

SULLIVAN HILL LEWIN REZ & ENGEL  
A Professional Law Corporation  
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**Electronically Filed: 5/5/2015**

Proposed Counsel for Debtor, Sullivan International Group, Inc.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

In re

SULLIVAN INTERNATIONAL  
GROUP, INC.,

Debtor.

CASE NO. 15-02281-LT11

Chapter 11

**NOTICE OF HEARING ON (1) EX  
PARTE APPLICATION TO EMPLOY  
SULLIVAN HILL LEWIN REZ &  
ENGEL AS DEBTOR'S GENERAL  
BANKRUPTCY COUNSEL; (2) EX  
PARTE APPLICATION FOR  
AUTHORITY TO EMPLOY 3C  
ADVISORS & ASSOCIATES, INC. AS  
DEBTOR'S FINANCIAL ADVISOR;  
AND (3) MOTION FOR APPROVAL  
OF INTERIM COMPENSATION  
PROCEDURES FOR PAYMENT OF  
PROFESSIONALS**

Date: May 21, 2015

Time: 2:00p.m.

Ctrm: Dept. 3, Room 129

United States Bankruptcy Court

325 West "F" Street

San Diego, CA 92101-6991

Judge: Hon. Laura S. Taylor

**TO THE HONORABLE LAURA S. TAYLOR, THE UNITED STATES  
TRUSTEE, AND ALL OTHER PARTIES ENTITLED TO NOTICE:**

**YOU ARE HEREBY NOTIFIED** that on May 21, 2015 at 2:00p.m. in Dept.  
3, Room 129, of the U.S. Bankruptcy Court, located at 325 West "F" Street, San  
Diego, CA 92101-6991, there will be a hearing on (1) Ex Parte Application to Employ

1 Sullivan Hill Lewin Rez & Engel (“Sullivan Hill”) as Debtor’s General Bankruptcy  
2 Counsel (the “Sullivan Hill Application”); (2) Ex Parte Application for Authority to  
3 Employ 3C Advisors & Associates, Inc. (“3C”) as Debtor’s Financial Advisor (the  
4 “3C Application”, and together with the Sullivan Hill Application collectively referred  
5 to herein as the “Employment Applications”); and (3) Motion for Approval of Interim  
6 Compensation Procedures for Payment of Professionals (the “Motion”) filed by  
7 Sullivan International Group, Inc. (the “Debtor”), the debtor and debtor in possession  
8 herein, pursuant to an Order Shortening Time for Hearing on the Employment  
9 Applications and Motion (the “Order”) entered by the Court on May 5, 2015 as  
10 Docket No.79. A copy of the Order is attached as Exhibit “A” hereto.

11 **YOU ARE FURTHER NOTIFIED** that the Motion seeks entry of an order,  
12 pursuant to sections 105(a), 328, and 330 of the Bankruptcy Code (11 U.S.C. § 101 et  
13 seq.) and the Local Bankruptcy Rules’ Guidelines For Establishing Interim  
14 Compensation Procedures For Professionals, establishing procedures, applying  
15 retroactively to the commencement of the case, for paying and monitoring the interim  
16 compensation and reimbursement of expenses due to professionals on a shorter basis  
17 than every 120 days, as follows:

18 Sullivan Hill and 3C, commencing at the inception of the case, are to receive  
19 certain payments of their fees and expenses on a monthly basis, subject to Court  
20 approval of their employment and regularly noticed interim and final fee applications  
21 submitted by them.

22 (a) On or after the 15th day of each month, Sullivan Hill and 3C, and any  
23 other professional employed in this case (collectively, the “Professionals”), may  
24 prepare a professional fee statement or invoice (the “Fee Statement”), which shall:

25 i. relate to services rendered and expenses incurred during the prior month  
26 (or, in the case of the first Fee Statement, the services rendered and expenses incurred  
27 since April 6, 2015 (the “Petition Date”);

28 ii. indicate the amount of the fees accrued during the relevant period (the

1 “Professional Fees”);

2       iii.     indicate the amount of costs accrued during the relevant period; and

3       iv.     indicate the services rendered, the amounts so requested, the total time  
4 expended, the names of the specific individuals who performed the services for which  
5 compensation is requested, and the hourly billing rate for each such individual, if  
6 applicable.

7       (b)     The Fee Statements shall be submitted to the Debtor. At the same time,  
8 the Professionals shall: (i) file these Fee Statements with the Court; and (ii) serve by  
9 regular first class postage prepaid mail a copy of the Fee Statements on the Office of  
10 the U.S. Trustee, the Debtor, the official committee of unsecured creditors (the  
11 “OCC”), any secured creditors, and any parties requesting special notice (collectively,  
12 the “Notice Parties”). The Notice Parties shall have 10 days after the service of the  
13 invoices to object by notifying the Debtor in writing and setting forth the specific  
14 grounds for the objection. The objecting party will provide the Debtor with the option  
15 to either request a hearing on the objection or hold back the amount of compensation  
16 and/or expenses that are the subject of the objection until the hearing on the  
17 application for interim compensation.

18       (c)     The Debtor shall thereafter pay 90 percent of the amount of Professional  
19 Fees not the subject of objection and 100 percent of the amount of Professional Costs  
20 not the subject of objection, subject to (i) the right of the Notice Parties and any other  
21 party in interest to later object to and seek disgorgement of payments previously made  
22 pursuant to a Fee Statement at hearings on interim fee applications; and (ii) any cash  
23 collateral orders entered in the case.

24       (d)     Notwithstanding any payment made pursuant to a Fee Statement, the  
25 Professionals shall file with the Court and serve on the Notice Parties interim fee  
26 applications (“Interim Application”) pursuant to 11 U.S.C. § 331, Local Bankruptcy  
27 Rule 2016, and Rules 2002(a)(6) and 2016 of the Federal Rules of Bankruptcy  
28 Procedure. Subject to the Court’s calendar, the first hearing on the Professionals’

1 Interim Applications shall be set approximately two to three months from the date of  
2 the filing of the Motion. Subsequent Interim Applications shall be filed approximately  
3 120 days after the cut-off period from the prior Interim Application. In such Interim  
4 Applications, the Professionals may seek approval of the compensation relating to,  
5 and reimbursement of expenses incurred in, the period since the Petition Date or the  
6 prior period, as the case may be.

7 (e) Subject to the applicable Federal Rules of Bankruptcy Procedure and  
8 Local Bankruptcy Rules for objecting to fee applications, nothing in the Interim  
9 Payment Procedures shall limit a Notice Party's or other party in interest's right to  
10 object to an Interim Application or to a Professional's application for final allowance  
11 of fees and costs. If the Court sustains an objection or otherwise so orders, a  
12 Professional shall disgorge the disallowed portion of any payment it has received in  
13 accordance with the Interim Payment Procedures to the Debtor's estate.

14 In connection with the administration of this case, the Debtor (or the OCC)  
15 from time to time may seek to employ additional attorneys, accountants, and other  
16 professionals for a finite period of time or for a limited purpose. In such instances, if  
17 any, the Debtor requests that the relevant professionals be subject to the Interim  
18 Payment Procedures.

19 **YOU ARE FURTHER NOTIFIED** that a set of the moving papers for the  
20 Sullivan Hill Application, the 3C Application, and/or the Motion (collectively, the  
21 "Papers") will be provided, upon request, by the undersigned or may be inspected at  
22 the office of the Clerk of the Bankruptcy Court at 325 West "F" Street, San Diego, CA  
23 92101-6991. You may also obtain the Papers at [www.donlinrecano.com/sig](http://www.donlinrecano.com/sig) or by  
24 calling Toll Free: 1(800) 416-3743 to request hard copies. The website is accessible  
25 24/7, the Toll Free number is open Monday through Friday, 9:00a.m. to 5:00p.m.  
26 Eastern Time, and all requested Papers will be sent within 24 hours of request by first-  
27 class United States mail.

28 **YOU ARE FURTHER NOTIFIED** that any opposition or other response to

1 the Sullivan Hill Application, the 3C Application, and/or the Motion must be served  
2 on the undersigned and the original and one copy of such papers with proof of service  
3 must be filed with the Clerk of the Bankruptcy Court at 325 West "F" Street, San  
4 Diego, CA 92101-6991, **NOT LATER THAN May 18, 2015**, pursuant to the Order.

5 **YOU ARE FURTHER NOTIFIED** that any reply to such opposition or  
6 response must be served on the opponent or respondent and the original and one copy  
7 of the reply with proof of service must be filed with the Clerk of the Bankruptcy Court  
8 at 325 West "F" Street, San Diego, CA 92101-6991, **NOT LATER THAN noon on**  
9 **May 20, 2015**, pursuant to the Order.

10 Dated: May 5, 2015

SULLIVAN HILL LEWIN REZ & ENGEL  
A Professional Law Corporation

11 By: /s/ James P. Hill  
12 James P. Hill  
13 Proposed Counsel for Debtor,  
14 Sullivan International Group, Inc.  
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**Exhibit Table**

<b>Exhibit</b>	<b>Description</b>	<b>Pages</b>
A	Order Shortening Time for Hearing	7-9



CSD 1001B [11/15/04]

Name, Address, Telephone No. &amp; I.D. No.

SULLIVAN HILL LEWIN REZ &amp; ENGEL, APLC

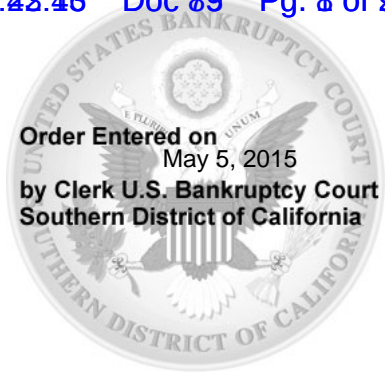
James P. Hill (SBN 90478) / Christopher V. Hawkins (SBN 222961)

550 West C Street, Suite 1500

San Diego, CA 92101

Telephone: (619) 233-4100

Proposed Counsel for Debtor, Sullivan International Group, Inc.



## UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF CALIFORNIA

325 West "F" Street, San Diego, California 92101-6991

In Re

SULLIVAN INTERNATIONAL GROUP, INC.,

Debtor.

BANKRUPTCY NO. 15-02281-LT11

DATE: May 21, 2015

TIME: 2:00 p.m.

JUDGE: Laura S. Taylor

## ORDER SHORTENING TIME FOR HEARING ON

**(1) EX PARTE APPLICATION TO EMPLOY SULLIVAN HILL LEWIN REZ & ENGEL AS DEBTOR'S GENERAL BANKRUPTCY COUNSEL; (2) EX PARTE APPLICATION FOR AUTHORITY TO EMPLOY 3C ADVISORS & ASSOCIATES, INC. AS DEBTOR'S FINANCIAL ADVISOR; AND (3) MOTION FOR APPROVAL OF INTERIM COMPENSATION PROCEDURES FOR PAYMENT OF PROFESSIONALS**

IT IS ORDERED THAT the relief sought as set forth on the continuation pages attached and numbered two (2)

through 2 with exhibits, if any, for a total of 2 pages, is granted. Motion/Application Docket Entry No. 73

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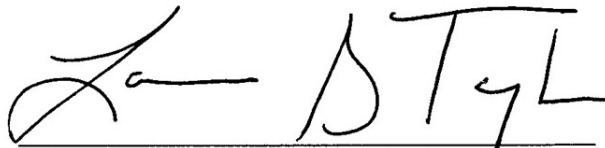
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DATED: May 5, 2015

Signature by the attorney constitutes a certification under Fed. R. of Bankr. P. 9011 that the relief in the order is the relief granted by the court.

  
Judge, United States Bankruptcy Court

Submitted by:

SULLIVAN HILL LEWIN REZ & ENGEL, APLC  
(Firm name)

By: /s/James P. Hill

Attorney for ☒ Movant ☐ Respondent



Upon review of the ex parte application for order shortening time for notice of hearing on the  
(1) EX PARTE APPLICATION TO EMPLOY SULLIVAN HILL LEWIN REZ & ENGEL AS DEBTOR'S GENERAL  
BANKRUPTCY COUNSEL; (2) EX PARTE APPLICATION FOR AUTHORITY TO EMPLOY 3C ADVISORS & ASSOCIATES,  
INC. AS DEBTOR'S FINANCIAL ADVISOR; AND (3) MOTION FOR APPROVAL OF INTERIM COMPENSATION  
PROCEDURES FOR PAYMENT OF PROFESSIONALS (collectively, the "Motion")

and for good cause appearing therefore,

**IT IS ORDERED** that this Court will conduct a hearing on the Motion, and any opposition, thereto on  
May 21, 2015 at 2:00p.m. in Department No. 3, Room 129 of the  
United States Bankruptcy Court, Southern District of California, 325 West F Street, San Diego, California 92101-6991.

**IT IS FURTHER ORDERED** that the Notice of Motion and Motion must be filed and served no later than  
May 5, 2015. Service will be deemed complete when delivered

- ☒ personally, or
- ☒ by electronic method, or
- ☒ by first class or overnight mail, or
- ☐ as provided for in the application for order shortening time.

**IT IS FURTHER ORDERED** that all opposition, if any, to the Motion must be filed and served no later than  
May 18, 2015.

**IT IS FURTHER ORDERED** that a reply, if any, to the opposition to the Motion must be filed and served no later than  
noon on May 20, 2015.