

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

IN RE:

Case No. 17-18864-MAM

AA FLORIDA BRIDAL RETAIL
COMPANY, LLC, *et al.*,

Chapter 7
(Jointly Administered)

Debtors.

**SUMMARY OF FIRST INTERIM APPLICATION FOR
REIMBURSEMENT OF COSTS FOR BAST AMRON LLP
AS SPECIAL LITIGATION COUNSEL TO THE TRUSTEE**

- | | | |
|-----|---|---|
| 1. | Name of Applicant | BAST AMRON LLP |
| 2. | Role of Applicant | Special Litigation Counsel |
| 3. | Name of certifying professional | Brett M. Amron, Esq. |
| 4. | Date Case Filed | July 14, 2017 |
| 5. | Date of Order approving employment | October 3, 2017 (ECF No. 184)
(<i>nunc pro tunc</i> to August 15, 2017) |
| 6. | Period for this Application | August 15, 2017-September 20, 2018 |
| | <u>Fees</u> | |
| 7. | Fees requested for this period | N/A |
| | <u>Expenses</u> | |
| 8. | Expense reimbursement requested for this period | \$38,540.61 |
| 9. | Amount of Retainer | N/A |
| 10. | Balance of Retainer | N/A |

Exhibit "1"
FEE APPLICATION SUMMARY CHART

REQUEST					APPROVAL				PAID		HOLDBACK	
Date Filed	ECF #	Period Covered	Fees Requested	Expenses Requested	Date Ordered	ECF #	Fees Approved	Expenses Approved	Fees Paid	Expenses Paid	Fees Holdback	Expenses Holdback
9/20/2018		8/15/17-9/20/18	N/A	38,540.61								
TOTALS				38,540.61								

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**FIRST INTERIM APPLICATION FOR REIMBURSEMENT OF COSTS FOR
BAST AMRON LLP AS SPECIAL LITIGATION COUNSEL TO THE TRUSTEE**

BAST AMRON LLP (“BA” or “Applicant”), special litigation counsel to Margaret J. Smith, in her capacity as the duly appointed Chapter 7 Trustee (“Trustee”) for the bankruptcy estates of AA Florida Bridal Retail Company, LLC (“Alfred Angelo”) and its related affiliates (collectively, the “Affiliated Debtors”),¹ through the undersigned, hereby files this First Interim Application for Reimbursement of Costs for BAST AMRON LLP (the “Application”) seeking reimbursement for its costs incurred between August 15, 2017 through September 20, 2018, inclusive (the “Application Period”).

With this instant Application, BA requests approval of all expenses incurred rendering services to the Trustee during the Application Period, as set forth on the attached Exhibit A.

¹ The Affiliated Debtors are: AA Florida Bridal Retail Co., LLC (Case No. 17-18864); Alfred Angelo – The Bride’s Studio No. 3, Inc. (Case No. 17- 18871); AA Bridal Midwest, LLC (Case No. 17-18873); AA Bridal Northeast, LLC (Case No. 17-18874); AA Bridal, LLC (Case No. 17-18877); BridesMart, LP (Case No. 17-18879); Hacienda Brides (Case No. 17-18881); DJ Fashions, LLC (Case No. 17-18882); AA Bridal Nebraska, LLC (Case No. 17-18883); Alfred Angelo Investment China I (Case No. 17-18887); Alfred Angelo Investment China III (Case No. 17-18888); Zhuhai Haiping Wedding DRESS Design LTD (Case No. 17-18896); Alfred Angelo Investment Company, Limited (Hong Kong) (Case No. 17-18898); and Alfred Angelo Newco, Inc. (Case No. 17-18900).

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
2. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. The statutory predicate for the relief requested in this application is 11 U.S.C. § 327(a) and Bankruptcy Rule 2016.
4. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND FACTS

5. On July 14, 2017, Alfred Angelo filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code (the "Petition Date").
6. On the same date, the Affiliated Debtors each filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.
7. Shortly thereafter, Margaret J. Smith was duly appointed as the Chapter 7 Trustee of Alfred Angelo and the Affiliated Debtors' bankruptcy estates (jointly, the "Debtors"). All of the Debtors are affiliates as such term is defined under 11 U.S.C. § 101(2).
8. On September 1, 2017, the Trustee filed the *Trustee's Application to Employ Brett M. Amron and BAST AMRON LLP as Special Litigation Counsel and to Approve Contingency Fee Compensation Arrangement with Respect to Investigation and Prosecution of Certain Potential Litigation Claims Nunc Pro Tunc to August 15, 2017* (ECF No. 158), and after a hearing on same, the *Order Granting Trustee's Application to Employ Brett M. Amron and BAST AMRON LLP as Special Litigation Counsel and to Approve Contingency Fee Compensation Arrangement with Respect to Investigation and Prosecution of Certain Potential Litigation Claims Nunc Pro*

Tunc to August 15, 2017 (ECF No. 184) (the “Order”) was entered by the Court on October 3, 2017.

9. The Order provides that BA is entitled to reimbursement of all out-of-pocket expenses incurred in connection with its representation of the Trustee, to be paid by the estates of the Debtors (the “Estates”) after application to the Court.

DESCRIPTION OF EXPENSES INCURRED

10. Section 330 of the Bankruptcy Code authorizes “reimbursement for actual, necessary expenses” incurred by professionals employed in a bankruptcy case. 11 U.S.C. § 330(a)(1)(B). Accordingly, BA seeks reimbursement for its actual and necessary expenses incurred in rendering services to the Trustee during the Application Period. The total amount of actual expenses is \$38,540.61, as detailed in the attached Exhibit A, which it submits were reasonable and necessary in light of the services provided.

WHEREFORE, Applicant, BAST AMRON LLP, respectfully requests the entry of a order (i) awarding its costs for the Application Period from August 15, 2017 through September 20, 2018, in the amount of \$38,540.61 (the “Requested Expenses”); (ii) authorizing the Trustee to pay \$25,000 of the Requested Expenses, with the balance of the remaining awarded expenses to be held back until such time when funds become available in the Estates and (iii) granting such other and further relief as the Court deems proper and just.

Date: September 20, 2018

Respectfully submitted,

BAST AMRON LLP
*Special Litigation Counsel for Margaret J. Smith,
Chapter 7 Trustee*
SunTrust International Center
One SE Third Avenue, Suite 1400
Miami, Florida 33131
Telephone: 305.379.7904
Facsimile: 305.379.7905
Email: bamron@bastamron.com
Email: dquick@bastamron.com

By: /s/ Brett M. Amron

Brett M. Amron, Esq. (FBN 148342)
Dana R. Quick, Esq. (FBN 82949)

Certification

1. I have been designated by the Applicant BAST AMRON LLP, as the professional with responsibility in this case for compliance with the current *Guidelines for Fee Applications for Professionals in the Southern District of Florida Bankruptcy Cases* (the “Guidelines”).
2. I have read the Applicant’s Application for reimbursement of expenses. This Application complies with the Guidelines, and the expenses sought fall within the Guidelines, except as specifically noted in the certification and described in the Application.
3. The expenses sought are billed at rates and in accordance with practices customarily employed by the Applicant and generally accepted by the Applicant’s clients.
4. In seeking reimbursements for the expenditures described in Exhibit A, the Applicant is seeking reimbursements only for actual expenditure and has not marked up the actual costs to provide a profit or to recover the amortized cost of investment in staff time or equipment or capital outlay (except to the extent that the Applicant has elected to charge for in-house photocopies and outgoing facsimile transmission at the maximum rates permitted by the Guidelines).
5. In seeking reimbursements for any services provided by a third party, the Applicant is seeking reimbursements only for the amount actually paid by the Applicant to the third party.
6. The following are the variances with the provisions of the guidelines, the date of the specific Court order approving the variance, and the justification for the variance: None.

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this Court set forth in Local Rule 2090-1 (A).

BAST AMRON LLP

/s/ Brett M. Amron
Brett M. Amron (FBN 148342)

CERTIFICATE OF SERVICE

I FURTHER CERTIFY that a true and correct copy of the foregoing was served via CM/ECF, where available, on this 20th day of September, 2018, upon all parties designated to receive electronic service via the CM/ECF system.

By: /s/ Brett M. Amron
Brett M. Amron, Esq.

EXHIBIT A**SUMMARY OF COSTS**

Description	Quantity	Cost	Total
1. Filing Fee			
2. Process Service Fees			
3. Witness Fee			
4. Court reporter Fees and Transcripts			
5. Lien and Title Searches			
6. Photocopies			
(1) In-House Copying	9,219	0.15/page	\$1,382.85
(2) Outside Copying			
7. Postage			\$31.25
8. Overnight Delivery Charges			\$25.22
9. Outside Courier/Messenger Service			
10. Long Distance Telephone Charges			
11. Long Distance Fax Transmissions			
12. Computerized Research			
(1) Westlaw			\$220.86
(2) PACER	776	0.10	\$77.60
13. Out of Southern-District-of-Florida Travel			
(1) Transportation			
(2) Lodging			
(3) Meals			
(4) Parking			
14. Other Permissible Expenses (must specify and justify)			
(1) Meals			
(2) Parking			\$7.00
(3) Conference Calls			\$10.05
(4) Binding			
(5) E-Discovery hosting/review software services			\$36,741.78
(6) Supplies			
(7) Court Call			\$44.00
(8) Color Copies			
Total Expense Reimbursement Requested			<u>\$38,540.61</u>