

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)
) CHAPTER 11
Conseco, Inc., et al.,)
) Case No. 02 B 49672
) Hon. Carol A. Doyle
Debtors.)

APPLICATION FOR ALLOWANCE OF FINAL
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
ORDINARY COURSE PROFESSIONAL

Jordan Price Wall Gray Jones & Carlton, P.L.L.C. (“Jordan Price”), by its undersigned attorneys, pursuant to Sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Court’s Order Authorizing the Debtors to Employ and Compensate Professionals utilized in the Ordinary Course of the Debtors’ Businesses entered January 14, 2003 (the “Ordinary Course Professionals’ Order”), hereby seeks allowance and authorization for the payment of attorneys’ fees for services rendered and for expenses incurred in the total amount of \$233,772.50 from the months of February, March and May 2003. In support of this application, Jordan Price respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this application pursuant to 28 U.S.C. Sections 157 and 1334(b). Venue is proper pursuant to 28 U.S.C. Sections 1408 and 1409.
2. This action is a core proceeding pursuant to 28 U.S.C. Section 157(b)(2).

BACKGROUND

3. On January 14, 2003, this Court entered the Ordinary Course Professionals' Order. Exhibit A to the Ordinary Course Professionals' Order set forth those Ordinary Course Professionals to be employed pursuant to the Order. Jordan Price was included on Exhibit A.

4. The Ordinary Course Professionals' Order required that the Ordinary Course Professionals file an affidavit of disinterestedness with the Court. On January 22, 2003, Paul Flick, a partner with Jordan Price, filed such an affidavit and a copy is attached hereto as Exhibit A.

5. The Ordinary Course Professionals' Order further required that all Ordinary Course Professionals who submit invoices to the Debtors for fees exceeding \$50,000.00 in any given month, submit a fee application to the Court for approval in accordance with Sections 330 and 331 of the Bankruptcy Code.

6. In the months of February, March and May of 2003 (the "Fee Periods"), Jordan Price provided legal services to the Debtors as Ordinary Course Professionals, exceeding \$50,000.00 each month, therefore requiring the filing of this fee application. Specifically, in February, Jordan Price invoiced the Debtors \$50,740.23, in March \$124,736.75, and in May, Jordan Price invoiced the Debtors \$58,295.52.

7. Debtors have substantially paid Jordan Price for the services provided during the Fee Periods pursuant to a written fee agreement with the Debtors. An outstanding balance for these fees and expenses of \$8,276.71 remains due and owing to Jordan Price.

8. Under the agreement, Jordan Price invoices at a flat rate for repossession cases and foreclosure proceedings and an hourly rate for bankruptcy matters, the issuance of writs, preparation of demand letters, and in defense of civil litigation matters. Jordan Price invoices Conseco for each separate matter referred under the fee agreement at the time the judgment, final report, or order is secured. The legal services provided by Jordan Price during the Fee Periods include the following:

- a. **Repossession of Collateral** – Filing of a lawsuit in state court and an ancillary proceeding known as a Claim and Delivery proceeding ("replevin" in other states). Filing of various pleadings, including motions for entry of default and default judgment, attending hearings, and requesting writs of possession to secure the collateral under a judgment.
- b. **Foreclosure:** The primary method of foreclosure in North Carolina at the present time is foreclosure by "power of sale." Jordan Price provides various services in connection with the foreclosure proceedings including, filing motions, attending hearings, examining titles, and administering sales of the foreclosed properties.
- c. **Bankruptcy Services:** the legal services provided by Jordan Price primarily concern the filing of motions for relief from the automatic stay to allow Conseco to repossess collateral or foreclose upon security.

9. As further detailed in the invoices attached hereto, Jordan Price requests compensation for the professionals and paraprofessionals who have provided services to the Debtors during the Fee Periods. Jordan Price provided services to the Debtors at a reduced rate because of the volume of work referred. A summary of the professionals and paraprofessionals who have provided services during the Fee Periods is summarized as follows:

<u>Attorneys</u>	<u>Standard Rate</u>	<u>Conseco Rate</u>
Paul T. Flick	\$190.00	\$150.00
Shawna Staton	\$190.00	\$150.00
Jon Carr	\$175.00	\$150.00
<u>Paralegals</u>	<u>Standard Rate</u>	
Stacey Ray	\$75.00	\$60.00

10. Pursuant to its fee arrangement with the Debtors, Jordan Price billed the Debtors as follows:

- \$500.00 plus expenses for repossession cases (\$330.00 if settled early in process)
- \$750.00 plus expenses for foreclosure proceedings

Hourly rate of \$150.00 per hour on bankruptcy matters

Hourly rate of \$150.00 per hour for additional civil litigation matters

11. Pursuant to its fee arrangement with the Debtors, Jordan Price does not charge the Debtors for expenses incurred for copying, facsimiles, or postage. In addition, there is no markup on the expenses that are invoiced to the Debtors.

RELIEF REQUESTED

12. The total amount invoiced to Debtors during the Fee Periods in question is \$233,772.50. The total amount of fees incurred during the Fee Periods is \$159,535.00 and the total amount of out-of-pocket expenses incurred during the Fee Periods is \$74,237.50. A detailed list of those fees and expenses rendered to the Debtors by Jordan Price is reflected on the monthly invoices attached hereto as Group Exhibit B.

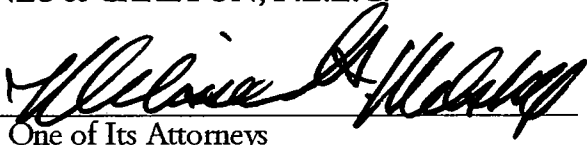
13. Jordan Price has diligently represented the Debtors and based upon the fair value of professional services rendered to the Debtors, the skill required, the nature of the services rendered and the results obtained, the fees Jordan Price charged for its services are reasonable.

WHEREFORE, Jordan Price respectfully requests the entry of an order:

- (a) Granting this Application;
- (b) Finding that its attorneys' fees and expenses, in the amount of \$233,772.50 are reasonable and necessary for legal services rendered to the Debtors during the months of February, March and May, 2003;
- (c) Finding that the expenses it incurred in connection with the legal services rendered to the Debtors during the months of February, March and May, 2003 are actual and necessary;
- (d) For such other and further relief as this Court deems appropriate.

Dated: October 9, 2003

JORDAN PRICE WALL GRAY
JONES & CARLTON, P.L.L.C.

By: 
One of Its Attorneys

Of Counsel:

R. Scott Alsterda (ARDC No. 3126771)
Melissa G. Melsher (ARDC No. 6269817)
UNGARETTI & HARRIS
3500 Three First National Plaza
Chicago, Illinois 60602
Telephone: 312.977.4400
Facsimile: 312.977.4405

FEBRUARY

LAW OFFICES
JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

POST OFFICE BOX 10669

RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90897

Consoco Finance Servicing Corp.
ATTN: Regional Manager
P.O. Box 33663
Raleigh, NC 27636

Client Id. 00-05733

Matter Id. 000-000-057 General File

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

01/02/03 SYS prepared letter to attorney for .25
A-1 Mobile Homes Morrisville
indicating lack of authority
regarding automatic stay;

01/28/03 SYS telephone conference with Greg .25
DeCastro on issues involving A-1
Mobile Home Movers;

Fees Billed	\$	75.00
Total Current Bill	\$	75.00
Previous Balance	\$	716.67
Balance Due	\$	791.67

Fee Summary

Attorney	Hours
S Y STATON	.50
Total hours	0.50

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90898

Conseco Finance Servicing Corp.
ATTN: Regional Manager
P.O. Box 33633
Raleigh NC 27636

Client Id. 00-06600

Matter Id. 000-001-005 v. Hans & Cynthia Machner
Account No. 9742947

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

01/24/03 PTF conference with Ms. Machner .25
regarding judgment and credit for
proceeds;

Fees Billed	\$ 37.50
Total Current Bill	\$ 37.50
Balance Due	\$ 37.50

Fee Summary

Attorney	Hours
P T FLICK	.25
Total hours	0.25

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90899

Conseco Finance Servicing Corp.
Attention: Bonnie Martley
Corp. Risk Management
P.O. Box 6154
Rapid City SD 57709-9858

Client Id. 00-06600

Matter Id. 000-001-204 v. Kathy Reid Ham

Account No. 97330200, Case No. 02-07059-9-JRL

Reference: Chapter 13, Vendor No. 0099941095

Attorney's fees and expenses that can be charged back to the account are LIMITED TO \$425 under the Order filed in the bankruptcy.

10/22/02	SYS	Complimentary - prepared and forwarded Motion for Relief from Stay and accompanying documents;	1.50
10/28/02	SYS	Complimentary - received filed Stay Motion; determined response time; sent e-mail to client giving filing date and response time;	.25
12/31/02	SYS	received e-mail from client requesting Lift of Stay letter; reviewed terms of Consent Order; prepared Lift of Stay letter;	.50
12/31/02	SYS	sent filed copy of Consent Order to client via e-mail;	.50
12/31/02	SYS	Complimentary - reviewed file and determined issue of fees and status of the case; attorney's fees and expenses that can be charged back to the account are limited to \$425 under the Order filed in the bankruptcy;	.25

Fees Billed

\$ 150.00

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(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90899
Page 2

Client Id. 00-066500

Matter Id. 000-001-204 v. Kathy Reid Ham

Account No. 97330200, Case No. 02-07059-0-JRL

Reference: Chapter 13, Vendor No. 0099941095

Disbursements

Clerk of Court.

\$ 75.00

Total Disbursements \$ 75.00

Total Current Bill \$ 225.00

Balance Due \$ 225.00
=====

Fee Summary

Attorney

Hours

S Y STATON

3.00

Total hours.

3.00

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(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90900

Conseco Finance Servicing Corp.
ATTN: Regional Manager
P.O. Box 33633
Raleigh NC 27636

Client Id. 00-06600

Matter Id. 000-001-280 v. Dennis and Brenda Shaw

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

01/14/03	PTF	conference with Jim Walter Home's regarding Judgment and confirmation of account status;	.25
01/28/03	PTF	Judgment Credit prepared and forwarded per Conseco's instructions;	.50

Fees Billed	\$	112.50
Total Current Bill	\$	112.50
Balance Due	\$	112.50

Fee Summary

Attorney	Hours
----- P T FLICK -----	.75
Total hours	0.75

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90901

Conseco Finance Servicing Corp.
ATTN: Regional Manager
P.O. Box 33533
Raleigh NC 27635

Client Id. 00-06500

Matter Id. 000-001-723 v. Roosevelt Keith Petteway
Account No. 94300237

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

01/30/03 PTF conference with Mr. Petteway and .25
Source Financial on status of
Judgment and record;

Fees Billed	\$	37.50
Total Current Bill	\$	37.50
Balance Due	\$	37.50

Fee Summary

Attorney	Hours
F T FLICK	.25
Total hours	0.25

LAW OFFICES
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POST OFFICE BOX 10669

RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90902

Conseco Finance Servicing Corp.
Attention: Bonnie Martley
Corp. Risk Management
P.O. Box 6154
Rapid City SD 57709-9858

Client Id. 00-06600
Matter Id. 000-002-612 v. Jeannie Jackson
GTA #94301042
Reference: Chapter 13, Vendor No. 0099941095

Attorney's fees and expenses CANNOT be charged back to the account based on the status of the bankruptcy case.

01/29/03	SYS	conference; sent filed Abandonment Order to client via e-mail;	.50
01/29/03	SYS	Complimentary - reviewed file and determined issue of fees and status of the case; Attorney's fees and expenses cannot be charged back to the account based on the status of the bankruptcy case;	.25

Fees Billed	\$	75.00
Total Current Bill	\$	75.00
Previous Balance	\$	450.00
Balance Due	\$	525.00

=====

Fee Summary

Attorney	Hours
S Y STATON	.75
Total hours	0.75

LAW OFFICES
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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90903

Conseco Finance Servicing Corp.
ATTN: Regional Manager
P.O. Box 33633
Raleigh NC 27636

Client Id. 00-06600

Matter Id. 000-003-232 v. Kay W. Key and Dana Key
Account No. 96321192

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

05/28/02	PTF	Complimentary - initial draft of Complaint for possession and deficiency;	1.25
07/26/02	PTF	Complimentary - drafted Complaint to Ms. Braswell for review and verification;	1.00
09/06/02	PTF	Complimentary - documents finalized and forwarded with fees to Court for filing and service;	.50
09/18/02	PTF	Complimentary - secured filed documents; forwarded via certified mail for Service of Process;	.25
09/23/02	PTF	Complimentary - Affidavit of Service prepared and forwarded;	.25
10/28/02	PTF	Complimentary - prepared and forwarded discovery requests;	1.25
01/07/03	PTF	entered Agreement to extend deadline on Discovery Responses;	.25
01/15/03	PTF	Motion for Leave to Amend and Amended Complaint prepared and forwarded for filing and service;	1.25
01/17/03	PTF	secured and reviewed Order for Mediated Settlement Conference;	.25

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-067407B

02/13/03

Invoice 90903
Page 2

Client Id. 00-06500

Matter Id. 000-003-232 v. Kay W. Key and Dana Key
Account No. 96321192

01/29/03 PTF secured administrative calendar; .25
call to opposing counsel on
scheduling matters;

01/30/03 PTF conference with counsel for Mr. & .25
Mrs. Key regarding position on
Motion to Amend and defenses;

Fees Billed \$ 337.50

Disbursements

Clerk of Court. \$ 75.00
Sheriff Fee \$ 10.00
Service Costs \$ 9.76

Total Disbursements \$ 94.76

Total Current Bill \$ 432.26

Balance Due \$ 432.26
=====

Fee Summary

Attorney Hours

P T FLICK 6.75

Total hours 6.75

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90904

Conseco Finance Servicing Corp.
ATTN: Regional Manager
P.O. Box 33633
Raleigh NC 27636

Client Id. 00-06600
Matter Id. 000-003-236 v. Derek Speed
Account No. 97426226

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with foreclosure;

	Fees Billed	\$	750.00
Disbursements			

Register of Deeds	\$	91.00	
Clerk of Court.	\$	130.00	
Sheriff Fee	\$	5.00	
Travel Expense	\$	22.65	
Legal Advertising	\$	232.00	
	Total Disbursements	\$	480.65

	Total Current Bill	\$	1,230.65

	Balance Due	\$	1,230.65
		=====	

LAW OFFICES
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(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90905

Conseco Finance Servicing Corp.
ATTN: Regional Manager
P.O. Box 33633
Raleigh NC 27636

Client Id. 00-06500
Matter Id. 000-003-249 v. Lova B. Harding
Account No. 94411481

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with foreclosure;

Fees Billed \$ 750.00

Disbursements

Clerk of Court. \$ 60.00
Sheriff Fee \$ 10.00
Register of Deeds \$ 17.00

Total Disbursements \$ 87.00

Total Current Bill \$ 837.00

Balance Due \$ 837.00
=====

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90906

Conseco Finance Servicing Corp.
 ATTN: Regional Manager
 P.O. Box 33633
 Raleigh NC 27636

Client Id. 00-06600
 Matter Id. 000-003-254 v. Ricky Eubanks
 Account No. 94303794

FOR PROFESSIONAL SERVICES RENDERED
 THROUGH 01/31/2003

01/02/03	PTF	formal suggestion of bankruptcy prepared and filed; served on all counsel and parties; copy to client;	1.00
01/07/03	PTF	received and reviewed Reply to Counterclaim from counsel; confirmed Notice of Bankruptcy;	.50
01/14/03	PTF	conference with client regarding status and possible resolutions; call to attorney to determine if mobile home can be repossessed;	.50
01/29/03	PTF	secured Order for Mediated Settlement conference; Motion to Dispense prepared and forwarded;	.50

Fees Billed	\$	375.00
<hr style="border-top: 1px dashed black;"/>		
Total Current Bill	\$	375.00
<hr style="border-top: 1px dashed black;"/>		
Previous Balance	\$	75.00
<hr style="border-top: 1px dashed black;"/>		
Balance Due	\$	450.00
<hr style="border-top: 1px dashed black;"/>		
=====		

Fee Summary

Attorney	Hours
P T FLICK	2.50

LAW OFFICES

JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

POST OFFICE BOX 10669

RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90907

Conseco Finance Servicing Corp. VA
 Attention: Bonnie Martley
 Corp. Risk Management
 P.O. Box 6154
 Rapid City SD 57709-9858

Client Id. 00-06601

Matter Id. 000-000-025 v. Barbara J. Scott and Charles Harvey
 Account No. 21422192, Case No. 0006688

Reference: Chapter 13, Vendor No. 0099941095

Attorney's fees and expenses that can be charged back to the account are LIMITED TO \$425 under the Order filed in the bankruptcy.

11/21/02	SYS	Complimentary - prepared and forwarded Motion for Relief from Stay and accompanying documents;	1.50
12/10/02	SYS	Complimentary - reviewed debtor's response to Stay Motion and Notice of Hearing; sent e-mail to client notifying client that response was filed to Stay Motion and providing hearing date;	.25
12/13/02	SYS	Complimentary - telephone conferences with client and office of opposing counsel to negotiate a settlement of Motion for Relief from Stay; prepared and forwarded Consent Order and transmittal letter;	1.50
12/30/02	SYS	prepared and forwarded letter to Clerk enclosing Consent Order for the Judge's signature and filing;	.25
12/30/02	SYS	telephone conference with opposing attorney regarding status of Automatic Stay;	.50
01/14/03	SYS	sent filed copy of Consent Order	.25

LAW OFFICES
JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90908

Conseco Finance Servicing Corp. MN
Attention: Ms. T. Treuber
332 Minnesota Street, Ste. 520
Saint Paul MN 55101

Client Id. 00-07053

Matter Id. 000-000-056 v. Jay S. Sikorski
Account No. 15984463

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with securing money
judgment;

	Fees Billed	\$	500.00
Disbursements			

Clerk of Court.	\$	92.50	
Sheriff Fee	\$.00	
	Total Disbursements	\$	92.50

	Total Current Bill	\$	592.50

	Balance Due	\$	592.50
		=====	

LAW OFFICES
JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

POST OFFICE BOX 10669

RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90909

Conseco Finance Servicing Corp. NC
ATTN: Regional Manager
P.O. Box 33663
Raleigh NC 27636

Client Id. 00-08020

Matter Id. 000-000-129 v. Gina N. DeRuisse and Joseph W. DeRuisse
Account No. 94408325

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

01/02/03	PTF	formal suggestion of bankruptcy prepared and filed; served on all counsel and parties; copy to client;	1.00
01/09/03	SYS	reviewed letter to plaintiff's attorney requesting dismissal due to bankruptcy of Conseco; conference regarding same;	.50
01/09/03	JFC	prepared letter to plaintiff's attorney regarding Motion to Dismiss and suggestion of Voluntary Dismissal of Conseco;	.50
01/22/03	JFC	reviewed manufacturer's Motion and memorandum on summary judgment;	.25

Fees Billed	\$	337.50
Total Current Bill	\$	337.50
Previous Balance	\$	450.00
Balance Due	\$	787.50

Fee Summary

Attorney	Hours
P T FLICK	1.00
S Y STATON	.50

LAW OFFICES
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POST OFFICE BOX 10669

RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90910

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-000-911 v. Lora J. Norman, Jr. and Dora Gibson
Account No. 94313775

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with Claim and Delivery;

	Fees Billed	\$	500.00
Disbursements			

Administration Fee	\$	100.00	
Clerk of Court.	\$	85.00	
Sheriff Fee	\$	10.00	
Service Costs	\$	9.76	
	Total Disbursements	\$	204.76
	Total Current Bill	\$	704.76
	Balance Due	\$	704.76
		=====	

LAW OFFICES
JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90912

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220
Matter Id. 000-001-105 v. Kathy M. Walker
Account No. 94309986

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed \$ 500.00

Disbursements

Administration Fee \$ 200.00
Clerk of Court. \$ 75.00
Sheriff Fee \$ 15.00

Total Disbursements \$ 290.00

Total Current Bill \$ 790.00

Balance Due \$ 790.00
=====

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JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

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RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90913

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4525 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-117 v. Jeanette Lynn and James Lyle Metz
Account No. 97449022

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with foreclosure;

Fees Billed \$ 750.00

Disbursements

Administration Fee \$ 100.00
Register of Deeds \$ 92.00
Clerk of Court. \$ 133.00
Sheriff Fee \$ 10.00
Service Costs \$ 7.88
Travel Expense \$ 50.39
Legal Advertising \$ 544.38

Total Disbursements \$ 937.65

Total Current Bill \$ 1,687.65

Balance Due \$ 1,687.65
=====

LAW OFFICES
JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

POST OFFICE BOX 10669

RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90914

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-160 v. Jean B. Bond and Mark Marrow
Account No. 97332302

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

	Fees Billed	\$	500.00
Disbursements			

Clerk of Court.	\$	75.00	
Sheriff Fee	\$	30.00	
Service Costs	\$	8.80	
Administration Fee	\$	100.00	
Travel Expense	\$	145.62	
	Total Disbursements	\$	359.42

	Total Current Bill	\$	859.42

	Balance Due	\$	859.42
		=====	

LAW OFFICES

JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

POST OFFICE BOX 10669

RALEIGH, NORTH CAROLINA 27605-0669

(919) 828-2501

FEDERAL ID #56-0674078

02/13/03

Invoice 90915

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-183 v. David H. Bartley
Account No. 11309502

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

01/08/03 PTF secured Answer and Counterclaim; .75
reviewed, prepared and forwarded
Suggestion of Bankruptcy;

01/20/03 PTF Motion for Extension of Time .50
prepared and forwarded;

Fees Billed \$ 187.50

Disbursements

Administration Fee \$ 100.00
Clerk of Court. \$ 85.00
Sheriff Fee \$ 5.00
Service Costs \$ 4.88

Total Disbursements \$ 194.88

Total Current Bill \$ 382.38

Balance Due \$ 382.38

Fee Summary

Attorney Hours

P T FLICK 1.25

Total hours 1.25

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02/13/03

Invoice 90916

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-190 v. Lawrence W. and Diane Tooley
Account No. 94311350

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with Claim and Delivery:

	Fees Billed	\$	500.00
Disbursements			

Clerk of Court.		\$	75.00
Sheriff Fee		\$	10.00
Travel Expense		\$	56.36
	Total Disbursements	\$	141.36
	Total Current Bill	\$	641.36
	Previous Balance	\$	721.54
	Balance Due	\$	1,362.90
		=====	

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02/13/03

Invoice 90917

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-195 v. Kevin Howard Smith
Account No. 97447362

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

12/20/02	SYS	office conference regarding Motion for Sanctions filed against Conseco;	.25
12/20/02	SYS	researched information regarding Conseco bankruptcy filing to include in Objection to Motion for Sanctions;	.50
12/20/02	SYS	researched information regarding Kenn Smith bankruptcy related to Motion for Sanctions;	.25
12/20/02	SYS	prepared Objection to Debtor's Motion for Sanctions;	1.50
12/23/02	SYS	revised Objection to Motion from Sanction;	.50

Fees Billed	\$	450.00
Total Current Bill	\$	450.00
Previous Balance	\$	945.86
Balance Due	\$	1,395.86

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02/13/03

Invoice 90917
Page 2

Client Id. 00-08220
Matter Id. 000-001-195 v. Kevin Howard Smith
Account No. 97447352

Fee Summary

Attorney	Hours
----- S Y STATON -----	----- 3.00 -----
Total hours	3.00

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02/13/03

Invoice 90918

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220
Matter Id. 000-001-224 v. Jean McCoy
Account No. 97323147

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

	Fees Billed	\$	500.00
Disbursements			

Administration Fee	\$	100.00	
Clerk of Court.	\$	75.00	
Sheriff Fee	\$	5.00	
Service Costs	\$	4.65	
Travel Expense	\$	15.09	
	Total Disbursements	\$	199.74
	Total Current Bill	\$	699.74
	Balance Due	\$	699.74
			=====

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02/13/03

Invoice 90919

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-286 v. Tracey S. Wright
Account No. 97345854

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with foreclosure;

Fees Billed \$ 500.00

Disbursements

Sheriff Fee	\$	15.00
Clerk of Court.	\$	75.00
Service Costs	\$	4.40
Administration Fee	\$	100.00
Travel Expense	\$	16.01

Total Disbursements \$ 210.41

Total Current Bill \$ 710.41

Balance Due \$ 710.41

=====

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02/13/03

Invoice 90920

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-426 v. Phyllis V. Jones
Account No. 97321802

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

	Fees Billed	\$	500.00
Disbursements			

Clerk of Court.	\$	75.00	
Sheriff Fee	\$	5.00	
Administration Fee	\$	100.00	
Travel Expense	\$	37.09	
	Total Disbursements	\$	217.09
	Total Current Bill	\$	717.09
	Balance Due	\$	717.09
		=====	

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02/13/03

Invoice 90921

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220
Matter Id. 000-001-433 v. Melissa L. Anderson
Account No. 97347924

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed \$ 330.00

Disbursements

Clerk of Court. \$ 75.00
Sheriff Fee \$ 5.00
Administration Fee \$ 100.00

Total Disbursements \$ 180.00

Total Current Bill \$ 510.00

Balance Due \$ 510.00
=====

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02/13/03

Invoice 90922

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220
Matter Id. 000-001-442 v. Christopher D. Smalls
Account No. 97349636

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed \$ 330.00

Disbursements

Clerk of Court. \$ 75.00
Sheriff Fee \$ 15.00
Administration Fee \$ 100.00

Total Disbursements \$ 190.00

Total Current Bill \$ 520.00

Balance Due \$ 520.00
=====

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02/13/03

Invoice 90923

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-473 v. Getty L. and James Green
Account No. 96338185

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

	Fees Billed	\$	500.00
Disbursements			

Clerk of Court.	\$	97.50	
Sheriff Fee	\$	20.00	
Service Costs	\$	9.76	
Administration Fee	\$	100.00	
	Total Disbursements	\$	227.26
	Total Current Bill	\$	727.26
	Balance Due	\$	727.26
		=====	

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02/13/03

Invoice 90924

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220
Matter Id. 000-001-514 v. Marie G. Hall
Account No. 94304254

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed	\$	330.00
Disbursements		

Clerk of Court.	\$	75.00
Sheriff Fee	\$	5.00
Service Costs	\$	4.88
Administration Fee	\$	100.00
Total Disbursements	\$	184.88
Total Current Bill	\$	514.88
Balance Due	\$	514.88
		=====

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Invoice 90925

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30098

Client Id. 00-08220

Matter Id. 000-001-525 v. Richard M. Gawlowski

Account No. 94307731

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed	\$	500.00
Disbursements		

Clerk of Court.	\$	75.00
Sheriff Fee	\$	5.00
Service Costs	\$	4.88
Administration Fee	\$	100.00
Total Disbursements	\$	184.88
Total Current Bill	\$	684.88
Balance Due	\$	684.88
		=====

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Invoice 90926

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220
Matter Id. 000-001-539 v. Robert Edward Perry
Account No. 97437219

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with foreclosure;

Fees Billed \$ 750.00

Disbursements

Register of Deeds \$ 131.00

Administration Fee \$ 100.00

Clerk of Court. \$ 240.00

Sheriff Fee \$ 10.00

Service Costs \$ 8.80

Travel Expense \$ 51.78

Legal Advertising \$ 281.60

Total Disbursements \$ 823.18

Total Current Bill \$ 1,573.18

Balance Due \$ 1,573.18

=====

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02/13/03

Invoice 90927

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-543 v. Bruce O. and Barbara Flowers
Account No. 97336387

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed \$ 500.00

Disbursements

Clerk of Court. \$ 75.00

Sheriff Fee \$ 15.00

Service Costs \$ 14.64

Administration Fee \$ 100.00

Total Disbursements \$ 204.64

Total Current Bill \$ 704.64

Balance Due \$ 704.64
=====

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Invoice 90928

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-582 v. Angela D. Stevens and Brian Barfield
Account No. 97333523

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed	\$	330.00
Disbursements		

Administration Fee	\$	100.00
Total Disbursements	\$	100.00
Total Current Bill	\$	430.00
Balance Due	\$	430.00
		=====

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Invoice 90929

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-595 v. Latoya N. Haynes and Misty Roberts
Account No. 96335636

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

	Fees Billed	\$	500.00
Disbursements			

Administration Fee	\$	100.00	
Clerk of Court:	\$	107.50	
Sheriff Fee	\$	20.00	
Total Disbursements		\$	227.50
Total Current Bill		\$	727.50
Balance Due		\$	727.50
=====			

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02/13/03

Invoice 90930

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30098

Client Id. 00-08220

Matter Id. 000-001-599 v. Billy J. Grooms and Connie Dierene
Account No. 98300645

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

	Fees Billed	\$	500.00
Disbursements			

Administration Fee	\$	100.00	
Service Costs	\$	9.76	
	Total Disbursements	\$	109.76
	Total Current Bill	\$	609.76
	Balance Due	\$	609.76
			=====

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02/13/03

Invoice 90931

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-601 v. Lessie J. Little
Account No. 96321913

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed \$ 500.00

Disbursements

Administration Fee \$ 100.00

Clerk of Court. \$ 85.00

Sheriff Fee \$ 5.00

Service Costs \$ 4.88

Total Disbursements \$ 194.88

Total Current Bill \$ 694.88

Balance Due \$ 694.88
=====

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02/13/03

Invoice 90932

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220

Matter Id. 000-001-605 v. Brenda D. Higgs
Account No. 97336915

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

Fees Billed \$ 330.00

Disbursements

Administration Fee	\$	100.00
Clerk of Court.	\$	85.00
Sheriff Fee	\$	10.00
Service Costs	\$	4.88

Total Disbursements \$ 199.88

Total Current Bill \$ 529.88

Balance Due \$ 529.88

=====

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Invoice 90933

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-08220
Matter Id. 000-001-609 v. Dennis R. Mitchell
Account No. 97330162

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

Legal services associated with repossession;

	Fees Billed	\$	330.00
Disbursements			

Administration Fee	\$	100.00	
Clerk of Court.	\$	85.00	
Sheriff Fee	\$	5.00	
Service Costs	\$	4.88	
	Total Disbursements	\$	194.88
	Total Current Bill	\$	524.88
	Balance Due	\$	524.88
			=====

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02/13/03

Invoice 90934

Conseco Finance Servicing Corp.
ATTN: Terrance Haire
4625 River Green Parkway
Duluth GA 30096

Client Id. 00-09220

Matter Id. 000-001-621 v. Pamela S. Gardner and Ricky Gardner
Account No. 97112575

FOR PROFESSIONAL SERVICES RENDERED
THROUGH 01/31/2003

legal services associated with repossession;

	Fees Billed	\$	500.00
Disbursements			

Clerk of Court.	\$	85.00	
Sheriff Fee	\$	15.00	
Service Costs	\$	9.76	
Administration Fee	\$	100.00	
	Total Disbursements	\$	209.76
	Total Current Bill	\$	709.76
	Balance Due	\$	709.76
		=====	