

UNITED STATES BANKRUPTCY COURT
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**KOZLOV SEATON ROMANINI BROOKS
& GREENBERG**

1940 ROUTE 70 EAST, SUITE 200
CHERRY HILL, NEW JERSEY 08003
(856) 424-8200
(856) 424-4446 Facsimile

Attorneys for Debtors and Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re:	:	Case No 98-10001 (JW), <u>et seq.</u> (Jointly Administered)
GREATE BAY HOTEL AND CASINO, INC.	:	Chapter 11
a New Jersey Corporation, GB HOLDINGS, INC.,	:	
a Delaware Corporation, and GB PROPERTY	:	Hearing Date:
FUNDING CORP., a Delaware Corporation,	:	
Debtors.	:	Hearing Time:

**APPLICATION OF KOZLOV SEATON ROMANINI
BROOKS & GREENBERG FOR ALLOWANCE OF
FEES AND EXPENSES AS SPECIAL CASINO
CONTROL COMMISSION COUNSEL.**

**TO: THE HONORABLE JUDITH H. WIZMUR
UNITED STATES BANKRUPTCY JUDGE**

Kozlov Seaton Romanini Brooks & Greenberg, (the "Firm") hereby makes application for compensation allowance for fees and or for reimbursement of expenses pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure and D.N.J. LBR 2016-1. In support of said application the Firm says:

1. The Firm submits this application (the "Application") for an entry of an Order granting compensation and reimbursement of expenses and allowance of fees in the amount of \$20,309.96.

RETENTION

2. The Firm was retained by Greate Bay Hotel and Casino, Inc., the Debtor in Possession ("GBHC" or the "Debtor"). The retention was authorized and approved by the Honorable Judith H. Wizmur, as Special Casino Control Commission counsel September 18, 2000. A copy of the Court's Order is attached hereto as Exhibit "A".

SERVICES PERFORMED

3. Through the period of its retention, Kozlov Seaton Romanini Brooks & Greenberg performed legal services on behalf of GBHC before the New Jersey Casino Control Commission. In particular, the Firm filed a petition with the Casino Control Commission to intervene in a Petition filed by a competitor of GBHC, Park Place Entertainment Corp. ("PPE"). PPE is seeking a declaratory ruling from the New Jersey Casino Control Commission that PPE's attempted acquisition of the Claridge Hotel and Casino in Atlantic City will not result in "undue economic concentration" as defined under the New Jersey Casino Control Act.

4. The Casino Control Commission granted GBHC's intervention petition and accordingly, the Firm continues to represent GBHC in the underlying PPE petition.

5. In accordance with D.N.J. LBR2016-1, attached as Exhibit "B" is a detailed narrative description and itemized statement of services rendered and itemization of expenses showing:

- a. Dates of service rendered or activity performed;

- b. The services rendered on each date and the identity of the person performing the service;
- c. The time spent in rendering each service;
- d. The breakdown showing the total time spent by each person rendering such service and the normal billing rates for each such person;
- e. The total requested for services;
- f. A list of actual, expenses with the total requested.

COMPENSATION REQUESTED

6. As indicated in Exhibit "B", Kozlov Seaton Romanini Brooks & Greenberg expended a total of 71.95 hours rendering actual and necessary services as GBHC's special Casino Control Commission counsel. The dollar value of all time expended in rendering such services is \$19,615.50. The Firm's rates in this matter are the rates that it generally charges other clients in Casino Control Commission related matters.

7. The rates charged are reasonable and reflect Kozlov Seaton Romanini Brooks & Greenberg conscientious efforts to have junior personnel or administrative staff, with lower hourly rates, perform services whenever possible, without sacrificing quality.

8. A summary, broken down by costs center, number of hours, actual hourly rates and value of time expended by each individual performing services in included in the Fee Application Cover Sheet, (Exhibit "C") as required by LBR 2016-1(a).

9. In the course of its representation of GBHC as Special Casino Control Commission Counsel, the Firm also incurred and paid actual and necessary expenses in connection with the services rendered. All of these expenses are summarized in the

accompanying fee application cover sheet, as required by LBR 2016-1(a) as well as described in detail in Exhibit "C".

10. The service rendered by Kozlov Seaton Romanini Brooks & Greenberg as Special Counsel to GBHC before the Casino Control Commission were reasonable and necessary services required for the proper performance of its duties. We respectfully submit that this Application is reasonable when measured under factors considered in connection with fee applications.

COMPLIANCE WITH D.N.J. LBR 2016-1(e)

11. In compliance with Local Bankruptcy Rule 2016-1(e), we delivered or mailed a copy of this Application at the same time that it was filed with the Court by overnight mail to each of the following persons:

Eric A. Browndorf, Esquire
Cooper Perskie April Niedelman Wagenheim & Levenson
1125 Atlantic Avenue, 3rd Floor
Atlantic City, New Jersey 08404-1125

James Lawlor, Esquire
Gibbons, Del Deo, Dolan, Griffinger & Vecchione
One Riverfront Plaza
Newark, New Jersey 07102-5497

Frederick H. Kraus, Esquire
Greate Bay Hotel & Casino, Inc.
Indiana Avenue & Brighton Park
Atlantic City, New Jersey 08401

Richard Heirsteiner, Esquire
Palmer & Dodge
One Beacon Street
Boston, Massachusetts 02108-3190

Richard Meth, Esquire
Herrick, Feinstein
104 Carnegie Center
Princeton, New Jersey 08540-6232

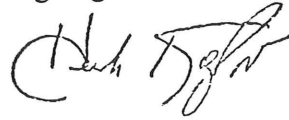
Richard Schepacarter, Esquire
Office of United States Trustee
One Newark Center, suite 2100
Newark, New Jersey 07102

12. Kozlov Seaton Romanini Brooks & Greenberg respectfully requests
allowance for fees and expenses as follows:

Fees and/or compensation \$19,615.50

Reimbursement of Expenses \$694.46

I declare under penalty of perjury that the foregoing is true and correct.



HERSH KOZLOV, ESQUIRE

Dated: November 9, 2000