

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

In re:

*

Case No. 22-13884-NVA

RAPID RESTORATION, INC.,

*

(Chapter 7)

Debtor.

*

* * * * *

**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 JUNE 7, 2024, THROUGH APRIL 25, 2025**

The Law Offices of Craig B. Leavers, LLC (the “Applicant”) hereby files this application (the “Application”) requesting entry of an Order approving the allowance of compensation and reimbursement of expenses for the work of the Applicant in providing legal services to Patricia B. Jefferson, the Chapter 7 Trustee in the above-captioned case (the “Trustee”), for the period from June 7, 2024, through April 25, 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 in the amount of, after the write-down of a little over percent (10%) noted herein, \$5,000.00, as well as reimbursement of \$110.56 for out-of-pocket expenses and other charges, for services rendered during the Application Period.

I. INTRODUCTION

3. Rapid Restoration, Inc., the debtor in the above-captioned bankruptcy case, commenced the above-captioned bankruptcy case (the “Bankruptcy Case”) by filing a voluntary petition under chapter 7 of the Bankruptcy Code on July 18, 2022 (the “Petition Date”).

4. The Trustee was appointed to serve as interim trustee in this chapter 7 proceeding, and no other trustee was appointed at the Debtor’s Meeting of Creditors held on September 20, 2022.

A. General Background

5. Prior to the Petition Date, the President of the Debtor, Henry R. Tiburzi (“Tiburzi”), held a personal credit card (the “Tiburzi Chase Card”) issued by JPMorgan Chase Bank, N.A. (“Chase”). During the period of January 2020 to the Petition Date, the Debtor made a series of payments totaling \$90,734.66 to Chase on account of the Tiburzi Chase Card (the “Transfers”).

6. The Trustee believed that the Transfers constituted avoidable and recoverable transfers under 11 U.S.C. §§ 544(b), 548, and 550 and under applicable state law (the “Trustee’s Claims”).

7. Seeking to avoid the Transfers, on June 7, 2024, the Trustee filed his application to employ the Applicant. (Doc. No. 56). On July 8, 2024, this Court entered an Order authorizing the Trustee’s employment of the Applicant. (Doc. No. 64)

II. **COMPENSATION REQUESTED AND THE LEGAL STANDARD TO BE APPLIED**

8. For the Application Period, the Applicant is requesting the allowance of fees in the amount of, after a write-down of a little over percent (10%), \$5,000.00, as well as reimbursement of \$110.56 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	12.5	\$450.00	\$5,625.00	\$625.00	\$5,000.00

TOTAL OUT-OF-POCKET EXPENSES	
Photocopying	\$ 32.60
Postage	77.96
Matter Total	\$ 110.56

9. 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”).

10. 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.

11. 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

12. 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.

13. 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**

14. 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.

15. As for the serviced rendered, prior to commencing litigation, the Applicant reviewed documents provided by the Trustee in support of her assertions that the Transfers were avoidable. Afterwards, the Applicant drafted and filed the Trustee's Complaint to Avoid and Recover Fraudulent Transfers (the "Complaint"), thereby commencing that adversary proceeding styled *Patricia B. Jefferson, Chapter 7 Trustee v. JPMorgan Chase Bank N.A.*, Adversary Proceeding No. 24-00182 (the "Adversary Proceeding"). After commencing the Adversary Proceeding, at the request by Chase's legal counsel, drafted and filed a Stipulation and Consent Order extending the deadline for Chase to file an answer or otherwise respond to the Complaint. (Adv. Pro., Doc. No. 5) Thereafter, after Chase filed its answer to the Complaint, Applicant draft a Rule 26(f) Report, and reviewed and revised revisions made by Chase legal counsel of the same. (Adv. Pro., Doc No 11) After entry of a scheduling order, Applicant and legal counsel for Chase began conducting settlement discussion and exchanging informal discovery. This ultimately resulted in the Applicant drafting and revising drafts of a settlement agreement that, in final form, provided for a payment to the Trustee in the amount of \$38,000.00 (the "Settlement Payment") to resolve all matters as issue in the Adversary Proceeding (the "Settlement Agreement"). After execution of the Settlement Agreement, the Applicant draft and filed a motion and notice pursuant to Fed. R. Bankr. P. 9019 seeking approval of the Settlement Agreement. (Adv. Pro., Doc No 15) That motion was granted.

(Adv. Pro., Doc No 16) After the Trustee received the Settlement Payment, the Application drafted and filed a Stipulation of Dismissal of the Adversary Proceeding. (Adv. Pro., Doc. No. 18) The Applicant also drafted this 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 litigation matters, 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 litigation matters. Although not extremely complex collections 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 the Bankruptcy Case and the Adversary Proceeding 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, due to the Applicant's services, the estate has received \$38,000.00 to be distributed to the estate's 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-three (23) 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 June 7, 2024, through April 25, 2025, resulting in fees, after a write down of a little over percent (10%), of \$5,000.00 and expenses of \$110.56.

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 \$5,000.00 for its services rendered to the Trustee, plus the reimbursement for out-of-pocket expenses in the amount of \$110.56; 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 12th day of May, 2025, a copy of the foregoing was served on the parties listed below by electronic service via CM/ECF:

Robert W. Taylor, Jr., Esq.
Butler, Melfa & Taylor, P.A.
407 W. Pennsylvania Avenue
Towson, Maryland 21204
(Attorney for Debtor)

Patricia B. Jefferson, Esq.
Miles & Stockbridge
100 Light Street
Baltimore, Maryland 21202
(Chapter 7 Trustee)

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

Office of the United States Trustee
101 West Lombard Street, Suite 2625
Baltimore, Maryland 21201

Rapid Restoration, Inc.
7855 Belair Road
Nottingham, Maryland 21236
(Debtor)

/s/ Craig B. Leavers
Craig B. Leavers

EXHIBIT A

Case 22-13884 Doc 73-1 Filed 05/12/25 Page 2 of 5
The Law Offices of Craig B. Leavers, LLC
P.O. Box 306
Cockeysville, Maryland 21030
(443) 318-4526

In Reference To: Rapid Restoration, Inc., Case No. 22-13884-NVA

Professional Services

		<u>Activity</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/15/2024	cbl	review M&T and WF bank statements and chart of transfers provide by Trustee, revising chart to comport with bank statements (.6)	0.6	\$450.00	\$270.00
7/16/2024	cbl	draft Complaint to Avoid and Recover Fraudulent Transfers;	2.1	\$450.00	\$945.00
7/24/2024	cbl	draft Affidavit of Service	0.2	\$450.00	\$90.00
8/13/2024	cbl	review and respond to email from Alissa Piccione, attorney for defendant, re: extending deadline to respond to complaint (.1); draft Stip and Consent order extending deadline for defendant to respond to complaint and forward same to APiccione for reveiw amd comment (.3);	0.4	\$450.00	\$180.00
8/19/2024	cbl	review revisions made to Stip and Consent order by opposing counsel and respond to email from opposing counsel concerning the approval of the revisions (.1);	0.1	\$450.00	\$45.00
8/26/2024	cbl	email to opposing counsel re entry of Stip and Consent, followed by email to chambers requesting new date for pretrial conference (.1)	0.1	\$450.00	\$45.00
9/24/2024	cbl	emails by and between me and Alissa Piccione, attorney for defendant, re: wanting to settle case and requesting another extension to file an answer (.2)	0.2	\$450.00	\$90.00
9/25/2024	cbl	draft Rule 26(f) Report (.5); email to Alissa Piccione, attorney for defendant, re: Rule 26(f) Report (.1)	0.6	\$450.00	\$270.00
9/30/2024	cbl	review Answer to Complaint (.1)	0.1	\$450.00	\$45.00

10/1/2024	cbl	emails by and between me and Alissa Piccione, attorney for defendant, re: revising Rule 26(f) statement (.1); revised Rule 26(f) report (.1); email to chambers re: Rule 26(f) report being filed and removing pretrial from court's docket (.1)	0.3	\$450.00	\$135.00
10/2/2024	cbl	review and analyze email from Alissa Piccione, attorney for defendant, re: settlement offer (.2); draft email to Trustee re: defendant's settlement offer (.2)	0.4	\$450.00	\$180.00
10/3/2024	cbl	emails by and between me and Trustee re: defendant's responses to allegations of insolvency and the amount of transfer actually in controversy	0.3	\$450.00	\$135.00
10/4/2024	cbl	emails by and between me and Trustee re: information and/or documentation concerning admissions concerning inability to repay	0.2	\$450.00	\$90.00
10/10/2024	cbl	email to Alissa Piccione, attorney for defendant, re: Trustee's counteroffer and response to defendant's defenses concerning insolvency and other defenses (.4)	0.4	\$450.00	\$180.00
10/22/2024	cbl	follow up email to Alissa Piccione, attorney for defendant, re: Trustee's counteroffer	0.1	\$450.00	\$45.00
10/29/2024	cbl	review counteroffer and defenses from Alissa Piccione, attorney for defendant, and email to trustee concerning the same (.4); emails by and between me and Alissa Piccione re: defendant's defenses (.3)	0.7	\$450.00	\$315.00
10/30/2024	cbl	telephone conference with Alissa Piccione, attorney for the defendant, re: settlement discussions and issues with the defenses being raised (.3); follow up email to APiccione re: issues with defenses being raised and the larger issue with insolvency (.3)	0.6	\$450.00	\$270.00
11/11/2024	cbl	review email from Alissa Piccione, attorney for the defendant, re: new settlement offer, and email to trustee concerning the same (.1);	0.1	\$450.00	\$45.00
11/12/2024	cbl	draft settlement agreement (.8); email to Trustee re: draft settlement agreement (.1);	0.9	\$450.00	\$405.00

11/19/2024	cbl	emails by and between me and trustee re: draft of settlement agreement (.1); email to Alissa Piccione, attorney for defendant, re: trustee's acceptance of new settlement offer and draft of settlement agreement (.1);	0.2	\$450.00	\$90.00
12/11/2024	cbl	review revisions to settlement agreement (.3); email to Alissa Piccione re: issues with revisions concerning release being too broad and her removal of provision concerning governing law (.2)	0.5	\$450.00	\$225.00
12/16/2024	cbl	review final version to settlement agreement provided by Alisaa Piccion, attorney for JP Morgan Chase (.3);	0.3	\$450.00	\$135.00
1/6/2025	cbl	revise final version of settlement agreement to provide notice addresses and other non-substantive matters (.2); email to trustee re: final version of settlement agreement for review and approval (.2);	0.4	\$450.00	\$180.00
1/31/2025	cbl	email Alissa Piccion, attorney for JP Morgan Chase, re: executed agreement and getting JP Morgan Chase to execute (.1)	0.1	\$450.00	\$45.00
2/3/2025	cbl	draft 9019 Mtn and Notice of Mtn (.9); draft Notice of 9019 Mtn to be filed in Bankr Case (.2)	1.1	\$450.00	\$495.00
3/28/2025	cbl	emails by and between me and Alissa Piccion, attorney for JP Morgan Chase, re: entry of order approving settlement and issuance of settlement payment (.2);	0.2	\$450.00	\$90.00
4/16/202	cbl	draft stipulation of dismissal (.2); email to Alissa Piccion, attorney for JP Morgan Chase, re: receipt of settlement check and draft of Stip of Dismissal (.1)	0.3	\$450.00	\$135.00
4/25/2025	cbl	draft fee application and notice of fee application	1	\$450.00	\$450.00
TOTAL SERVICES			12.5		\$5,625.00

Fees, Costs, Expenses

		<u>Expense</u>	<u>Price</u>	<u>Amount</u>
7/24/2024	cbl	Photocopies (Summons and Complaint)	\$0.20 (x22)	\$4.40
7/24/2024	cbl	Postage - Certified Mail (Summons and Complaint)	\$9.96 (x2)	\$19.92
2/4/2025	cbl	Photocopies (Notice of Settlement)	\$0.15 (x82)	\$12.30
2/4/2025	cbl	Postage - First Class Mail (Notice of Settlement)	\$0.69 (x41)	\$28.29
5/12/2025	cbl	Photocopies (Fee App and Notice of Fee App to UST and Debtor)	\$0.20 (x18)	\$3.60
5/12/2025	cbl	Postage - First Class Mail (Fee App and Notice of Fee App to UST and Debtor)	\$0.73 (x2)	\$1.46
5/12/2025	cbl	Photocopies (Notice of Fee App)	\$0.15 (x82)	\$12.30
5/12/2025	cbl	Postage - First Class Mail (Notice of Fee App)	\$0.69 (x41)	\$28.29
TOTAL FEES, COSTS, EXPENSES				\$110.56

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

In re:

*

Case No. 22-13884-NVA

RAPID RESTORATION, INC.,

*

(Chapter 7)

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 JUNE 7, 2024, THROUGH APRIL 25, 2025**

Upon consideration of the Application of The Law Offices of Craig B. Leavers, LLC for Allowance of Compensation and Reimbursement of Expenses as Counsel to Trustee for the Period from June 7, 2024, through April 25, 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 \$5,000.00 for its services rendered to the Trustee, plus the reimbursement for out-of-pocket expenses in the amount of \$110.56; and it is further

ORDERED that the Trustee is hereby authorized and directed to make payment to The Law Offices of Craig B. Leavers, LLC in the amount of \$5,000.00 for its services rendered to the Trustee, plus the reimbursement for out-of-pocket expenses in the amount of \$110.56.

cc: Patricia B. Jefferson, Esq. *via CM/ECF*

Craig B. Leavers, Esq. *via CM/ECF*

Robert W. Taylor, Jr., Esq. *via CM/ECF*

Office of the United States Trustee
101 West Lombard Street, Suite 2625
Baltimore, Maryland 21201

Rapid Restoration, Inc.
7855 Belair Road
Nottingham, Maryland 21236

END OF ORDER

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

In re:

*

Case No. 22-13884-NVA

RAPID RESTORATION, INC.,

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(Chapter 7)

Debtor.

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**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 JUNE 7, 2024, THROUGH APRIL 25, 2025**

TO CREDITORS AND PARTIES IN INTEREST:

PLEASE TAKE NOTICE that The Law Offices of Craig B. Leavers, LLC, Special Counsel for Patricia B. Jefferson, the Chapter 7 trustee in the above-captioned case, filed its Application of The Law Offices of Craig B. Leavers, LLC for Allowance of Compensation and Reimbursement of Expenses as Counsel to Trustee for the Period from June 7, 2024, through April 25, 2025 (the “Application”). The Application may be inspected at the Clerk’s Office, United States Bankruptcy Court, 101 West Lombard Street, Suite 8530, Baltimore, Maryland 21201. 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 \$5,000.00, as well as reimbursement of \$110.56 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, 101 West Lombard Street, Suite 8530, Baltimore, Maryland 21201, 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 12th day of May, 2025, a copy of the foregoing was served on the parties listed below by electronic service via CM/ECF:

Robert W. Taylor, Jr., Esq.
Butler, Melfa & Taylor, P.A.
407 W. Pennsylvania Avenue
Towson, Maryland 21204
(Attorney for Debtor)

Patricia B. Jefferson, Esq.
Miles & Stockbridge
100 Light Street
Baltimore, Maryland 21202
(Chapter 7 Trustee)

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

Office of the United States Trustee
101 West Lombard Street, Suite 2625
Baltimore, Maryland 21201

Rapid Restoration, Inc.
7855 Belair Road
Nottingham, Maryland 21236
(Debtor)

Attached creditors' matrix

/s/ Craig B. Leavers
Craig B. Leavers

Label Matrix for local noticing
0416-1
Case 22-13884
District of Maryland
Baltimore
Mon Feb 3 18:02:46 EST 2025

Rapid Restoration, Inc.
7855 Belair Road
Nottingham, MD 21236-4059

Al's Fell's Point Seafood, Inc.
c/o Robert Schulman, Esq.
One East Pratt Street, Suite 904
Baltimore, MD 21202-1193

(p)BALTIMORE COUNTY OFFICE OF LAW
400 WASHINGTON AVENUE
2ND FLOOR
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Towson, MD 21286-5362

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Nottingham, MD 21236-4059

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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).

Baltimore County, MD
Office of Budget & Finance
400 Washington Avenue
Towson, MD 21204

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

(d)Al's Fells Point Seafood Incorporated
7313 Chesapeake Road
Middle River, MD 21220-1101

End of Label Matrix	
Mailable recipients	40
Bypassed recipients	1
Total	41