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5 Special Litigation Counsel for the
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PLANT INSULATION COMPANY, a
California corporation,

Debtor.

Tax ID: 94-0292481

Case No. 09-31347

Chapter 11

**CAMPAGNOLI, ABELSON &
CAMPAGNOLI'S FIRST COVER SHEET
APPLICATION FOR ALLOWANCE AND
PAYMENT OF INTERIM
COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM MAY 20, 2009
THROUGH AUGUST 31, 2010**

[No Hearing Required]

Judge: Hon. Thomas E. Carlson

1 Campagnoli, Abelson & Campagnoli ("CAC") submits its Cover Sheet Application (the
 2 "Application") for Allowance and Payment of Interim Compensation and Reimbursement of
 3 Expenses for the Period from May 20, 2009 through August 31, 2010 (the "Application Period").
 4 In support of the Application, CAC respectfully represents as follows:

5 1. CAC is special litigation counsel to the Official Committee of Unsecured Creditors
 6 (the "Committee") of Plant Insulation Company (the "Debtor"), the debtor and debtor-in-
 7 possession in the above-referenced Chapter 11 case. CAC's employment was approved by this
 8 Court in an Order entered on September 20, 2010 [Dckt. #829] (the "Employment Order"). CAC
 9 hereby applies to the Court for allowance and payment of interim compensation for services
 10 rendered and reimbursement of expenses incurred during the Application Period.

11 2. CAC billed a total of \$23,578.50 in fees and expenses during the Application
 12 Period. These fees represent 47.5 hours expended during the period covered by this Application.
 13 These fees and expenses are broken down as follows:

Period	Fees	Expenses	Total
5/20/09 – 8/31/10	\$23,500.00	\$78.50	\$23,578.50

17 3. CAC seeks allowance of interim compensation and reimbursement in the amount of
 18 a total of \$18,878.50 at this time, comprising \$18,800.00 (80% of the fees for services rendered)
 19 plus \$78.50 (100% of the expenses incurred).

20 4. The following chart reflects (1) the post-petition compensation and expense
 21 reimbursement amounts CAC has obtained authority to receive from the Debtor's estate, and
 22 (2) excluding the amounts sought by this Application, the post-petition compensation and expense
 23 reimbursement amounts that are currently due and owing to CAC from the Debtor's estate:

Fee Statement Period	Fees Sought (100%)	Expenses Sought (100%)	Fees Authorized (80%)	Expenses Authorized (100%)	Unpaid Fees	Unpaid Expenses
No prior requests have been submitted	NONE	NONE	NONE	NONE	NONE	NONE

1 5. Attached hereto as **Exhibit A** is the name of each professional who performed
2 services in connection with this case during the Application Period, his or her hourly rate and the
3 number of hours he or she billed to the case. Attached hereto as **Exhibit B** is the detailed billing
4 statement for the Application Period, which includes a breakdown of the expenses incurred during
5 the Application Period.

6 6. The Committee's counsel, Sheppard Mullin, has served a copy of this Application
7 on the Office of the United States Trustee, the Debtor, counsel for the Debtor, the Committee
8 members, and counsel for the Futures Representative appointed by the Court in this case. The
9 Application was mailed by first class mail, postage prepaid, on September 22, 2010.

10 7. Notice of the filing of this Application has been served on the Office of the United
11 States Trustee, the Debtor, counsel for the Debtor, the Committee members, counsel for the
12 Futures Representative and any party who has requested special notice as of the date of the Notice.
13 The Notice was mailed by first class mail, postage prepaid, on September 22, 2010.

14 8. Pursuant to this Court's *Order Granting Debtor's Motion to Establish Interim Fee*
15 *Application and Expense Reimbursement Procedures* [Dckt #344] (the "Interim Fee Procedures
16 Order"), which was entered on September 26, 2009, the Debtor is authorized to make the payment
17 requested herein, without a further hearing or order of this Court unless an objection to this
18 Application is filed with the Court and served within ten (10) calendar days after the date of
19 mailing of the Notice of this Application. If such an objection is filed, the Debtor is authorized to
20 pay 80% of the uncontested fees and 100% of the uncontested expenses.

21 9. The interim compensation and reimbursement of expenses sought in this
22 Application is not final. During the case CAC will file interim fee applications with the Court and
23 upon the conclusion of its involvement in this case, CAC will seek fees and reimbursement of the
24 expenses incurred for the totality of the services rendered in the case. Any interim fees or
25 reimbursement of expenses approved by this Court and received by CAC will be credited against
26 such final fees and expenses as may be allowed by this Court.

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EXHIBIT A

CAC Billings by Professional

<u>Name of Proessional</u>	<u>Hourly Rate</u>	<u>Hours Billed</u>
Mark B. Abelson	\$500.00	47.5

Exhibit A

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EXHIBIT B
Detailed Billing Statement

[See Attached]

Exhibit B

July 10, 2009

abrayton@braytonlaw.com

Alan R. Brayton, Esq.
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BRAYTON PURCELL
222 Rush Landing Road
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David M. McClain
Kazan, McClain
171 12th St Ste 300
Oakland, CA 94607

Re: PLANT INSULATION CO.

STATEMENT FOR SERVICES THROUGH JUNE 30, 2009

COSTS:

6/15/09	Parking	\$22.50
6/16/09	Cab	\$18.00
6/16/09	MUNI	\$4.50
6/18/09	Parking	\$22.50
6/18/09	Cab	\$8.00
6/22/09	MUNI	\$3.00
6/14/09	Receive and review Brayton's deposition, motion and exhibits	4.00 Hrs.
6/15/09	Review of additional materials	1.00 Hrs.
6/15/09	Meet with client and counsel; call with McClain and counsel, review 6/12 court transcripts	8.50 Hrs.
6/16/09	Finish court transcript review; attend court in morning and afternoon; start McClain deposition review; review other documents, e-mails	7.50 Hrs.

6/17/09	Research, travel to and attend court all day; e-mails and calls with Sacks	10.50 Hrs.
6/18/09	Start review of McClain's deposition and attend court	7.50 Hrs.
6/22/09	Continue review of McClain's deposition, court attendance, e-mail to Sacks, Brayton and McClain	5.50 Hrs.
TOTAL CURRENT TIME:		\$78.50
TOTAL CURRENT TIME:		43.50 Hrs.
TOTAL CURRENT FEES: (43.50 Hrs. @ \$500.00)		\$21,500.00
TOTAL CURRENTLY DUE AND OWING:		\$21,578.50

August 10, 2009

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Re: PLANT INSULATION CO.

STATEMENT FOR SERVICES THROUGH JULY 31, 2009

PREVIOUSLY DUE AND OWING:	\$21,578.50
CURRENT TIME:	
7/1/09	E-mails and calls re: petition-complete pleadings for filing .50 Hrs.
7/2/09	Finalize petition and my declaration, prepare filing, e-mails .50 Hrs.
7/6/09	File Exhibit A with court; e-mails with counsel .25 Hrs.
7/8/09	E-mails re: fees and petition; call re: fees and petition with Ferges, clients and Benevenuti; e-mail bill 1.50 Hrs.
7/9/09	Call with Benevenuti, letter to Carlson, transmit letter to Plant service list .50 Hrs?
7/22/09	Call from US Trustee's office and e-mail to Sachs and clients .25 Hrs.
TOTAL CURRENT TIME:	3.50 Hrs.
TOTAL CURRENT FEES: (3.50 Hrs. @ \$500.00)	\$1,750.00
TOTAL CURRENTLY DUE AND OWING:	\$23,328.50

September 10, 2009

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Re: PLANT INSULATION CO.

STATEMENT FOR SERVICES THROUGH AUGUST 31, 2009

PREVIOUSLY DUE AND OWING:	\$23,328.50	
CURRENT TIME:		
8/5/09	Draft supplemental declaration pursuant to Ms. Loo's request, confer with Sheppard, Mullin; finalize supplemental declaration	.50 Hrs.
TOTAL CURRENT TIME:		.50 Hrs.
TOTAL CURRENT FEES: (0.50 Hrs. @ \$500.00)		\$250.00
TOTAL CURRENTLY DUE AND OWING:		\$23,578.50