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9 Healthcare Corporation

FILED 10/18/98 21  
Fees on 10/18/98 3:21  
1-112,693.00  
2-79,869.00  
3-128,900.00 ✓  
tot 321,461.00  
EXP  
1-19,120.35  
3-5,811.20 ✓  
2-6,342.91  
tot 31,274.46

10 IN THE UNITED STATES BANKRUPTCY COURT  
11 FOR THE DISTRICT OF ARIZONA

12 In re:

13 UNISON HEALTHCARE CORPORATION,  
14 and related proceedings,

15 Federal I.D. No. 86-0684011

16 Debtors.

Chapter 11

Case No. B-98-06583-PHX-GBN

(Jointly Administered)

17  
18 APPLICABLE DEBTOR(S) (Check)  
19 UNISON HEALTHCARE CORPORATION  
20 (Case No. 98-06583-PHX-RGM) [X]  
21 SUNQUEST SPC, INC.  
22 (Case No. 98-06584-PHX-SSC) [ ]  
23 BRITWILL HEALTHCARE COMPANY  
24 (Case No. 98-06585-PHX-SSC) [ ]  
25 BRITWILL FUNDING CORPORATION  
26 (Case No. 98-06602-PHX-SSC) [ ]  
27 MEMPHIS CLINICAL  
LABORATORY, INC.  
(Case No. 98-06588-PHX-CGC) [ ]  
AMERICAN PROFESSIONAL  
HOLDINGS, INC.  
(Case No. 98-06587-PHX-GBN) [ ]  
AMPRO MEDICAL SERVICES, INC.  
(Case No. 98-06609-PHX-GBN) [ ]

**THIRD INTERIM AND FINAL  
APPLICATION FOR ALLOWANCE AND  
PAYMENT OF FEES AND EXPENSES  
FOR SERVICES RENDERED BY  
GALLAGHER & KENNEDY, P.A. AS  
ATTORNEYS FOR THE BRITWILL  
DEBTORS AND AS SPECIAL  
COUNSEL TO UNISON HEALTHCARE  
CORPORATION**

(Pertaining to Debtors:  
Unison Healthcare  
Corporation; Britwill  
Investments-I, Inc.; Britwill  
Investments-II, Inc.; and  
Britwill Indiana Partnership)

1 GAMMA LABORATORIES, INC.  
2 (Case No. 98-06611-PHX-SSC) [ ]  
3 SIGNATURE HEALTH CARE  
4 CORPORATION  
5 (Case No. 98-06591-PHX-SSC) [ ]  
6 BROOKSHIRE HOUSE INC.  
7 (Case No. 98-06608-PHX-RGM) [ ]  
8 CHRISTOPHER NURSING  
9 CENTER, INC.  
10 (Case No. 98-06596-PHX-JMM) [ ]  
11 AMBERWOOD COURT, INC.  
12 (Case No. 98-06597-PHX-RGM) [ ]  
13 THE ARBORS HEALTH CARE  
14 CORPORATION  
15 (Case No. 98-06598-PHX-CGC) [ ]  
16 LOS ARCOS, INC.  
17 (Case No. 98-06603-PHX-RGM) [ ]  
18 PUEBLO NORTE, INC.  
19 (Case No. 98-06604-PHX-RTB) [ ]  
20 RIO VERDE NURSING CENTER  
21 (Case No. 98-06606-PHX-CGC) [ ]  
22 SIGNATURE MANAGEMENT  
23 GROUP, INC.  
24 (Case No. 98-06605-PHX-GBN) [ ]  
25 CORNERSTONE CARE CENTER  
26 (Case No. 98-06595-PHX-RTB) [ ]  
27 ARKANSAS, INC.  
28 (Case No. 98-06590-PHX-GBN) [ ]  
29 DOUGLAS MANOR, INC.  
30 (Case No. 98-06589-PHX-CGC) [ ]  
31 SAFFORD CARE, INC.  
32 (Case No. 98-06593-PHX-RTB) [ ]  
33 REHABWEST, INC.  
34 (Case No. 98-06594-PHX-CGC) [ ]  
35 QUEST PHARMACIES, INC.  
36 (Case No. 98-06586-PHX-RGM) [ ]  
37 SUNBELT THERAPY MANAGEMENT  
SERVICES, INC. (ALABAMA)  
38 (Case No. 98-06607-PHX-RTB) [ ]  
39 DECATUR SPORTS FIT & WELLNESS  
40 CENTER, INC.  
41 (Case No. 98-06601-PHX-SSC) [ ]  
42 THERAPY HEALTH SYSTEMS, INC.  
43 (Case No. 98-06600-PHX-GBN) [ ]  
44 HENDERSON & ASSOCIATES  
45 REHABILITATION, INC.  
46 (Case No. 98-06599-PHX-SSC) [ ]

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2  
3 SUNBELT THERAPY MANAGEMENT  
4 SERVICES, INC. (ARIZONA) [ ]  
5 (Case No. 98-06592-PHX-RGM) [ ]  
6 CEDAR CARE, INC.  
7 (Case No. 98-06612-PHX-GBN) [ ]  
8 SHERWOOD HEALTHCARE CORP.  
9 (Case No. 98-06610-PHX-SSC) [ ]  
10 BRITWILL INVESTMENTS-I, INC.  
11 (Case No. 98-0173-PHX-GBN) [X]  
12 BRITWILL INVESTMENTS-II, INC.  
13 (Case No. 98-0174-PHX-GBN) [X]  
14 BRITWILL INDIANA PARTNERSHIP  
15 (Case No. 98-0175-PHX-GBN) [X]  
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Gallagher & Kennedy, P.A., duly-appointed counsel to  
BRITWILL INVESTMENTS-I, INC., a Delaware corporation; BRITWILL  
INVESTMENTS-II, INC., a Delaware corporation; and BRITWILL  
INDIANA PARTNERSHIP, an Arizona general partnership  
(collectively, the "Britwill Debtors"), and special counsel to  
UNISON HEALTHCARE CORPORATION (the "Unison Debtor"), hereby  
submits its "Third Interim and Final Application for Allowance  
and Payment of Fees and Expenses for Services Rendered by  
Gallagher & Kennedy, P.A. as Attorneys for the Britwill Debtors  
and as Special Counsel to Unison Healthcare Corporation"  
("Application"). This Application is submitted pursuant to 11  
U.S.C. §§ 330, 331, 503(a) and (b), and Rule 2016(a),  
Fed.R.Bankr.P., and in compliance with the "Order Authorizing  
and Approving the Employment of Gallagher & Kennedy, P.A. as  
Counsel for the Debtors and Debtors-in-Possession" dated January

1 12, 1998, and the "Order Approving Nunc Pro Tunc Expedited  
2 Application of Unison Healthcare Corporation to Retain and  
3 Employ Gallagher & Kennedy, P.A. as Special Counsel Under 11  
4 U.S.C. § 325(e)" dated October 19, 1998.<sup>1</sup> In support of its  
5 Application, Gallagher & Kennedy submits its separate billing  
6 statements for work performed and for costs incurred from  
7 September 1, 1998 through January 31, 1999 ("Application  
8 Period"), which are collectively attached hereto as Exhibit "A"  
9 and incorporated herein by reference. At the U.S. Trustee's  
10 request, Gallagher & Kennedy has segregated its time entries  
11 into billing statements for each of the Britwill Debtors  
12 relating to general bankruptcy representation, and for the  
13 Unison Debtor relating to special counsel activities.  
14 Exhibit "A" to this Application includes the following billing  
15 statements:  
16  
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18 File #10603-0001 = time and costs  
19 attributable to all three debtors;

20 File #10603-0002 = time and costs  
21 attributable to debtor Britwill Indiana  
22 Partnership only;

23 File #10603-0003 = time and costs  
24 attributable to debtor Britwill Investments-  
25 II, Inc. only;

26 <sup>1</sup> This Application also complies with the United States  
27 Trustee's "Guidelines for Reviewing Applications for  
Compensation and Reimbursement of Expenses Filed Under 11 U.S.C.  
§ 330" dated January 30, 1996 ("U.S. Trustee's Guidelines").

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File #10603-0004 = time and costs attributable to debtor Britwill Investments-I, Inc. only; and

File #11291-0001 = time and costs attributable to debtor Unison Healthcare Corporation for special counsel representation in a single labor/employment matter.

**I. SERVICES RENDERED**

The fees in the aggregate amount of \$128,900.00 and costs in the aggregate amount of \$5,811.20 set forth in Exhibit "A" were incurred in representing the Britwill Debtors and the Unison Debtor with regard to, but not limited to, the following:

1. Business Operations (BK01) . . . . . \$393.00

"Business Operations" time entries have been divided among the four billing files established for this matter as follows:

TIMEKEEPER	10603-0001 all Britwill Debtors	10603-0002 Britwill Indiana Matters	10603-0003 Britwill II Matters	11297-0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	.8	.2	.2	- -	1.2 hrs. @ \$275.00 = \$330.00
CKT (Cindy K. Templeton)	.7	- -	- -	- -	.7 hrs. @ \$90.00 = \$63.00
<b>TOTAL</b>	1.5	.2	.2	- -	\$393.00

In relation to all three Britwill Debtors, during the Application Period, Gallagher & Kennedy continued to work with

1 trade vendors of the Britwill Debtors regarding the delivery of  
 2 post-bankruptcy goods and services to the Britwill Debtors'  
 3 nursing home facilities. Gallagher & Kennedy also worked on  
 4 issues relating to Medicare payments.  
 5

6 With respect to the specific operations of Debtors  
 7 Britwill Indiana Partnership and Britwill Investments-II, Inc.,  
 8 Gallagher & Kennedy handled inquires regarding vendor agreements  
 9 and payments for post-petition services.  
 10

11 **2. Case Administration (BK02) . . . . . 11,188.50**

12 "Case Administration" time entries have been divided  
 13 among the four billing files established for this matter as  
 14 follows:

15 TIMEKEEPER	10603- 0001 all Britwill Debtors	10603- 0002 Britwill Indiana Matters	10603- 0003 Britwill II Matters	11297- 0001 Unison Debtor Matters	TOTALS
18 CRS (Charles R. Sterbach)	39.5	.4	- -	- -	39.9 hrs. @\$275.00 = \$10,972.50
20 CKT (Cindy K. Templeton)	2.4	- -	- -	- -	2.4 hrs. @ \$90.00 = \$216.00
21 <b>TOTAL</b>	41.9	.4	- -	- -	\$11,188.50

22  
 23 With respect to all of the Britwill Debtors, Gallagher  
 24 & Kennedy reviewed the Debtors' monthly operating reports,  
 25 worked on issues relating to appointment of an examiner,  
 26 docketed hearing dates on various motions, reviewed numerous  
 27

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1 pleadings regarding administrative matters in the Unison  
 2 Debtor's Chapter 11 proceedings, and responded to numerous  
 3 telephone inquiries from general creditors.  
 4

5 3. Asset Analysis and Recovery (BK03) . . . \$470.00

6 "Asset Analysis and Recovery" time entries have been  
 7 divided among the four billing files established for this matter  
 8 as follows:

TIMEKEEPER	10603-0001 all Britwill Debtors	10603-0002 Britwill Indiana Matters	10603-0003 Britwill II Matters	11297-0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	.3	- -	.4	- -	.7 hrs. @ \$275.00 = \$192.50
JEC (Joseph E. Cotterman)	.9	.6	- -	- -	1.5 hrs. @ \$185.00 = \$277.50
<b>TOTAL</b>	1.2	.6	.4	- -	\$470.00

17 With respect to all three Britwill Debtors, during the  
 18 Application Period, Gallagher & Kennedy analyzed a personal  
 19 injury claim regarding post-petition transfers, and conducted  
 20 research regarding same.  
 21

22 Relating to Debtor Britwill Indiana Partnership,  
 23 Gallagher & Kennedy worked on recovery of sanctioned fees  
 24 against a creditor. Relating to Debtor Britwill Investments-II  
 25 Inc., Gallagher & Kennedy worked on recovery of an unauthorized,  
 26 post-petition transfer.  
 27

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2                   4. Asset Disposition (BK04)                   . . . . \$10,386.00

3                   "Asset Disposition" time entries have been divided  
4 among the four billing files established for this matter as  
5 follows:

TIMEKEEPER	10603- 0001 all Britwill Debtors	10603- 0002 Britwill Indiana Matters	10603- 0003 Britwill II Matters	11297- 0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	17.0	.5	3.9	- -	21.4 hrs. @ \$275.00 = 5,885.00
JEC (Joseph E. Cotterman)	11.3	- -	5.1	- -	16.4 hrs. @ \$185.00 = 3,034.00
CKT (Cindy K. Templeton)	8.4	- -	7.9	- -	16.3 hrs. @ \$90.00 = 1,467.00
<b>TOTAL</b>	36.7	.5	16.9	- -	\$10,386.00

16                   In relation to all three Britwill Debtors, during the  
17 Application Period, Gallagher & Kennedy prepared the pleadings  
18 necessary to obtain a third and fourth court-approved extension  
19 of time to assume or reject the Debtors' non-residential real  
20 property leases, worked on payment and escrow issues on certain  
21 leases, and continued to work with landlords and with the Unison  
22 Debtor's counsel regarding all of the Debtors' remaining leases.

24                   In direct relation to Debtor Britwill Indiana  
25 Partnership, Gallagher & Kennedy assisted the Debtor with  
26 matters concerning rejection of leases at the Owensville and  
27 Kendalville nursing facilities.



1 With respect to Debtor Britwill Investments-II,  
 2  
 3 Gallagher & Kennedy worked on assumption and rejection issues  
 4 for leases at the Four States Facility, the Homestead of  
 5 McKinney facility, and the Oakwood facility. Gallagher &  
 6 Kennedy continued to work with counsel for Britwill Texas  
 7 regarding lease payments and lease rejection deadlines.  
 8

9 5. Claims Administration and  
Objections (BK05) ..... \$9,832.50

10 "Claims Administration and Objections" time entries  
 11 have been divided among the four billing files established for  
 12 this matter as follows:  
 13

14 TIMEKEEPER	10603- 0001 all Britwill Debtors	10603- 0002 Britwill Indiana Matters	10603- 0003 Britwil 1 II Matters	11297- 0001 Unison Debtor Matters	15 TOTALS
17 CRS (Charles R. Sterbach)	27.0	.6	.7	- -	28.3 hrs. @ \$275.00 = 7,782.50
19 JEC (Joseph E. Cotterman)	5.5	- -	1.3	- -	6.8 hrs. @ \$185.00 = \$1,258.00
21 CKT (Cindy K. Templeton)	7.9	.7	.2	- -	8.8 hrs. @ \$90.00 = \$792.00
22 <b>TOTAL</b>	40.4	1.3	2.2	- -	\$9,832.50

23 For all Britwill Debtors, Gallagher & Kennedy worked  
 24 with the Britwill Debtors' claims agent regarding reconciliation  
 25 of claims, reviewed the Unison Debtor's bar date notice  
 26 regarding claims procedures, worked on the claims dispute  
 27

1 between two major, secured creditors, and responded to numerous  
 2 inquiries from general creditors regarding the filing of claims.  
 3

4 In relation to Debtor Britwill Indiana Partnership,  
 5 Gallagher & Kennedy worked on the claims issues of NCS  
 6 Healthcare and the Indiana Department of Health.

7 In specific relation to Debtor Britwill Investments-  
 8 II, Gallagher & Kennedy continued to work on personal injury  
 9 claims against the Texas nursing facilities, and corresponded  
 10 with claimants and their counsel regarding claims and the bar  
 11 date. Gallagher & Kennedy also worked on issues relating to a  
 12 motion for relief from the bar date.  
 13

14 6. Labor Issues and Employee Benefits  
 15 /Pensions (BK06). . . . . \$20,510.00

16 "Labor Issues and Employee Benefits/Pensions" time  
 17 entries have been divided among the four billing files  
 18 established for this matter as follows:

19 TIMEKEEPER	10603- 0001 all Britwill Debtors	10603- 0002 Britwill Indiana Matters	10603- 0003 Britwill II Matters	11297- 0001 Unison Debtor Matters	TOTALS
22 CRS (Charles R. Sterbach)	- -	- -	- -	5.8	5.8 hrs. @ \$275.00 = \$1,595.00
24 RJM (Robert J. Milligan)	- -	- -	- -	4.1	4.1 hrs. @ \$250.00 = \$1,025.00
26 SBW (Steve B. Wiggs)	- -	- -	- -	82.2	82.2 hrs. @ \$210.00 = 17,262.00

JRT (James R. Taylor)	- -	- -	- -	1.3	1.3 hrs. @ \$190.00 = \$247.00
SEE (Scott E. Eastmond)	- -	- -	- -	2.1	2.1 hrs. @ \$130.00 = \$273.00
CKT (Cindy K. Templeton)	- -	- -	- -	1.2	1.2 hrs. @ \$90.00 = \$108.00
<b>TOTAL</b>	- -	- -	- -	96.7	\$20,510.00

TOTAL "UNISON DEBTOR ONLY/SPECIAL  
COUNSEL ACTIVITIES"

\$20,510.00

During the Application Period, as special counsel to the Unison Debtor, Gallagher & Kennedy responded to allegations of patient neglect occurring at the Unison Debtor's Arbors Healthcare Center in Camp Verde, Arizona. The Arizona Attorney General's Office, AHCCCS Fraud Control Unit ("AG's Office"), was investigating allegations that a resident of the facility sustained a head injury when left unattended, and was thereafter denied adequate medical treatment. This investigation commenced in September of 1998. Although the Unison Debtor denied the allegations, the investigation continues, and Gallagher & Kennedy continues to assist the Unison Debtor in responding to the AG's Office's requests for information.

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7. Fee/Employment Applications (BK07) . . . . \$5,810.00

"Fee/Employment Applications" time entries have been divided among the four billing files established for this matter as follows:

TIMEKEEPER	10603-0001 all Britwill Debtors	10603-0002 Britwill Indiana Matters	10603-0003 Britwill II Matters	11297-0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	6.0	.2	.2	- -	6.4 hrs. @ \$275.00 = \$1,760.00
CKT (Cindy K. Templeton)	35.2	.6	1.9	- -	37.7 hrs. @ \$90.00 = \$3,393.00
AEB (Alyson E. Baer)	7.3	- -	- -	- -	7.3 hrs. @ \$90.00 = \$657.00
<b>TOTAL</b>	48.5	.8	2.1	- -	\$5,810.00

During the Application Period, in relation to all three Britwill Debtors, Gallagher & Kennedy prepared, finalized, and noticed out its second interim fee and expense application.

As to the specific employment matters of Britwill Indiana Partnership, Gallagher & Kennedy reviewed and finalized the billing statements for inclusion in this Application.

Specifically relating to Debtor Britwill Investments-II, Gallagher & Kennedy reviewed and finalized its billing statements for inclusion in this Application, and worked on the employment of a collection attorney for the Pleasant Manor Nursing Home.

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2 8. Fee/Employment Objections (BK08). . . . \$2,255.00

3 "Fee/Employment Objections" time entries have been  
4 divided among the four billing files established for this  
5 matter as follows:

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TIMEKEEPER	10603- 0001 all Britwill Debtors	10603- 0002 Britwill Indiana Matters	10603- 0003 Britwill II Matters	11297- 0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	8.2	- -	- -	- -	8.2 hrs. @ \$275.00 =\$2,255.00
<b>TOTAL</b>	8.2	- -	- -	- -	\$2,255.00

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13 During the Application Period, with respect to all  
14 three Britwill Debtors, Gallagher & Kennedy worked on issues  
15 regarding objections to the employment of Chanin as financial  
16 advisor to the committee, and of the Guardian Group as financial  
17 advisor to the Britwill and Unison Debtors. Gallagher & Kennedy  
18 prepared for and attended a hearing on these matters, and worked  
19 on a resolution to these matters.

20  
21 9. Financing (BK09) . . . . . \$7,893.00

22 "Financing" time entries have been divided among the  
23 four billing files established for this matter as follows:  
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TIMEKEEPER	10603-0001 all Britwill Debtors	10603-0002 Britwill Indiana Matters	10603-0003 Britwill II Matters	11297-0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	27.0	- -	- -	- -	27.0 hrs. @ \$275.00 = 7,425.00
CKT (Cindy K. Templeton)	5.2	- -	- -	- -	5.2 hrs. @ \$90.00 = \$468.00
<b>TOTAL</b>	32.2	- -	- -	- -	\$7,893.00

On behalf of all three Britwill Debtors, Gallagher & Kennedy worked with counsel for the Unison Debtor on the extension of debtor-in-possession financing, and renewal of cash collateral agreements. Gallagher & Kennedy prepared for, and attended, a hearing regarding same.

10. Litigation (BK10) . . . . . \$797.50

"Litigation" time entries have been divided among the four billing files established for this matter as follows:

TIMEKEEPER	10603-0001 all Britwill Debtors	10603-0002 Britwill Indiana Matters	10603-0003 Britwill II Matters	11297-0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	2.6	- -	.3	- -	2.9 hrs. @ \$275.00 = \$797.50
<b>TOTAL</b>	2.6	- -	.3	- -	\$797.50

During the Application Period, with respect to litigation matters for all Britwill Debtors, Gallagher & Kennedy

1 worked with the Unison Debtor's counsel on a lawsuit brought by  
 2 the State of Arizona regarding Medicare issues. Gallagher &  
 3 Kennedy also worked on a securities litigation dispute.  
 4

5 **11. Meeting of Creditors (BK11). . . . . \$0.00**  
 6

7 There are no "Meeting of Creditors" time entries for  
 8 the Application Period.

9 **12. Plan and Disclosure Statement (BK12) . . \$33,856.00**  
 10

11 "Plan and Disclosure Statement" time entries have been  
 12 divided among the four billing files established for this matter  
 13 as follows:

TIMEKEEPER	10603-0001 all Britwill Debtors	10603-0002 Britwill Indiana Matters	10603-0003 Britwill II Matters	11297-0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	109.7	.2	.2	- -	110.1 hrs. @ \$275.00 =\$30,277.50
JEC (Joseph E. Cotterman)	17.3	- -	- -	- -	17.3 hrs. @ \$185.00 = \$3,200.50
CKT (Cindy K. Templeton)	4.2	- -	- -	- -	4.2 hrs. @ \$90.00 = \$378.00
<b>TOTAL</b>	131.2	.2	.2	- -	\$33,856.00

23 During the Application Period, Gallagher & Kennedy  
 24 researched, prepared necessary pleadings, and attended a hearing  
 25 to obtain a third court-approved extension of the Debtors'  
 26 exclusivity period to file and confirm a plan of reorganization.  
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Gallagher & Kennedy worked with secured creditors' counsel regarding a dispute over exclusivity. Gallagher & Kennedy reviewed various objections to the disclosure statement, and worked on resolution to such objections. Gallagher & Kennedy reviewed the revised disclosure statement and amended plan, liquidation analysis, and related documents, and attended a hearing on plan confirmation. Gallagher & Kennedy responded to numerous inquiries from creditors regarding the plan, ballots, and the status of plan confirmation.

13. Relief From Stay Proceedings (BK13) . . \$25,508.50

"Relief From Stay Proceedings" time entries have been divided among the four billing files established for this matter as follows:

TIMEKEEPER	10603-0001 all Britwill Debtors	10603-0002 Britwill Indiana Matters	10603-0003 Britwill II Matters	11297-0001 Unison Debtor Matters	TOTALS
CRS (Charles R. Sterbach)	75.9	.7	8.6	- -	85.2 hrs. @ \$275.00 = \$23,430.00
JEC (Joseph E. Cotterman)	2.8	.7	- -	- -	3.5 hrs. @ \$185.00 = \$647.50
CKT (Cindy K. Templeton)	1.6	- -	14.3	- -	15.9 hrs. @ \$90.00 = \$1,431.00
<b>TOTAL</b>	80.3	1.4	22.9	- -	\$25,508.50

With respect to all Britwill Debtors, Gallagher & Kennedy continued to work with the Unison Debtor's counsel to

1  
2 defend the Debtors against Omega Healthcare Corporation's stay  
3 relief motion, including preparing discovery responses and  
4 working with counsel on pretrial issues. Gallagher & Kennedy  
5 conducted research, participated in conference calls with  
6 opposing counsel, and attended hearings on the Omega stay relief  
7 matter. Gallagher & Kennedy traveled to Dallas to participate  
8 in depositions in this matter, and worked on a settlement  
9 stipulation with Omega, including a subordination and attornment  
10 agreement.

11  
12 With respect to the specific operations of Britwill  
13 Indiana Partnership, Gallagher & Kennedy continued to work on  
14 collection of the Britwill Debtors' judgment against Commercial  
15 Laundry for its intentional violation of the automatic stay  
16 relating to Sunset Manor and other Indiana nursing facilities.

17  
18 With respect to Debtor Britwill Investment-II, Inc.,  
19 during the Application Period, Gallagher & Kennedy continued to  
20 work with personal injury claimants on stay relief stipulations  
21 to pursue insurance settlements for claims allegedly arising at  
22 nursing home facilities in Texas.

23 **II. BACKGROUND**

24 1. On January 7, 1998 ("Petition Date"), the Britwill  
25 Debtors commenced voluntary reorganization cases under Chapter  
26 11 of the Bankruptcy Code, and continue to manage their business  
27 affairs as debtors-in-possession pursuant to Sections 1107 and

1  
2 1108 of the Bankruptcy Code.

3 2. On January 8, 1998, the Britwill Debtors filed  
4 "Debtors' Application for Order Authorizing and Approving the  
5 Employment of Gallagher & Kennedy as Counsel for the Debtors-in-  
6 Possession," which was granted and approved by the Court on  
7 January 12, 1998.

8 3. Gallagher & Kennedy received a pre-petition retainer  
9 from the Britwill Debtors in the amount of \$50,000.00.  
10 Additionally, the Britwill Debtors executed a formal engagement  
11 letter setting forth the terms and conditions of Gallagher &  
12 Kennedy's employment, a copy of which is attached hereto as  
13 Exhibit "B".  
14

15 4. Since its appointment as bankruptcy counsel to the  
16 Britwill Debtors, Gallagher & Kennedy has rendered substantial  
17 time and legal services and has contributed significant  
18 expertise for the benefit of the jointly-administered estates  
19 during the Britwill Debtors' Chapter 11 proceedings. The  
20 Britwill Debtors' Chapter 11 cases have required active and  
21 extensive legal representation, often on an expedited basis. In  
22 fulfilling the Britwill Debtors' needs, Gallagher & Kennedy  
23 delivered necessary professional services and incurred related  
24 expenses, and now seeks interim allowance of reasonable  
25 compensation and reimbursement of expenses relative to actual  
26 and necessary services, pursuant to Sections 330(a), 331, 503(a)  
27

1  
2 and (b) of the Bankruptcy Code.

3 5. On October 14, 1998, the Unison Debtor filed "Nunc Pro  
4 Tunc Expedited Application of Unison Healthcare Corporation to  
5 Retain and Employ Gallagher & Kennedy, P.A., as Special Counsel  
6 Under 11 U.S.C. § 327(e)", which was granted and approved by the  
7 Court on October 19, 1998. Additionally, the Unison Debtor  
8 executed a formal engagement letter setting forth the terms and  
9 conditions of Gallagher & Kennedy's employment as special  
10 counsel, a copy of which is attached hereto as Exhibit "C." The  
11 scope of Gallagher & Kennedy's work for the Unison Debtor as  
12 special counsel was limited to assisting the Unison Debtor with  
13 respect to an internal investigation at The Arbors in Camp  
14 Verde, Arizona, regarding patient care issues, which are the  
15 subject of an investigation by the State of Arizona; interfacing  
16 with the Attorney General's Office during the investigation; and  
17 advising The Arbors on all matters relating to the Attorney  
18 General's investigation.  
19  
20

21 6. Since its appointment as special counsel to the Unison  
22 Debtor, Gallagher & Kennedy has rendered substantial time and  
23 legal services and has contributed significant expertise for the  
24 benefit of the Unison Debtors Chapter 11 proceedings. In  
25 fulfilling the Unison Debtors needs, Gallagher & Kennedy  
26 delivered necessary professional services and incurred related  
27 expenses, and now seeks interim allowance of reasonable

1 compensation and reimbursement of expenses relative to actual  
2 and necessary services, pursuant to §§ 330(a), 331, 503(a) and  
3 (b) of the Bankruptcy Code.  
4

5 7. By this Application, Gallagher & Kennedy seeks: (1)  
6 approval for payment from the Britwill Debtors' estates of  
7 \$108,390.00 in attorneys' and professionals' fees, and \$5,455.79  
8 in costs, for a total of \$113,845.79, representing actual and  
9 necessary fees and expenses incurred on the Britwill Debtors'  
10 behalves during the Application Period, and (2) \$20,510.00 in  
11 attorneys' and professional's fees, and \$355.41 in costs, for a  
12 total of \$20,865.41, representing actual and necessary fees and  
13 expenses incurred on the Unison Debtor's behalf during the  
14 Application Period. The total fees requested herein are broken  
15 down as follows:  
16

17 File #10603-0001 (all three debtors)  
18 Fees: \$99,919.00; Costs: \$5,363.24

19 File #10603-0002 (Britwill Indiana matters)  
20 Fees: \$1,127.50; Costs: (\$1.40)

21 File #10603-0003 (Britwill II matters)  
22 Fees: \$7,358.50; Costs: \$91.15

23 File #10603-0004 (Britwill I matters)  
24 Fees: \$-0-; Costs: \$-0-

25 File #11291-0001 (Unison Debtor Special Counsel matters)  
26 Fees: \$20,510.00; Costs: \$355.41

27 8. The Britwill Debtors and the Unison Debtor, through  
their respective Vice President, Clayton Kloehr, have reviewed

1 the billing statements of Gallagher & Kennedy during the  
2 Application Period, and have approved them for payment, subject  
3 to Court approval. The Britwill Debtors and Unison Debtor  
4 believe and assert that all legal services and cost  
5 disbursements as set forth in the billing statements have  
6 provided a benefit to the estates, and that the requested fees  
7 and expense reimbursement are fair, reasonable and customary for  
8 the services provided. The billing statements collectively  
9 attached hereto as Exhibit "A" include a detailed list of  
10 attorneys and paraprofessionals providing services during the  
11 Application Period and the time and rates attributable to each,  
12 all in conformity with the U.S. Trustee's Guidelines.

13  
14  
15 9. Finally, this Application seeks interim and final  
16 approval of payment of all amounts due and owing under the  
17 attached billing statements, and further seeks final approval  
18 and allowance of all amounts requested in prior applications as  
19 listed below:  
20

	<b>FEEES</b>	<b>COSTS</b>
21 First Interim Fee and Expense 22 Application of Gallagher & 23 Kennedy, P.A.	\$112,693.00	\$19,120.35
24 Second Interim Fee and Expense 25 Application of Gallagher & 26 Kennedy, P.A.	\$ 79,868.00	\$ 6,342.91
27 Third Interim and Final Fee and Expense Application of Gallagher & Kennedy, P.A.	\$128,900.00	\$ 5,811.20

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GRAND TOTAL ALL FEES AND COSTS	\$321,461.00	\$31,274.46
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III. PRESENT CONDITION OF DEBTOR

1. Pursuant to the U.S. Trustee's Guidelines, Gallagher & Kennedy submits the following information:

(a) On May 28, 1998, Unison Healthcare Corporation ("Unison"), the Britwill Debtors' parent corporation, commenced voluntary reorganization proceedings under Chapter 11 of Title 11 of the Bankruptcy Code. The Britwill Debtors' proceedings were incorporated into Unison's proceedings and jointly administered thereafter under Unison's case.

(b) To the best of Gallagher & Kennedy's knowledge, as of the date of this Application, no interim fee/expense applications have been filed by any other professionals on behalf of the Britwill Debtors. All other professionals employed in Unison's proceedings are working on matters unrelated to the Britwill Debtors. Gallagher & Kennedy's first interim fee application (fees: \$112,693.00 and costs: \$19,120.35) was approved by the Court on or about June 16, 1998. Gallagher & Kennedy's second interim fee application (fees: \$79,868.00 and costs: \$6,342.91) was approved by the Court on or about November 4, 1998.

(c) On or about August 10, 1998, Unison and the



1  
2 Britwill Debtors filed a Disclosure Statement and Joint Plan of  
3 Reorganization.

4 (d) As of the date of this Application, the Britwill  
5 Debtors and the Unison Debtor have paid the quarterly fees due  
6 to the U.S. Trustee. The respective Debtors will continue to  
7 pay quarterly fees throughout the pendency of the proceedings.

8 (e) The Britwill Debtors' monthly operating report  
9 for December, 1999 (as part of Unison's monthly operating  
10 report) was filed with the Court on January 29, 1999 (Docket  
11 Nos. 878-880). According to the December monthly operating  
12 report, the Britwill Debtors have cash on hand as follows:  
13

14 Britwill Investments-I, Inc. - \$ -0-  
15 Britwill Investments-II, Inc. - \$165,767.00  
16 Britwill Indiana Partnership - \$452,034.00

17 According to the December monthly operating report, the Unison  
18 Debtor has cash on hand of \$16,172,689.00.

19 (f) Pursuant to the "Final Order: (I) Authorizing  
20 Debtors to Obtain Post-Petition Financing from HCFP Funding,  
21 Inc. Pursuant to 11 U.S.C. §§ 364(c)(1) and (d); (II) Granting  
22 Senior Liens and Security Interests; (III) Granting Authority to  
23 Make Payments to Lender; and (IV) Granting Other Requested  
24 Relief" dated January 29, 1998 ("HCFP Order"), and other orders  
25 of the Court, funds were available to pay administrative claims  
26 of professionals, whose compensation was to be paid from the  
27 estates. To the extent that the Britwill Debtors' current

lender, HCFP Funding, Inc., was undersecured on its claims, approved fees of Gallagher & Kennedy enjoyed a "carve-out" up to \$150,000, and were junior to administrative priority claims of HCFP Funding Inc. to the extent that approved fees exceed \$150,000. Payment of Gallagher & Kennedy's fees and costs approved under its First and Second Applications was made from the carve-out funds. The carve-out funds are now depleted. However, upon information and belief, the carve-out is a moot issue, since HCFP Funding, Inc. has been paid in full for all secured claims arising post-petition and accruing through the Effective Date of the Plan, January 31, 1999. The Britwill Debtors and the Unison Debtor have operating funds available for payment of professional fees without prejudicing any creditors.

#### **IV. BILLING STATEMENTS AND ACCOUNTING PROCEDURES**

1. The detailed billing statements attached collectively hereto as Exhibit "A" constitute complete time records and cost disbursement records of Gallagher & Kennedy during the Application Period consistent with privilege requirements. The volume and detail of such records underscore: (i) the size and complexity of the Britwill Debtors' Chapter 11 cases; (ii) the numerous pleadings, documents and correspondence which had to be produced or reviewed; (iii) the number of issues to be researched, analyzed and incorporated into pleadings, responses

1 and correspondence on an expedited basis; (iv) the discussions  
2 and negotiations with many parties involved in the cases; (v)  
3 the number of attorneys and paraprofessionals required to assist  
4 the Britwill Debtors and Unison Debtor during the Application  
5 Period; and (vi) the requirements of the U.S. Trustee's  
6 Guidelines.  
7

8 2. Exhibit "A" (including the summary pages) reflects  
9 legal services subdivided and summarized by categories, as  
10 recommended and endorsed by the U.S. Trustee's Guidelines. In  
11 particular, Gallagher & Kennedy provided services segregated  
12 into the following subject matters:  
13

14	<u>Project Category #</u>	<u>Description</u>
15	BK01	<u>Business Operations:</u> Issues related to 16 Debtor-in-Possession/employee, vendor, tenant issues/similar problems.
17	BK02	<u>Case Administration:</u> Coordination and 18 compliance activities/preparation of statement of financial 19 affairs/schedules/contracts/interim statements and operating 20 reports/contacts with the U.S. Trustee/general creditor inquiries. 21
22	BK03	<u>Asset Analysis and Recovery:</u> 23 Identification and review of potential assets/causes of action/ non-litigation 24 recoveries.
25	BK04	<u>Asset Disposition:</u> Sales, leases (§ 26 365 matters), abandonment and related transaction work.
27	BK05	<u>Claims Administration and Objections:</u> Claims inquiries/bar date motions;

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BK06

analyses, objections and allowances of claims.

**Labor Issues and Employee**

**Benefits/Pensions:** Review issues severance, retention/ 401K coverage and continuance of pension plan.

BK07

**Fee/Employment Applications:**

Preparations of employment and fee applications for Gallagher & Kennedy and others/establish interim procedures. Review of, objections to, the employment and fee application.

BK08

**Fee/Employment Objections:** Review of and objections to the employment and fee applications of others.

BK09

**Financing:** Matters under §§ 361, 363 and 364 cash collateral/secured claims/loan document analysis.

BK10

**Litigation:** [Be specific in naming the litigation and stating whether Debtor is the plaintiff or defendant. This category is for all litigation except relief from stay proceedings]

BK11

**Meetings of Creditors:** Preparing for/attending conference of creditors, the § 341(a) meeting/ other creditors' committee meetings.

BK12

**Plan and Disclosure Statement:**

Formulation, presentation and confirmation/the plan confirmation order, related orders and rules/ disbursement and case closing activities, except those related to allowance/objections to allowance of claims.

BK13

**Relief From Stay Proceedings:**

Termination or continuation matters of automatic stay under § 362.

1  
2 Services rendered by attorneys and paralegals in each of the  
3 foregoing categories have been separately totaled in the  
4 foregoing "SERVICES RENDERED" section of this Application  
5 (beginning at Page 5), and are set forth in detail in Exhibit  
6 "A".

7  
8 3. Gallagher & Kennedy generally incurs costs as  
9 necessary for effective representation of its clients. These  
10 costs are incurred in the ordinary course of its business, and  
11 reimbursement of costs are requested in the manner sought by  
12 other firms of comparable size and caliber. The prices for  
13 services such as photocopying, telecopying and messengers are  
14 determined by the management of Gallagher & Kennedy from time to  
15 time. The costs of these services relate directly to Gallagher  
16 & Kennedy's representation of a particular client, and are  
17 identifiable as such. Reimbursement of costs help defray  
18 expenses initially borne by Gallagher & Kennedy in accordance  
19 with local practice.  
20

21 4. Gallagher & Kennedy has incurred photocopying,  
22 telecopying, postage expenses, and messenger expenses in  
23 representing the Britwill Debtors and Unison Debtor in the  
24 above-captioned Chapter 11 cases. Such expenses are directly  
25 related to services provided to the respective Debtors.  
26 Photocopying and out-of-state telecopying expenses are incurred  
27 at a flat rate per page. This rate reflects the costs to

1  
 2 Gallagher & Kennedy for long distance telephone service (clients  
 3 are not charged for local telecopies) and the purchase of paper.  
 4 For this case, Gallagher & Kennedy charged \$.20 per page for  
 5 photocopies, and \$1.00 per page for out-of-state telecopies.  
 6 Services of U.S. postal carriers and overnight carriers are  
 7 charged to clients at rates determined by the carrier, with no  
 8 additional overhead charges. Messenger services may be in-house  
 9 or independent service companies. Both are used only when  
 10 necessary to effectuate the Britwill Debtors' reorganization or  
 11 ordinary business transactions. Such messenger services are  
 12 charged according to competitive rates set by outside services  
 13 or for in-house messengers by the firm management. The  
 14 foregoing services are not "profit centers" for Gallagher &  
 15 Kennedy. Following is a condensed breakdown of the expenses  
 16 incurred by Gallagher & Kennedy for the Application Period.  
 17 See, Exhibit "A" hereto for a chronological summary recap of  
 18 Gallagher & Kennedy's expenses for the Application Period.  
 19  
 20

21 TYPE OF COST/ EXPENSE	File # 10603-0001	File # 10603-0002	File # 10603-0003	File # 11291-0001	TOTALS
22 In-house Duplication	\$2,921.20	\$1.40	\$10.40	\$59.80	\$2,992.80
23 Long Distance Telephone	\$27.15	\$-0-	\$4.07	\$51.70	\$82.92
24 Messenger Services	\$575.87	\$-0-	\$-0-	\$56.27	\$632.14
25 Automated Legal Research	\$72.73	\$-0-	\$11.18	\$-0-	\$83.91
26 Postage	\$61.09	\$-0-	\$-0-	\$-0-	\$61.09
Express Mail	\$312.00	\$-0-	\$-0-	\$-0-	\$312.00
27 Fax Transmittals	\$37.00	\$-0-	\$2.50	\$17.00	\$56.50
Outside Duplication (special projects)	\$32.00	\$-0-	\$63.00	\$-0-	\$95.00

Conference Calls	\$28.14	\$-0-	\$-0-	\$-0-	\$28.14
Travel Expenses, Including Mileage	\$1,356.36	\$-0-	\$-0-	\$170.64	\$1,527.00
Transcripts	\$269.70	\$-0-	\$-0-	\$-0-	\$269.70
Overpayments/Credits	<\$330.00>				<\$330.00>
GRAND TOTALS <sup>2</sup> :	\$5,363.24	\$1.40	\$91.15	\$355.41	\$5,811.20

V. ALLOWANCE OF COMPENSATION

1. Gallagher & Kennedy submits that the legal services rendered by it to the Britwill Debtors and the Unison Debtor constitute a substantial contribution to the estate, and Gallagher & Kennedy is therefore entitled to compensation from the estate, pursuant to Section 503(b) of the Bankruptcy Code. The professional services rendered by Gallagher & Kennedy have required the expenditure of substantial time and effort. In total, more than 572 recorded hours have been devoted to this case by partners, associates and paralegals of Gallagher & Kennedy during the Application Period. This Application seeks approval and payment of all amounts due and owing under the attached billing statements.

2. Under the Bankruptcy Code, it is clear that the compensation a law firm would receive in matters other than a reorganization case is a relevant standard for fixing the amount

<sup>2</sup>Expenses of \$5,811.20 for the Application Period are less than the expenses requested under Gallagher & Kennedy's Second Application in the amount of \$6,342.91, demonstrating Gallagher & Kennedy's efforts to be cost efficient for its clients.

total exp  
\$12,154.11



1 of compensation allowed in a Chapter 11 case. The allowance and  
2 payment of fees sought herein by Gallagher & Kennedy, is  
3 reasonable in light of compensation for comparable services for  
4 non-reorganization cases<sup>3</sup>, and consistent with compensation paid  
5 to other law firms in the Phoenix metropolitan area for legal  
6 services in comparable cases. Gallagher & Kennedy submits that  
7 it has rendered valuable professional services that have  
8 benefited, and will continue to benefit, the Britwill Debtors,  
9 the Unison Debtor, the bankruptcy estates, and other parties in  
10 interest.

11  
12  
13 3. Gallagher & Kennedy does not seek an allowance of  
14 compensation from the estate for any services unrelated to the  
15 Britwill Debtors' and the Unison Debtor's Chapter 11 cases, or  
16 for any services not directly relating to the matters described  
17 in the Application.

18  
19 4. The professional services required in these Chapter 11  
20 cases and described herein were performed by attorneys and  
21 paraprofessionals with the requisite expertise and skill in the  
22 areas in which they rendered services. Moreover, the  
23 professional services rendered required a high degree of  
24

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25 <sup>3</sup> In addition to its representation of parties in Chapter 11  
26 cases, Gallagher & Kennedy maintains a general law practice in  
27 areas of corporate law, securities, real estate, taxation,  
probate, insurance defense litigation and general state and  
federal trial and appellate practice.

1  
2 professional competence. The services rendered by Gallagher &  
3 Kennedy have not been duplicative of services rendered by other  
4 professionals employed or compensated by the estate, and  
5 represent services required in an organized and cooperative  
6 approach to the numerous issues and problems encountered in  
7 these cases. As with most Chapter 11 cases, this case has  
8 provided numerous difficult questions, and has often required  
9 extensive legal analysis and interpretation for the Britwill  
10 Debtors and the Unison Debtor.  
11

12 5. No agreement has been made and no understanding exists  
13 for any division of the compensation requested by this  
14 Application between Gallagher & Kennedy and any other person in  
15 violation of the Bankruptcy Code and Bankruptcy Rules. In  
16 conjunction with the Employment Applications and accompanying  
17 Declarations on file with this Court, Gallagher & Kennedy  
18 represents that no partner, associate, or "of counsel" member of  
19 Gallagher & Kennedy holds any direct or indirect interest, claim  
20 or equitable or beneficial interest in the Britwill Debtors or  
21 the Unison Debtor or Unison Debtor, or directly or indirectly  
22 acquired or transferred any such claim or interest in the  
23 Britwill Debtors for their own account after commencement of the  
24 Chapter 11 cases. Furthermore, no partner, associate or "of  
25 counsel" member of Gallagher & Kennedy has purchased or sold any  
26 claim against the Britwill Debtors or the Unison Debtor or  
27

1 equitable or beneficial interest in the respective Debtors.  
2  
3 There is no partner, associate or "of counsel" member of  
4 Gallagher & Kennedy by whom, or for whose account, such claim or  
5 interest otherwise has been acquired or transferred.

6 6. Gallagher & Kennedy respectfully submits that all  
7 services rendered in this case have been at the request of the  
8 Britwill Debtors and the Unison Debtor, and have been reasonable  
9 and necessary to protect the respective Debtors' interests.  
10 Such services have also been beneficial to the estates and their  
11 creditors. Costs incurred have been necessary and proper and  
12 assessed at Gallagher & Kennedy's normal and customary rates.

13 **WHEREFORE**, Gallagher & Kennedy respectfully requests: (1)  
14 interim and final allowance and approval of its fees and costs  
15 for the Application Period totaling \$134,711.20; (2) final  
16 allowance and approval of its fees and costs under previous  
17 applications totaling \$218,024.26; (3) an order directing the  
18 Britwill Debtors to pay the approved fees and costs for the  
19 Application Period relating to their cases from funds currently  
20 in the bankruptcy estates or available to the estates for  
21 payment of the fees and costs requested herein; (4) an order  
22 directing the Unison Debtor to pay the approved fees and costs  
23 for the Application Period relating to special counsel  
24 activities from funds currently in the bankruptcy estate or  
25 available to the estate for payment of the fees and costs  
26  
27

128,900.00  
218,024.26  
~~346,924.26~~

1 requested herein; and (5) granting such other and further relief  
2 as is just and proper under the circumstances.  
3

4 RESPECTFULLY SUBMITTED this 19 day of March, 1999.

5 GALLAGHER & KENNEDY, P.A.

6  
7 By: 

8 Charles R. Sterbach  
9 Joseph E. Cotterman  
10 2600 North Central Avenue  
11 Phoenix, Arizona 85004-3020  
12 Attorneys for the Britwill  
13 Debtors

11  
12 **COPIES** of the foregoing mailed  
13 this 19 day of March, 1999, to:

14 Richard Cuellar  
15 U. S. Trustee's Office  
16 2929 North Central Ave., Suite 700  
17 Phoenix, AZ 85012

18 Ronald L. Rose, Esq.  
19 DYKEMA GOSSETT  
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21 Bloomfield Hills, MI 48304-2820

22 Jared G. Parker, Esq.  
23 Brenda K. Martin, Esq.  
24 MORRISON & HECKER, LLP  
25 2800 N. Central, No. 1600  
26 Phoenix, AZ 85004-1047

27 Thomas J. Salerno, Esq.  
SQUIRE, SANDERS & DEMPSEY  
40 North Central, Suite 2700  
Phoenix, AZ 85004-4440  
Attorneys for Unison Healthcare Corp.

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*C. Templeton*

563927/10603-0005

C E R T I F I C A T I O N

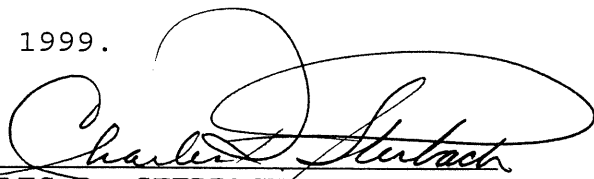
STATE OF ARIZONA )  
 ) ss.  
County of Maricopa )

I, Charles R. Sterbach, a shareholder in the law firm of  
Gallagher & Kennedy, P.A., general bankruptcy counsel for  
BRITWILL INVESTMENTS-I, INC., BRITWILL INVESTMENTS-II, INC., and  
BRITWILL INDIANA PARTNERSHIP, and special counsel for UNISON  
HEALTHCARE CORPORATION, Debtors herein ("Debtors"), hereby  
certify that:

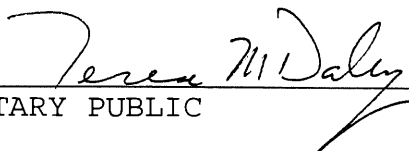
1. Pursuant to the United States Trustee's Guidelines  
regarding interim fee and expense applications dated January 30,  
1996, I have provided a copy of the foregoing fee and expense  
application to Clayton Kloehr, Vice President of the Debtors.

2. The fee and expense application has been approved as  
to form and content by Mr. Kloehr, and I am authorized to file  
it in its present form with the Court.

DATED this 19 day of March, 1999.

  
CHARLES R. STERBACH

Subscribed and sworn to before me this 19 day of March,  
1999, by CHARLES R. STERBACH.

  
NOTARY PUBLIC

My commission expires:



IDENTIFICATION OF TIMEKEEPERS

- 1  
2  
3  
4 CRS - **Charles R. Sterbach**, Shareholder, Bankruptcy Section.  
5 Practice concentrates primarily on bankruptcy  
6 representation and litigation. Mr. Sterbach's current  
7 hourly rate is \$275.00. He was admitted to practice  
8 in 1983. Mr. Sterbach is a Certified Bankruptcy  
9 Specialist.
- 10  
11 RJM - **Robert J. Milligan**, Shareholder, Litigation Section.  
12 Practice concentrates primarily on healthcare law in  
13 the physician services and long-term care areas. Mr.  
14 Milligan's current hourly rate is \$250.00. He was  
15 admitted to practice in 1980.
- 16  
17 JRT - **James R. Taylor**, Shareholder, Litigation Section.  
18 Practice concentrates on primarily healthcare law.  
19 Mr. Taylor's current hourly rate is \$190.00. He was  
20 admitted to practice in 1991.
- 21  
22 JEC - **Joseph E. Cotterman**, Shareholder, Bankruptcy Section.  
23 Practice concentrates primarily on bankruptcy  
24 representation and litigation. Mr. Cotterman's  
25 current hourly rate is \$200.00. He was admitted to  
26 practice in 1991.
- 27  
SBW - **Steven B. Wiggs**, Associate, Litigation Section.  
Practice concentrates primarily on healthcare law with  
an emphasis on fraud and abuse, long-term care issues,  
and corporate compliance. Mr. Wigg's current hourly  
rate is \$210.00. He was admitted to practice in 1988.
- CKT - **Cindy K. Templeton**, Paralegal/Bankruptcy Assistant.  
Ms. Templeton's current hourly rate is \$90.00.