

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:

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Case No. 22-14337-MCR

JENNIFER C. GIVINS,

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(Chapter 13)

Debtor.

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**APPLICATION OF THE LAW OFFICES OF CRAIG B. LEAVERS, LLC
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES AS SPECIAL COUNSEL TO TRUSTEE
FOR THE PERIOD FROM MARCH 7, 2023, THROUGH SEPTEMBER 12, 2025**

The Law Offices of Craig B. Leavers, LLC (the “Applicant”) requests entry of an Order approving the allowance (the “Application”) of compensation and reimbursement of expenses for the work of the Applicant in providing legal services to Rebecca A. Herr, the Chapter 13 Trustee in the above-captioned case (the “Trustee”), for the period from March 7, 2023, through September 12, 2025 (the “Application Period”) and, in support thereof, states:

1. This Application is submitted pursuant to 11 U.S.C. §§ 328, 330 and 331, Bankruptcy Rule 2016 and Local District Court Rule 401. This Court has jurisdiction to hear this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding.

2. As discussed in greater detail below, Applicant is requesting the allowance of fees, after a discount of 7%, in the amount of \$17,000.00, as well as reimbursement of \$1,888.37 for out-of-pocket expenses and other charges, for services rendered during the Application Period.

I. INTRODUCTION

3. The debtor herein (the “Debtor”) commenced the above-captioned bankruptcy case (the “Bankruptcy Case”) by filing a petition under chapter 13 of the Bankruptcy Code on August 9, 2022 (the “Petition Date”).

4. The Trustee was appointed to serve as interim trustee in this chapter 13 proceeding, and no other trustee was appointed at the Debtors’ Meeting of Creditors held on September 15, 2022.

A. General Background

5. Prior to the Petition Date, by deeds dated July 27, 2020, and recorded on April 22, 2021, the Debtor transferred her partial interest in nine (9) rental properties (the “Rental Properties”) to her mother and step-father (the “Defendants”) for no consideration (the “Transfers”):

6. Also prior to the Petition Date, a creditor of the Debtor, Tidewater Capital Partners, LLC (“Tidewater”), commenced state court actions against the Defendants seeking to avoid and recover the Transfers of the Rental Properties as fraudulent conveyances under Florida and Georgia law. Specifically, on May 4, 2022, Tidewater filed its Complaint against the Defendants in the Circuit Court of the Ninth Judicial Circuit for Orange County, Florida, thereby commencing that proceeding styled *Tidewater Capital Partners, LLC v. John Thompson, Jr., et al.*, Case No 2022-CA-003924-O, and on May 13, 2022, Tidewater filed its Complaint for Avoidance of Fraudulent Transfers and for Preliminary and Permanent Injunction against the Defendants in the Superior Court of Fulton County, Georgia, thereby commencing that proceeding styled *Tidewater Capital Partners, LLC v. Jennifer Givins, et al.*, Case No 2022-CV-364803 (collectively, the “State Court Proceedings”).

7. On the Petition Date, the Trustee had the sole right to pursue the claims asserted in the State Court Proceedings for the benefit of all creditors and parties in interest in the Bankruptcy Case because they related to property interests that might have been property of the estate. As such, on January 10, 2023, the Trustee commenced that adversary proceeding styled *Rebecca A. Herr v. Jennifer Thompson, et al.*, Adv. Pro. No. 23-00009, in which the Trustee sought to avoid the Debtor's transfers of the Rental Properties to the Defendants (the "Adversary Proceeding").

8. On March 7, 2023, the Trustee filed her application to employ the Applicant as special counsel to prosecute the Adversary Proceeding and perform such services as may be necessary or desirable in the administration of this case. (Doc. No. 68) On March 28, 2023, this Court entered an Order authorizing the Trustee's employment of the Applicant. (Doc. No. 78)

II. COMPENSATION REQUESTED AND THE LEGAL STANDARD TO BE APPLIED

9. For the Application Period, the Applicant is requesting the allowance of fees, after a discount of 7%, in the amount of \$17,000.00, as well as reimbursement of \$1,888.37 for out-of-pocket expenses and other charges. The aggregate amount of compensation and other charges incurred during the Application Period for the various matters handled by the Applicant are as follows:

TOTAL PROFESSIONAL FEES					
Attorney	Total Hours	Hourly Rate	Total Fees	Writedown	Billed Fees
CBL	45.6	\$400.00	\$18,240.00	\$1,240.00	\$17,000.00

TOTAL OUT-OF-POCKET EXPENSES	
Deposition Transcripts	\$1,688.25
Photocopying	115.20
Postage	84.92
Matter Total	\$1,888.37

10. Applicant is familiar with and is submitting this Application in conformity with the Compensation Guidelines for Professionals in the United States Bankruptcy Court for the District of Maryland (the “Guidelines”).

11. The expenses incurred by Applicant are of a type that are customarily not considered part of overhead by the Applicant or other attorneys in this geographic area and which the Applicant customarily requires its clients to pay. Additionally, all of the expenses for which Applicant seeks reimbursement are in accordance with and allowable by the Guidelines.

12. Applicant’s request for compensation is being made in conformity with the eight (8) factors set forth in the Guidelines (the “Guidelines’ Factors”), as well as the twelve (12) factors adopted by the United States Court of Appeals for the Fourth Circuit (the “*Johnson* Factors”). Each of these will be discussed in turn.

A. The Guidelines’ Factors

13. The Guidelines enumerate the following eight (8) factors for the Court to consider in awarding fees:

- (1) the services rendered;
- (2) the time expended;
- (3) other charges incurred;
- (4) the amounts requested;
- (5) the rates charged for such services;
- (6) how services rendered were necessary to the administration of, or beneficial at the time said services were rendered toward the completion of the case;
- (7) information relevant to a determination that the services were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue or task addressed; and

- (8) an affirmation that the compensation requested is reasonable based upon the customary compensation and reimbursement of expenses charged by Applicant and comparably skilled professional in non-bankruptcy cases.

14. Applying these eight (8) factors to Applicant's representation of the Trustee during the Application Period, Applicant presents the following analysis:

**Services Rendered, Time Expended and
Other Charges Incurred for Such Services**

15. All of the time expended and the nature of the services rendered by Applicant were recorded on time sheets maintained on a daily basis. Applicant's time bill for the Application Period, itemizing the services rendered, as well as the fees and expenses for said services, is attached as *Exhibit A*. This time bill sets forth the date of each service rendered, the professional rendering the service, a description of the services rendered, the amount of time spent performing each service, and the total dollar value of such service for each such professional. For each time entry, Applicant provided in reasonable detail that amount of information necessary to give a description of the services rendered while simultaneously protecting the attorney-client and work-product privileges. The Applicant attempted, in accordance with the Guidelines, not to lump services. For all entries in excess of one hour of time, the time entries provide a breakdown of the amount of time spent on a specific activity included in that time entry if more than one service was rendered.

As for the services rendered, at the onset of the Applicant's engagement, the proceedings in the Bankruptcy Case and the Adversary Proceeding were stayed pending the resolution of state court litigation against the debtor. Nevertheless, the Applicant reviewed all the pleadings in papers in the Adversary Proceeding as well as related adversary proceeding filed by the Defendants.¹ Further, despite the stay in the Bankruptcy Case and the Adversary Proceeding, Defendants

¹ Adv. Pro. No. 22-00212

expressed an interest in settling the Adversary Proceeding. As such, the Applicant conducted informal discovery with the Defendants and the Debtor. The Applicant also conferred with and obtained documents from counsel for Tidewater. This informal discovery also involved deposing the Defendants, followed by preliminary settlement discussions.

Those settlement discussions lead nowhere until the stay in the Adversary Proceeding was lifted and, after a status conference, a scheduling order was entered. Thereafter, the Applicant drafted and propounded discovery upon the Defendants and issued subpoenas to third parties for documents in their possession (Bank of America, Bluevine, Inc., and Dominion Parks to Beach Title Company). (Doc. Nos. 25 – 27, 31) The Applicant also deposed the Defendants for a second time, and later deposed the Debtor. (Doc. Nos. 28, 29)

Having conducted the aforementioned informal and formal discovery, the Applicant obtained, reviewed and analyzed (1) the Defendants' federal income tax returns for tax years 2018 – 2021; (2) rent ledgers for the Rental Properties for the years 2018 – 2023; (3) leases for the Rental Properties; (4) the Defendants' bank statements for accounts held with Bank of America for the period of July 2018 – December of 2022, Delta Community Credit Union for the period of January 2012 – December of 2022, and Truist for the period of July 2022 – October 2022; (5) the Debtor's federal income tax returns for tax years 2019 – 2021; (6) the Debtor's bank statements for her account held with Delta Community Credit Union for the period of January 2018 – January of 2025; (7) the bank statements for the account of the Debtor's business, JCG Group, LLC, held with Bank of America for the period of June 2019 – February of 2023; (8) settlement statements from the initial purchase of the Rental Properties; (9) deeds to all the Rental Properties, including the initial deed for each Rental Property and all deeds for each Rental Property leading up to the deeds effectuating the Transfers; (10) documents produced by the Defendants in response to the

Trustee's Request for Production of Documents; (11) documents produced by Bluevine, Inc. in response to a Subpoena *Duces Tecum*; (12) documents produced by Dominion Parks to Beach Title Company in response to a Subpoena *Duces Tecum*; and (13) bank statements for an account held with Bank of America by one of the Defendants "ITF" the Debtor and her sister for the period of July 2018 – December of 2022.

At the conclusion of discovery, the Parties in the Adversary Proceeding conducted settlement negotiations and ultimately settled the Adversary Proceeding for \$85,000.00. The Applicant then drafted a settlement agreement and the motion seeking authorization of that settlement. (Doc. No. 32). After the order was entered approving the Parties' settlement, the Applicant drafted and filed, pursuant to the terms of the settlement agreement, a Stipulation of Dismissal. (Doc. No. 34)

During the Application Period, the Applicant also drafted this fee application.

The Amounts Requested and Rates Charged for Such Services

16. The attorney who has worked on this case and his hourly rate is shown on the invoice attached hereto as *Exhibit A*.

17. Applicant charges \$0.20 per page for in-house copying.

18. The charges for which reimbursement are sought are of a type that are customarily not considered part of overhead in this geographic area. Applicant customarily requires its clients to pay such other charges in addition to attorneys' fees at Applicant's normal hourly rate.

Necessity of Services

19. As detailed above, Applicant seeks compensation only for those activities that are beneficial to the estate.

20. Representation of the Trustee has required Applicant to exercise its skill and expertise in the preparation of the documentation filed and the actions taken in the case. The services rendered by Applicant in this case have not been duplicative.

Reasonableness of Time Spent in Relation to Complexity of Case

21. The problems, issues and tasks involved in this case were those generally expected to routinely be encountered in prosecuting fraudulent conveyance cases, and were resolved in an amount of time commensurate with the complexity, importance and nature of the problems, issues and tasks addressed.

22. The services rendered by Applicant in this case have not been duplicative.

The Customary Fee for Comparably Skilled Practitioners

23. The hourly rate for the attorney providing services covered by this Application is the normal and customary rates charged for his services. Applicant believes and avers that its fees are comparable to those charged by other small to medium-sized Baltimore law firms. Applicant also believes and avers that the hourly rates are comparable to those charged by comparably skilled practitioners in other fields of law.

B. The “Lodestar” Analysis/The “Johnson” Factors

24. In addition to the Guidelines’ Factors discussed above, Applicant’s request for compensation is made in conformity with the twelve (12) factors enumerated in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 719 (5th Cir. 1974), and expressly adopted by the United States Court of Appeals for the Fourth Circuit in *Barber v. Kimbrells, Inc.*, 577 F.2d 216 (4th Cir. 1978), *Anderson v. Booths*, 658 F.2d 246 (4th Cir. 1978), and *Harman v. Levin (In re: Robertson)*, 772 F.2d 1150 (4th Cir. 1985) (the “Johnson Factors”). The *Johnson* Factors are as follows:

(1) the time and labor expended; (2) the novelty and difficulty of the questions raised; (3) the skill required to properly perform the legal services rendered; (4) the attorney's opportunity costs in pressing the instant litigation; (5) customary fee for like work; (6) the attorney's expectations at the outset of the litigation; (7) the time limitations imposed by the client or circumstances; (8) the amount of controversy and the results obtained; (9) the experience, reputation and ability of the attorney; (10) the undesirability of the case within the legal community in which the suit arose; (11) the nature and length of the professional relationship between the attorney and client; and (12) attorneys' fee awards in similar cases.

Barber v. Kimbrells Inc., 577 F.2d at 226 n 28. These criteria are discussed in detail below.

25. When considering a professional's application for compensation, the Court should first determine the professional's "lodestar" by multiplying the number of hours reasonably expended by a reasonable hourly rate. *In re LBH Associates Ltd. Partnership*, 109 B.R. 157, 15862 (Bankr. D. Md. 1989). *See also, In re Leonard Jed Co.*, 118 B.R. 339, 345 (Bankr. D.Md. 1990).

26. Fees should be adjusted upward if the results achieved by the attorney are exceptional in light of the hourly rate charged. *Blum v. Stenson*, 465 U.S. 889 (1984). *See generally, Pennsylvania v. Delaware Valley Citizens' Counsel*, 478 U.S. 546 (1986); *Hansley v. Eckerhardt*, 461 U.S. 424 (1983).

27. The total fees requested by the Applicant are reasonable under the circumstances, and the *Johnson* Factor analysis, as discussed below, supports an award of compensation in the amount requested.

Time and Labor Required

28. The Applicant has described, in this Application and the attached invoice, the services performed and the time expended.

The Novelty and Difficulty of the Questions Raised

29. The issues involved were those generally expected to routinely be encountered in prosecuting fraudulent conveyance actions. Although not extremely complex cases, it has nonetheless been important for the Applicant to use its experience in bankruptcy and litigation to render the services deemed necessary at the time they were rendered.

Skill Required to Perform the Legal Services Required

30. Representation of the Trustee has required the Applicant to exercise skill and expertise in the preparation of all documentation filed and all actions taken in accordance with the strictures of the Bankruptcy Code and the Bankruptcy Rules.

Preclusion of Other Employment Due to Acceptance of Case

31. This factor has no applicability to this case.

Customary Fee for Similar Work

32. The hourly rate for the attorney listed in *Exhibit A* reflects the normal and customary rates charged for the Applicant's services to debtors, creditors, trustees, receivers and other clients in bankruptcy and state court insolvency proceedings. Applicant believes and avers that its fees are comparable to those charged by other small and medium-sized Baltimore law firms, and that the total compensation sought is reasonable compared with fees charged by other similarly situated law firms in comparable cases.

Attorney's Expectation at Outset of Litigation

33. The Order authorizing the employment of Applicant approved fees based upon Applicant's customary charges, subject, of course, to the filing, notice and court-approval of this Application. As such, Applicant expected that it would be compensated for services rendered at

its standard hourly rates and would be reimbursed for all out-of-pocket disbursements made on behalf of the Trustee.

Time Limitations Imposed by Client or Circumstances

34. This factor has little applicability to this case.

Amount of Controversy and Results Obtained

35. The services rendered by Applicant in this case, and the necessity for said services, is reflected in the time recorded entries of the bill for the Application Period attached as *Exhibit A*. Those services, and the necessity thereof, are also described above.

36. As for the results obtained, the Applicant has brought \$85,000.00 into the estate for the benefit of its creditors.

Experience, Reputation and Ability of the Attorneys

37. Applicant is a law firm that concentrates primarily in bankruptcy, insolvency and related debtor/creditor work. Applicant serves on the Chapter 7 Trustee Panel, and for the past twenty-four (24) years has routinely represented bankruptcy trustees. Applicant believes that it enjoys the experience, reputation and abilities that are commensurate with the fee allowance requested.

The Undesirability of the Case within the Legal Community

38. This factor has only limited applicability to this case. As a result of the representing the Trustee, Applicant has necessarily been forced to accept delays in obtaining compensation. Such delays do not occur in representing clients in other bankruptcy cases or other clients outside of bankruptcy.

Nature and Length of Professional Relationship with Client

39. This factor has no applicability to this case.

Awards in Similar Cases

40. The compensation sought by Applicant is not inconsistent with, and is considered to be less than, awards provided by this Court in other similar cases to other firms that have provided similar work and who have achieved similar results.

III. SUMMARY

41. All legal services for which compensation is requested in this Application were performed by Applicant for or on behalf of the Trustee and not on behalf of any other person or entity. No beneficial interests, direct or indirect, or claim against, or interest of the Trustee has been acquired by Applicant or for its account.

42. No payments have been made or promised to the Applicant. There exists no agreement or understanding between Applicant and any other person for the sharing of compensation received or to be received for the services rendered in connection with these proceedings.

43. Applicant has performed necessary services for and provided significant benefits to the Trustee from March 7, 2023, through September 12, 2025, resulting in fees, after a discount of 7%, in the amount of \$17,000.00, as well as reimbursement of \$1,888.37 for out-of-pocket expenses and other charges.

44. Notice of this Application has been given to the Office of the United States Trustee, all creditors, and parties-in-interest who have filed a request with the Clerk of the Court that such notices be mailed to them, and all persons entitled to receive notice pursuant to the Bankruptcy Rules.

45. The Trustee has reviewed and approved the fees and expenses requested in this Application.

WHEREFORE, Applicant respectfully requests the following relief:

- A. That Applicant be awarded compensation in the amount of \$17,000.00 for its services rendered to the Trustee, plus the reimbursement for out-of-pocket expenses in the amount of \$1,888.37; and
- B. That the Trustee be authorized to pay Applicant the fees and expenses awarded; and
- C. That Applicant be granted such other and further relief as is just and equitable.

/s/ Craig B. Leavers
Craig B. Leavers, Bar No. 26914
P.O. Box 306
Cockeysville, Maryland 21030
(443) 318-4526
Craig@LeaversLaw.com

(Attorney for the Trustee)

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 16th day of September, 2025, a copy of the foregoing was served on the parties listed below by electronic service via CM/ECF:

Ronald B. Greene, Esq.
4500 Forbes Blvd., 2nd Floor
Lanham, Maryland 20706
(Attorney for Debtor)

Rebecca A. Herr, Trustee
185 Admiral Cochrane Dr., Ste 240
Annapolis, Maryland 21401

And on the parties listed below by first class mail, postage prepaid:

Office of the United States Trustee
6305 Ivy Lane, Suite 600
Greenbelt, Maryland 20770

Jennifer C. Givins
4903 Ashford Drive
Upper Marlboro, Maryland 20772
(Debtor)

/s/ Craig B. Leavers
Craig B. Leavers

EXHIBIT A

The Law Offices of Craig B. Leavers, LLC

P.O. Box 306

Cockeysville, Maryland 21030

(443) 318-4526

In Reference To: Herr v. Jennifer Thompson, et al. (In re Jennifer C. Givins)

Professional Services

		<u>Activity</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/7/2023	cbl	review amended complaint in adversary proceeding, defendants' answer, and scheduling order (.3)	0.4	\$400.00	\$160.00
3/8/2023	cbl	telephone conference with Jeff Orenstein re: status of state court litigation and adversary proceeding, suggestion of staying the adversary proceeding, his facts in the case and his client's defenses, settlement discussions, my request for the discovery provided thus far, and new scheduling order (.9); telephone conference with client re: my conversation with JOrenstein, my request for documents recieved pertaining to the trustee's cliams, and suggested course of action going forward (.3)	1.2	\$400.00	\$480.00
3/11/2023	cbl	research and review FL and GA law re: standards for determining equitable v. legal interest (2.1); cursory review of documents produced by JOrenstein, attorney for defendants (.6)	2.7	\$400.00	\$1,080.00
7/28/2023	cbl	emails by and between me and JOrenstein, attorney for defendants, Georgia court further delaying trial until December and defendants' desire to settle AP if possible (.1);	0.1	\$400.00	\$40.00
9/8/2023		telephone conference with Jeff Orenstein re: questions about bank statements, tax returns and other documents produced in discovery, as well as my request for additional documents	0.5	\$400.00	\$200.00
9/11/2023	cbl	follow up email to Jeff Orenstein with request for additional documents (.2); telephone conference with, followed by email to, James Carmon, attorney for Debtor, re: request for debtor's tax returns and bank statements (.2);	0.4	\$400.00	\$160.00

9/12/2023	cbl	emails by and between me, Bob Hockenbury and Jeff Orenstein re: dates for deposition of defendants (.1);	0.1	\$400.00	\$40.00
9/13/2023	cbl	review bank statements, tax returns, and other documents produced by debtor's attorney	0.6	\$400.00	\$240.00
9/28/2023	cbl	telephone conference with Jeff Orenstein, followed by email to Bob Hockenbury, re: defendants desire to cancel their deposition and settlement discussions pending the outcome of the state court litigation now scheduled for December (.1)	0.1	\$400.00	\$40.00
12/6/2023	cbl	emails by and between me and Jeff Orenstein re: whether trial occurred and inquiry as to its outcome (.1)	0.1	\$400.00	\$40.00
12/19/2023	cbl	review and respond to email from Jeff Orenstein re: ruling on Mtn for Summary Judgment in the state court litigation (.1); review full Order and Opinion on Mtn for Summary Judgment in state court litigation (.4)	0.5	\$400.00	\$200.00
1/8/2024	cbl	emails by and between me and Jeff Orenstein re: defendants still wanting for resolution of state court litigation before attempting to settle AP (.1)	0.1	\$400.00	\$40.00
3/27/2024	cbl	emails by and between me and Jeff Orenstein re: status of trial in state court litigation (.1)	0.1	\$400.00	\$40.00
8/1/2024	cbl	emails by and between me and Jeff Orenstein re: status of trial in state court litigation (.1)	0.1	\$400.00	\$40.00
12/13/2024	cbl	review and respond to email from Jeff Orenstein re: debtor wanting to resume settlement discussions, followed by email to the trustee concerning the same	0.1	\$400.00	\$40.00
12/20/2024	cbl	telephone conference with trustee re: defendants desire to settle and need for deposition of defendants before doing so (.1); telephone conference with Jeff Orenstein re: trustee's willingness to entertain settlement and need for deposition before discussing settlement (.2)	0.3	\$400.00	\$120.00
12/24/2024	cbl	emails by and between me and Jeff Orenstein re: depo dates of defendants	0.1	\$400.00	\$40.00
1/21/2025	cbl	further emails by and between me and Jeff Orenstein re: depo dates for defendants	0.1	\$400.00	\$40.00

2/5/2025	cbl	conduct Zoom deposition of defendants (.8);	0.8	\$400.00	\$320.00
2/13/2025	cbl	voicemail followed by email to Alan Eisler, local counsel for Tidewater, re: request for any documents Tidewater may have received in response to discovery (.2); review deeds emailed to me by AEisler (.2); telephone conference with Alan Eisler and Bruce Walker re: documents and other information that they have concerning the debtor's defense of having only bare legal title to the properties (.3); emails by and between me and Jeff Orenstein re: request for documents noted in deposition (.2)	0.9	\$400.00	\$360.00
3/x/2025	cbl	review documents and notes from Bruce Walker, attorney for Tidewater, concerning his analysis of claims and defenses	0.5	\$400.00	\$200.00
3/15/2025	cbl	review additional discovery documents provided by Jeff Orenstein (.4);	0.4	\$400.00	\$160.00
3/19/2025	cbl	telephone conference with Jeff Orenstein and later with Trustee re: status of adversary proceeding and significance to status of confirmation for tomorrow's status conference (.1); follow up email to Jeff Orenstein re: documents missing from supplemental production (.1);	0.2	\$400.00	\$80.00
3/20/2025	cbl	attend status conference	1	\$400.00	\$400.00
4/18/2025	cbl	review additional documents and notes provided by Bruce Walker, attorney for Tidewater	0.3	\$400.00	\$120.00
5/2/2025	cbl	create proof chart referencing discovery documents obtained from defendants, debtor and Tidewater thus far	1.1	\$400.00	\$440.00
5/5/2025	cbl	review more notes provided by Bruce Waler, attorney for Tidewater, as well as the cases for which he had recently provide citations	1.4	\$400.00	\$560.00
5/9/2025	cbl	review and analyze JCG bank statements provided by Bruce Walker (.9); revise proof chart to add deposits into and payment from JCG bank account (1.1)	2	\$400.00	\$800.00
5/12/2025	cbl	research FL land records and review and analyze all conveyances of properties by and between defendants and debtor and her sister	2.1	\$400.00	\$840.00

5/15/2025	cbl	email to followed by telephone conference with David Barkett of Dominion Park Title Company re: whether he still have records from closing in 2017 (.2); continue research of FL land records and review and analyze all conveyances of properties by and between defendants and debtor and her sister (1.2); revise proof chart to add all conveyances of FL properties by and between defendants and debtor and her sister, to include properties not at issue in litigation (1.1); research GA land records and reveiw and analyze conveyances of properties by and between defendants and debtor and her sister (.8)	3.3	\$400.00	\$1,320.00
5/16/2025	cbl	emails by and between me, JOrenstein, and Rgreene re: deposition dates for Debtor and Defendants (.2); draft Interrogatories and Request for Production of Documents to Defendants (1.1); draft Notice of Service of Discovery (.1); email to JOrenstein, attorney for defendants, re: pdf and MS Word copy of discovery (.1);	1.5	\$400.00	\$600.00
5/20/2025	cbl	draft Notice of Depo Duces Tecum for Dominion Parks Title Co, attachment to Subpoena setting forth request for produciton of documents, and Notice of Service of Disc upon Dominion Parks Title Co (1.1); complete subpoena form for Dominion Parks Title (.1)	1.2	\$400.00	\$480.00
5/23/2025	cbl	draft Notice of Depo Duces Tecum for Bluevine, attachment to Subpoena setting forth request for produciton of documents, and Notice of Service of Disc upon Bluevine (1.1); complete subpoena form for Bluevine (.1)	1.2	\$400.00	\$480.00
6/2/2025	cbl	email to followed by telephone conference with Bruce Walker re: releasing lis pendens on one of the Thompson condos (.1)	0.1	\$400.00	\$40.00
6/4/2025	cbl	review and analyze documents produced by Bluevine (.8)	0.8	\$400.00	\$320.00
6/6/2025	cbl	emails by and between me, JOorenstein, and RGreene re: revised deposition dates for Debtor and Defendants (.2)	0.2	\$400.00	\$80.00

6/10/2025	cbl	draft Notice of Depo and Notice of Service of Discovery for Defendants (.5); draft Notice of Depo, Notice of Service of Discovery, and complete Subpoena for Debtor (.7);	1.2	\$400.00	\$480.00
6/11/2025	cbl	review documents provided by Dominion Title (.4); draft Custodian of Records Affidavit for Dominion Title Co (.4); email to David Barkett, Pres of Dominion Title, re: executing Custodian of Records Affidavit (.1)	0.9	\$400.00	\$360.00
6/17/2025	cbl	draft Notice of Depo Duces Tecum for Bank of America (.4); draft attachment to subpoena for Bank of America (.1); complete subpoena for Bank of America (.2); draft Notice of Service of Discovery for Depo Duces Tecum for Bank of America (.1);	0.8	\$400.00	\$320.00
7/1/2025	cbl	review and respond to email from Bank of America re: BoA's request for Mrs. Thompson's social security number to enable it to locate correct account (.1); voicemail followed by email to JOrenstein, attorney for defendants, re: status of responses to discovery (.1)	0.2	\$400.00	\$80.00
7/7/2025	cbl	review documents produced by defendants in response to RFPD as well as Bank of America bank statements for trust account	0.7	\$400.00	\$280.00
7/14/2025	cbl	attend and conduct Zoom deposition of the defendants (2.8)	2.8	\$400.00	\$1,120.00
7/15/2025	cbl	prepare for deposition of debtor	0.7	\$400.00	\$280.00
7/17/2025	cbl	attend and conduct deposition of debtor (4.8)	4.8	\$400.00	\$1,920.00
7/18/2025	cbl	further search and review of GA land records for ownership of properties noted by debtor at her deposition	0.5	\$400.00	\$200.00
7/21/2025	cbl	telephone conference with trustee re: proof chart, the depositions, strength of claims and defenses and settlement (.8); telephone conference with Bruce Walker re: the depositions, my proof chart, strength of claims and defenses and settlement (.6)	1.4	\$400.00	\$560.00

7/24/2025	cbl	telephone conference with counsel for defendants re: settlement discussions and trustee's settlment offer of \$100k (.3); another telephone conference with counsel for defendants re: counteroffer of \$85k (.1); draft email to trustee re: counteroffer of \$85k (.4); draft settlement agreement (.5); draft 9019 Mtn and notices of the 9019 Mtn (.8); email to trustee and email to defendants' counsel re: draft settlement agreement (.1)	2.2	\$400.00	\$880.00
7/25/2025	cbl	review revisions made to settlement agreement by defendants' counsel and email to the trustee concerning the same (.3)	0.3	\$400.00	\$120.00
7/29/2025	cbl	revise and finalize 9019 Mtn and propsoed order to comport with revisions made by defendants' counsel in settlement agreement (.6); email to Jeff Orenstein, defendants' counsel, re: trustee's execution of settlement agreement and draft of 9019 motion and proposed order (.1)	0.7	\$400.00	\$280.00
7/30/2025	cbl	emails by and between me and Jeff Orenstein, defendants' attorney, amount of time for defendants to remit settlement payment after entry of approval order, followed by email to trustee concerning the same (.1)	0.1	\$400.00	\$40.00
8/4/2025	cbl	emails by and between me and trustee re: additional detail in 9019 motion (.3);	0.3	\$400.00	\$120.00
9/5/2025	cbl	emails by and between me, trustee and counsel for defendants re: settlement payment (.1)	0.1	\$400.00	\$40.00
9/9/2025	cbl	draft Stipulation of Dismissal and emails by an between me and Jeff Orenstein, attonrey for defendants, concerning the same	0.2	\$400.00	\$80.00
9/12/2025	cbl	draft CBL Fee App	1.1	\$400.00	\$440.00
TOTAL PROFESSIONAL SERVICES			45.6		\$18,240.00

Fees, Costs, Expenses

		<u>Expense</u>	<u>Price</u>	<u>Amount</u>
2/25/2025	cbl	Transcript - CRC Salomon - Inv No 172002 (Depo of Jennifer and John Thompson)	\$330.00	\$330.00
5/16/2025	cbl	Photocopies (Roggs and RFPD to defendants and counsel)	\$0.20 (x20)	\$4.00

5/16/2025	cbl	Postage - First Class Mail (Roggs and RFPD to defendants and counsel)	\$0.73 (x2)	\$1.46
5/20/2025	cbl	Postage - Certified Mail (Notice of Depo Duces Tecum, Subpoena and notice of Service of Disc - Dominion Parks Title Co - to title company)	\$9.96	\$9.96
5/20/2025	cbl	Photocopies (Notice of Depo Duces Tecum, Subpoena and notice of Service of Disc - Dominion Parks Title Co - to defendants and counsel)	\$0.20 (x22)	\$4.40
5/20/2025	cbl	Postage - First Class Mail (Notice of Depo Duces Tecum, Subpoena and notice of Service of Disc - Dominion Parks Title Co - to defendants and counsel)	\$0.73 (x2)	\$1.46
5/23/2025	cbl	Postage - Certified Mail (Notice of Depo Duces Tecum, Subpoena and notice of Service of Disc - Bluevine, Inc - to Bluevine)	\$10.42	\$10.42
5/23/2025	cbl	Photocopies (Notice of Depo Duces Tecum, Subpoena and notice of Service of Disc - Bluevine, Inc. - to defendants and counsel)	\$0.20 (x48)	\$9.60
5/23/2025	cbl	Postage - First Class Mail (Notice of Depo Duces Tecum, Subpoena and notice of Service of Disc - Bluevine, Inc. - to defendants and counsel)	\$1.01 (x4)	\$4.04
6/10/2025	cbl	Photocopies (Notice of Depo and Notice of Service of Disc - Defendants)	\$0.20 (x8)	\$1.60
6/10/2025	cbl	Postage - First Class Mail (Notice of Depo and Notice of Service of Disc - Defendants)	\$0.73 (x2)	\$1.46
6/10/2025	cbl	Photocopies (Notice of Depo, Notice of Service of Disc, Subpoena - Debtor)	\$0.20 (x28)	\$5.60
6/10/2025	cbl	Postage - First Class Mail (Notice of Depo, Notice of Service of Disc, Subpoena - Debtor)	\$0.73 (x4)	\$2.92
6/10/2025	cbl	Photocopies (GA Superiour Court - deed search and copies)	\$19.95	\$19.95
6/17/2025	cbl	Photocopies (Notice of Depo Duces Tecum, Notice of Service of Disc, Subpoena - Bank of America - to defendants, debtor and respective counsel)	\$0.20 (x48)	\$9.60

6/17/2025	cbl	Postage - First Class Mail (Notice of Depo Duces Tecum, Notice of Service of Disc, Subpoena - Bank of America - to defendants, debtor and respective counsel)	\$1.01 (x4)	\$4.04
7/15/2025	cbl	Photocopies (Exhibits for Debtor's Deposition)	\$0.20 (x97)	\$19.40
8/4/2025	cbl	Photocopies (9019 Mtn)	\$0.20 (x24)	\$4.80
8/4/2025	cbl	Postage - First Class Mail (9019 Motion)	\$0.78 (x4)	\$3.12
8/4/2025	cbl	Photocopies (Notice of 9019 Mtn to Creditors)	\$0.15 (x58)	\$4.80
8/4/2025	cbl	Postage - First Class Mail (Notice of 9019 Mtn to Creditors)	\$0.74 (x29)	\$21.46
8/10/2025	cbl	Photocopies (GA Superiour Court - deed search and copies)	\$17.95	\$17.95
8/7/2025	cbl	Transcript - CRC Salomon - Inv No 177775 (Depo of Jennifer and John Thompson)	\$813.00	\$813.00
8/7/2025	cbl	Transcript - CRC Salomon - Inv No 177804 (Depo of Jennifer Givins)	\$545.25	\$545.25
9/12/2025	cbl	Photocopies (CBL Fee App)	\$0.20 (x24)	\$4.80
9/12/2025	cbl	Postage - First Class Mail (CBL Fee App)	\$0.78 (x4)	\$3.12
9/12/2025	cbl	Photocopies (Notice of CBL Fee App)	\$0.15 (x58)	\$8.70
9/12/2025	cbl	Postage - First Class Mail (Notice of CBL Fee App)	\$0.74 (x29)	\$21.46
TOTAL FEES, COSTS, EXPENSES				\$1,888.37

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:

*

Case No. 22-14337-MCR

JENNIFER C. GIVINS,

*

(Chapter 13)

Debtor.

*

* * * * *

**ORDER GRANTING APPLICATION OF THE LAW OFFICES OF CRAIG B.
LEAVERS, LLC FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES AS SPECIAL COUNSEL TO TRUSTEE
FOR THE PERIOD FROM MARCH 7, 2023, THROUGH SEPTEMBER 12, 2025**

Upon consideration of the Application of The Law Offices of Craig B. Leavers, LLC for Allowance of Compensation and Reimbursement of Expenses as Special County to Trustee for the Period from March 7, 2023, through September 12, 2025 (the “Application”), and good cause having been shown, it is, by the United States Bankruptcy Court for the District of Maryland,

ORDERED, that the Application is hereby **GRANTED**; and it is further

ORDERED, that The Law Offices of Craig B. Leavers, LLC is hereby allowed compensation in the amount of \$17,000.00 for its services rendered to the Trustee, plus the reimbursement for out-of-pocket expenses in the amount of \$1,888.37; and it is further

ORDERED, that that The Law Offices of Craig B. Leavers, LLC be and is hereby granted an allowed administrative claim in this chapter 13 proceeding in the foregoing amounts allowed

as compensation for its services to the Trustee and for the reimbursement for out-of-pocket expenses in doing so; and it is further

ORDERED that the Trustee is hereby authorized and directed to make said payment to The Law Offices of Craig B. Leavers, LLC.

Cc: Rebecca A. Herr, Trustee via CM/ECF

Craig B. Leavers, Esq. via CM/ECF

Ronald B. Greene, Esq. via CM/ECF

Office of the United States Trustee
6305 Ivy Lane, Suite 600
Greenbelt, Maryland 20770

Jennifer C. Givins
4903 Ashford Drive
Upper Marlboro, Maryland 20772

END OF ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:

*

Case No. 22-14337-MCR

JENNIFER C. GIVINS,

*

(Chapter 13)

Debtor.

*

* * * * *

**NOTICE OF APPLICATION OF THE LAW OFFICES OF CRAIG B. LEAVERS, LLC
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES AS SPECIAL COUNSEL TO TRUSTEE
FOR THE PERIOD FROM MARCH 7, 2023, THROUGH SEPTEMBER 12, 2025**

TO CREDITORS AND PARTIES IN INTEREST:

PLEASE TAKE NOTICE that The Law Offices of Craig B. Leavers, LLC, Special Counsel for Rebecca A. Herr, the Chapter 13 Trustee in the above-captioned case, filed its Application for Allowance of Compensation and Reimbursement of Expenses as Special Counsel to Trustee for the Period of March 7, 2023, through September 12, 2025 (the “Application”). The Application may be inspected at the Clerk’s Office, United States Bankruptcy Court, 6500 Cherrywood Lane, Suite 300, Greenbelt, Maryland 20770. It can also be viewed at <https://www.leaverslaw.com/trustee-cases>.

COMPENSATION SOUGHT: The Application seeks the allowance of fees in the amount of \$17,000.00, as well as reimbursement of \$1,888.37 for out-of-pocket expenses and other charges.

NOTICE IS FURTHER GIVEN that objections, if any, must be filed with the Clerk of the Bankruptcy Court, 6500 Cherrywood Lane, Suite 300, Greenbelt, Maryland 20770, and served upon the undersigned within twenty-one (21) days of the date of this Notice. If objections are filed, they must state the facts and legal grounds on which they are based. The Court may act on any such objection with or without a hearing, at its discretion. If no objection is filed, the Court may approve the Application without further notice.

[Continued Next Page]

Parties-in-interest desiring further information should contact the undersigned counsel.

/s/ Craig B. Leavers
Craig B. Leavers, Bar No. 26914
P.O. Box 306
Cockeysville, Maryland 21030
(443) 318-4526
Craig@LeaversLaw.com

(Attorney for the Trustee)

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 16th day of September, 2025, a copy of the foregoing was served on the parties listed below by electronic service via CM/ECF:

Ronald B. Greene, Esq.
4500 Forbes Blvd., 2nd Floor
Lanham, Maryland 20706
(Attorney for Debtor)

Rebecca A. Herr, Trustee
185 Admiral Cochrane Dr., Ste 240
Annapolis, Maryland 21401

And on the parties listed below by first class mail, postage prepaid:

Office of the United States Trustee
6305 Ivy Lane, Suite 600
Greenbelt, Maryland 20770

Jennifer C. Givins
4903 Ashford Drive
Upper Marlboro, Maryland 20772
(Debtor)

Attached creditors matrix

/s/ Craig B. Leavers
Craig B. Leavers

Label Matrix for local noticing
0416-0
Case 22-14337
District of Maryland
Greenbelt
Mon Aug 4 13:40:02 EDT 2025

TD Bank, N.A., successor in interest to TD A
1715 Aaron Brenner Drive, Suite 800
Memphis, TN 38120-1445

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Capital One
ATTN: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0285

Fortiva
Attn: Bankruptcy
Po Box 105555
Atlanta, GA 30348-5555

State of Maryland DLLR
Division of Unemployment Insurance
1100 N. Eutaw Street, Room 401
Baltimore, MD 21201-2226

Tidewater Capital Partners LLC
c/o James G. Killough, Esq.
6075 Barfield Rd., SynerG Law Complex
Atlanta, GA 30328-4402

Truist Bank
P.O. Box 27767
306-40-04-95
Richmond, VA 23261-7767

Jennifer Thompson
c/o Jeffrey M. Orenstein
15245 Shady Grove Road
Suite 465
Rockville, MD 20850-7203

Rebecca A. Herr
Chapter 13 Trustee
185 Admiral Cochrane Dr.
Suite 240
Annapolis, MD 21401-7623

Capital One Auto Finance, a division of Capi
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Tidewater Capital Partners, LLC
c/o Glendon Smith
6075 Barfield Road, Suite 113
Atlanta, GA 30328-4402

Amex
Correspondence/Bankruptcy
Po Box 981540
El Paso, TX 79998-1540

(p)COMPTROLLER OF MARYLAND
BANKRUPTCY UNIT
7 ST PAUL STREET SUITE 230
BALTIMORE MD 21202-1626

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

TD Bank, N.A.
c/o Jacob Zweig, Esq., Evans Petree PC
1715 Aaron Brenner Drive, Suite 800
Memphis, TN 38120-1445

Tidewater Capital Partners, LLC
c/o Michael A. Nardella
135 W. Central Blvd., Suite 300
Orlando, FL 32801-2435

Bruce Z. Walker
Cohen, Pollock, Merlin, Turner, P.C.
3350 Riverwood Parkway
Suite 1600
Atlanta, GA 30339-3359

Jennifer C. Givins
4903 Ashford Dr.
Upper Marlboro, MD 20772-2776

Ronald B. Greene
Ronald B. Greene, Esquire
4500 Forbes Blvd.
Second Floor
Lanham, MD 20706-6312

Prince George's County, Maryland
c/o Meyers, Rodbell & Rosenbaum, P.A.
6801 Kenilworth Ave.
Suite 400
Riverdale Park, MD 20737-1331

Truist Bank
1001 Semmes Avenue
Richmond, VA 23224-2245

Barclays Bank Delaware
PO Box 8803
Wilmington, DE 19899-8803

Financial Recovery Services Inc.
PO Box 21405
Saint Paul, MN 55121-0405

Prince George's County, Maryland
Office of Finance
1301 McCormick Drive, Ste. 1100
Largo, MD 20774-5416

Td Auto Finance
Attn: Bankruptcy
Po Box 9223
Farmington Hills, MI 48333-9223

Truist Bank
Attn: Bankruptcy
Mail Code VA-RVW-6290 POB 85092
Richmond, VA 23286-0001

Craig B. Leavers
The Law Offices of Craig B. Leavers, LLC
P.O. Box 306
Cockeysville, MD 21030-0306

John Thompson Jr.
c/o Jeffrey M. Orenstein
15245 Shady Grove Road
Suite 465
Rockville, MD 20850-7203

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Comptroller of the Treasury
Compliance Division, Room 409
301 W. Preston Street
Baltimore, MD 21201

Portfolio Recovery Associates, LLC
POB 41067
Norfolk, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Prince George's County, Maryland
c/o Meyers, Rodbell & Rosenbaum, P.A.
6801 Kenilworth Ave., Ste. 400
Riverdale Park, MD 20737-1331

(d)Tidewater Capital Partners, LLC
c/o Glendon Smith
6075 Barfield Road, Suite 113
Atlanta, GA 30328-4402

End of Label Matrix	
Mailable recipients	28
Bypassed recipients	2
Total	30