

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

CASE NO.: 2:09-CV-229-FTM-SPC

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

FOUNDING PARTNERS CAPITAL MANAGEMENT, CO,  
and WILLIAM L. GUNLICKS,

Defendants,

SUN CAPITAL, INC.,  
SUN CAPITAL HEALTHCARE, INC.,  
FOUNDING PARTNERS STABLE-VALUE FUND, L.P.,  
FOUNDING PARTNERS STABLE-VALUE FUND II, L.P.,  
FOUNDING PARTNERS GLOBAL FUND, LTD, and  
FOUNDING PARTNERS HYBRID-VALUE FUND, L.P.,

Relief Defendants.

---

**LEYZA F. BLANCO'S, FORMER RECEIVER, FIRST AND FINAL APPLICATION  
FOR REIMBURSEMENT OF LEGAL FEES AND EXPENSES AND MEMORANDUM  
OF LAW IN SUPPORT OF SAME**

Leyza F. Blanco ("Blanco"), Former Receiver, pursuant to this Court's Order Appointing Receiver dated April 20, 2009 (hereinafter, "Order Appointing Receiver") moves this Court for an Order Approving the Reimbursement of Legal Fees and Expenses ("Motion"). The grounds for this Motion are fully set forth in the Memorandum of Law below.

**I. GENERAL BACKGROUND**

1. On April 20, 2009, this Court entered an Order Appointing Receiver over FOUNDING PARTNERS STABLE-VALUE FUND, L.P., FOUNDING PARTNERS STABLE-VALUE FUND II, L.P., FOUNDING PARTNERS GLOBAL FUND, LTD, and FOUNDING

PARTNERS HYBRID-VALUE FUND, L.P. (hereinafter “the Founding Partners Relief Defendants”).

2. On May 13, 2009, this Court entered an Opinion and Order removing Blanco as Receiver and GrayRobinson as counsel to Blanco and directed that each should thereafter take only those actions necessary to maintain the status quo until a new receiver was appointed. [CP# 70, Paragraph 4].

3. On May 20, 2009, this Court entered an Order Appointing Replacement Receiver, naming Daniel Newman as replacement receiver over the Founding Partners Relief Defendants.

4. Paragraph 4 of the Order Appointing Receiver, in pertinent part, authorized Blanco to:

...employ legal counsel...as the Receiver deems necessary and to fix and pay their reasonable compensation and reasonable expenses, as well as all reasonable expenses of taking possession of the assets and business of Founding Partners and the Relief Defendants, and exercising the power granted by this Order, subject to approval by this Court at the time to Receiver accounts to the Court for such expenditures and compensation;

5. Pursuant to paragraph 4 of the Order Appointing Receiver, Blanco retained GrayRobinson to provide legal services to her as receiver. GrayRobinson provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve the Receivership Assets and attempted to locate and recover additional assets during the period that Blanco served as receiver. These services were provided for the benefit of aggrieved investors, creditors, and other interested parties of the Founding Partners Relief Defendants.

6. Pursuant to the proposal provided to the Securities and Exchange Commission for purposes of Blanco’s appointment as Receiver, Blanco agreed to cap all fees for Receiver at \$325 per hour. This rate was set forth in the Commission’s Emergency Motion for Appointment of Receiver and Memorandum of Law (hereinafter “Motion for Appointment of Receiver”),

[CP# 30]. In addition, Blanco did not bill for any time for services incurred in connection with the potential conflict of interest issue raised in this case. Furthermore, Blanco has agreed to reduce her request for fees by twenty percent (20%) for the sole reason that she believes such reduction will be in the best interest of the estate. At the request of the Securities and Exchange Commission, Blanco has further agreed to a hold-back of ten percent (10%) of the amount in fees requested herein until additional funds become available.

7. Blanco's fees for professional services rendered and costs incurred through July 31, 2009 amounted to \$75,010.00 in fees and \$6,472.53 in costs. However, after agreeing to reduce her fee request by twenty percent (20%), Blanco seeks an award in the amount of \$60,008.00 (i.e., 20% reduction of \$75,010.00) in fees and \$6,472.53 in costs, for a total of \$66,480.53. The request is consistent: (i) with the accommodation made to the Receiver of the hourly rate caps consistent with the Motion for Appointment of Receiver; (ii) with not billing for services rendered in connection with the potential conflict of interest issue raised in the case; and (iii) with the twenty percent (20%) reduction of the fees incurred.

8. The activities of Blanco for the services covered by this Motion are billed in accordance with the Billing Instructions provided by the Commission and are coded in accordance with the billing codes required therein. A copy of the time detail for the time spent by Blanco as the former Receiver in this matter is attached hereto as Exhibit "A." At the early stage of the receivership case during Blanco's term as receiver, the work of Blanco was primarily focused on locating and taking control of the receivership assets, preserving and cataloging the records of the Founding Partners Relief Defendants, meeting with aggrieved investors, addressing legal issues presented by the Sun Capital Relief Defendants. A summary of the time

spent by Blanco in each of the specific Activity Categories required under the Billing Instructions is as follows:

<b>Activity Category</b>	<b>Hours Expended</b>	<b>Fee Amount</b>
Asset Analysis & Recovery	78.30	\$25,447.50
Asset Disposition	.30	\$97.50
Case Administration	138.10	\$44,882.50
Litigation Consulting	14.10	\$4,582.50
<b>Total</b>	<b>230.80</b>	<b>\$75,010.00</b>

9. The detail of expenses incurred by Blanco is attached hereto as Exhibit "B."

10. Neither the present receiver of this case, Daniel Newman, nor the Securities and Exchange Commission have objections to the relief sought herein.

#### MEMORANDUM OF LAW

It is well settled that this Court has the power to appoint a receiver and award the receiver and those appointed by her reimbursement of professional fees and expenses. See, e.g., *Securities and Exchange Commission v. Mobley*, No. 00-CV-1316, 1317RCC, 2000 WL 1702024 (S.D.N.Y. Nov. 13, 200) (court awarded reasonable fees for the receiver and his professionals). The determination of fees to be awarded is largely within the discretion of the trial court. See *Monaghan v. Hill*, 140 F. 2d. 31, 34 (9<sup>th</sup> Cir. 1944). In determining reasonable compensation by a Receiver's professionals, the Court should consider the circumstances surrounding the receivership. *Elliot*, 953 F. 2d 1560, 1577 (11<sup>th</sup> Cir. 1992).

Here, because of the nature of this case, it was necessary for the receiver to employ attorneys familiar with financial frauds, federal receivership, securities laws, insolvency and healthcare issues. As discussed above, Blanco discounted her normal and customary rate as an

accommodation to the receivership and to conserve receivership assets. The rate charged by the Blanco is at or below those charged by the attorneys and paralegals of comparable skill from other law firms in the Middle and Southern Districts of Florida. This is the first and final request for an award of compensation for services rendered by former Receiver and for un-reimbursed out-of-pocket costs although she has worked diligently on this matter and continues to do so.

This case was time-intensive for the receiver and her professionals because of the need to resolve many issues rapidly and efficiently immediately upon her appointment. The attached Exhibits detail the time, nature and extent of the professional services rendered by Blanco for the benefit of investors, creditors and other interested parties.

Although the SEC investigated and filed the initial pleadings in the case, the former receiver, with the assistance of GrayRobinson, assumed the primary responsibility for securing assets and records, investigating and analyzing events leading to the commencement of the proceeding, efforts to locate and gather investors' money and fielding of creditor and investor inquiries. The former receiver is sensitive to the need to conserve the assets of the receivership estate but maintains that the fees and costs expended during her term as receiver in this matter were reasonable, necessary and benefited the receivership.

#### CONCLUSION

Under the provisions of the Order Appointing Receiver, Blanco was authorized to apply to the Court for authority to pay fees and costs incurred in carrying out her duties and obligations as receiver. In exercising her duties, Blanco determined that the services rendered and the attendant fees and costs were reasonable, necessary, advisable and in the best interest of the receivership estate.

WHEREFORE, for the foregoing reasons, Leyza F. Blanco, former receiver in this matter, requests that this first and final application for fees and expenses of the former receiver be approved and that the Court direct that payment be made from the receivership assets in the amount of in the amount of \$60,008.00 (i.e., 20% reduction of \$75,010.00) in fees, of which ten percent (10%) will be held back until additional funds become available, and \$6,472.53 in costs, for a total of \$66,480.53, and any further relief the Court deems just and proper.

Date: November 17<sup>th</sup>, 2009

Respectfully submitted,  
Former Receiver, Leyza F. Blanco  
1221 Brickell Avenue, Suite 1600  
Miami, FL 33131  
[Leyza.Blanco@gray-robinson.com](mailto:Leyza.Blanco@gray-robinson.com)  
Telephone: (305) 416-6880  
Facsimile: (305) 416-6887

By: /s/Leyza F. Blanco  
Leyza F. Blanco  
Florida Bar No.: 104639

## EXHIBIT "A"

## Time by Activity Code

Client / Matter 351058 Leyza Blanco as Receiver

1

Founding Partners Capital Management

## Activity Code 001

4/17/2009	Blanco, Leyza F	0.60	195.00	Follow up strategy discussion with F. Schrills.
4/17/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with I. Anderson and B. Levenson.
4/17/2009	Blanco, Leyza F	0.90	292.50	Telephone conference with R. Bendix and I. Reich regarding issue regarding Chicago office.
4/17/2009	Blanco, Leyza F	0.50	162.50	Correspondence and follow up call with I. Reich regarding visit to Founding Partners Chicago office.
4/19/2009	Blanco, Leyza F	0.40	130.00	Correspondence regarding contact information for Chicago team to and from P. Von Kahle.
4/20/2009	Blanco, Leyza F	0.60	195.00	Coordinate legal team for inventory and indexing of business records.
4/20/2009	Blanco, Leyza F	2.30	747.50	Various calls regarding coordination of Chicago team and prepare cover letter for Chicago counsel; Various correspondence regarding same.
4/20/2009	Blanco, Leyza F	0.60	195.00	Review final motions to appoint receiver and to freeze assets from P. Soto.
4/20/2009	Blanco, Leyza F	0.90	292.50	Prepare detailed summary of Naples and Chicago office issues and service of orders.
4/20/2009	Blanco, Leyza F	0.30	97.50	Review summary of Chicago details from M. Latta.
4/20/2009	Blanco, Leyza F	4.70	1,527.50	Service of orders at Naples office; discussions with J. Aller and D. Teets; calls with S. Casey and various counsel; deal with issues relating to back up of server.
4/20/2009	Blanco, Leyza F	1.30	422.50	Prepare agenda of issues to address and designate team for each.
4/21/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from general counsel from global relay regarding construction of freeze of email server.
4/21/2009	Blanco, Leyza F	0.50	162.50	Review correspondence and attachment regarding asset freeze order and bank accounts.
4/21/2009	Blanco, Leyza F	0.90	292.50	Handling issues regarding building management.
4/21/2009	Blanco, Leyza F	1.30	422.50	Meeting with IT experts to discuss issues.
4/21/2009	Blanco, Leyza F	0.60	195.00	Follow up regarding email service provided by G. RElay and provide detailed information to I. Christianson.
4/21/2009	Blanco, Leyza F	1.60	520.00	Various telephone conferences with P. Von Kahle regarding coordination.
4/21/2009	Blanco, Leyza F	0.20	65.00	Review correspondence regarding check of office in Chicago.
4/21/2009	Blanco, Leyza F	0.20	65.00	Review detailed plan for Chicago office inventory.

4/21/2009	Blanco, Leyza F	0.20	65.00	Coordinate with P. White regarding inventory of collectibles and FF&E.
4/22/2009	Blanco, Leyza F	0.20	65.00	Deal with mail issues in Chicago.
4/22/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from M. Panozo regarding May rent.
4/22/2009	Blanco, Leyza F	0.70	227.50	Review report and pictures regarding Chicago collectibles and FF&E.
4/22/2009	Blanco, Leyza F	0.60	195.00	Discuss and address follow up on UCC searches for relief defendants.
4/22/2009	Blanco, Leyza F	0.30	97.50	Review and respond to confirmation from global relay regarding outside access to email.
4/22/2009	Blanco, Leyza F	0.90	292.50	Review and approve proposed affidavits regarding service at Chicago office.
4/22/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with M. Patagul regarding lease in Chicago.
4/22/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence to M. Panozzo regarding authorization/access to Chicago office.
4/22/2009	Blanco, Leyza F	0.40	130.00	Discussion coordination of report for inventory of Naples and Chicago offices.
4/23/2009	Blanco, Leyza F	0.90	292.50	Meet with IT experts regarding imaging of computers and progress regarding same.
4/23/2009	Blanco, Leyza F	2.30	747.50	Review various bank documents and follow up email to L Anderson.
4/23/2009	Blanco, Leyza F	0.90	292.50	Travel to lock up mini storage; view contacts of storage room.
4/23/2009	Blanco, Leyza F	1.80	585.00	Visit to bank to access safe deposit box; deal with issues relating to instructions to freeze and refusal to provide access to receiver.
4/23/2009	Blanco, Leyza F	1.20	390.00	Personally served receivership and freeze order on RBC; meet with branch manager and confirmed account closing.
4/23/2009	Blanco, Leyza F	0.60	195.00	Travel to other mini storage location; meet with manager; confirm that storage location is closed.
4/23/2009	Blanco, Leyza F	4.20	1,365.00	Work on motion to expand powers of receiver over Sun.
4/23/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence regarding Suntrust safe deposit box with L Anderson.
4/24/2009	Blanco, Leyza F	0.80	260.00	Conference call with P. Von Kahle regarding status.
4/24/2009	Blanco, Leyza F	2.80	910.00	Review cases in support of motion to expand powers of receiver.
4/25/2009	Blanco, Leyza F	1.70	552.50	Review additional case law in support of motion to expand powers of receiver over Sun Capital.
4/25/2009	Blanco, Leyza F	1.80	585.00	Analyze issues regarding lockbox agreement and discuss same with counsel.
4/25/2009	Blanco, Leyza F	2.30	747.50	Review of default letters to Sun Capital Healthcare and Sun Capital, Inc.
4/25/2009	Blanco, Leyza F	0.10	32.50	Follow up with S. Kapila regarding accounting work.



4/26/2009	Blanco, Leyza F	9.90	3,217.50	Review case law, supporting documents and prepare a motion for expansion of receivership powers over Sun and supporting memorandum.
4/26/2009	Blanco, Leyza F	1.20	390.00	Telephone conference with I. Anderson regarding issues raised in draft motion.
4/26/2009	Blanco, Leyza F	0.60	195.00	Review analysis of security interest in Security interest owned by Sun Capital.
4/27/2009	Blanco, Leyza F	0.30	97.50	Follow up meeting with I. Anderson.
4/27/2009	Blanco, Leyza F	0.20	65.00	Review notice of withdrawal of motion and order granting same.
4/27/2009	Blanco, Leyza F	1.80	585.00	Meeting with R. Addison and investor group.
4/27/2009	Blanco, Leyza F	0.20	65.00	Review follow up email correspondence from I. Anderson.
4/27/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with I. Anderson and B. Levenson regarding Motion to Expand Powers.
4/27/2009	Blanco, Leyza F	3.80	1,235.00	Review documents at Founding office in respect to lockbox issues.
4/27/2009	Blanco, Leyza F	0.90	292.50	Meeting in advance of hearing with I. Anderson.
4/28/2009	Blanco, Leyza F	0.20	65.00	Detailed correspondence to R. Addison.
4/28/2009	Blanco, Leyza F	0.20	65.00	Email regarding request from D. Teets.
4/28/2009	Blanco, Leyza F	0.70	227.50	Review proposed lockbox transfer letter and agreement and correspondence to SEC regarding same.
4/28/2009	Blanco, Leyza F	0.20	65.00	Review bankruptcy search and correspondence to I. Anderson regarding same.
4/28/2009	Blanco, Leyza F	2.60	845.00	Review finalized motion for expansion of receivership powers including additional new information regarding Founding Bermuda.
4/28/2009	Blanco, Leyza F	1.60	520.00	Review and analyze revised motion for expansion of receivership over Sun Capital.
4/28/2009	Blanco, Leyza F	0.20	65.00	Review and respond to status on move of documents and FF&E from P. Von Kahle.
4/28/2009	Blanco, Leyza F	1.60	520.00	Deal with calls from employees and counsel for same.
4/28/2009	Blanco, Leyza F	1.40	455.00	Meeting with R. Rein regarding Bermuda issue.
4/28/2009	Blanco, Leyza F	0.80	260.00	Prepare detailed correspondence to R. Addison.
4/28/2009	Blanco, Leyza F	0.30	97.50	Review detailed status email regarding Chicago office.
4/29/2009	Blanco, Leyza F	0.90	292.50	Review and revise default letters to Sun Capital.
4/29/2009	Blanco, Leyza F	0.50	162.50	Review documents provided by I. Anderson.
4/29/2009	Blanco, Leyza F	0.20	65.00	Review courts order setting briefing schedule for expansion of receivership.
4/29/2009	Blanco, Leyza F	0.10	32.50	Correspondence regarding default letters.
4/29/2009	Blanco, Leyza F	0.60	195.00	Discuss issues regarding Bermuda entities with R. Plotkin.
4/29/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with investor for T. Greenberg.

4/30/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from I. Anderson and call to investory M. Lindsay.
4/30/2009	Blanco, Leyza F	0.20	65.00	Follow up with R. Addison in preparation for meeting.
5/1/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with P. Calli regarding freeze issues.
<b>Total Activity Code 001</b>		<b>78.30</b>	<b>\$25,447.50</b>	

**Activity Code 002**

4/22/2009	Blanco, Leyza F	0.30	97.50	Address issues relating to request for personal effects by employees.
<b>Total Activity Code 002</b>		<b>0.30</b>	<b>\$97.50</b>	

**Activity Code 004**

4/15/2009	Blanco, Leyza F	6.60	2,145.00	Work on issues in preparation for Receivership.
4/17/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence to F. Schriels regarding status after call with B. Levenson and I. Anderson.
4/17/2009	Blanco, Leyza F	0.90	292.50	Coordination call and various follow up correspondence to P. Von Kahle.
4/17/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with F. Schriels; telephone conference with I. Anderson regarding update.
4/18/2009	Blanco, Leyza F	0.50	162.50	Detailed correspondence to and from F. Schriels regarding details for Monday filing of SEC complaint.
4/20/2009	Blanco, Leyza F	0.70	227.50	Various calls regarding issues regarding service of freeze orders.
4/20/2009	Blanco, Leyza F	0.50	162.50	Review executed orders.
4/20/2009	Blanco, Leyza F	0.20	65.00	Telephone conference with I. Anderson regarding status.
4/20/2009	Blanco, Leyza F	2.80	910.00	Coordinate various calls and service of anticipated orders.
4/20/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence with S. Kapila.
4/20/2009	Blanco, Leyza F	0.50	162.50	Review final complaint from P. Soto.
4/21/2009	Blanco, Leyza F	1.30	422.50	Meeting regarding phone service and mail with J. Coyle.
4/21/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from B. Levenson.
4/21/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with I. Anderson regarding various issues.
4/21/2009	Blanco, Leyza F	0.80	260.00	Multiple calls with I. Anderson.
4/21/2009	Blanco, Leyza F	0.20	65.00	Telephone conference with Building Management Office.
4/21/2009	Blanco, Leyza F	0.70	227.50	Conference call with S. Casey.
4/22/2009	Blanco, Leyza F	0.30	97.50	Review correspondence from R. Rein regarding Bermuda/Cayman issues.
4/22/2009	Blanco, Leyza F	0.80	260.00	Telephone conference with R. Addison and D. Migala.
4/22/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from I. Anderson.

4/22/2009	Blanco, Leyza F	0.80	260.00	Review correspondence and attachments from D. Migala.
4/22/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with D. Belyea regarding affidavit.
4/22/2009	Blanco, Leyza F	0.10	32.50	Review and execute correspondence confirming service of complaint and various motions.
4/22/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with S. Casey.
4/22/2009	Blanco, Leyza F	1.20	390.00	Calls with I. Anderson regarding Bermuda issues.
4/23/2009	Blanco, Leyza F	0.40	130.00	Prepare list of documents of interest regarding important issues.
4/23/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding UCC Searches.
4/23/2009	Blanco, Leyza F	0.60	195.00	Review correspondence from I. Anderson in preparation for meetings.
4/23/2009	Blanco, Leyza F	0.20	65.00	Prepare correspondence to I. Anderson.
4/23/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with B. Levenson.
4/24/2009	Blanco, Leyza F	0.20	65.00	Follow up email to B. Levenson and I. Anderson.
4/24/2009	Blanco, Leyza F	0.60	195.00	Follow up telephone conference with B. Levenson and I. Anderson.
4/24/2009	Blanco, Leyza F	0.30	97.50	Review and respond to investor inquiry.
4/28/2009	Blanco, Leyza F	4.30	1,397.50	Review additional documents provided by SEC.
4/29/2009	Blanco, Leyza F	0.50	162.50	Review revise and execute engagement for Dykema in Chicago.
4/29/2009	Blanco, Leyza F	2.20	715.00	Review various information in order to comply with 28 USC 754.
4/29/2009	Blanco, Leyza F	0.20	65.00	Follow up with R. Addison in preparation for meeting.
4/29/2009	Blanco, Leyza F	0.80	260.00	Prepare agenda for meeting with SEC.
4/29/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with SEC.
4/30/2009	Blanco, Leyza F	2.50	812.50	Prepare for and attend meeting with SEC in preparation for hearings.
4/30/2009	Blanco, Leyza F	0.20	65.00	Correspondence to B. Levenson regarding meeting.
4/30/2009	Blanco, Leyza F	0.10	32.50	Call from FedEx regarding delivery of default letters.
4/30/2009	Blanco, Leyza F	3.50	1,137.50	Review documents copied from office and discuss issues with counsel.
4/30/2009	Blanco, Leyza F	0.20	65.00	Correspondence regarding meeting with P. Calli.
4/30/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from J. Guso and response from counsel to same.
4/30/2009	Blanco, Leyza F	1.40	455.00	Filed media inquiry regarding motion to expand receivership.
5/1/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from Sun Capital in response to default letter.
5/1/2009	Blanco, Leyza F	0.10	32.50	Review follow up from B. Levenson.

5/1/2009	Blanco, Leyza F	3.20	1,040.00	Meeting with R. Addison.
5/1/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with P. Calli.
5/1/2009	Blanco, Leyza F	0.90	292.50	Telephone conference with J. Guso and A. Spector.
5/1/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from counsel to P. Fues.
5/1/2009	Blanco, Leyza F	0.50	162.50	Discuss notice of Grosvenor Fund administrator for Global Fund with R. Plotkin.
5/1/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with J. Guso regarding Sun issues.
5/1/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding website construction.
5/2/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from B. Levenson regarding Bermuda update.
5/2/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from R. Addison.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with J. Guso for Sun Capital.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with I. Anderson regarding recommendation and discussion with P. Calli.
5/4/2009	Blanco, Leyza F	2.30	747.50	Meeting with counsel in preparation for hearing.
5/4/2009	Blanco, Leyza F	0.40	130.00	Telephone conference with I. Anderson and B. Levenson.
5/4/2009	Blanco, Leyza F	0.60	195.00	Attend conference call with P. Calli.
5/4/2009	Blanco, Leyza F	0.20	65.00	Correspondence to counsel for Promise and follow up call.
5/4/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with M. Lindsey.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with I. Anderson and M. Ann for IA.
5/4/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with B. Levenson.
5/4/2009	Blanco, Leyza F	0.60	195.00	Various detailed correspondence to P. Calli.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with M. Lindsey, investor in Global Fund.
5/4/2009	Blanco, Leyza F	0.10	32.50	Review follow up correspondence with D. Voth.
5/5/2009	Blanco, Leyza F	6.20	2,015.00	Travel to and attend hearings.
5/5/2009	Blanco, Leyza F	0.60	195.00	Prepare agenda for counsel and suggested discussion of labor in preparation for various hearings.
5/5/2009	Blanco, Leyza F	1.60	520.00	Various telephone conferences with counsel for Sun Capital and Promise.
5/6/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with SEC and counsel for Bank of Bermuda.
5/6/2009	Blanco, Leyza F	0.80	260.00	Meeting with counsel to discuss issues raised by counsel for Sun Capital.
5/6/2009	Blanco, Leyza F	0.80	260.00	Telephone conference with investor, C. Berlin.
5/6/2009	Blanco, Leyza F	1.90	617.50	Review case law in preparation for hearings.
5/6/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from I. Anderson to P. Calli.

5/6/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding website maintenance.
5/6/2009	Blanco, Leyza F	0.60	195.00	Review correspondence and agreement from J. Guso.
5/6/2009	Blanco, Leyza F	0.90	292.50	Participate in conference call with counsel regarding preparation for hearing on various issues.
5/6/2009	Blanco, Leyza F	0.60	195.00	Review motion for leave to file a reply.
5/7/2009	Blanco, Leyza F	0.30	97.50	Review order on motion to lift asset freeze.
5/7/2009	Blanco, Leyza F	0.80	260.00	Review correspondence from S. Salmon; discuss same with I. Anderson and respond to correspondence.
5/7/2009	Blanco, Leyza F	2.90	942.50	Attend various conference calls; discuss strategy for reply to Sun Capital response.
5/7/2009	Blanco, Leyza F	0.20	65.00	Review order regarding leave to file reply.
5/7/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding toll free number for creditor inquiry.
5/7/2009	Blanco, Leyza F	1.60	520.00	Review drafts of reply to Sun Capital response.
5/8/2009	Blanco, Leyza F	0.70	227.50	Attend conference call with counsel regarding W. Gunlicks response.
5/8/2009	Blanco, Leyza F	0.20	65.00	Telephone conference with B. Brasher and follow up correspondence.
5/8/2009	Blanco, Leyza F	0.60	195.00	Review response filed by W. Gunlick.
5/8/2009	Blanco, Leyza F	2.90	942.50	Review various drafts of various pleadings and conference call regarding sale with counsel.
5/8/2009	Blanco, Leyza F	0.40	130.00	Telephone conference with I. Anderson regarding drafts of pleadings to be filed.
5/9/2009	Blanco, Leyza F	3.60	1,170.00	Prepare for hearing.
5/10/2009	Blanco, Leyza F	0.50	162.50	Conference call regarding preparation of file for hearing.
5/11/2009	Blanco, Leyza F	7.30	2,372.50	Travel to and attend hearings.
5/11/2009	Blanco, Leyza F	4.60	1,495.00	Prepare for hearings.
5/12/2009	Blanco, Leyza F	2.80	910.00	Prepare complete conflicts list from various documents and follow up email to SEC counsel.
5/12/2009	Blanco, Leyza F	0.30	97.50	Correspondence to and from S. Salmon from Bank of Bermuda.
5/12/2009	Blanco, Leyza F	2.90	942.50	Begin organizing information such as files, documents, etc... for transition to new receiver.
5/12/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from R. Hager and respond to same.
5/12/2009	Blanco, Leyza F	0.80	260.00	Review proposed tolling agreement.
5/12/2009	Blanco, Leyza F	0.20	65.00	Review and respond to correspondence from K. Martes.
5/13/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with D. Pigott.
5/13/2009	Blanco, Leyza F	0.90	292.50	Handle rent issues.
5/14/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with A. Hassen regarding general inquiry.

5/14/2009	Blanco, Leyza F	1.90	617.50	Deal with issues raised by E&Y regarding tolling agreement.
5/14/2009	Blanco, Leyza F	0.90	292.50	Gather creditor inquiry for transition of files.
5/14/2009	Blanco, Leyza F	0.30	97.50	Review notice and prepare response to L. Gross.
5/14/2009	Blanco, Leyza F	1.30	422.50	Continue working on organizing documents in preparation for transition.
5/14/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with K. Hobbs of National Adversions Trust regarding general inquiry and status.
5/15/2009	Blanco, Leyza F	1.80	585.00	Review and respond to various correspondence regarding E&Y tolling agreement. Telephone conference with M. Sommers.
5/18/2009	Blanco, Leyza F	0.20	65.00	Correspondence to and from R. Bendix.
5/18/2009	Blanco, Leyza F	0.70	227.50	Review tolling agreement and correspondence regarding revisions to same.
5/18/2009	Blanco, Leyza F	1.40	455.00	Continue to organize and put together files and information for transfer to new receiver and segregate important documents.
5/18/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding rent for Chicago and keys.
5/19/2009	Blanco, Leyza F	0.10	32.50	Telephone conference with I. Anderson.
5/19/2009	Blanco, Leyza F	0.80	260.00	Meeting with P. Von Kahle to discuss transition details.
5/19/2009	Blanco, Leyza F	1.20	390.00	Telephone conference with M. Sommers and revisions to Tolling Agreement.
5/19/2009	Blanco, Leyza F	0.30	97.50	Review and respond to correspondence from L. Gross, landlord in Chicago.
5/20/2009	Blanco, Leyza F	0.50	162.50	Correspondence to and from M. Sommers regarding Tolling Agreement with Mayer Browz.
5/20/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with I. Anderson and follow up regarding NY case law and cites.
5/20/2009	Blanco, Leyza F	3.40	1,105.00	Telephone conference with D. Newman and J. Etra regarding transition; follow up with various correspondence.
5/20/2009	Blanco, Leyza F	0.30	97.50	Review correspondence from Naples Executive Suite; follow up regarding mail.
5/21/2009	Blanco, Leyza F	1.90	617.50	Review documents and boxes to be delivered to D. Newman.
5/21/2009	Blanco, Leyza F	0.80	260.00	Revisions to and updates to memo to D. Newman.
5/21/2009	Blanco, Leyza F	4.10	1,332.50	Meet with D. Newman and J. Etra.
5/21/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence to S. Kapila.
5/21/2009	Blanco, Leyza F	0.30	97.50	Follow up regarding information requested by D. Newman.
5/22/2009	Blanco, Leyza F	0.20	65.00	Follow up with P. Von Kahle regarding transition.
5/26/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with B. Levenson; follow up with J. Etra and D. Newman.

5/26/2009	Blanco, Leyza F	0.40	130.00	Telephone conference with J. Fox and follow up correspondence to D. Newman.
5/27/2009	Blanco, Leyza F	0.90	292.50	Telephone conference with D. Newman.
5/28/2009	Blanco, Leyza F	0.30	97.50	Correspondence to and from D. Newman.
5/29/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with D. Newman; return call to B. Horne and follow up email to D. Newman.
6/1/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with J. Perez regarding bank accounts.
6/1/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with D. Newman; follow up regarding same; creditor inquiry and follow up email to D. Newman.
6/2/2009	Blanco, Leyza F	0.20	65.00	Respond to creditor inquiry and forward same to D. Newman.
6/3/2009	Blanco, Leyza F	0.10	32.50	Review correspondence and follow up with D. Newman.
6/4/2009	Blanco, Leyza F	0.30	97.50	Review and respond to correspondence from D. Newman.
6/5/2009	Blanco, Leyza F	0.20	65.00	Review and respond to creditor inquiry.
6/9/2009	Blanco, Leyza F	0.20	65.00	Review detailed message from Executive Management and prepare detailed correspondence to D. Newman regarding same.
6/12/2009	Blanco, Leyza F	0.20	65.00	Detailed correspondence to L. Gross.
6/25/2009	Blanco, Leyza F	0.20	65.00	Review and respond to J. Etra regarding Bermumda issues.
6/25/2009	Blanco, Leyza F	0.30	97.50	REspond to inquiry from B. Fradera regarding safe deposit boxes.
6/26/2009	Blanco, Leyza F	0.60	195.00	Review email correspondence regarding Bermuda requested by J. Etra.
6/26/2009	Blanco, Leyza F	0.80	260.00	Telephone conference with D. Newman regarding various issues.
6/29/2009	Blanco, Leyza F	0.10	32.50	Follow up regarding storage unit.
7/1/2009	Blanco, Leyza F	0.80	260.00	Attend conference call with D. Newman and his counsel.
<b>Total Activity Code 004</b>		<b>138.10</b>	<b>\$44,882.50</b>	

**Activity Code 010**

4/23/2009	Blanco, Leyza F	0.80	260.00	Follow up discussions with counsel regarding strategy.
4/23/2009	Blanco, Leyza F	0.70	227.50	Conference call with counsel to Sun Capital.
4/24/2009	Blanco, Leyza F	0.20	65.00	Review update on settlement discussions from counsel and follow up correspondence to B. Levenson and I. Anderson.
4/24/2009	Blanco, Leyza F	3.90	1,267.50	Attend meeting with Sun Capital.
4/24/2009	Blanco, Leyza F	1.30	422.50	Prepare for meeting with Sun Capital.
4/24/2009	Blanco, Leyza F	0.30	97.50	Correspondence to counsel regarding Annandale lawsuit.
4/26/2009	Blanco, Leyza F	3.20	1,040.00	Travel to Fort Myers in anticipation for hearing.

4/27/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with L. Heller for Sun Capital.
4/27/2009	Blanco, Leyza F	1.60	520.00	Attend hearing.
4/29/2009	Blanco, Leyza F	1.80	585.00	Meeting with counsel regarding issues relating to 28 USC 754 and compliance therewith.
<b>Total Activity Code 010</b>		<b>14.10</b>	<b>\$4,582.50</b>	
		<b>230.80</b>	<b>\$75,010.00</b>	



**EXHIBIT "B"****Summary of Requested Reimbursement of Expenses  
for this Time Period Only**

1.	Filing Fees & Recording Fees	\$0.00
2.	Process Service Fees	\$0.00
3.	Witness Fees	\$0.00
4.	Court Reporter & Transcripts	\$0.00
5.	Lien & Title Searches	\$0.00
6.	Photocopies (in-house copies)	\$0.00
7.	Photocopies (outside reproduction cost)	\$0.00
8.	Certified Copies	\$0.00
9.	Postage	\$0.00
10.	Overnight Delivery Charges	\$28.02
11.	Outside Courier/Messenger Services	\$24.91
12a.	Long Distance (a) Telephone Charges	\$7.03
12b.	Long Distance (b) Conference Calls	\$0.00
13.	Long Distance Fax Transmission @ \$1.00/pg	\$0.00
14.	Computerized Research	\$116.25
15.	Travel A. Transportation B. Lodging C. Meals D. Mileage	\$519.60
16.	Other (Not specifically disallowed; must specify and justify)  Rent Advanced for Chicago Office – Payment to Civic Opera Building, LLC	\$5,776.72
<b>TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS</b>		<b>\$6,472.53</b>

## EXHIBIT "A"

## Time by Activity Code

Client / Matter 351058 Leyza Blanco as Receiver

1

Founding Partners Capital Management

## Activity Code 001

4/17/2009	Blanco, Leyza F	0.60	195.00	Follow up strategy discussion with F. Schrilla.
4/17/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with I. Anderson and B. Levenson.
4/17/2009	Blanco, Leyza F	0.90	292.50	Telephone conference with R. Bendix and I. Reich regarding issue regarding Chicago office.
4/17/2009	Blanco, Leyza F	0.50	162.50	Correspondence and follow up call with I. Reich regarding visit to Founding Partners Chicago office.
4/19/2009	Blanco, Leyza F	0.40	130.00	Correspondence regarding contact information for Chicago team to and from P. Von Kahle.
4/20/2009	Blanco, Leyza F	0.60	195.00	Coordinate legal team for inventory and indexing of business records.
4/20/2009	Blanco, Leyza F	2.30	747.50	Various calls regarding coordination of Chicago team and prepare cover letter for Chicago counsel; Various correspondence regarding same.
4/20/2009	Blanco, Leyza F	0.60	195.00	Review final motions to appoint receiver and to freeze assets from P. Soto.
4/20/2009	Blanco, Leyza F	0.90	292.50	Prepare detailed summary of Naples and Chicago office issues and service of orders.
4/20/2009	Blanco, Leyza F	0.30	97.50	Review summary of Chicago details from M. Latta.
4/20/2009	Blanco, Leyza F	4.70	1,527.50	Service of orders at Naples office; discussions with J. Aller and D. Teets; calls with S. Casey and various counsel; deal with issues relating to back up of server.
4/20/2009	Blanco, Leyza F	1.30	422.50	Prepare agenda of issues to address and designate team for each.
4/21/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from general counsel from global relay regarding construction of freeze of email server.
4/21/2009	Blanco, Leyza F	0.50	162.50	Review correspondence and attachment regarding asset freeze order and bank accounts.
4/21/2009	Blanco, Leyza F	0.90	292.50	Handling issues regarding building management.
4/21/2009	Blanco, Leyza F	1.30	422.50	Meeting with IT experts to discuss issues.
4/21/2009	Blanco, Leyza F	0.60	195.00	Follow up regarding email service provided by G. RElay and provide detailed information to I. Christianson.
4/21/2009	Blanco, Leyza F	1.60	520.00	Various telephone conferences with P. Von Kahle regarding coordination.
4/21/2009	Blanco, Leyza F	0.20	65.00	Review correspondence regarding check of office in Chicago.
4/21/2009	Blanco, Leyza F	0.20	65.00	Review detailed plan for Chicago office inventory.

4/21/2009	Blanco, Leyza F	0.20	65.00	Coordinate with P. White regarding inventory of collectibles and FF&E.
4/22/2009	Blanco, Leyza F	0.20	65.00	Deal with mail issues in Chicago.
4/22/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from M. Panozo regarding May rent.
4/22/2009	Blanco, Leyza F	0.70	227.50	Review report and pictures regarding Chicago collectibles and FF&E.
4/22/2009	Blanco, Leyza F	0.60	195.00	Discuss and address follow up on UCC searches for releif defendants.
4/22/2009	Blanco, Leyza F	0.30	97.50	Review and respond to confirmation from global relay regarding outside access to email.
4/22/2009	Blanco, Leyza F	0.90	292.50	Review and approve proposed affidavits regarding service at Chicago office.
4/22/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with M. Patagul regarding lease in Chicago.
4/22/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence to M. Panozzo regarding authorization/access to Chicago office.
4/22/2009	Blanco, Leyza F	0.40	130.00	Discussion coordination of report for inventory of Naples and Chicago offices.
4/23/2009	Blanco, Leyza F	0.90	292.50	Meet with IT experts regarding imaging of computers and progress regarding same.
4/23/2009	Blanco, Leyza F	2.30	747.50	Review various bank documents and follow up email to L. Anderson.
4/23/2009	Blanco, Leyza F	0.90	292.50	Travel to lock up mini storage; view contacts of storage room.
4/23/2009	Blanco, Leyza F	1.80	585.00	Visit to bank to access safe deposit box; deal with issues relating to instructions to freeze and refusal to provide access to receiver.
4/23/2009	Blanco, Leyza F	1.20	390.00	Personally served receivership and freeze order on RBC; meet with branch manager and confirmed account closing.
4/23/2009	Blanco, Leyza F	0.60	195.00	Travel to other mini storage location; meet with manager; confirm that storage location is closed.
4/23/2009	Blanco, Leyza F	4.20	1,365.00	Work on motion to expand powers of receiver over Sun.
4/23/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence regarding Suntrust safe deposit box with L. Anderson.
4/24/2009	Blanco, Leyza F	0.80	260.00	Conference call with P. Von Kahle regarding status.
4/24/2009	Blanco, Leyza F	2.80	910.00	Review cases in support of motion to expand powers of receiver.
4/25/2009	Blanco, Leyza F	1.70	552.50	Review additional case law in support of motion to expand powers of receiver over Sun Capital.
4/25/2009	Blanco, Leyza F	1.80	585.00	Analyze issues regarding lockbox agreement and discuss same with counsel.
4/25/2009	Blanco, Leyza F	2.30	747.50	Review of default letters to Sun Capital Healthcare and Sun Capital, Inc.
4/25/2009	Blanco, Leyza F	0.10	32.50	Follow up with S. Kapila regarding accounting work.

4/26/2009	Blanco, Leyza F	9.90	3,217.50	Review case law, supporting documents and prepare a motion for expansion of receivership powers over Sun and supporting memorandum.
4/26/2009	Blanco, Leyza F	1.20	390.00	Telephone conference with I. Anderson regarding issues raised in draft motion.
4/26/2009	Blanco, Leyza F	0.60	195.00	Review analysis of security interest in Security interest owned by Sun Capital.
4/27/2009	Blanco, Leyza F	0.30	97.50	Follow up meeting with I. Anderson.
4/27/2009	Blanco, Leyza F	0.20	65.00	Review notice of withdrawal of motion and order granting same.
4/27/2009	Blanco, Leyza F	1.80	585.00	Meeting with R. Addison and investor group.
4/27/2009	Blanco, Leyza F	0.20	65.00	Review follow up email correspondence from I. Anderson.
4/27/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with I. Anderson and B. Levenson regarding Motion to Expand Powers.
4/27/2009	Blanco, Leyza F	3.80	1,235.00	Review documents at Founding office in respect to lockbox issues.
4/27/2009	Blanco, Leyza F	0.90	292.50	Meeting in advance of hearing with I. Anderson,
4/28/2009	Blanco, Leyza F	0.20	65.00	Detailed correspondence to R. Addison.
4/28/2009	Blanco, Leyza F	0.20	65.00	Email regarding request from D. Teets.
4/28/2009	Blanco, Leyza F	0.70	227.50	Review proposed lockbox transfer letter and agreement and correspondence to SEC regarding same.
4/28/2009	Blanco, Leyza F	0.20	65.00	Review bankruptcy search and correspondence to I. Anderson regarding same.
4/28/2009	Blanco, Leyza F	2.60	845.00	Review finalized motion for expansion of receivership powers including additional new information regarding Founding Bermuda.
4/28/2009	Blanco, Leyza F	1.60	520.00	Review and analyze revised motion for expansion of receivership over Sun Capital.
4/28/2009	Blanco, Leyza F	0.20	65.00	Review and respond to status on move of documents and FF&E from P. Von Kahle.
4/28/2009	Blanco, Leyza F	1.60	520.00	Deal with calls from employees and counsel for same.
4/28/2009	Blanco, Leyza F	1.40	455.00	Meeting with R. Rein regarding Bermuda issue.
4/28/2009	Blanco, Leyza F	0.80	260.00	Prepare detailed correspondence to R. Addison.
4/28/2009	Blanco, Leyza F	0.30	97.50	Review detailed status email regarding Chicago office.
4/29/2009	Blanco, Leyza F	0.90	292.50	Review and revise default letters to Sun Capital.
4/29/2009	Blanco, Leyza F	0.50	162.50	Review documents provided by I. Anderson.
4/29/2009	Blanco, Leyza F	0.20	65.00	Review courts order setting briefing schedule for expansion of receivership.
4/29/2009	Blanco, Leyza F	0.10	32.50	Correspondence regarding default letters.
4/29/2009	Blanco, Leyza F	0.60	195.00	Discuss issues regarding Bermuda entities with R. Plotkin.
4/29/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with investor for T. Greenberg.

4/30/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from I. Anderson and call to investory M. Lindsay.
4/30/2009	Blanco, Leyza F	0.20	65.00	Follow up with R. Addison in preparation for meeting.
5/1/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with P. Calli regarding freeze issues.
<b>Total Activity Code 001</b>		<b>78.30</b>	<b>\$25,447.50</b>	

**Activity Code 002**

4/22/2009	Blanco, Leyza F	0.30	97.50	Address issues relating to request for personal effects by employees.
<b>Total Activity Code 002</b>		<b>0.30</b>	<b>\$97.50</b>	

**Activity Code 004**

4/15/2009	Blanco, Leyza F	6.60	2,145.00	Work on issues in preparation for Receivership.
4/17/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence to F. Schrills regarding status after call with B. Levenson and I. Anderson.
4/17/2009	Blanco, Leyza F	0.90	292.50	Coordination call and various follow up correspondence to P. Von Kahle.
4/17/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with F. Schrills; telephone conference with I. Anderson regarding update.
4/18/2009	Blanco, Leyza F	0.50	162.50	Detailed correspondence to and from F. Schrills regarding details for Monday filing of SEC complaint.
4/20/2009	Blanco, Leyza F	0.70	227.50	Various calls regarding issues regarding service of freeze orders.
4/20/2009	Blanco, Leyza F	0.50	162.50	Review executed orders.
4/20/2009	Blanco, Leyza F	0.20	65.00	Telephone conference with I. Anderson regarding status.
4/20/2009	Blanco, Leyza F	2.80	910.00	Coordinate various calls and service of anticipated orders.
4/20/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence with S. Kapila.
4/20/2009	Blanco, Leyza F	0.50	162.50	Review final complaint from P. Soto.
4/21/2009	Blanco, Leyza F	1.30	422.50	Meeting regarding phone service and mail with J. Coyle.
4/21/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from B. Levenson.
4/21/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with I. Anderson regarding various issues.
4/21/2009	Blanco, Leyza F	0.80	260.00	Multiple calls with I. Anderson.
4/21/2009	Blanco, Leyza F	0.20	65.00	Telephone conference with Building Management Office.
4/21/2009	Blanco, Leyza F	0.70	227.50	Conference call with S. Casey.
4/22/2009	Blanco, Leyza F	0.30	97.50	Review correspondence from R. Rein regarding Bermuda/Cayman issues.
4/22/2009	Blanco, Leyza F	0.80	260.00	Telephone conference with R. Addison and D. Migala.
4/22/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from I. Anderson.

4/22/2009	Blanco, Leyza F	0.80	260.00	Review correspondence and attachments from D. Migala.
4/22/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with D. Belyea regarding affidavit.
4/22/2009	Blanco, Leyza F	0.10	32.50	Review and execute correspondence confirming service of complaint and various motions.
4/22/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with S. Casey.
4/22/2009	Blanco, Leyza F	1.20	390.00	Calls with I. Anderson regarding Bermuda issues.
4/23/2009	Blanco, Leyza F	0.40	130.00	Prepare list of documents of interest regarding important issues.
4/23/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding UCC Searches.
4/23/2009	Blanco, Leyza F	0.60	195.00	Review correspondence from I. Anderson in preparation for meetings.
4/23/2009	Blanco, Leyza F	0.20	65.00	Prepare correspondence to I. Anderson.
4/23/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with B. Levenson.
4/24/2009	Blanco, Leyza F	0.20	65.00	Follow up email to B. Levenson and I. Anderson.
4/24/2009	Blanco, Leyza F	0.60	195.00	Follow up telephone conference with B. Levenson and I. Anderson.
4/24/2009	Blanco, Leyza F	0.30	97.50	Review and respond to investor inquiry.
4/28/2009	Blanco, Leyza F	4.30	1,397.50	Review additional documents provided by SEC.
4/29/2009	Blanco, Leyza F	0.50	162.50	Review revise and execute engagement for Dykema in Chicago.
4/29/2009	Blanco, Leyza F	2.20	715.00	Review various information in order to comply with 28 USC 754.
4/29/2009	Blanco, Leyza F	0.20	65.00	Follow up with R. Addison in preparation for meeting.
4/29/2009	Blanco, Leyza F	0.80	260.00	Prepare agenda for meeting with SEC.
4/29/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with SEC.
4/30/2009	Blanco, Leyza F	2.50	812.50	Prepare for and attend meeting with SEC in preparation for hearings.
4/30/2009	Blanco, Leyza F	0.20	65.00	Correspondence to B. Levenson regarding meeting
4/30/2009	Blanco, Leyza F	0.10	32.50	Call from FedEx regarding delivery of default letters.
4/30/2009	Blanco, Leyza F	3.50	1,137.50	Review documents copied from office and discuss issues with counsel.
4/30/2009	Blanco, Leyza F	0.20	65.00	Correspondence regarding meeting with P. Calli.
4/30/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from J. Guso and response from counsel to same.
4/30/2009	Blanco, Leyza F	1.40	455.00	Filed media inquiry regarding motion to expand receivership.
5/1/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from Sun Capital in response to default letter.
5/1/2009	Blanco, Leyza F	0.10	32.50	Review follow up from B. Levenson.

5/1/2009	Blanco, Leyza F	3.20	1,040.00	Meeting with R. Addison.
5/1/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with P. Calli.
5/1/2009	Blanco, Leyza F	0.90	292.50	Telephone conference with J. Guso and A. Spector.
5/1/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from counsel to P. Fues.
5/1/2009	Blanco, Leyza F	0.50	162.50	Discuss notice of Grosvenor Fund administrator for Global Fund with R. Plotkin.
5/1/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with J. Guso regarding Sun issues.
5/1/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding website construction.
5/2/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from B. Levenson regarding Bermuda update.
5/2/2009	Blanco, Leyza F	0.10	32.50	Review correspondence from R. Addison.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with J. Guso for Sun Capital.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with I. Anderson regarding recommendation and discussion with P. Calli.
5/4/2009	Blanco, Leyza F	2.30	747.50	Meeting with counsel in preparation for hearing.
5/4/2009	Blanco, Leyza F	0.40	130.00	Telephone conference with I. Anderson and B. Levenson.
5/4/2009	Blanco, Leyza F	0.60	195.00	Attend conference call with P. Calli.
5/4/2009	Blanco, Leyza F	0.20	65.00	Correspondence to counsel for Promise and follow up call.
5/4/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with M. Lindsey.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with I. Anderson and M. Ann for IA.
5/4/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with B. Levenson.
5/4/2009	Blanco, Leyza F	0.60	195.00	Various detailed correspondence to P. Calli.
5/4/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with M. Lindsey, investor in Global Fund.
5/4/2009	Blanco, Leyza F	0.10	32.50	Review follow up correspondence with D. Voth.
5/5/2009	Blanco, Leyza F	6.20	2,015.00	Travel to and attend hearings.
5/5/2009	Blanco, Leyza F	0.60	195.00	Prepare agenda for counsel and suggested discussion of labor in preparation for various hearings.
5/5/2009	Blanco, Leyza F	1.60	520.00	Various telephone conferences with counsel for Sun Capital and Promise.
5/6/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with SEC and counsel for Bank of Bermuda.
5/6/2009	Blanco, Leyza F	0.80	260.00	Meeting with counsel to discuss issues raised by counsel for Sun Capital.
5/6/2009	Blanco, Leyza F	0.80	260.00	Telephone conference with investor, C. Berlin.
5/6/2009	Blanco, Leyza F	1.90	617.50	Review case law in preparation for hearings.
5/6/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from I. Anderson to P. Calli.

5/6/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding website maintenance.
5/6/2009	Blanco, Leyza F	0.60	195.00	Review correspondence and agreement from J. Guso.
5/6/2009	Blanco, Leyza F	0.90	292.50	Participate in conference call with counsel regarding preparation for hearing on various issues.
5/6/2009	Blanco, Leyza F	0.60	195.00	Review motion for leave to file a reply.
5/7/2009	Blanco, Leyza F	0.30	97.50	Review order on motion to lift asset freeze.
5/7/2009	Blanco, Leyza F	0.80	260.00	Review correspondence from S. Salmon; discuss same with I. Anderson and respond to correspondence.
5/7/2009	Blanco, Leyza F	2.90	942.50	Attend various conference calls; discuss strategy for reply to Sun Capital response.
5/7/2009	Blanco, Leyza F	0.20	65.00	Review order regarding leave to file reply.
5/7/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding toll free number for creditor inquiry.
5/7/2009	Blanco, Leyza F	1.60	520.00	Review drafts of reply to Sun Capital response.
5/8/2009	Blanco, Leyza F	0.70	227.50	Attend conference call with counsel regarding W. Gunlicks response.
5/8/2009	Blanco, Leyza F	0.20	65.00	Telephone conference with B. Brasher and follow up correspondence.
5/8/2009	Blanco, Leyza F	0.60	195.00	Review response filed by W. Gunlick.
5/8/2009	Blanco, Leyza F	2.90	942.50	Review various drafts of various pleadings and conference call regarding sale with counsel.
5/8/2009	Blanco, Leyza F	0.40	130.00	Telephone conference with I. Anderson regarding drafts of pleadings to be filed.
5/9/2009	Blanco, Leyza F	3.60	1,170.00	Prepare for hearing.
5/10/2009	Blanco, Leyza F	0.50	162.50	Conference call regarding preparation of file for hearing.
5/11/2009	Blanco, Leyza F	7.30	2,372.50	Travel to and attend hearings.
5/11/2009	Blanco, Leyza F	4.60	1,495.00	Prepare for hearings.
5/12/2009	Blanco, Leyza F	2.80	910.00	Prepare complete conflicts list from various documents and follow up email to SEC counsel.
5/12/2009	Blanco, Leyza F	0.30	97.50	Correspondence to and from S. Salmon from Bank of Bermuda.
5/12/2009	Blanco, Leyza F	2.90	942.50	Begin organizing information such as files, documents, etc... for transition to new receiver.
5/12/2009	Blanco, Leyza F	0.20	65.00	Review correspondence from R. Hager and respond to same.
5/12/2009	Blanco, Leyza F	0.80	260.00	Review proposed tolling agreement.
5/12/2009	Blanco, Leyza F	0.20	65.00	Review and respond to correspondence from K. Martes.
5/13/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with D. Pigott.
5/13/2009	Blanco, Leyza F	0.90	292.50	Handle rent issues.
5/14/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with A. Hassan regarding general inquiry.



5/14/2009	Blanco, Leyza F	1.90	617.50	Deal with issues raised by E&Y regarding tolling agreement.
5/14/2009	Blanco, Leyza F	0.90	292.50	Gather creditor inquiry for transition of files.
5/14/2009	Blanco, Leyza F	0.30	97.50	Review notice and prepare response to L. Gross.
5/14/2009	Blanco, Leyza F	1.30	422.50	Continue working on organizing documents in preparation for transition.
5/14/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with K. Hobbs of National Adversions Trust regarding general inquiry and status.
5/15/2009	Blanco, Leyza F	1.80	585.00	Review and respond to various correspondence regarding E&Y tolling agreement. Telephone conference with M. Sommers.
5/18/2009	Blanco, Leyza F	0.20	65.00	Correspondence to and from R. Bendix.
5/18/2009	Blanco, Leyza F	0.70	227.50	Review tolling agreement and correspondence regarding revisions to same.
5/18/2009	Blanco, Leyza F	1.40	455.00	Continue to organize and put together files and information for transfer to new receiver and segregate important documents.
5/18/2009	Blanco, Leyza F	0.20	65.00	Follow up regarding rent for Chicago and keys.
5/19/2009	Blanco, Leyza F	0.10	32.50	Telephone conference with I Anderson.
5/19/2009	Blanco, Leyza F	0.80	260.00	Meeting with P. Von Kahle to discuss transition details.
5/19/2009	Blanco, Leyza F	1.20	390.00	Telephone conference with M. Sommers and revisions to Tolling Agreement.
5/19/2009	Blanco, Leyza F	0.30	97.50	Review and respond to correspondence from L. Gross, landlord in Chicago.
5/20/2009	Blanco, Leyza F	0.50	162.50	Correspondence to and from M. Sommers regarding Tolling Agreement with Mayer Browz.
5/20/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with I Anderson and follow up regarding NY case law and cites.
5/20/2009	Blanco, Leyza F	3.40	1,105.00	Telephone conference with D. Newman and J. Etra regarding transition; follow up with various correspondence.
5/20/2009	Blanco, Leyza F	0.30	97.50	Review correspondence from Naples Executive Suite; follow up regarding mail.
5/21/2009	Blanco, Leyza F	1.90	617.50	Review documents and boxes to be delivered to D. Newman.
5/21/2009	Blanco, Leyza F	0.80	260.00	Revisions to and updates to memo to D. Newman.
5/21/2009	Blanco, Leyza F	4.10	1,332.50	Meet with D. Newman and J. Etra.
5/21/2009	Blanco, Leyza F	0.20	65.00	Follow up correspondence to S. Kapila.
5/21/2009	Blanco, Leyza F	0.30	97.50	Follow up regarding information requested by D. Newman.
5/22/2009	Blanco, Leyza F	0.20	65.00	Follow up with P. Von Kahle regarding transition.
5/26/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with B. Levenson; follow up with J. Etra and D. Newman.

5/26/2009	Blanco, Leyza F	0.40	130.00	Telephone conference with J. Fox and follow up correspondence to D. Newman.
5/27/2009	Blanco, Leyza F	0.90	292.50	Telephone conference with D. Newman.
5/28/2009	Blanco, Leyza F	0.30	97.50	Correspondence to and from D. Newman.
5/29/2009	Blanco, Leyza F	0.70	227.50	Telephone conference with D. Newman; return call to B. Horne and follow up email to D. Newman.
6/1/2009	Blanco, Leyza F	0.60	195.00	Telephone conference with J. Perez regarding bank accounts.
6/1/2009	Blanco, Leyza F	0.50	162.50	Telephone conference with D. Newman; follow up regarding same; creditor inquiry and follow up email to D. Newman.
6/2/2009	Blanco, Leyza F	0.20	65.00	Respond to creditor inquiry and forward same to D. Newman.
6/3/2009	Blanco, Leyza F	0.10	32.50	Review correspondence and follow up with D. Newman.
6/4/2009	Blanco, Leyza F	0.30	97.50	Review and respond to correspondence from D. Newman.
6/5/2009	Blanco, Leyza F	0.20	65.00	Review and respond to creditor inquiry.
6/9/2009	Blanco, Leyza F	0.20	65.00	Review detailed message from Executive Management and prepare detailed correspondence to D. Newman regarding same.
6/12/2009	Blanco, Leyza F	0.20	65.00	Detailed correspondence to L. Gross.
6/25/2009	Blanco, Leyza F	0.20	65.00	Review and respond to J. Etra regarding Bermuda issues.
6/25/2009	Blanco, Leyza F	0.30	97.50	REspond to inquiry from B. Fradera regarding safe deposit boxes.
6/26/2009	Blanco, Leyza F	0.60	195.00	Review email correspondence regarding Bermuda requested by J. Etra.
6/26/2009	Blanco, Leyza F	0.80	260.00	Telephone conference with D. Newman regarding various issues.
6/29/2009	Blanco, Leyza F	0.10	32.50	Follow up regarding storage unit.
7/1/2009	Blanco, Leyza F	0.80	260.00	Attend conference call with D. Newman and his counsel.
<b>Total Activity Code 004</b>		<b>138.10</b>	<b>\$44,882.50</b>	

---

**Activity Code 010**

4/23/2009	Blanco, Leyza F	0.80	260.00	Follow up discussions with counsel regarding strategy.
4/23/2009	Blanco, Leyza F	0.70	227.50	Conference call with counsel to Sun Capital.
4/24/2009	Blanco, Leyza F	0.20	65.00	Review update on settlement discussions from counsel and follow up correspondence to B. Levenson and I. Anderson.
4/24/2009	Blanco, Leyza F	3.90	1,267.50	Attend meeting with Sun Capital.
4/24/2009	Blanco, Leyza F	1.30	422.50	Prepare for meeting with Sun Capital.
4/24/2009	Blanco, Leyza F	0.30	97.50	Correspondence to counsel regarding Annandale lawsuit.
4/26/2009	Blanco, Leyza F	3.20	1,040.00	Travel to Fort Myers in anticipation for hearing.

4/27/2009	Blanco, Leyza F	0.30	97.50	Telephone conference with L. Heller for Sun Capital.
4/27/2009	Blanco, Leyza F	1.60	520.00	Attend hearing.
4/29/2009	Blanco, Leyza F	1.80	585.00	Meeting with counsel regarding issues relating to 28 USC 754 and compliance therewith.
<b>Total Activity Code 010</b>		<b>14.10</b>	<b>\$4,582.50</b>	
		<b>230.80</b>	<b>\$75,010.00</b>	

**EXHIBIT "B"****Summary of Requested Reimbursement of Expenses  
for this Time Period Only**

1.	Filing Fees & Recording Fees	\$0.00
2.	Process Service Fees	\$0.00
3.	Witness Fees	\$0.00
4.	Court Reporter & Transcripts	\$0.00
5.	Lien & Title Searches	\$0.00
6.	Photocopies (in-house copies)	\$0.00
7.	Photocopies (outside reproduction cost)	\$0.00
8.	Certified Copies	\$0.00
9.	Postage	\$0.00
10.	Overnight Delivery Charges	\$28.02
11.	Outside Courier/Messenger Services	\$24.91
12a.	Long Distance (a) Telephone Charges	\$7.03
12b.	Long Distance (b) Conference Calls	\$0.00
13.	Long Distance Fax Transmission @ \$1.00/pg	\$0.00
14.	Computerized Research	\$116.25
15.	Travel A. Transportation B. Lodging C. Meals D. Mileage	\$519.60
16.	Other (Not specifically disallowed; must specify and justify)  Rent Advanced for Chicago Office – Payment to Civic Opera Building, LLC	\$5,776.72
<b>TOTAL "GROSS" AMOUNT OF REQUESTED DISBURSEMENTS</b>		<b>\$6,472.53</b>