Matt Hale; telephone conference with Alpert; and dictated email to client regarding	4.70

Matter:	1	Bill # 44689 Page	3
		outcome of hearing	
04/07/2020		Work on litigation matters	1.00
04/08/2020) MBH	Call with Scott Stichter regarding injunction issues; receive, review, and respond to emails regarding same	0.50
04/08/2020) SAS	Review of email from Schutz regarding status of injunction motion; dictated response; exchange of emails with Schutz; dictated email to Matt Hale and Edward Peterson regarding issues to be addressed as to protective complaint, scheduling of hearing, and topics to be included in amended motion; telephone conference with Matt Hale; and telephone conference with Edward Peterson	1.10
04/08/2020) EJP	Work on litigation matters	1.00
04/08/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
04/09/2020) MBH	Receive, review, and respond to emails from Khan Whiteside and Edward Peterson regarding hearings	0.20
04/09/2020) HEF		0.20
04/09/2020) SAS	Review of email from Miller regarding client file issues; telephone conference with Miller; dictated drafts of order on Defendants' motion to compel turnover of client files, motion to establish procedures for client files and motion to compel turnover; and conference with Edward Peterson	1.60
04/09/2020	SAS	Telephone conference with McLaughlin regarding Langston's recently filed complaint	0.20
04/09/2020) SAS	Review of email from Hill requesting position on WARN Act Plaintiffs' motion to appear at mediation; dictated email to Rocke; and review of email from Valles	0.30
04/09/2020	SAS	Exchange of emails with Edward Peterson and Matt Hale regarding scheduling of hearing on injunction motion; dictated email to Schutz; and review of email from Schutz	0.30
04/09/2020) EJP	Work on litigation matters	1.50
04/09/2020	SJ	Review file, draft hearing agenda and forwarding to Edward Peterson	1.20
04/10/2020) MBH	Review hearing materials; call with Khan Whiteside; revisions to amended notice of hearing	0.40
04/10/2020) MBF	Receive, review, and respond to email from Edward Peterson regarding settlement payments; review agreements and appellate rules; call with Khan Whiteside; draft and send email to Soneet Kapila	0.80
04/10/2020) HEF	Electronic correspondence regarding litigation.	0.30
04/10/2020) SAS	Dictated further revisions to orders on client file issues; dictated email to Edward Peterson enclosing drafts of orders	0.80
04/10/2020) SAS	Review of WARN Act plaintiffs' motion to attend mediation; dictated email to Rocke and Valles regarding responding to motion; review of email from Edward Peterson regarding status of motion to attend mediation in ABC proceedings; review of files; and dictated email to Edward Peterson enclosing correspondence with plaintiffs' counsel regarding scheduling of hearing	0.50
04/10/2020) SAS		0.20
04/10/2020	SAS	Review and revision of notice of hearing for April 16th hearing	0.10
04/10/2020	DRF	Receive and review email re: Katten production status	0.10
04/10/2020) EJP	Work on litigation matters	1.00
04/10/2020) SJ	Revise agenda and forwarding to Edward Peterson	0.20
04/11/2020	SAS	Review of email regarding filing of motion to attend mediation in WARN Act case	0.10
04/11/2020	SAS	Telephone conference with Miller; review of email from Edward Peterson; and dictated email to counsel enclosing drafts of order	0.30
04/12/2020) HEF	Electronic correspondence regarding litigation.	0.20
04/13/2020) HEF	, , , , , , , , , , , , , , , , , , , ,	0.20
04/13/2020) SAS	Dictated revisions to order to incorporate parties' changes; dictated email to Miller enclosing drafts	0.30
04/13/2020) EJP	Work on litigation matters	1.00
04/13/2020) SJ	Receipt and review of CT Service of Process and circulate same	0.30
04/14/2020) HEF	Work on litigation.	0.80
04/14/2020	SAS	Telephone conference with Miller regarding comments on order; dictated email to Edward	0.60

F 239.939.5568

F 850.791.6545

Matter: 1		Bill # 44689 Page	4
		Peterson, McCoy, and Kapila regarding call and open issues with order	,
04/14/2020	SAS	Review of email regarding draft of notice of hearing for May hearing; dictated response	0.20
04/14/2020	SAS	Review of recently filed Langston complaint	0.60
04/14/2020	SAS	Review of order denying Langston's motion to amend; dictated email to Miller enclosing order	0.20
04/14/2020	SAS	Review of email from Alpert regarding scheduling of hearing on motion for injunction; dictated response; and review of email from Alpert	0.20
04/15/2020	MBH	Research of law on injunction issues; work on amended injunction motion	1.30
04/15/2020	HER	Conference with Edward J. Peterson regarding litigation; electronic correspondence.	0.50
04/15/2020	HER	Review of Comment of Texas Capital Bank to the Interim Fee Applications of Estate Professionals.	0.30
04/15/2020	SAS	Review of EFO's objections to Holland & Knight turnover of client files; telephone conference with Guso; dictated email to Edward Peterson and Matt Hale; and exchange of emails with Edward Peterson; review of email from Capuano; dictated response; review of email from Edward Peterson; and review of email from Capuano	0.90
04/15/2020	SAS	Review of emails regarding briefing schedules for client files; dictated response; and review of email from Edward Peterson	0.20
04/15/2020	EJP	Work on litigation matters	1.00
04/16/2020	MBH	Work on amended injunction motion; research regarding same	1.80
04/16/2020	SAS	Review of email from Schutz regarding today's hearing; dictated response; and conference with Edward Peterson	0.20
04/16/2020	EJP	Work on litigation matters	2.50
04/16/2020	SJ	Revise first fee order and forwarding to Edward Peterson	0.50
04/17/2020	MBH	Review EFO parties' objection; research regarding same; emails with Scott Stichter and Edward Peterson regarding same; call with Mr. Peterson and Mr. Stichter regarding objection	1.90
04/17/2020	SAS	Telephone conference with Miller regarding client files order	0.20
04/17/2020	SAS	Conference with Edward Peterson and Matt Hale regarding EFO's objection	0.40
04/17/2020	SAS	Continued review of EFO's objection; review of case law cited in objection; exchange of emails with Matt Hale; telephone conference with Matt Hale; review of email from Edward Peterson regarding EFO's objection; and dictated response	1.40
04/17/2020	EJP	Work on litigation matters	1.00
04/17/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
04/17/2020	SJ	Emails regarding checks received with subpoenas, review file, forwarding of original subpoenas with checks to Kevin McCoy; work on fee order and forwarding to Edward Peterson	0.70
04/19/2020	SAS	Review of emails from Edward Peterson and Battista regarding EFO's objection	0.10
04/19/2020	SAS	Review of email from Attorney General forwarding patient complaint	0.10
04/20/2020	MBH	Drafting of amended motion for injunction	2.00
04/20/2020	HER	Electronic correspondence regarding litigation.	0.20
04/20/2020	SAS	Telephone conference with Kastner; review of email from Kastner; and dictated email to Kapila	0.20
04/20/2020	EJP	Work on litigation matters	1.00
04/20/2020	SJ	Emails, review file, draft order on Highwoods settlement and forwarding to Edward Peterson	0.30
04/21/2020	MBH	Research of law on injunction issues; work on revisions to motion	3.50
04/21/2020	MBH	Review documents regarding EFO objection to turnover motion; call with co-counsel regarding same	0.70
04/21/2020	MBH	Review documents regarding EFO objection to turnover motion; call with co-counsel regarding same	0.70
04/21/2020	HER	Work on multiple litigation matters.	1.00
04/21/2020	SAS	Review of email from Kastner regarding California litigation issues; review of files; dictated email to Kapila discussing open issues and enclosing draft email to Kastner; exchange of emails with Kapila; and finalized email to Kastner	0.50
04/21/2020	SAS	Review of files in preparation for call; telephone conference with Edward Peterson, Matt Hale, Rocke, Sbar, and Battista regarding litigation issues	0.50

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04/21/2020	SAS	Review of email regarding Langston discovery; dictated response	0.10
04/21/2020	SAS	Telephone conference with Kasten and Kapila (portions) regarding litigation issues	0.50
04/21/2020	SAS	Follow-up call with Kapila regarding California litigation issues; telephone conference with Kapila and Edward Peterson; and telephone conference with Kasten	0.40
04/21/2020	SAS	Telephone conference with Guso regarding attorney-client files issues; conference with Edward Peterson regarding same	0.30
04/21/2020	EJP	Work on litigation matters	2.00
04/21/2020	EJP	Work on litigation matters	0.20
04/21/2020	BMB	Interoffice communications regarding review of K&L documents; follow up with Daniel R. Fogarty and Edward J. Peterson regarding additional document review	0.40
04/22/2020	BFA	Call with Edward Peterson, Dan Fogarty and Matt Hale re status of documents	0.30
04/22/2020	MBH	Revise and edit amended injunction motion; draft and send email regarding same to Scott Stichter	0.80
04/22/2020	MBH	Review document tracking chart; call with team regarding document review	0.40
04/22/2020	MBH	Emails regarding response to EFO objection to turnover motion	0.20
04/22/2020	HER	Electronic correspondence, telephonic communications, and analysis regarding H & K, including conference with Edward Peterson; left voice mail for and email to Doug Wright; follow-up.	1.50
04/22/2020	SAS	Review of emails from Edward Peterson and Kapila regarding draft email to Altman regarding pending matters; dictated revisions; dictated reply enclosing revised email; and review of follow-up emails	0.40
04/22/2020	SAS	Review of email from Battista to Edward Peterson regarding issues revised by insurance carrier's counsel; review of email from Edward Peterson enclosing draft response; dictated revisions to Edward Peterson's draft; dictated email to Edward Peterson enclosing revised draft; and telephone conference with Edward Peterson regarding finalizing draft	0.60
04/22/2020	SAS	Dictated email to Kapila regarding California litigation issues; review of email from Kapila; dictated response; review of follow-up emails; and dictated email regarding need to prepare an application to employ	0.40
04/22/2020	DRF	Telephone call with E. Peterson, et al. re: document production; review status	0.80
04/22/2020	EJP	Work on litigation	2.00
04/22/2020	BMB	Review of K&L documents; follow up with Edward J. Peterson regarding same; call with Edward J. Peterson and team regarding all document review projects, status, next steps; continue document review	3.70
04/22/2020	SJ	Emails, review file, draft proposed orders and forwarding to Edward Peterson	0.70
04/23/2020	BFA	Telephone call to Stacy Blank re status of document production	0.30
04/23/2020	MBH	Receive and review emails regarding EFO objection to HK turnover motion; call with Scott Stichter regarding same; work on drafting of Reply	0.60
04/23/2020	HER	Preparation for and participation in conference call with Doug Wright at 10:30 a.m.; follow-up.	0.90
04/23/2020	HER	Client communications regarding fee applications.	0.30
04/23/2020	SAS	Review of email from Valles enclosing draft of opposition to WARN Act class members' motion to participate in mediation; dictated revisions to opposition; dictated email to Valles enclosing revisions; and review of follow-up email from Valles	0.60
04/23/2020	SAS	Dictated email to Valles regarding filing of response to motion to mediate; review of email from Valles	0.10
04/23/2020	SAS	Review of emails from Altman regarding April 29 hearing; conference with Edward Peterson; and telephone conference with Matt Hale	0.40
04/23/2020	SJ	Emails regarding litigation, receipt and review of CT Service of Process, download and circulate same	0.30
04/24/2020	BFA	Telephone call to Stacy Blank re status of document production and e mail to Edward J. Peterson re same	0.70
04/24/2020	MBH	Research of law regarding reply to EFO objection to HK turnover motion	2.00
04/24/2020	MBH	Call with Edward Peterson regarding HK files issue	0.20
04/24/2020	MBH	Work throughout the day on reply to EFO Objection; revise and edit same	3.80
04/24/2020	HER	Work on H & K matters (including multiple items of electronic correspondence); initial review	1.00

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		of clean and red-lined version of the Tolling Agreement. Received from H & K.	
04/24/2020	O SAS	Review of email from Khan Whiteside regarding order to be entered for hearings to be conducted on Zoom; conference with Khan Whiteside regarding preparation of hearing books; and review of case management orders for remote appearances	0.30
04/24/2020	SAS	Review of emails from Miller enclosing revisions to orders; dictated email to Kapila and McCoy; exchange of emails with McCoy; and telephone conference with Miller	0.60
04/24/2020	SAS	Review of emails from Altman and Edward Peterson regarding litigation issues; conference with Edward Peterson	0.40
04/24/2020) EJP	Work on litigation matters	1.00
04/24/2020) EJP	Work on deminimis sales	0.50
04/24/2020	o SJ	Emails, review file, draft motion to employ and forwarding to Scott Stichter and Edward Peterson	0.40
04/25/2020	SAS	Dictated revision to orders revised by Miller; dictated email to Edward Peterson enclosing revised draft and discussing open issues with regards to each motion	0.60
04/25/2020) SAS	Review and dictated revisions to reply to EFO objections; dictated email to Matt Hale and Edward Peterson enclosing revisions to reply; review of email from Edward Peterson; dictated response; dictated email to Battista and Rocke; and review of email from Matt Hale	1.20
04/25/2020) EJP	Work on litigation matters	1.00
04/26/2020) SAS	Review of email from Lamb regarding Langston's failure to serve LSI or Franceville with second lawsuit; dictated response	0.20
04/26/2020		Review of email from Guso regarding extension of time to object to procedures motion; dictated email to Guso regarding pending matters	0.20
04/26/2020		Review of drafts of pleadings in California litigation; dictated response	0.70
04/27/2020	-	Revisions to reply to EFO objection to HK turnover motion; calls and emails regarding finalizing and filing of same	0.70
04/27/2020) SAS	Review of email from Emden regarding HUD's approval of Regal's Form 2530; review of email from Lapowsky to Emden	0.10
04/27/2020) SAS	Review of Altman's revisions to reply; dictated revisions; dictated email to Matt Hale and Edward Peterson enclosing revised draft; review of Matt Hale's revisions; telephone conference with Matt Hale; and review of emails regarding finalizing and filing of reply	0.90
04/27/2020	SAS	Telephone conference with Guso regarding issues with Holland & Knight motion; review of email from Guso; and dictated to Guso emails enclosing drafts of orders	0.40
04/27/2020) EJP	Work on litigation matters	0.50
04/27/2020) SJ	Emails and review file regarding lawsuits, forwarding of Highwoods order to Edward Peterson, work on stay notice and forwarding to Scott Stichter, finalize and mailing of stay notice to Court and parties	1.10
04/27/2020) SJ	Receipt and review of CT service of process, download and circulate	0.20
04/28/2020) MBH	Receive and respond to email from Edward Peterson regarding hearing preparation; work on hearing preparation	1.00
04/28/2020		Electronic correspondence regarding litigation.	0.20
04/28/2020	SAS	Telephone conference with Edward Peterson regarding tomorrow's hearings	0.20
04/28/2020		Review and revision of amended motion for preliminary and permanent injunction against Langston; dictated email to Matt Hale and Edward Peterson enclosing revised draft	1.20
04/28/2020		Review of email from Kastner regarding filing of California lawsuit	0.10
04/28/2020		Work on litigation matters	3.00
04/28/2020) BMB	Review of correspondence; discussions with Edward J. Peterson regarding transfer of assets, documentation	0.40
04/29/2020) BFA	Telephone call with Stacy Blank re status of document production and need for conference call with IT people re format of same	0.50
04/29/2020) MBH	Call with Edward Peterson regarding hearing; follow up emails with Mr. Peterson regarding same	0.40
04/29/2020) HER	Electronic correspondence regarding hearings and participation in hearing on production of attorney files; follow-up with Edward J. Peterson.	0.90
04/29/2020		Telephone contact with Doug Wright following hearing regarding H & K.	0.40
04/29/2020	SAS	Review of email from Miller regarding status of approval of orders; dictated response; review	0.30

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		of follow-up email from Miller; and dictated follow-up email enclosing requested order	
04/29/2020) SAS	Review of email from Guso regarding today's hearings; dictated response; and conference with Edward Peterson regarding today's hearings; and telephone conference with Edward Peterson and Matt Hale regarding today's hearings	0.50
04/29/2020	SAS	Work on mediation issues, including review of email from Banez enclosing chart of settlements; review of email from Battista regarding open issues; review of files; dictated response addressing spam issues and enclosing documents; and review of email from Kapila	0.40
04/29/2020	SAS	Conference with Edward Peterson regarding outcome of today's hearings; review of voicemai from Rocke; review of emails from Edward Peterson and Matt Hale; and review of emails from Edward Peterson and other professionals regarding production of H&K documents	0.40
04/29/2020) EJP	Preparation for H and K and Bonati hearing and time for same	3.00
04/29/2020) BMB	Review of correspondence; draft, review and revise bill of sale; interoffice communications with Edward J. Peterson regarding same; revisions to bill of sale	1.50
04/29/2020) SJ	Receipt and review of CT Service of Process, download and circulate	0.20
04/30/2020) BFA	E mail to Stacy Blank to coordinate call on technical aspects of document production; follow up with appropriate people from our team to participate in same	0.40
04/30/2020) BFA	Telephone call with Edward J. Peterson and Ms. Van Vliet re status of H&K document production	0.30
04/30/2020) MBH	Receive, review, and respond to emails regarding document productions	0.20
04/30/2020) MBH	IT and ediscovery issues; call with ehounds	0.60
04/30/2020) MBH	Work on order on turnover motion	1.00
04/30/2020) HER	Review of email from Jennifer Altman regarding tolling agreement.	0.10
04/30/2020	DRF	Telephone call with M. Hale re: records turnover and review	0.30
04/30/2020) EJP	Work on discovery matters	0.50
04/30/2020) BMB	Review of correspondence; follow up regarding conveyance of IT assets	0.30
For Disburs	sements Incurre	Total Professional Services Rendered	\$50,293.00
04/01/2020		Photocopies of Injunction Motion	\$141.00
04/01/2020)	Postage injunction motion	\$49.15
04/02/2020)	Federal Express Corporation; Overnight Courier to Claims Dept., Chubb Grp. of Insurance Cos./Simsbury, CT.	\$57.32
04/03/2020)	Photocopies of Ltr to Judge Stoddard	\$0.30
04/07/2020)	Photocopies of research	\$1.80
04/07/2020)	Photocopies of research	\$1.80
04/10/2020)	Photocopies of NOH	\$1.80
04/10/2020)	Postage NOH 4-16-20	\$3.00
04/13/2020)	Photocopies of cases	\$1.80
04/16/2020)	Photocopies of cases	\$9.00
04/17/2020)	Public Access to Court Electronic Records for 1st Qtr., 2020.	\$12.90
04/17/2020)	Postage subpoenas	\$2.20
04/17/2020)	Postage O-Case Manag	\$3.00
04/23/2020)	iTransPerfect Translations Intl., Inc.; Court Reporter fees for April 14, 2020 hearing.	\$225.00
04/24/2020)	Photocopies of Case Management Order	\$4.35
04/27/2020		Photocopies of Turn Over Client Files	\$16.50
04/27/2020)	Postage turn over client	\$3.90
04/27/2020)	Postage Stay Notice	\$2.50
		Total Expenses Incurred	\$537.32

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		Recapitulation	
	Name	Hours	Amount
	Ferrell-Anton, Becky	2.50	\$937.50
	Bachman, Michael	8.80	\$3,300.00
	Fogarty, Dan R.	1.40	\$525.00
	Peterson, Edward J.	30.70	\$13,047.50
	Riedel, Harley E.	9.90	\$4,950.00
	Hale, Matt B.	35.80	\$8,950.00
	Stichter, Scott A.	40.10	\$17,243.00
	Jeffcoat, Susan	6.70	\$1,340.00
	Total For Professional Services Rendered	135.90 Hours	\$50,293.00
	Adjusted Services Total		\$50,293.00
	Professional Services		\$50,293.00
	Disbursements		\$537.32
	Total New Charges This Invoice		\$50,830.32
	Previous Balance		\$635,771.90
	Less Payments Received		(\$0.00)
	Outstanding Balance		\$635,771.90
	New Charges This Invoice		\$50,830.32
Bill #	44689	Total Due	\$686,602.22

Date Last Payment Last Payment Amount May/18/2020 \$5,300.82

Please reference our Bill #: and Matter #: upon remittance - Thank You

SRBP STICHTER RIEDEL BLAIN & POSTLER P.A.

ATTORNEYS AT LAW

DON M. STICHTER 1929-2019 RICHARD C. PROSSER 1950-2017

B. MICHAEL BACHMAN, JR. RUSSELL M. BLAIN JODI DANIEL DUBOSE BECKY FERRELL-ANTON DANIEL R. FOGARTY MATTHEW B. HALE AMY DENTON HARRIS BARBARA A. HART

MICHAEL J. HOOI ELENA PARAS KETCHUM STEPHEN R. LESLIE EDWARD J. PETERSON, III CHARLES A. POSTLER HARLEY E. RIEDEL, II MARK F. ROBENS SUSAN HEATH SHARP SCOTT A. STICHTER

G. CHRISTOPHER MEYER OF COUNSEL

REMIT PAYMENT TO TAMPA

June 24, 2020

Soneet Kapila Kapila-Laser Spine Kapila & Company 1000 South Federal Highway, Suite 200

Fort Lauderdale, FL 33316 USA

INVOICE

Matter: 1 Kapila-Laser Spine Client: 13857

For Professional Services Rendered:

05/01/2020	MBH	Revisions to order; call with Scott Stichter; draft and send email regarding same	1.00
05/01/2020	MBH	Call with Edward Peterson; call with Mr. Peterson, Scott Stichter, and litigation counsel regarding documents	0.50
05/01/2020	HER	Electronic correspondence regarding collection of settlement funds.	0.30
05/01/2020	SAS	Review of email from Schutz regarding Langston scheduling conflict; telephone conference with Schutz regarding scheduling issues and Langston issues; and follow-up telephone conference with Matt Hale	0.40
05/01/2020	SAS	Review of emails from counsel regarding procedures for handling emails received from Holland & Knight; review of email from Matt Hale enclosing revisions to draft order on turnover of H&K files; dictated revisions to order; dictated email to Matt Hale and Elena Ketchum enclosing draft of revised order; and further telephone conference with Matt Hale	0.60
05/01/2020	SAS	Telephone conference with Matt Hale regarding Langston injunction issues	0.20
05/01/2020	SAS	Review of email from Edward Peterson regarding receipt of settlement funds	0.10
05/01/2020	SAS	Telephone conference with Rocke, Valles, Matt Hale,, and Edward Peterson regarding H&K file issues; conference with Harley Riedel; and dictated follow-up email to counsel	0.50
05/01/2020	EJP	Work on litigation matters	0.50
05/03/2020	SAS	Dictated email to Miller regarding hearing scheduled in Bonati case	0.10
05/04/2020	BFA	Telephone call with Stacy Blank, IT rep from H&K, Matt Hale, and E Hounds rep re format of document production; telephone call Edward Peterson re same; telephone call Matt Hale re same	1.30
05/04/2020	MBH	Conference with Edward Peterson regarding HK documents; work on order revisions; draft	1.70

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-		and send email to litigation team	
05/04/202	0 MBH	Call with Holland and Knight attorneys regarding electronic information; call with Dan Fogarty; call with David Bukas; receive and respond to emails regarding same; call with Becky Ferrell-Anton	0.70
05/04/202	0 HER	Review of orders and internal communications regarding same.	0.40
05/04/2020	0 SAS	Review of emails from Edward Peterson and Matt Hale regarding finalizing Holland & Knight order; review of email from Valles enclosing revision to order and confidentiality agreement; dictated response; review of email from Matt Hale enclosing revised order; dictated response; telephone conference with Matt Hale and conference with Edward Peterson	0.60
05/04/202	0 SAS	Review of email from Susan Jeffcoat enclosing revisions to Bonati and file turnover order; conference with Edward Peterson; and dictated email to Guso and Miller enclosing revised orders	0.30
05/04/202	0 SAS	Review of email regarding outcome of hearing on Bonati case; review of email from Edward Peterson to Miller	0.10
05/04/202	0 DRF	Call with H&K	0.50
05/04/202	0 EJP	Work on cash collateral issues	0.50
05/04/202	0 EJP	Work on litigation matters	1.50
05/04/202	0 SJ	Review orders and file, conference with Edward Peterson, revise orders, prepare redlines and forwarding to Edward Peterson and Scott Stichter	0.80
05/05/202	0 BFA	Draft e mail to Stacy Blank regarding requesting documents in Native format and following up our telephone call	0.40
05/05/202	0 MBH	•	0.20
05/05/202	0 MBH	Review revised injunction motion; further revisions; emails regarding same; review transcript of prior hearing	1.70
05/05/202		Work on litigation matters and on execution of tolling agreement.	0.80
05/05/202	0 SAS	Review of emails from Matt Hale and Edward Peterson regarding revisions to Holland & Knight file turnover order; dictated responses; and review of email from Edward Peterson to co-counsel enclosing draft of order	0.40
05/05/202	0 SAS	Work on Langston issues, including review of further emails from Schutz regarding need to continue hearing; dictated email to Khan Whiteside regarding available hearing dates; telephone conference with Khan Whiteside; telephone conference with Schutz; further telephone conference with Khan Whiteside; review of email from Wagoner; review of notice of hearing; review of email from court regarding calendering issues; dictated email to Khan Whiteside; and review of follow-up	0.70
05/05/202	0 SAS	Review of email from Matt Hale regarding Langston issues and review of revisions to motion; dictated response enclosing state court transcript	0.30
05/05/202	0 SAS	Review of email from Guso regarding status of Holland & Knight order; exchange of emails with Guso	0.20
05/05/202	0 EJP	Work on litigation matters	1.00
05/05/202	0 SJ	Receipt and review of CT Service of Process, download and circulate	0.20
05/06/202	0 BFA	Receive e mail from Stacy Blank at Holland and Knight re format of documents; forward same to EDWARD PETERSON and Matt Hale	0.20
05/06/202	0 MBH	Receive and review email from Stacy Blank regarding document turnover; conference with Dan Fogarty; draft and send email regarding same; research	1.10
05/06/202	0 SAS	Review of email from Battista enclosing draft of joint motion received from counsel for insurance company; dictated response; review of emails from Garno, Battista, Edward Peterson, and Kapila; review of email from Rocke requesting copy of joint motion; and dictated response enclosing requested document	0.70
05/06/202	0 SAS	Review of email from Edward Peterson to counsel regarding need to receive comments on H&K order; dictated response; review of emails from counsel; conference with Edward Peterson; and review of emails from Edward Peterson to Guso and Wright enclosing draft of order; and review of emails from Edward Peterson and Battista; and conference with Edward Peterson	0.50
05/06/202	0 SAS	Dictated email to Miller regarding status of review of orders; review of email from Miller; dictated response; dictated follow-up email to Guso; review of email from Guso; and finalized orders for submission	0.40

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iviation.		Bill # 44030	3
05/06/2020	SAS	Review of emails regarding receipt of additional settlement amounts; dictated email to Adrienne Napoli enclosing information for wire transfer	0.20
05/06/2020	SAS	Review of draft of Langston notice of hearing; dictated email to Khan Whiteside	0.10
05/06/2020	DRF	Emails and follow up re: Katten documents; conference with M. Hale; research re: format turnover for H&K documents; emails re: same	1.30
05/06/2020	EJP	Work on litigation matters	1.50
05/06/2020	BMB	Review of fully executed bill of dale, exhibit thereto; review of related correspondence	0.20
05/06/2020	SJ	Emails, attempts to download and unzip files, conference with Dan Fogarty regarding same	0.50
05/07/2020	BFA	Review cases re discovery format and Florida Rules of Professional Responsibility re turnover of client files; draft e mail to Stacy Blank about request to receive electronic documents in Native format	1.70
05/07/2020	HER	Exchange of emails with Jennifer Altman.	0.20
05/07/2020	HER	Electronic correspondence regarding H & K.	0.30
05/07/2020	DRF	Emails and follow up on Katton file turnover	0.40
05/07/2020	EJP	Work on litigation matters	1.00
05/07/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.40
05/08/2020	BFA	Following up on Holland & Knight document production	0.40
05/08/2020	HER	Email to Doug Wright regarding Holland & Knight.	0.10
05/08/2020	HER	Review of email from Stacy Blank with attached executed tolling agreement from H&K email to Soneet Kapila with attached tolling agreement for his execution and Mr. Kapila's reply email attaching executed tolling agreement (forwarded to Ms. Blank); telephone conference with Doug Wright.	2.20
05/08/2020	SAS	Review of emails from Susan Jeffcoat and State of Florida regarding status of Department of Health responding to records requests	0.10
05/08/2020	EJP	Work on cash collateral issues	0.50
05/08/2020	SJ	Work on fee orders and forwarding to Edward Peterson	2.20
05/11/2020	BFA	Follow up on H&K document production and e mail to H&K	0.10
05/11/2020	EJP	Work on litigation matters	1.00
05/12/2020	BFA	E mail to Stacy Blank re authority for Native format request	0.20
05/12/2020	HER	Multiple telephone calls and emails regarding H & K, including report to client and review of response.	1.20
05/12/2020	SAS	Dictated response to attorney general complaint	0.20
05/12/2020	SAS	Review of status report filed by WARN plaintiffs regarding District Court action	0.20
05/12/2020	SAS	Telephone conference with Ferrara regarding California litigation; dictated email to Kastner regarding call with Ferraro; and review of email from Kastner	0.30
05/12/2020	SAS	Initial review of Bailey Group's amended complaint and complaint to pierce veil	0.70
05/12/2020	EJP	Work on litigation matters	1.50
05/13/2020	SAS	Review of email from Guso enclosing comments on H&K client files order; dictated email to Edward Peterson and Matt Hale; review of email from Blank; and review of emails from Edward Peterson and Miller	0.40
05/13/2020	EJP	Work on litigation matters	1.50
05/14/2020	BFA	E mail to Theresa Van Vliet re follow up on H&K nonBailey document production	0.20
05/14/2020	MBH	Receive and review H&K order revisions; receive and review emails regarding same	0.20
05/14/2020	SAS	Review of email from Battista enclosing additional revisions to Holland & Knight order	0.10
05/14/2020	SAS	Review of email from Blank enclosing revisions to H&K client file order; dictated email to Edward Peterson regarding same; review of emails from Edward Peterson to co-counsel; review of emails from co-counsel; and conference with Edward Peterson	0.60
05/14/2020	SAS	Review of email regarding bank's approval of order on first fee applications; review of emails regarding uploading order	0.20
05/14/2020	SAS	Review of email from Edward Peterson regarding Bailey group pleadings; dictated response	0.20
05/14/2020	EJP	Work on litigation matters	1.00
05/14/2020	SJ	Emails, review file, begin drafting letter to Judge enclosing first fee orders	0.30

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05/15/2020	MBH	Review transcript; research of law; revisions to amended injunction motion	2.00
05/15/2020	HER	Preparation for (including review of bank emails and communications with client) and participation in 3:30 p.m. conference call with Toby Gerber, Ryan Manns, Bruce Shilcutt, Chris Pizzo, Soneet Kapila, Kevin McCoy, and Edward J. Peterson; follow-up.	2.50
05/15/2020	SAS	Review of further comments regarding submission of fee orders; finalized letter to court submitting fee orders	0.20
05/15/2020	EJP	Calls with Soneet Kapila and preparation for lender call; time for same	4.00
05/15/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
05/15/2020	SJ	Work on transmittal letter of fee orders and orders, forwarding of letter to Edward Peterson, finalize and submit letter and orders	1.30
05/17/2020	HER	Electronic correspondence regarding cash collateral issues.	0.30
05/17/2020	SAS	Review of fee orders entered by court; review of emails regarding same	0.20
05/17/2020	SAS	Review of emails regarding litigation issues	0.20
05/18/2020	BFA	E mail to EDWARD PETERSON and Matt Hale re status of electronic production from Holland and Knight	0.10
05/18/2020	MBH	Conference with Scott Stichter regarding injunction motion; revisions to injunction motion; draft and send email to litigation group regarding same	1.00
05/18/2020	MBH	Call with Khan Whiteside regarding hearing; review emails; draft and send email to chambers; receive and respond to emails from Jodi Guso	0.30
05/18/2020	HER	Telephone contacts (two) with Edward J. Peterson regarding cash collateral issues.	0.40
05/18/2020	HER	Electronic correspondence regarding litigation issues.	0.40
05/18/2020	HER	Electronic correspondence regarding H & K.	0.20
05/18/2020	SAS	Work on Langston issues, including dictated revisions to amended motion for injunction; conference with Matt Hale regarding further revisions; review of email from Waggoner enclosing Langston's petition for writ; dictated response; review of email from Matt Hale to counsel enclosing amended motion; and dictated email to Waggoner enclosing latest draft of amended motion	0.80
05/18/2020	SAS	Review of emails from McLaughlin and Lamb regarding petition for certiorari; dictated response	0.10
05/18/2020	SAS	Review of emails regarding scheduling call on Bailey issues; further review of pleadings filed by Bailey to receive damages and pierce veil	0.50
05/18/2020	SAS	Review of emails regarding status of orders on client files orders	0.20
05/18/2020	SAS	Review of emails regarding cancellation of hearings	0.20
05/18/2020	EJP	Work on litigation matters	2.00
05/19/2020	MBH	Call with Khan Whiteside regarding orders	0.10
05/19/2020	HER	Electronic correspondence regarding cash collateral and related issues.	0.60
05/19/2020	SAS	Review of Langston's petition for writ of certiorari	0.60
05/19/2020	EJP	Work on cash collateral issues	1.00
05/20/2020	BFA	Meeting with EDWARD PETERSON and Matt Hale re Holland & Knight document production; participate in litigation team meeting	0.70
05/20/2020	MBH	Review correspondence and documents relating to HK document production issues; call with Edward Peterson and Becky Ferrell-Anton regarding same; call with Soneet Kapila and litigation team regarding same and Bailey litigation issues	1.40
05/20/2020	HER	Preparation for and participation in 9:00 a.m. call with client; follow-up, including work on email to TCB and client communications regarding same.	1.80
05/20/2020	HER	Electronic correspondence and participation in 2:30 p.m. conference call regarding litigation matters.	1.00
05/20/2020	SAS	Telephone conference with McLaughlin, Lamb, and Edward Peterson regarding Langston's petition for writ of certiorari; follow-up conference with Edward Peterson	0.40
05/20/2020	EJP	Work on litigation matters	3.80
05/20/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
05/21/2020	HER	Work on malpractice claim issues, including telephone contact with Doug Wright and communications with Soneet Kapila and Edward Peterson.	0.90
05/21/2020		Work on litigation matters	1.50

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EJP

05/21/2020

Matter:

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Work on litigation matters

1.50

Page

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05/22/2020) HER	Electronic correspondence regarding TCB issues.	0.20
05/22/2020) HER	Telephone contact with Stacy Blank regarding H & K; electronic correspondence regarding same.	0.50
05/22/2020) SAS	Review of email from Susan Jeffcoat enclosing recently filed lawsuit and recently received notice of intent to sue; dictated response with recommendations as to how to respond	0.20
05/22/2020) SAS	Review of emails from Edward Peterson discussing call with Holland & Knight regarding turnover of files	0.20
05/22/2020) EJP	Work on cash collateral matters	2.00
05/22/2020) SJ	Receipt and review of CT Service of Process, download and circulate	0.30
05/23/2020) SAS	Review of emails regarding litigation issues	0.20
05/25/2020) SAS	Review of orders granting motion to approve client procedures and turnover of files	0.10
05/26/2020) MBH	Review amended motion for injunction; draft and send email to litigation team regarding same; finalize for filing	0.90
05/26/2020) HER	Review of emails from Ryan Manns and Edward Peterson's regarding cash collateral and bank issues.	0.30
05/26/2020) SAS	Review of emails regarding service of orders	0.10
05/26/2020) SAS	Review of email from Matt Hale to co-counsel regarding finalizing amended motion for preliminary and permanent injunction; review of email from Schutz; dictated response; conference with Matt Hale; and dictated follow-up email to Schutz	0.30
05/26/2020) SAS	Review of order from second DCA directing response to writ; exchange of emails with McLaughlin's office; telephone conference with Stein regarding appeal issues; review of files; and dictated follow-up emails to Stein enclosing documents	0.50
05/26/2020) EJP	Work on litigation matters	1.50
05/26/2020) SJ	Receipt and review of CT Service of Process, download and circulate	0.20
05/27/2020) HER	Preparation for and participation in conference call with Edward Peterson, Ryan Manns and Toby Gerber at 2:00 p.m.; follow-up.	1.00
05/27/2020) EJP	Work on cash collateral issues	1.00
05/28/2020) BFA	E mail from Stacy Blank re H&K nonBailey documents and production; forward to EDWARD PETERSON, HER and Matt Hale, review e mails in response	0.20
05/28/2020) MBH	Receive and review email from Edward Peterson regarding cash collateral; draft and send response email; review cash collateral motion drafts; work on revisions to cash collateral motion; conference with Edward Peterson regarding motion	2.00
05/28/2020	SAS	Review of emails regarding cash collateral issues	0.20
05/28/2020) SAS	Review of emails from Edward Peterson and Matt Hale regarding cash collateral issues; conference with Matt Hale and Edward Peterson	0.30
05/28/2020	DRF	Receive and respond to emails re: hard files	0.10
05/28/2020) EJP	Work on cash collateral motion	1.50
05/28/2020) SJ	Receipt and review of CT Service of Process, download and circulate	0.40
05/29/2020) BFA	Review EDWARD PETERSON email re H&K documents and respond to same; e mails with Melissa Davis and Suruchi Banez re document request/subpoena to US Bank; draft letter request to US Bank, finalize and deliver same	1.40
05/29/2020) MBH	Receive and respond to email regarding discovery production	0.10
05/29/2020) MBH	Work on settlement motion	1.40
05/29/2020) HER	Electronic correspondence regarding H&K.	0.30
05/29/2020) HER	Electronic correspondence and analysis of issues regarding possible renewed Motion for Use of Cash Collateral.	1.00
05/29/2020	SAS	Exchange of emails with Schutz regarding Langston issues	0.20
05/29/2020) EJP	Work on cash collateral issues	1.50
05/29/2020) SJ	Emails, revise H&K order and forwarding to Edward Peterson	0.30
05/30/2020) SAS	Review of email from Edward Peterson forwarding email from bank's counsel; dictated email to Edward Peterson enclosing draft response	0.30

Total Professional Services Rendered

\$37,434.50

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For Disburse	ements Incurred:			
05/01/2020	Photocopies of NOH - Langston M	N ot		\$2.70
05/01/2020	NOH-Langston Mot			\$4.00
05/01/2020	Postage Orders			\$5.40
05/04/2020	Photocopies of Orders			\$8.25
05/04/2020	Michael Musetta & Assoc., Inc.; H Langston vs. LSI, LLC, et al.	learing before Judge Stoddard transcript re		\$204.75
05/06/2020	Photocopies of Amended NOH			\$1.80
05/06/2020	Amended NOH			\$3.50
05/06/2020	Letter & Claim Form		\$0.50	
05/18/2020	Postage fee orders			\$8.40
05/18/2020	service of orders			\$7.00
05/18/2020	Preliminary Injuncti			\$69.95
05/26/2020	Transperfect/Court Reporter appe	earance/no write minimum		\$170.00
05/27/2020	Photocopies of Preliminary Injunc	tion		\$196.50
		Total Expenses Incurred		\$682.75
		Recapitulation		
	Name	Hours		Amount
	Ferrell-Anton, Becky	6.90		\$2,587.50
	Bachman, Michael	0.20		\$75.00
	Fogarty, Dan R.	2.30		\$862.50
	Peterson, Edward J.	31.30		\$13,302.50
	Riedel, Harley E.	16.90		\$8,450.00
	Hale, Matt B.	16.30		\$4,075.00
	Stichter, Scott A.	15.40		\$6,622.00
	Jeffcoat, Susan	7.30		\$1,460.00
	Jencoat, Susan	7.30		φ1,400.00
	Total For Professional Services Rendered	96.60 Hours		37,434.50
	Adjusted Services Total			37,434.50
	Professional Services		:	\$37,434.50
	Disbursements			\$682.75
	Total New Charges This Invoice			38,117.25
	Previous Balance		\$6	886,602.22
	Less Payments Received			(\$0.00)
	Outstanding Balance		\$6	886,602.22
	New Charges This Invoice			38,117.25
		Total Due	\$7	724,719.47

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Bill # 44690

Date Last Payment Last Payment Amount May/18/2020 \$5,300.82

Please reference our Bill #: and Matter #: upon remittance - Thank You

SRBP STICHTER RIEDEL BLAIN & POSTLER P.A.

ATTORNEYS AT LAW

DON M. STICHTER 1929-2019 RICHARD C. PROSSER 1950-2017

B. MICHAEL BACHMAN, JR. RUSSELL M. BLAIN JODI DANIEL DUBOSE BECKY FERRELL-ANTON DANIEL R. FOGARTY MATTHEW B. HALE AMY DENTON HARRIS BARBARA A. HART

MICHAEL J. HOOI ELENA PARAS KETCHUM STEPHEN R. LESLIE EDWARD J. PETERSON, III CHARLES A. POSTLER HARLEY E. RIEDEL, II MARK F. ROBENS SUSAN HEATH SHARP SCOTT A. STICHTER

G. CHRISTOPHER MEYER OF COUNSEL

REMIT PAYMENT TO TAMPA

August 31, 2020

Soneet Kapila Kapila-Laser Spine Kapila & Company 1000 South Federal Highway, Suite 200

Fort Lauderdale, FL 33316 USA

INVOICE

Matter: 1 Kapila-Laser Spine Client: 13857

For Professional Services Rendered:

06/01/2020SHSReceipt and review of email regarding e-hounds0.1006/01/2020EJPWork on organizing docs.1.00	0
06/01/2020 EJP Work on organizing docs. 1.00	
	0
06/01/2020 BFA E mails re status of H&K documents delivered; participate in telephone call with LSI litigation 0.40 team re status of documents	
06/01/2020 MBH Receive and respond to email from Suruchi Banez regarding electronic document upload; 0.80 review notes and files; further emails regarding discovery	0
06/01/2020 MBH Call with litigation team regarding documents; email regarding same 0.50	0
06/01/2020 HER Conference with Scott Stichter regarding Langston. 0.20	0
06/01/2020 SAS Conference with Harley Riedel regarding Langston issues 0.20	0
06/02/2020 MBH Work on settlement motion; review of documents and summaries regarding same 1.20	0
06/02/2020 BMB Interoffice communications regarding document review, next steps 0.20	0
06/02/2020 BFA Review response from USBank requiring subpoena for account documents; e mails with 0.50 Melissa Davis and Suruchi Davis re same; instructions to Joanne Ratliff re form of subpoena and notice of intent to serve subpoena	0
06/02/2020 MBH Emails and review of files regarding document production; call with Edward Peterson 0.30	0
06/02/2020 HER Electronic correspondence regarding H & K documents. 0.20	0
06/02/2020 SAS Review of email from Richards regarding Langston injunction hearing; dictated response 0.10	0
06/03/2020 MBH Work throughout the day on TCB settlement motion; revise and edit same 4.00	0
06/03/2020 MBH Call with Edward Peterson regarding injunction motion; coordinate document scanning and 0.40	0

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		retention of discovery files	
06/03/2020	HER	Work on fee application.	1.00
06/03/2020	HER	Electronic correspondence and conference with Edward Peterson regarding cash collateral.	0.30
06/03/2020	BFA	Review and revise notice of intent to serve subpoena to US Bank; prepare subpoena to US Bank re account documents; conference with Khan Whiteside re service in the case; e mail to clients for approval of form of subpoena	2.10
06/03/2020	HER	Review of email from Doug Wright (forwarded to Jennifer Altman); review of reply from Ms. Altman and follow-up, including communication with client.	0.40
06/03/2020	SAS	Review of revised draft of Holland & Knight file turnover order; dictated email to Edward Peterson	0.20
06/03/2020	SAS	Review of email from Edward Peterson regarding Langston issues; dictated response	0.10
06/03/2020	EJP	Work on litigation matters	0.50
06/04/2020	MBH	Revisions to TCB settlement motion	0.60
06/04/2020	MBH	Drafting of TCB settlement stipulation	2.70
06/04/2020	HER	Communications with Edward Peterson regarding cash collateral and budget issues.	0.40
06/04/2020	SAS	Finalized letter with respect to recently filed notice of intent and notice with respect to recently filed suit	0.20
06/04/2020	SAS	Review of email from Knopik regarding medical malpractice action	0.20
06/04/2020	SAS	Review and revision of motion to approve compromise with bank group; conference with Edward Peterson; conference with Matt Hale; and review of emails from Michael Hooi and Edward Peterson regarding revised draft	1.10
06/04/2020	SAS	Review of draft of stipulation with bank group; dictated revisions; conference with Matt Hale; and review of email from Matt Hale enclosing revised draft	0.80
06/04/2020	EJP	Work on cash collateral motion	1.50
06/04/2020	SJ	Work on SRBP third fee application and forwarding to Edward Peterson, emails	1.40
06/04/2020	BFA	Finalize US Bank subpoena and prepare the same for filing; e mail to Melissa Davis and Suruchi Banez; e mail to Ms. Lancaster-Poole at US Bank re intent to serve subpoena	0.90
06/04/2020	MBH	Review revisions received to TCB settlement motion; incorporate revisions; revise TCB stipulation	0.80
06/04/2020	HER	Work on litigation issues.	0.80
06/04/2020	SAS	Conference with Matt Hale regarding drafting a response to Langston opposition	0.30
06/04/2020	SJ	Receipt and review of CT Service of Process and circulate same; draft notice of assignment for new litigation and stay letter and forwarding to Scott Stichter; finalize and mailout out letter; finalize and file notice of assignment	1.10
06/05/2020	MBH	Review and revise draft of response to Langston opposition; research of law	2.50
06/05/2020	MBH	Finalize TCB settlement motion and stipulation	0.50
06/05/2020	HER	Review email from Kevin McCoy and of revised Cash Collateral Settlement Motion.	0.40
06/05/2020	SAS	Review of email from McCoy enclosing revisions to cash collateral settlement motion; review of email from Edward Peterson to Morris enclosing draft of motion	0.20
06/05/2020	EJP	Work on cash collateral settlement	0.50
06/05/2020	SJ	Emails regarding fee application	0.20
06/05/2020	HER	Communications with Doug Wright and Jennifer Altman regarding H & K; communications with client.	0.50
06/05/2020	SAS	Further review of Langston's opposition to amended motion for preliminary injunction; begin drafting response; dictated email to Matt Hale enclosing initial draft; conference with Matt Hale; review of Matt Hale's revisions; further conference with Matt Hale; and finalized documents for filing	3.10
06/05/2020	SAS	Review of emails regarding uploading documents to chambers	0.20
06/08/2020	MBH	Compile documents for injunction hearing	1.20
06/08/2020	HER	Communications with client, co-counsel and opposing counsel regarding malpractice litigation.	1.40
06/08/2020	HER	Work on H & K matter, including exploration of settlement and mediation prospects, including review of draft of proposed demand letter to Doug drafted by Jennifer Altman.	2.00
06/08/2020	SAS	Review and revision of notice of filing authorities	0.40

Bill # 44867

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06/08/2020	SAS	Review of order denying motion to attend mediations; dictated email to Kapila and Battista enclosing order; and review of follow-up emails	0.30
06/08/2020	EJP	Work on litigation matters	0.50
06/08/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.30
06/09/2020	MBH	Review hearing outline and filings; conferences throughout the day with Scott Stichter regarding injunction hearing	1.10
06/09/2020	HER	Electronic correspondence regarding cash collateral issues.	0.30
06/09/2020	HER	Work on demand letter on malpractice claim.	0.40
06/09/2020	SAS	Began preparations for tomorrow's hearings, including begin drafting hearing outlines and conferences with Matt Hale regarding same	2.40
06/10/2020	MBH	Conference with Scott Stichter in preparation for hearing; attend and assist in hearing	2.30
06/10/2020	EJP	Emails with Brian Walders	0.20
06/10/2020	SAS	Preparation for hearing on Langston injunctive motion hearing; conference with Matt Hale regarding preparation for hearing; attended hearing; telephone conference with Schutz following hearing; telephone conference with Wagoner following hearing; conference with Matt Hale regarding outcome of hearing; and dictated email to counsel regarding outcome of hearing	4.90
06/11/2020	MBH	Receive and respond to emails regarding documents; review files regarding same	1.80
06/11/2020	SAS	Dictated email to Richards regarding outcome of Langston injunction hearing; dictated emails to state court counsel and appellate counsel regarding outcome of Langston injunction hearing	0.40
06/12/2020	MBH	Review and revise order; review notes from hearing; review judge rules and procedures; call with Scott Stichter regarding order	0.70
06/12/2020	HER	Electronic correspondence regarding cash collateral issues.	0.40
06/12/2020	HER	Telephone conference with Edward Peterson regarding cash collateral.	0.20
06/12/2020	EJP	Emails with lenders	0.50
06/12/2020	EJP	Work on cash collateral	0.50
06/12/2020	MBH	Email to David Bukas regarding documents; coordinate with parties regarding ediscovery documents; calls and emails regarding same; review file issues	0.80
06/12/2020	SAS	Dictated order on motion for preliminary and permanent injunction; dictated email to Matt Hale enclosing draft of order	0.60
06/12/2020	SAS	Review of email from Matt Hale enclosing comments on Langston order; conference with Matt Hale regarding same	0.20
06/12/2020	SJ	Receipt and review if CT Service of Process, download and circulate	0.30
06/13/2020	SAS	Review of Langston's motion to transfer and other recent pleadings	0.30
06/13/2020	SAS	Dictated revisions to Langston injunction order	0.20
06/13/2020	SAS	Dictated email to Peterson regarding Holland & Knight order	0.10
06/14/2020	HER	Review of and reply to email from Jennifer Altman regarding H&K.	0.20
06/15/2020	HER	Conference with Edward J. Peterson regarding cash collateral issues.	0.20
06/15/2020	EJP	Work on cash collateral issues	0.50
06/15/2020	SAS	Review of email from Edward Peterson regarding Holland & Knight order	0.10
06/15/2020	SAS	Dictated email to counsel enclosing draft of order on Langston injunction motion; review of email from Schutz; review of email from Wagoner; review of follow-up email from Schutz; and dictated email to Schutz enclosing contact information for court reporter	0.40
06/16/2020	HER	Review of emails from Edward Peterson and Soneet Kapila; participation in conference call with Messrs. Kapila and Peterson; further call with Mr. Kapila; follow-up.	1.20
06/16/2020	EJP	Work on cash collateral issues	1.50
06/16/2020	SJ	Emails, work on fee invoice and fee application	1.20
06/16/2020	HER	Work on proposed order regarding H&K document production.	0.40
06/16/2020	SAS	Review of email from Schutz regarding transcript from Langston hearing	0.10
06/16/2020	SAS	Review of emails regarding Holland & Knight order	0.10
06/16/2020	SAS	Review of joint motion for payment of defense costs	0.20

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06/17/2020	HER	Conferences with Edward J. Peterson regarding cash collateral.	0.40
06/17/2020	EJP	Work on cash collateral issues	2.00
06/17/2020	SJ	Conference with Edward Peterson regarding fee application, work on fee application, finalize, file and serve same, forwarding of invoices to Kevin McCoy	2.30
06/17/2020	SAS	Review of email from Schutz enclosing comments on Langston order	0.20
06/18/2020	EJP	Work on cash collateral matters	0.50
06/18/2020	BMB	Review of file and corporate materials; follow up with Edward J. Peterson regarding same; continued review	2.30
06/18/2020	SJ	Emails regarding fee applications	0.20
06/18/2020	SJ	Review demand letter regarding medical malpractice and forwarding to Edward Peterson and Scott Stichter	0.20
06/18/2020	BFA	Review and respond to e mail from USB re subpoena and coordinate with staff re same	0.30
06/18/2020	MBH	Call regarding mediation; conference with Edward Peterson regarding same	0.80
06/18/2020	HER	Review of email from Robert Rocke; preparation for and participation in conference call with Mr. Rocke, Soneet Kapila, Greg Garno, Matt Hale, Edward Peterson, Paul Battista, and Jonathan Sbar; communications with Jennifer Altman and client regarding demand letter.	1.80
06/18/2020	SAS	Review of emails from Schutz and Alpert regarding Langston transcript; dictated response	0.20
06/18/2020	SAS	Review of notice of hearing on motion to dismiss in Langston case	0.10
06/18/2020	SAS	Review of recent decision regarding direct v. indirect claims; conference with Matt Hale regarding same	0.40
06/18/2020	EJP	Work on litigation matters	1.00
06/19/2020	HER	Communications, including 1:30 p.m. telephone conference, with Soneet Kapila; work on demand letter and email to Jennifer Altman with attached draft letter to Doug Wright; review of and reply to further emails with Ms. Altman and Mr. Kapila.	1.00
06/19/2020	SJ	Receipt of CT Service of Process, download and circulate	0.20
06/22/2020	HER	Telephone conference with Toby Gerber; conference with Edward J. Peterson regarding same.	0.50
06/22/2020	SAS	Review of email from Edward Peterson enclosing proposed revisions to Holland and Knight file turnover order	0.20
06/22/2020	EJP	Work on cash collateral issues	1.00
06/22/2020	BMB	Review of corporate materials	1.20
06/22/2020	BFA	Coordinate personal service of subpoena on USB; e mail to USB re same	0.50
06/22/2020	MBH	Participate in D&O mediation	6.00
06/22/2020	SAS	Review of email from Schutz enclosing comments on Langston order	0.20
06/23/2020	HER	Conference call with bank counsel and Edward Peterson; email to Soneet Kapila regarding same; further emails and participation in 5:00 p.m. conference call with Messrs. Peterson and Kapila and Kevin McCoy.	1.30
06/23/2020	EJP	Work on cash collateral	0.50
06/23/2020	BMB	Review of corporate information	0.90
06/23/2020	BFA	E mails with USB re service of subpoena and courtesy copy of same	0.20
06/23/2020	HER	Electronic correspondence with Jennifer Altman regarding H & K; review of draft correspondence in D & O litigation.	0.40
06/23/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
06/24/2020	HER	Work on fee application.	1.10
06/24/2020	HER	Review of emails between Soneet Kapila and Bruce Shilcutt regarding distribution from cash collateral account; receipt and review of electronic correspondence; client communications and email to Toby Gerber regarding cash collateral.	1.00
06/24/2020	EJP	Work on cash collateral issues	0.50
06/24/2020	BMB	Review of prior memos, summaries and notes regarding action; review of corporate materials	1.60
06/24/2020	SJ	Work on SRBP billing	0.70
06/24/2020	HER	Work on finalization of demand letter, including T/C with Jennifer Altman at 10:00 a.m. and client communications.	0.90
06/24/2020	SAS	Review of emails from court reporter regarding corrections to transcript; dictated emails	0.90

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		enclosing revisions to transcript; review of emails from Schutz; dictated response; and review of follow-up emails	
06/24/2020	SAS	Review of email from court regarding rejection of order granting joint motion to advance defense costs; review of follow-up emails; and dictated response	0.20
06/24/2020	SAS	Conference with Matt Hale regarding Second DCA reply brief; dictated email to Stein; and review of email from Stein	0.20
06/25/2020	MBH	Conference with Edward Peterson regarding cash collateral and related issues; conference with Mr. Peterson and Becky Anton regarding same; review settlement motion; draft and send email to Ms. Anton	0.70
06/25/2020	SAS	Review of emails regarding surcharge issues	0.20
06/25/2020	EJP	Work on cash collateral issues	1.50
06/25/2020	LMF	Review and respond to email from E. Peterson; telephone conference.	0.40
06/25/2020	BFA	Conference call with Edward J. Peterson and Matt Hale re surcharge motion with TCB	0.50
06/25/2020	SAS	Dictated email to Edward Peterson regarding Holland & Knight issues; conference with Edward Peterson; and review of follow-up emails	0.20
06/25/2020	SAS	Review of email regarding recently received demand letter; dictated email to Susan McKee and Edward Peterson	0.20
06/25/2020	SJ	Download CT Service of Process	0.10
06/26/2020	HER	Work throughout the day on cash collateral issues, including review of emails from Kevin McCoy and review of attached cash flow summaries and waterfall; internal communications; email to Mr. McCoy and Soneet Kapila regarding strategy; telephone contact with Mr. McCoy at 1:35 p.m.; follow-up and participation in 3:30 conference call with Messrs. Kapila, McCoy, and Peterson.	2.50
06/26/2020	EJP	Work on cash collateral issues.	1.00
06/26/2020	BFA	Review settlement motion previously drafted in TCB matter and review research and other ABC pleadings requesting surcharge	1.20
06/26/2020	HER	Electronic correspondence regarding D & O.	0.20
06/26/2020	SAS	Dictated email to Stein regarding appellate brief	0.10
06/26/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.30
06/28/2020	HER	Review of email from Toby Gerber regarding cash collateral; review of files and analysis of cash flow usage during the case; draft reply (circulated to Soneet Kapila, Kevin McCoy and Edward Peterson and review of their comments thereto; follow-up with Mr. Kapila.	2.30
06/29/2020	MBH	Meeting with Becky Anton and Edward Peterson regarding motion; conference with IT regarding email searches	0.70
06/29/2020	MBH	Receive and review emails regarding D&O settlement; call with litigation team and Soneet Kapila regarding D&O mediation and settlement; conference with Edward Peterson	0.50
06/29/2020	HER	Further work on cash collateral issues, including emails with Edward Peterson and Kevin McCoy regarding surcharge; research of historical facts, further revision of draft email to Toby Gerber (circulated to Messrs. Peterson, McCoy, and Kapila).	1.60
06/29/2020	SAS	Dictated email to Susan McKee regarding need to provide notice of assignment proceeding to party recently sending notice of intent; review and execution of letter	0.20
06/29/2020	SAS	Review of emails regarding cancellation of hearing	0.10
06/29/2020	SAS	Review of emails regarding cancellation of hearing	0.10
06/29/2020	EJP	Work on cash collateral issues	1.00
06/29/2020	SJ	Emails, draft notice letter and forwarding to Scott Stichter, finalize and mail letter	0.30
06/29/2020	BFA	Review materials re TCB history and surcharge; conference with EDWARD J. PETERSON and Matt Hale re surcharge motion	2.10
06/29/2020	MBH	Call with litigation team regarding subsequent transferee lawsuit and injunction issues; internal attorney conference following same	0.60
06/29/2020	HER	Telephone conference with Doug Wright.	0.10
06/29/2020	HER	Review of emails from Paul Battista and Jordi Guso with attachments; electronic correspondence regarding same; mid-afternoon conference with Edward Peterson, Scott Stichter, and Matt Hale regarding same; follow-up telephone conference with Paul Battista and further internal communications	1.00

110 East Madison Street-Suite 200 Tampa, Florida 33602 T 813.229.0144

06/29/2020

F 813.229.1811

SAS

1342 Colonial Boulevard-Suite H57 Fort Myers, Florida 33907-1009 T 239.939.5518

and further internal communications.

F 239.939.5568

41 North Jefferson Street-Suite 111 Pensacola, Florida 32502-5669 T 850.637.1836 F 850.791.6545 4475 Legendary Drive-Suite 40 Destin, Florida 32541-9306 T 850.460.7676 F 850.424.6604

0.50

Review of emails from Battista and Edward Peterson regarding Bailey Group litigation; review

Matter: 1		Bill # 44867 Page	6
		of files; dictated response to Edward Peterson; and review of follow-up emails from Battista and Edward Peterson	
06/29/2020	SAS	Dictated email to Edward Peterson regarding Holland & Knight order; review of email from Edward Peterson; and dictated response	0.20
06/29/2020	SAS	Telephone conference with Rocke, Garno, Battista, Edward Peterson, and Matt Hale regarding Bailey litigation issues; conference with Edward Peterson, Matt Hale, and Harley Riedel regarding same; and review of email from Harley Riedel regarding call with Battista	0.60
06/29/2020	EJP	Work on litigation matters	1.00
06/30/2020	EJP	Work on cash collateral issues	0.50
06/30/2020	MBH	Call from Bob Rocke and Andrea Holder	0.20
06/30/2020	HER	Electronic correspondence regarding revised LSI demand letter to Dennis Waggoner.	0.30
06/30/2020	HER	Work on cash collateral issues, including further revision of bank communication, review of waterfall and other exhibits, emails with Kevin McCoy and Soneet Kapila; email to and telephone contact with Toby Gerber (at 3:30 p.m.); follow-up communications.	2.00
06/30/2020	SAS	Review of email from Battista enclosing draft of demand letter to Waggoner; dictated response; and review of follow-up emails from Garno, Kapila, Rocke, and Battista	0.40
06/30/2020	SAS	Dictated draft of email to Bailey Group's counsel regarding Assignee's ownership of fraudulent transfer claims; dictated email to Harley Riedel enclosing draft of email	0.50
06/30/2020	EJP	Work on litigation matters	0.50
06/30/2020	SJ	Receipt and review of CT Service of Process and circulate same	0.20
07/01/2020	HER	Conference with Edward Peterson regarding abandonment of assets, June 30 call with Toby Gerber.	0.40
07/01/2020	EJP	Work on cash collateral issues	0.50
07/01/2020	BFA	Drafting motion to surcharge and abandon TCB's collateral	3.40
07/02/2020	BFA	Receive production of documents from US Bank in response to subpoena; forward same to Melissa Davis and Suruchi Banez	0.30
07/06/2020	BFA	Receive and review documents produced in response to USB subpoena; coordinate with Suruchi Banez and Susan Jeffcoat re accessing same	0.60
07/06/2020	SAS	Review of emails regarding cash collateral issues	0.10
07/06/2020	EJP	Work on cash collateral issues	0.50
07/06/2020	SJ	Call with Becky Ferrell-Anton, review email link for US Bank document production, receipt of link, download and organize documents, forwarding to Suruchi Banez via email	0.60
07/06/2020	BFA	Working on TCB surcharge motion and motion to abandon	2.50
07/07/2020	HER	Work on cash collateral motion and issues.	0.80
07/07/2020	SAS	Review and revision of motion to surcharge; review of revised motion; dictated further revisions; review of bank's revisions to stipulation; and conference with Edward Peterson	1.30
07/07/2020	EJP	Work on cash collateral matters	1.50
07/07/2020	BFA	Continue working on draft of TCB surcharge/abandonment motion; conference with EDWARD J. PETERSON and incorporate his comments and Scott A. Stichter comments into draft motion	4.80
07/08/2020	HER	Work on abandonment – surcharge motion; internal and client communications regarding same and cash collateral.	0.60
07/08/2020	SAS	Review of email from Edward Peterson enclosing draft of revised abandonment motion	0.20
07/08/2020	SAS	Review of email from McCoy enclosing revisions to surcharge motion	0.30
07/08/2020	EJP	Work on litigation matters	0.50
07/08/2020	EJP	Work on cash collateral issues	1.50
07/08/2020	SAS	Review of email from Edward Peterson enclosing revisions to Holland & Knight order; dictated response; and review of emails from counsel	0.30
07/08/2020	SAS	Review of email enclosing order on motion to permit payment of defense costs	0.10
07/09/2020	HER	Participation in conference call with Kevin McCoy, Soneet Kapila, Scott Stichter and Edward	0.60

110 East Madison Street-Suite 200 Tampa, Florida 33602 T 813.229.0144

EJP

BFA

07/09/2020

07/09/2020

F 813.229.1811

1342 Colonial Boulevard-Suite H57 Fort Myers, Florida 33907-1009 T 239.939.5518 F 239.939.5568

Peterson; follow-up.

document production

Work on cash collateral issues

41 North Jefferson Street-Suite 111 Pensacola, Florida 32502-5669 T 850.637.1836 F 850.791.6545 4475 Legendary Drive-Suite 40 Destin, Florida 32541-9306 T 850.460.7676 F 850.424.6604

1.50

0.30

Retrieve ABA Ethics Opinion and send to Brian Miller per his request re order on H&K

Matter: 1		Bill # 44867	Page	7
07/09/2020	SAS	Review of emails in preparation for call regarding cash collateral issues; participate	d in call	0

07/09/2020	SAS	Review of emails in preparation for call regarding cash collateral issues; participated in call with Kapila, McCoy, Harley Riedel, and Edward Peterson; follow-up conference with Edward Peterson	0.70
07/10/2020	HER	Work on cash collateral issues and on global settlement with TCB of issues raised by recently filed abandonment motion – including numerous items of electronic correspondence.	1.20
07/10/2020	EJP	Work on cash collateral issues	2.00
07/10/2020	BMB	Follow up regarding corporate documents, actions; review of same	0.40
07/13/2020	HER	Electronic correspondence regarding cash collateral.	0.30
07/13/2020	SAS	Review of email from Edward Peterson to counsel regarding status of revising Holland & Knight order; review of emails from Gusso and Edward Peterson	0.20
07/13/2020	EJP	Work on status report	0.50
07/13/2020	SJ	Work on status report and circulate	0.20
07/13/2020	MBH	Conference with Edward Peterson; call with litigation team	0.30
07/13/2020	EJP	Work on litigation matters	0.50
07/13/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
07/14/2020	SAS	Review of email from Harley Riedel and Matt Hale regarding recent fraudulent transfer opinion; dictated response	0.30
07/14/2020	EJP	Preparation for hearing	0.50
07/14/2020	MBH	Receive and review case law regarding fraudulent transfer developments; draft and send email to Harley Riedel	0.50
07/14/2020	HER	Review and circulation of recent opinion on fraudulent transfers.	0.40
07/15/2020	SAS	Review of updated status report	0.20
07/15/2020	SAS	Review of bank's comments on Stichter Riedel fee application	0.20
07/15/2020	EJP	Work on litigation matters	0.50
07/15/2020	HER	Review of revised turnover order with H&K changes.	0.30
07/15/2020	HER	Work on malpractice settlement demand issues.	0.50
07/15/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
07/16/2020	HER	Review of emails from Edward Peterson and Ken Mather; follow-up with Mr. Peterson and client.	0.40
07/16/2020	EJP	Work on cash collateral issues	2.00
07/17/2020	HER	Work on abandonment and settlement with TCB.	1.10
07/17/2020	SAS	Conference with Charles Postler regarding cash collateral issues	0.20
07/17/2020	EJP	Work on cash collateral issues	0.50
07/17/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.30
07/19/2020	SAS	Review of email from Susan McKee regarding recently received notice of intent to sue; dictated email to Kapila; and dictated email to Susan McKee	0.20
07/19/2020	EJP	Work on litigation matters	0.30
07/20/2020	SJ	Draft SRBP third fee application order and forwarding to Edward Peterson; work on fourth interim fee applications and forwarding to Edward Peterson	2.00
07/20/2020	SAS	Review of Bailey Group's motion to compel discovery from bank group	0.30
07/21/2020	SJ	Draft stay letter and forwarding to Scott Stichter, finalize and mail same	0.20
07/21/2020	SAS	Review of email from Harley Riedel to litigation team enclosing draft of email to Bailey Group regarding avoidance actions; dictated response	0.20
07/21/2020	SAS	Review of notice of hearing on Langston's motion to transfer	0.10
07/22/2020	SJ	Emails, review file regarding fee applications and amounts paid, prepare chart of same, revise fee applications and circulate same	1.90
07/22/2020	SJ	Receipt and review of CT Service of Process, download and circulate	0.20
07/23/2020	EJP	Emails with Lara Fernandez	0.50
07/27/2020	SAS	Review of status report filed in Ali and Emby district court action	0.10
07/28/2020	SAS	Review of emails from Battista, Kapila, and Harley Riedel regarding response to Bailey Group	0.20
07/28/2020	SAS	Review of pleadings filed in Langston state court action; review of report regarding outcome of mediation	0.40

Matter: 1		Bill #	44867 Page	e 8
07/28/2020	SJ	Receipt an review of CT Service	e of Process, download and circulate	0.20
07/29/2020	HER	Electronic correspondence rega	arding cash collateral issues.	0.40
07/29/2020	SAS	Initial review of draft reply to La	ngston petition for writ of certiori	0.70
07/29/2020	EJP	Work on litigation matters		0.30
07/30/2020	SJ	Emails, revise SRBP 3rd fee or	der and forwarding to Edward Peterson	0.20
07/30/2020	SAS	Review of email from Diaz regarding Edwards state court litigation; dictated email to Susan McKee; and review of email from Susan McKee		
07/30/2020	SAS	Review of email from Edward P response	eterson regarding Holland & Knight file order; dictated	0.20
07/30/2020	SAS	Review of emails from McLaugh petition and outcome of yesterd	nlin and Stein regarding Langston issues, including reply to ay's hearings	0.20
07/30/2020	EJP	Work on litigation matters		0.50
07/30/2020	SJ	Receipt and review of CT Servi	ce of Process, download and circulate	0.50
07/31/2020	SAS	Dictated revisions to response t McLaughlin enclosing revisions	o petition for writ of certiorari; dictated email to Stein and	0.90
07/31/2020	SAS	Review of state court pleadings	filed in Langston lawsuit in preparation for call with counsel	0.30
07/31/2020	SAS	Telephone conference with Ste	in and McLaughlin regarding Langston appeal brief	0.80
07/31/2020	EJP	Work on litigation matters		0.30
For Disburseme	ante Incurre	od.	Total Professional Services Rendered	\$68,198.50
06/01/2020	ZIIIO IIIOUITO		Overnight Couriers to Mr. Soneet R. Kapila/Ft.	\$45.28
00/01/2020		Lauderdale.	vornight Council to Wil. Concert it requial to	ψ10.20
06/04/2020		Photocopies of Not of intent to s	serve subpoena	\$11.85
06/25/2020		S&W Process Service on US B	ank National Assoc./Naples, Fl.	\$130.00
07/01/2020	7/01/2020 Federal Express Corporation; Overnight Courier to David Bukas/Palm Harbor.			\$22.92
			Total Expenses Incurred	\$210.05
			Recapitulation	
	Name		Hours	Amount
		aton Becky	20.60	\$7,725.00
Ferrell-Anton, Becky Bachman, Michael		-	6.60	\$2,475.00
Peterson, Edward J.			32.60	\$13,855.00
Riedel, Harley E.			36.30	\$18,150.00
		-	0.40	\$80.00
Ferris, Laura M			35.40	\$8,850.00
Hale, Matt B.			32.20	\$13,846.00
Stichter, Scott A. Sharp, Susan			0.10	\$37.50
Jeffcoat, Susan			15.90	\$3,180.00
Total For Professional Services Rendered			180.10 Hours	\$68,198.50
	Adjusted S	Services Total		\$68,198.50

Matter:	1 Bill # 44867		Page 9			
	Disbursements	Disbursements				
	Less Prepaid Applied		(\$5,300.82)			
	Total New Charges This Invoice	\$63,107.73				
	Previous Balance Less Payments Received		\$724,719.47 (\$635,771.90)			
	Outstanding Balance		\$88,947.57			
	New Charges This Invoice		\$63,107.73			
Bill #	44867	Total Due	\$152,055.30 			
Date Las	st Payment August/25/2020					

Date Last Payment Last Payment Amount

August/25/2020 \$5,300.82

Please reference our Bill #: and Matter #: upon remittance - Thank You

Laser Spine Institute, LLC 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 Consolidated Case No. Assignors, 2019-CA-2762 to Soneet Kapila, Division L Assignee.

COMPOSITE EXHIBIT B

FOURTH INTERIM APPLICATION OF STICHTER, RIEDEL,
BLAIN & POSTLER, P.A. FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES AS COUNSEL FOR ASSIGNEE FOR
THE PERIOD OF APRIL 1, 2020 THROUGH JULY 31, 2020

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

In re:

the "Assignors").

	G N 2010 G 2762
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.
5	2019-CA-2762
to	
Soneet Kapila,	Division L
Solloot Izapila,	DIVISION D
Assignee.	
/	

UPDATED STATUS REPORT AS OF APRIL 10, 2020

SONEET KAPILA, as assignee (the "Assignee"), undertook his duties as Assignee on

March 14, 2019. The Assignee hereby provides the following status report summarizing some of

¹ On April 8, 2019, the Court entered an order administratively consolidating this case with the assignment cases (collectively, the "Assignment Cases" or the "Assignment Estates") 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 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,

the recent activity and efforts on behalf of the Assignment Estates since the last hearing on February 27, 2020, as follows:

- 1. The Assignee, his professional team, and the LSI Staff continued to communicate with patients regarding the release of records to the patients. The Assignee reached an agreement with the Florida Department of Health ("FL DOH") in December 2019, to assume custody and control of the patient medical records and all record requests since have been directed to the FL DOH.
- 2. The Assignee, through his litigation counsel, has been prosecuting lawsuits filed against certain recipients of fraudulent transfers and against former directors and officers for acts and omissions. In total, thus far, the Assignee has filed 18 lawsuits for recovery of fraudulent conveyances and 9 lawsuits against former directors and officers for acts and omissions. The filed lawsuits are progressing. Other litigation targets have executed tolling agreements. The Assignee has reached settlements with certain of the targets of fraudulent conveyance lawsuits. To date, such settlements have yielded approximately \$1.6 million in the aggregate. The actions against former officers and directors are scheduled for mediation.
- 3. The Assignee recently filed a motion to enjoin the prosecution by a single creditor of certain causes of action that belong to the assignment estate.
- 4. The Assignee regularly communicates with unsecured creditors of the Assignors regarding the Assignment Cases. In particular, in addition to communicating with Texas Capital Bank, which will likely have a large deficiency claim, the Assignee has been in frequent communication with the Bailey Group, the holder of a large unsecured claim. Further, at the commencement of the case, the Assignee set up a website (www.lsi-assignee.com) that contains information about the Assignment Cases and also contains answers to frequently asked questions.

- 5. The Assignee has reached a settlement with Highwoods, the landlord at the Tampa location. Pursuant to such settlement, and subject to Court approval, Highwoods will be paid \$150,000 to compensate for the costs of removal of certain items as required by the lease. The Assignee's negotiations of a standstill agreement with Highwoods saved the estate over six million dollars in rent.
- 6. The Assignee continues to review and provide support to the Buell & Elligett, P.A. firm in an effort to resolve the business interruption claim filed as a result of Hurricane Irma.
- 7. The Assignee has expended considerable efforts with Accordias, the third-party accounts receivable collection company whose retention was approved by this Court on June 11, 2019, to maximize the recovery of the outstanding accounts receivable. Effective April 1, 2020, Accordias transferred all the billing and collection data from the Laser Spine servers that are warehoused at a co-location facility in Tampa, FL (the "LSI Servers") to their in-house platform, thereby reducing the estate's burden to maintain the costs and expenses associated with IT connectivity and co-location lease expense to warehouse the LSI Servers.
- 8. The Assignee is currently in the process of (i) terminating the IT connectivity to the LSI Servers that are warehoused at a co-location facility in Tampa, FL, and (ii) decommissioning and preserving the LSI Servers with the assistance of the eHounds, the computer forensic company engaged by the Assignee.

9. The Assignee continues to review and prepare for the filing of the Assignment Estates' tax returns and respond to notices and other correspondence from various tax agencies.

/s/ Edward J. Peterson

Harley E. Riedel (FBN 183628) Edward J. Peterson (FBN 0014612) Matthew B. Hale (FBN 0110600) Stichter, Riedel, Blain & Postler, P.A. 110 E. Madison Street, Suite 200 Tampa, Florida 33602

Telephone: (813) 229-0144 Facsimile: (813) 229-1811

Email: hriedel@srbp.com; epeterson@srbp.com

mhale@srbp.com Counsel for Assignee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing *Updated Status Report as of April 10, 2020* has been furnished on this 14th day of April, 2020 by the Court's electronic system to all parties receiving electronic service.

/s/ Edward J. Peterson
Edward J. Peterson

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.
2	2019-CA-2762
to	
Soneet Kapila,	Division L
1 /	
Assignee.	

UPDATED STATUS REPORT AS OF JULY 15, 2020

SONEET KAPILA, as assignee (the "Assignee"), undertook his duties as Assignee on

March 14, 2019. The Assignee hereby provides the following status report summarizing some of

¹ On April 8, 2019, the Court entered an order administratively consolidating this case with the assignment cases (collectively, the "Assignment Cases" or the "Assignment Estates") 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 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,

the "Assignors").

the recent activity and efforts on behalf of the Assignment Estates since the last hearing on April 16, 2020, as follows:

- 1. The Assignee, his professional team, and the LSI Staff continued to communicate with patients regarding the release of records to the patients. The Assignee reached an agreement with the Florida Department of Health ("FL DOH") in December 2019, to assume custody and control of the patient medical records and all record requests since have been directed to the FL DOH.
- 2. The Assignee, through his litigation counsel, has been prosecuting lawsuits filed against certain recipients of fraudulent transfers and against former directors and officers for acts and omissions. In total, thus far, the Assignee has filed 18 lawsuits for recovery of fraudulent conveyances and 9 lawsuits against former directors and officers for acts and omissions. The filed lawsuits are progressing. Other litigation targets have executed tolling agreements. The Assignee has reached settlements with certain of the targets of fraudulent conveyance lawsuits. To date, such settlements have yielded approximately \$1.6 million in the aggregate. The Assignee continues to prosecute the actions against former officers and directors.
- 3. The Assignee regularly communicates with unsecured creditors of the Assignors regarding the Assignment Cases. In particular, in addition to communicating with Texas Capital Bank ("TCB"), which will likely have a large deficiency claim, the Assignee has been in frequent communication with the Bailey Group, the holder of a large unsecured claim. Further, at the commencement of the case, the Assignee set up a website (www.lsi-assignee.com) that contains information about the Assignment Cases and also contains answers to frequently asked questions.
- 4. The Assignee continues to review and provide support to the Buell & Elligett, P.A. firm in an effort to resolve the business interruption claim filed as a result of Hurricane Irma.

accounts receivable collection company whose retention was approved by this Court on June 11, 2019, to maximize the recovery of the outstanding accounts receivable. Effective April 1, 2020, Accordias transferred all the billing and collection data from the Laser Spine servers that are

The Assignee has expended considerable efforts with Accordias, the third-party

warehoused at a co-location facility in Tampa, FL (the "LSI Servers") to their in-house platform,

thereby reducing the estate's burden to maintain the costs and expenses associated with IT

connectivity and co-location lease expense to warehouse the LSI Servers.

6. In April 2020, the Assignee (i) terminated the IT connectivity to the LSI Servers

that are warehoused at a co-location facility in Tampa, FL, and (ii) decommissioned and preserved

the LSI Servers with the assistance of the eHounds, the computer forensic company engaged by

the Assignee.

5.

7. On July 10, 2020, the Assignee filed the Motion to Abandon Certain Collateral of

Texas Capital Bank, N.A. as Administrative Agent for Lender Group in which the Assignee

requests authority to abandon to TCB all of its remaining collateral.

8. The Assignee continues to review and prepare for the filing of the Assignment

Estates' tax returns and respond to notices and other correspondence from various tax agencies.

/s/ Edward J. Peterson

Harley E. Riedel (FBN 183628)

Edward J. Peterson (FBN 0014612)

Matthew B. Hale (FBN 0110600)

Stichter, Riedel, Blain & Postler, P.A.

110 E. Madison Street, Suite 200

Tampa, Florida 33602

Telephone: (813) 229-0144

Facsimile: (813) 229-1811

Email: hriedel@srbp.com; epeterson@srbp.com

mhale@srbp.com

Counsel for Assignee

3

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing *Updated Status Report as of July 15, 2020* has been furnished on this 14th day of July, 2020 by the Court's electronic system to all parties receiving electronic service.

/s/ Edward J. Peterson

Edward J. Peterson