

Appendix B

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The following limitations apply to the recovery of common benefit fees by the firms identified:

1. Khorrami Pollards (“Khorrami”) is to receive a minimum award of \$77,000.00. In the disbursement recommended by this motion, the Trustee will disburse to Khorrami the full amount of \$77,000.00 which is Khorrami’s 0.097 percent share of the \$62.3 million available for disbursement plus an additional \$16,569.00 to reach the firm’s minimum of \$77,000.00. Khorrami will receive no additional money from future disbursements unless and until the Common Benefit Fund (“Fund”) has recovered the \$16,569.00 paid early. Once that recovery has occurred, Khorrami will receive future distributions at the identified percentage of 0.097 percent.
2. Diane Fenner (“Fenner”) was guaranteed a minimum award of \$250,000.00. In the disbursement recommended by this motion, the Trustee will disburse to Fenner the full amount of \$250,000.00 which is Fenner’s 0.325 percent share of the \$62.3 million available for disbursement plus an additional \$47,525.00 to reach the firm’s minimum of \$250,000.00. Fenner will receive no additional money from future disbursements unless and until the Fund has recovered the \$47,475.00 paid early. Once that recovery has occurred, Fenner will receive future distributions at the identified percentage of 0.325 percent.
3. Finkelstein & Partners (“Finkelstein”) was guaranteed a minimum of \$800,000.00. In the disbursement recommended by this motion, the Trustee will disburse to Finkelstein the full amount of \$800,000.00 which is Finkelstein’s 1.036 percent of the \$62.3 million available for disbursement plus an additional \$154,572.00 to reach the firm’s minimum of \$800,000.00. Finkelstein will receive no additional money from future disbursements until the Fund has recovered the \$154,572.00 paid early. Once that recovery has occurred, Finkelstein will receive future distributions at the identified percentage of 1.036 percent.
4. Weisbrod / Miller & Curtis (“Weisbrod”) is to receive a flat fee of \$ 1 million. This adjustment yields an addition to the funds available for other firms of \$28,573.00 (which is the difference between the amount Weisbrod would have received at 1.651 percent of the Fund and \$ 1 million).
5. Hausfeld / Cohen Millstein (“Hausfeld”) is to receive a one-time payment of \$91,000 in addition to its 2.441 percent share in the Fund.

The difference between each disbursement and the firm's share will come from the Holdback Fund, with the exception of the addition to the Holdback Fund relating to Weisbrod's payment. The Holdback Fund, originally set at \$ 4 million, will actually be \$3,718,907.

$$4,000,000 - (16,569 + 47,525 + 154,572 + 91,000) + 28,573$$