

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Case No. 10-50494
	)	
FAIR FINANCE COMPANY	)	Chapter 7
	)	
Debtor.	)	Judge Jessica E. Price Smith

**SUMMARY OF SECOND FEE APPLICATION FOR INTERIM ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
NOVEMBER 29, 2018 THROUGH FEBRUARY 28, 2020  
FILED BY CHARLES S. HEFLIN  
AS CONSULTING AND TESTIFYING EXPERT FOR THE ESTATE**

Name of Applicant:	Charles S. Heflin
Authorized to Provide Professional Services to:	The Estate of Fair Finance Company (“Debtor”)
Date of Retention:	June 29, 2017 (effective as of June 12, 2017)
Period for Which Compensation and Reimbursement is Sought:	November 29, 2018 – February 28, 2020
Amount of Compensation for Services Sought as Actual, Reasonable and Necessary:	\$14,670.00
Amount of Expenses Sought to be Reimbursed as Actual, Reasonable and Necessary:	\$195.11
Total Amount of Fees and Expenses Sought to be Reimbursed as Actual, Reasonable and Necessary:	\$14,865.11

This is Mr. Heflin’s second application for an allowance of compensation and reimbursement of expenses incurred pursuant to 11 U.S.C. §§ 330 and 331.



1050494200612000000000003

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Case No. 10-50494
	)	
FAIR FINANCE COMPANY	)	Chapter 7
	)	
Debtor.	)	Judge Jessica E. Price Smith

**SECOND FEE APPLICATION FOR INTERIM ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
NOVEMBER 29, 2018 THROUGH AND INCLUDING FEBRUARY 28, 2020,  
FILED BY CHARLES S. HEFLIN  
AS CONSULTING AND TESTIFYING EXPERT FOR THE ESTATE**

Charles S. Heflin submits this Second Fee Application for Interim Allowance of Compensation and Reimbursement of Expenses for the Period November 29, 2018 through and including February 28, 2020 (the “**Application**”) pursuant to 11 U.S.C. §§ 330 and 331. In support of this Application, Mr. Heflin states as follows:

**INTRODUCTION**

1. On February 8, 2010, creditor-investors filed a petition for involuntary bankruptcy against Fair Finance Company (the “**Debtor**”).
2. On March 2, 2010, the Court entered an order granting the relief sought by the petitioning creditor-investors *nunc pro tunc* as of February 24, 2010, and appointing Brian A. Bash (the “**Trustee**”) as the duly appointed trustee of the Debtor.
3. As part of his duty to administer and liquidate the estate for the benefit of creditors, the Trustee has needed to engage in litigation to recover assets. During the Application period, the Trustee’s primary litigation included, but was not limited to, the action captioned *Bash v. Textron Financial Corp., et al.*, Case No. 12-cv-00987, in the United States District Court for the Northern District of Ohio, Eastern Division (Honorable Patricia A. Gaughan) (the “**Textron Litigation**”).
4. On June 12, 2017, the Trustee filed an application requesting court approval for the retention of Mr. Heflin as a consulting and testifying expert in connection with the Textron Litigation

[Dkt. No. 2330]. On June 29, 2017, this Court entered an order granting the Trustee's retention application in its entirety and authorizing the Trustee's retention of Mr. Heflin (the "**Retention Order**") [Dkt. No. 2343].

5. On March 23, 2017, the Trustee filed a motion requesting court approval of the Trustee's interim, monthly payment of 80% of the fees and 100% of the out-of-pocket costs incurred by the Trustee's experts retained in the Textron Litigation, including Mr. Heflin [Dkt. No. 2291]. This Court entered an order granting the Trustee's motion regarding interim compensation of these experts, including Mr. Heflin, on April 14, 2014 (the "**Expert Compensation Order**") [Dkt. No. 2298].

**SUMMARY OF COMPENSATION AND EXPENSE  
REIMBURSEMENT REQUESTED**

6. Mr. Heflin files this Application seeking allowance for payment of services performed during the period from November 29, 2018 through and including February 28, 2020 (the "**Application Period**"). The Application is subject to, *inter alia*, the Retention Order and the Expert Compensation Order. Mr. Heflin has not received a retainer in connection with his engagement as an expert for the Trustee. He has received interim compensation pursuant to the Expert Compensation Order. A summary of the compensation and expense reimbursement during the Application Period is as follows:

<b>Invoice Date</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Fees Paid</b>	<b>Expenses Paid</b>
November 13, 2019	November 29, 2018 – August 14, 2019	\$925.00	\$740.00	\$0.00
March 7, 2020	February 5, 2020 – February 28, 2020	\$13,745.00	\$10,996.00	\$195.11
<b>Total</b>		<b>\$14,670.00</b>	<b>\$11,736.00</b>	<b>\$195.11<sup>1</sup></b>

7. Mr. Heflin has received no promise of payment for professional services rendered in this case other than in accordance with the provisions of the Bankruptcy Code.

---

<sup>1</sup> Mr. Heflin inadvertently received an overpayment of \$1,486.95 of expenses directly from Baker & Hostetler.

8. Mr. Heflin kept daily time records detailing the services he performed and the time expended in connection with those services by project, as directed by the Guidelines for Compensation and Expense Reimbursement of Professionals, updated May 16, 2011 (the “**Guidelines**”).

9. Mr. Heflin’s hourly billing rate and the number of hours billed for services rendered during the Application Period is set forth in Exhibit A. Set forth in Exhibit B is a chronological listing of services provided for the Application Period.

10. To the best of Mr. Heflin’s knowledge, he has complied with the monthly reporting requirements.

### **SUMMARY OF SERVICES RENDERED**

11. A narrative summary of the project under which material and substantial services were performed by Mr. Heflin during the Application Period is set forth below. A more detailed description of the services provided by Mr. Heflin appears in Exhibit B. During the Application Period, Mr. Heflin focused his efforts on providing consulting and testifying expert services to the Trustee in connection with the Textron Litigation.

12. The Trustee retained Mr. Heflin, pursuant to the Retention Order, to be used as a consulting and testifying expert in connection with the Textron Litigation. Nearly all of the services provided by Mr. Heflin during the Application Period relate to Mr. Heflin’s preparation for and testimony during the Textron Litigation trial, which has now concluded.

### **ALLOWANCE OF COMPENSATION**

13. The allowance of interim compensation for services rendered and reimbursement of expenses in bankruptcy cases is expressly provided for in Section 331 of the Bankruptcy Code:

Any professional person...may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered...as is provided under section 330 of this title.

11 U.S.C. § 331. Moreover, this Court authorized the filing of this Application in the Retention Order.

14. With respect to the level of compensation, Section 330(a)(1) of the Bankruptcy Code provides, in pertinent part, that the Court may award to a professional person “reasonable compensation for actual, necessary services rendered....” Section 330(a)(3)(A), in turn, provides:

In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- (E) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A). The clear Congressional intent and policy expressed in this statute is to provide for adequate compensation in order to continue to attract qualified and competent bankruptcy practitioners to bankruptcy cases.

15. The Textron Litigation involved millions of pages of documents and thousands of pages of deposition transcripts and exhibits. The Textron Litigation jury trial took place over two (2) weeks, from February 24, 2020 through March 10, 2020. As shown by this Application and the supporting documents, Mr. Heflin spent his time expeditiously preparing for his testimony in the Textron Litigation trial, and providing his expert testimony at the trial itself. Mr. Heflin engaged in appropriate efforts that were necessary to fulfill his duties as a consulting and testifying expert for the Trustee in the Textron Litigation.

## **REIMBURSEMENT OF EXPENSES**

16. Mr. Heflin incurred actual and necessary out-of-pocket expenses in connection with rendering professional services to the estate in the sums indicated in Exhibit C. Most of these expenses are travel and hotel costs associated with Mr. Heflin's attendance in Cleveland to meet with the Trustee's counsel and prepare for his testimony at trial in the Textron Litigation.

## **CONCLUSION**

17. No agreement or understanding exists between Mr. Heflin and any other person for the sharing of any compensation to be received for professional services rendered or to be rendered in connection with this case.

18. Except as set forth in this Application, no prior application has been made in this or in any other court for the relief requested in the Application for the Application Period.

**WHEREFORE**, Mr. Heflin respectfully requests that this Court enter an order:

- a) approving the allowance for compensation of professional services rendered to the estate from November 29, 2018 through and including February 28, 2020, in the total sum of \$14,670.00;
- b) approving the reimbursement of Mr. Heflin's out-of-pocket expenses incurred in connection with the rendering of such professional services from November 29, 2018 through and including February 28, 2020, in the total sum of \$195.11;
- c) authorizing and directing the estate to pay Mr. Heflin the remaining amount due of **\$1,447.05**, which amount represents the amount owed for professional services rendered by Mr. Heflin during the period of November 29, 2018 through and including February 28, 2020 (\$14,865.11), *less* amounts that have been paid by the estate as of the date of this Application (\$11,931.11, as described on page 2), *less* \$1,486.95 of expenses that were inadvertently overpaid (as described in footnote 1); and
- d) granting such other and further relief as this Court may deem just and proper.

Dated: June 12, 2020

Respectfully submitted,

/s/ Charles S. Heflin

Charles S. Heflin  
4217 Whistler Drive  
Plano, Texas 75093  
Telephone: 214.202.3390

Electronically filed on behalf of Charles S.  
Heflin by,

/s/ Michael A. VanNiel

Michael A. VanNiel (0073948)  
BAKER & HOSTETLER LLP  
Key Tower  
127 Public Square, Suite 2000  
Cleveland, Ohio 44114-1214  
Telephone: 216.621.0200  
Facsimile: 216.696.0740

*Counsel for the Trustee*

**EXHIBIT A**

SUMMARY OF HOURLY BILLING RATE AND HOURS BILLED BY MR. HEFLIN

FAIR FINANCE COMPANY

CHARLES S. HEFLIN  
SUMMARY OF HOURS BY PROFESSIONAL  
FOR THE PERIOD NOVEMBER 29, 2018 THROUGH AND INCLUDING  
FEBRUARY 28, 2020

<b>Professional</b>	<b>Hours Billed</b>	<b>Hourly Rate</b>	<b>Fees Billed</b>
Charles S. Heflin	52.2	250.00	13,050.00
Charles S. Heflin	5.4	300.00	1,620.00
<b>Total</b>	<b>57.6</b>		<b>14,670.00</b>

**EXHIBIT B**

DESCRIPTION OF SERVICES PROVIDED BY MR. HEFLIN

# Charles S. Heflin

4217 Whis  
Plano, T  
214-  
bheflin1@

Scott Holbrook  
Baker & Hostetler, LLP  
127 Public Square, Suite 2000  
Cleveland, Ohio 44114-1214

## Professional Services Invoice through November 13, 2019

Date	Hours	Subject
11/29/18	1.5	Read and review Harris opinion and order
11/30/18	.7	Teleconference with Scott Holbrook
7/12/19	.4	Teleconference with Scott Holbrook
8/14/19	1.1	Review and subsequent discussion with Scott Holbrook Re: Opinion and Order regarding Expert testimony
3.7 hrs. @ \$250 = \$925.00		

Please submit to above addressee

# Charles S. Heflin



4217 Whistler Drive  
Plano, TX 75093  
214-202-3390  
bheflin1@live.com

Scott Holbrook  
Baker & Hostetler, LLP  
127 Public Square, Suite 2000  
Cleveland, Ohio 44114-1214

## Professional Services Invoice for February 2020

Date	Hours	Subject	
2/5	2.2	Prep for meeting	
2/6	7.1	Meeting with Dan Warren et al	
2/10	2.4	Review reports/documents	
2/11	1.9	Review reports/documents	
2/12	4.6	Teleconference re testimony	
2/14	2.0	Teleconference re testimony	
2/18	3.2	Teleconference re testimony	
2/19	2.9	Teleconference re testimony	
2/24	1.0	Teleconference re testimony	
2/26	4.6	Trial prep - Cleveland	
2/27	8.9	Trial prep - Cleveland	
2/28	6.2	Trial prep - Cleveland	
2/28	<u>1.5</u>	Trail prep - Cleveland	
	48.5		@ \$250 = \$12,125.00
2/28	5.4	Court testimony	@ \$300 = <u>\$ 1,620.00</u>
		<b>TOTAL FEES</b>	<b>\$13,745.00</b>
		<b>TOTAL EXPENSES*</b>	<b><u>\$195.11</u></b>
		<b>Total due</b>	<b>\$13,940.11</b>

Charles S. Heflin  
Submitted electronically on 3/7/20

\*Expense Detail Attached

Charles S. Heflin



4217 Whistler Drive  
Plano, TX 75093  
214-202-3390  
bheflin1@live.com

**Amended Travel Invoice 2/25-29/2020**

Travel Expenses Feb 25-29, 2020 office visit/trial:

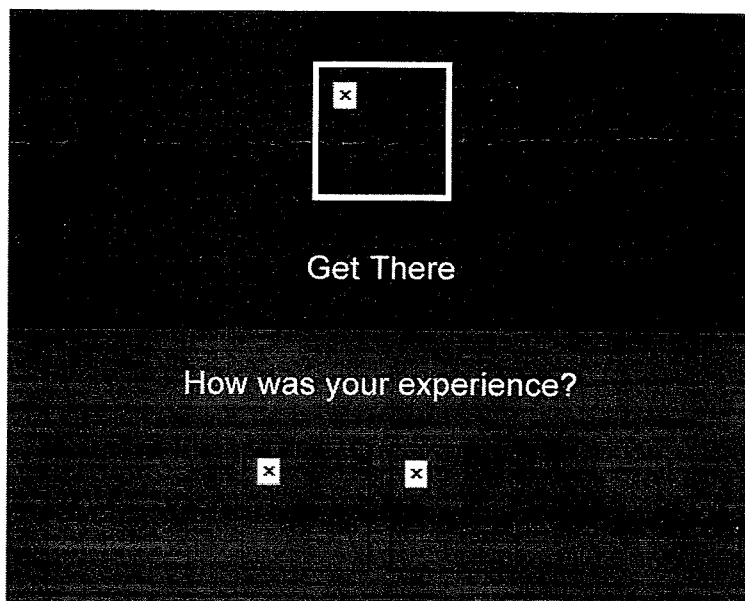
Airfare	\$ 0.00
airport parking	\$ 60.62
meals	\$ 0.00
hotel	\$ 0.00
cab	\$ 101.32
Mileage DFW 62 @.535	<u>\$ 33.17</u>
<b>Total</b>	<b>\$ 195.11</b>

  
Charles S. Heflin 3/18/20



**From:** Get There via Square <receipts@messaging.squareup.com>  
**Sent:** Saturday, February 29, 2020 4:33 AM  
**To:** bheflin1@live.com  
**Subject:** Receipt from Get There

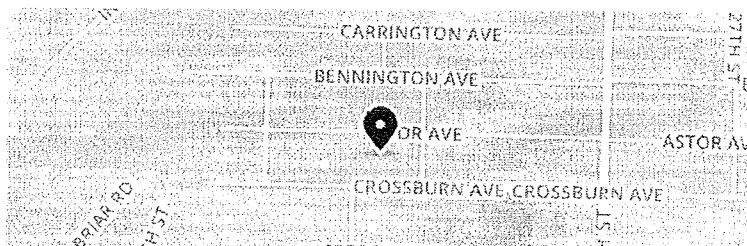
Square automatically sends receipts to the email address you used at any Square seller. [Learn more](#)



\$59.32

Custom Amount	\$59.32
Total	\$59.32

*[Handwritten signature]*



**EXHIBIT C**

DESCRIPTION OF EXPENSES INCURRED BY MR. HEFLIN

FAIR FINANCE COMPANY

CHARLES S. HEFLIN

SUMMARY OF EXPENSES INCURRED

FOR THE PERIOD NOVEMBER 29, 2020 THROUGH AND INCLUDING  
FEBRUARY 28, 2020

<b>Expense</b>	<b>Cost</b>
Airport Parking	60.62
Cab	101.32
Mileage	33.17
<b>Total</b>	<b>195.11</b>

## **CERTIFICATE OF SERVICE**

A copy of the foregoing has been served via ECF or regular, U.S. Mail, on June 12, 2020,  
on the attached service list.

/s/ Michael A. VanNiel

Michael A. VanNiel

*Counsel for the Trustee*

## SERVICE LIST

### Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case.

- Richard M Bain bain@buckleyking.com, krupa@buckleyking.com
- Stephen M. Bales sbales@zieglermetzger.com, dmalloy@zieglermetzger.com
- Brian A Bash bashtrustee@bakerlaw.com, bbash@ecf.epiqsystems.com
- Brian A. Bash BBash@bakerlaw.com
- Brian A. Bash bashtrustee@bakerlaw.com, bbash@ecf.epiqsystems.com
- John E. Bator jbator@batorlaw.com, sbator@batorlaw.com
- Alexis Beachdell abeachdell@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Kathryn A. Belfance kb@rlblp.com
- John B. Blanton jblanton@bakerlaw.com
- Thomas J Budd disneydiver@me.com, law@disneydiver.com
- Kelly Burgan kborgan@bakerlaw.com
- Patrick W. Carothers pcarothers@leechtishman.com,  
bankruptcy@leechtishman.com;ghauswirth@leechtishman.com;dtomko@leechtishman.com
- Anthony J. Cespedes ajc1253@yahoo.com
- William Gregory Chris wchris@rlblp.com, hkoerner@rlblp.com
- Michael L. Cioffi cioffi@blankrome.com
- LeGrand L Clark legrand.clark@atg.in.gov, stephanie.patrick@atg.in.gov
- Deborah A. Coleman dacoleman@hahnlaw.com,  
hlpcr@hahnlaw.com;mcsoulsby@hahnlaw.com;cmbeitel@hahnlaw.com
- Anthony J DeGirolamo ajdlaw@sbcglobal.net,  
amber\_weaver@sbcglobal.net;G23630@notify.cincompass.com
- Rocco I. Debitetto ridebitetto@hahnlaw.com, cmbeitel@hahnlaw.com
- Duriya Dhinojwala ddhinojwala@bmdllc.com, ddhinojwala@icloud.com
- Michelle DiBartolo-Haglock mdibartolo@ttmlaw.com, mldibartolo@gmail.com
- Breaden M. Douthett bdouthett@bakerlaw.com, fairfinancedocket@bakerlaw.com
- J Douglas Drushal ddrushal@ccj.com, lehman@ccj.com
- Charles R. Dyas charles.dyas@btlaw.com
- Robert W. Eckinger rwe@eckingerlaw.com
- Joseph Esmont jesmont@bakerlaw.com, joe.esmont@gmail.com;cbkfuturesinc@bakerlaw.com
- Joseph Esmont jesmont@bakerlaw.com, joe.esmont@gmail.com;cbkfuturesinc@bakerlaw.com
- Joseph E. Ezzie jezzie@bakerlaw.com
- Gregory R Farkas gfarkas@frantzward.com, dlbeatrice@frantzward.com
- Adam Lee Fletcher afletcher@bakerlaw.com
- Dov Frankel dfrankel@taftlaw.com, BHORVATH@TAFTLAW.COM;CLE\_Docket\_Assist@taftlaw.com
- Leon Friedberg lfriedberg@cpmlaw.com, efiling@cpmlaw.com
- Ronald P. Friedberg rfriedberg@meyersroman.com, vvardon@meyersroman.com
- Marc P Gertz mpgertz@goldman-rosen.com, debm@goldman-rosen.com
- Matthew Gold courts@argopartners.net
- Eric R. Goodman egoodman@bakerlaw.com
- Harry W. Greenfield bankpleadings@bucklaw.com,  
young@buckleyking.com;toole@buckleyking.com;heberlein@buckleyking.com
- Harry W. Greenfield greenfield@buckleyking.com,  
young@buckleyking.com;toole@buckleyking.com;heberlein@buckleyking.com
- John J Guy johnguy@neo.rr.com
- John J Guy johnguy@neo.rr.com
- Adam Bradley Hall amps@manleydeas.com
- Scott Holbrook sholbrook@bakerlaw.com
- H Ritchey Hollenbaugh hrh@cpmlaw.com, knocera@cpmlaw.com;slq@cpmlaw.com
- Rachel Huston rachel.huston@ohioattorneygeneral.gov
- Joseph F. Hutchinson jhutchinson@bakerlaw.com, sszalay@bakerlaw.com

- Steven G Janik , 8382591420@filings.docketbird.com
- Steven G Janik steven.janik@janiklaw.com, 8382591420@filings.docketbird.com
- Cynthia A Jeffrey bknotice@reimerlaw.com
- Kenneth C Johnson kjohnson@bricker.com, lpickett@bricker.com
- Nathaniel R. Jones jones-n@blankrome.com
- Mitchell A. Karlan mkarlan@gibsondunn.com, ldunst@gibsondunn.com;nhart@gibsondunn.com;blutz@gibsondunn.com;mao@gibsondunn.com
- Patrick J Keating pkeating@bdblaw.com, sconard@bdblaw.com
- Scott J. Kelly scottkelly@skellylaw.com
- David Charles Knowlton dck@kckblaw.com
- John F Kostelnik jkostelnik@frantzward.com, dlbeatrice@frantzward.com
- Stuart A. Laven slaven@cavitch.com
- James Michael Lawniczak jlawniczak@calfee.com
- Trish D. Lazich trish.lazich@ohioattorneygeneral.gov, angelique.dennis-noland@ohioattorneygeneral.gov
- Stephen P Leiby sleiby@neolaw.biz, jackie@neolaw.biz
- Scott B. Lepene scott.lepene@thompsonhine.com, Christine.Broz@thompsonhine.com;ECFDocket@thompsonhine.com
- Jeffrey M. Levinson jml@jml-legal.com
- Patrick T. Lewis plewis@bakerlaw.com, sjeney@bakerlaw.com
- Quintin F. Lindsmith qlindsmith@bricker.com, cwarner@bricker.com
- David A Looney David@OhioAttorney.com, davelooney1@gmail.com
- Bruce J.L. Lowe blowe@taftlaw.com, CLE\_Docket\_Assist@taftlaw.com;SMcKean@taftlaw.com
- Thomas R Lucchesi tlucchesi@bakerlaw.com
- Thomas R Lucchesi tlucchesi@bakerlaw.com
- Crystal L. Maluchnik crystal.maluchnik@janiklaw.com
- Crystal L. Maluchnik crystal.maluchnik@janiklaw.com
- Grant A Mason gamason@millermast.com
- Matthew H Matheney mmatheney@bdblaw.com, bhajduk@bdblaw.com
- Shorain L. McGhee shorain@smcgehelaw.com
- David W. Mellott dmellott@beneschlaw.com
- Tarek E. Mercho tmercho@mercholegal.com
- David P. Meyer dmeyer@dmlaws.com, docket@dmlaws.com
- David Polan Meyer dmeyer@dmlaws.com
- Michael J Moran mike@gibsonmoran.com, moranecf@gmail.com;r55982@notify.bestcase.com
- Michael J Moran moranecf@yahoo.com, moranecf@gmail.com;r55982@notify.bestcase.com
- David A Mucklow davidamucklow@yahoo.com
- David A Mucklow davidamucklow@yahoo.com
- Steven J. Mulligan stevenmulligan@cox.net
- Maritza S. Nelson mnelson@bakerlaw.com
- F. Anthony Paganelli tony@tonypaganelli.com
- Lucas Keith Palmer palmer@ccj.com, aaichele@ralaw.com
- David C. Perduk dperduk@perduklaw.com, jody@perduklaw.com
- Mark A Phillips mphilips@beneschlaw.com, docket@beneschlaw.com;lbehra@beneschlaw.com;cgreen@beneschlaw.com
- Mark A Phillips mphilips@beneschlaw.com, docket@beneschlaw.com;lbehra@beneschlaw.com;cgreen@beneschlaw.com
- Larry G. Poulos larry\_poulos@yahoo.com
- Kenneth G. Prabucki kprabucki@bakerlaw.com
- Kenneth G. Prabucki kprabucki@bakerlaw.com
- Clinton E. Preslan ndohbky@jbandr.com
- Clinton E. Preslan cpreslan@preslanlaw.com
- David F. Proano dproano@bakerlaw.com, fairfinancedocket@bakerlaw.com
- David F. Proano dproano@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Stephen J Pruneski spruneski@rlblp.com
- Timothy J Richards trichards@frantzward.com, dlbeatrice@frantzward.com;timrichardslegal1976@gmail.com
- Mark Riemer mriemer@goldman-rosen.com

- Tim Robinson tim.robinson@dinsmore.com, lisa.geeding@dinsmore.com
- Tim Robinson tim.robinson@dinsmore.com, lisa.geeding@dinsmore.com
- James E. Rossow jim@rubin-levin.net, robin@rubin-levin.net;lisa@rubin-levin.net;atty\_jer@trustesolutions.com
- James E. Rossow jim@rubin-levin.net, robin@rubin-levin.net;lisa@rubin-levin.net;atty\_jer@trustesolutions.com
- Colin P. Sammon colin.sammon@janiklaw.com, Julie.Zakrzewski@Janiklaw.com
- Matthew J. Samsa msamsa@mcdonaldhopkins.com, docket@beneschlaw.com;cgreen@beneschlaw.com
- James Preston Schuck jschuck@bricker.com, cwarner@bricker.com
- Richard V. Singleton rsingleton@blankrome.com, kreda@blankrome.com;jhanner@blankrome.com
- Dale S Smith dsmith@frantzward.com, dlbeatrice@frantzward.com
- Sheldon Stein ssteindocs@gmail.com, kristine@steintrustee.com;sheldon@steintrustee.com
- Rachel L. Steinlage rsteinlage@meyersroman.com, jray@meyersroman.com;mnwak@meyersroman.com
- Ray H Stoess raystoess@600westmain.com
- Megan D. Stricker mnvinc@davisyoung.com, gcampbell@davisyoung.com
- Timothy M. Sullivan tim@tmslaw.net, crystal@tmslaw.net
- Jonathan D. Sundheimer jsundheimer@btlaw.com
- Gregory D Swope gswope@kwgd.com, mhelmick@kwgd.com
- David J. Theising dtheising@harrisonmoberly.com
- Ronald N. Towne rtowne@neolaw.biz, awehener@neolaw.biz
- Vance P. Truman medinaatty@vancetruman.com
- United States Trustee (Registered address)@usdoj.gov
- Michael S Tucker mtucker@ulmer.com
- Nancy A. Valentine nancy.valentine@icemiller.com, carol.builder@icemiller.com
- Michael A. VanNiel mvanniel@bakerlaw.com
- Thomas C Wagner wagnert@tcwlawyers.com, wagnert@vwlawyers.com
- Daniel Rubin Warren dwarren@bakerlaw.com
- Wayne County Litigants ddrushal@ccj.com
- Nicholas L. White nwhite@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Alicia Raina Whiting-Bozich whiting-bozich@buckleyking.com, heberlein@buckleyking.com
- Douglas Wolfe dwolfe@asmcapital.com
- Lenore Kleinman ust04 Lenore.Kleinman@usdoj.gov
- Maria D. Giannirakis ust06 maria.d.giannirakis@usdoj.gov

## Manual Notice List

The following is the list of **parties** who are **not** on the list to receive e-mail notice/service for this case (who therefore require manual noticing/service).

Emily S. Donahue  
Jackson Walker L.L.P.  
2323 Ross Avenue, Suite 600  
Dallas, TX 75202

Christine A. Arnold  
6005 Twin Lakes Drive  
Parma, OH 44219

Dennis S. Sumerix  
18592 Edwards Road, Lot 171  
Doylestown, OH 44230-9546

Leon Friedberg  
Dennis J. Concilla  
Carl A. Aveni  
H. Ritchey Hollenbaugh  
Carlile Patchen & Murphy LLP  
366 Broad Street  
Columbus, OH 43215

Robert Boote  
Ballard Shahr LLP  
919 North Market Street, 12th Floor  
Wilmington, DE 19801-3034

Leslie C Heilman  
Ballard Spahr LLP  
919 North Market Street, 12th Floor  
Wilmington, DE 19801-3034

Maria D. Giannirakis  
Office of the United States Trustee  
Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue East, Suite 441  
Cleveland, OH 44114

Lothar Jung  
12962 W. Linden Avenue  
Parma, OH 44130-5817

John J. Kuster  
Benjamin R. Nagin  
Sidley Austin LLP  
787 Seventh Avenue  
New York, NY 10019

Eric W. Sleeper  
Barton Barton & Plotkin LLP  
711 Third Avenue, 14th Floor  
New York, NY 10017

Gary Sallee  
11650 Olio Road, Suite 1000-333  
Fishers, IN 46037

Robert Hanlon  
Eileen Hanlon  
P.O. Box 42  
State Route 43  
Mogadore, OH 44260

John McCauley, Esq.  
J. Richard Kiefer, Esq.  
Bingham McHale LLP  
2700 Market Tower  
10 West Market Street  
Indianapolis, IN 46204

Tobey Daluz  
Ballard Spahr LLP  
919 North Market Street, 12th Floor  
Wilmington, DE 19801-3034

Jay Jaffe  
Faegre Baker Daniels LLP  
600 E. 96<sup>th</sup> Street, Suite 600  
Indianapolis, IN 46240

Michael V. Demczyk  
12370 Cleveland Avenue, NW  
P.O. Box 867  
Uniontown, OH 44685

Charles Boerner  
1848 Ritchie Road  
Stow, OH 44224

JM Partners LLC  
Attn: John Marshall  
6800 Paragon Place, Suite 202  
Richmond, VA 23230-1656