

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION**

**In re:**

**GREENFIELD SILVER, INC.  
f/k/a LUNT SILVERSMITHS, INC.**

**DEBTOR**

**Chapter 7  
Case No. 09-32228-HJB**

**FINAL APPLICATION OF SHATZ, SCHWARTZ AND FENTIN, P.C. AS COUNSEL TO  
THE FORMER CHAPTER 11 DEBTOR-IN-POSSESSION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES**

**Request for Limited Notice**

Now comes Shatz, Schwartz and Fentin, P.C. (the "Applicant"), counsel to Greenfield Silver, Inc., f/k/a Lunt Silversmiths, Inc., the above-captioned former Debtor-in-Possession, now Chapter 7 debtor, (the "Debtor") and hereby submits this fourth and final application for compensation and reimbursement of expenses pursuant to 11 U.S. C. § § 330 and 331 for legal services performed and expenses. In support thereof, the Applicant respectfully states as follows:

**Procedural Background**

On December 18, 2009, the Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code with this Court to liquidate its assets. The Debtor is a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. A creditors committee has been appointed in this case. The matters set forth herein constitute core proceedings, pursuant to 28 U.S.C. §157(b)(2)(A).

**I. Prior and Partial Payments**

The Debtor paid the Applicant a retainer of \$50,000.00 for prepetition services and expenses in anticipation of the Chapter 11 case. During its Chapter 11 case, the Applicant successfully assisted the Debtor to liquidate all of its assets through public and private sales authorized by this Court. The Applicant negotiated and prepared a motion and order to sell the Debtor's personal property, including certain inventory, finished goods, work in process, raw materials, spec samples, tools, molds, intellectual property, customer, supplier and sales records, UPC numbers and good will to Reed and Barton Corporation ("RBC") for a total of \$552,016.62 after adjustments. The proceeds of the sale to RBC were utilized to partially satisfy a loan owed to the Debtor's secured creditor, Greenfield Commercial Credit ("GCC").

This Court's order allowing the sale to RBC provided a carve out to pay the reasonable and necessary attorneys' fees of the Applicant for services performed associated with the Debtor's liquidation of assets for the benefit of GCC during the period beginning December 18, 2010 and ending March 18, 2010, in an aggregate amount not to exceed \$25,000 (the "RBC Carve Out").

The Applicant negotiated and prepared a motion and order to sell at public auction the items not purchased by RBC, including machinery, equipment, office furnishings, production materials, miscellaneous silver flatware and giftware inventory (the "Auction"). The auctioneer collected \$247,177.25 from the sale. In its motion to approve the Auction, the Debtor requested another carve out from GCC, for services associated with the liquidation of assets for the benefit of GCC through the Auction, to pay the reasonable and necessary attorneys' fees of the Applicant, in an aggregate amount not to exceed \$20,000 (the "Auction Carve Out"). After

payment of the associated costs and expenses of the auction, the proceeds were utilized to again pay down the debt to GCC.

In July 2010, the Applicant filed its First Interim Application for Compensation and Reimbursement of Expenses relating to the RBC Carve Out and Auction Carve Out. On September 2, 2010, the Court granted the First Interim Application in the total amount of \$34,217.70, which the Applicant has been paid.

The Debtor's also owned real estate known as Unit B of the 298 Federal Street Commercial Condominium, which includes a 60% undivided interest in the common area ("Unit B") created by a Master Deed recorded in the Franklin County Registry of Deeds (the "Condominium"). Unit B consists of office spaces and a manufacturing facility which the Debtor used in the operation of its business. The Condominium consists of one other unit, Unit A, owned by S&W. Unit A is retail commercial space. Unit A owns a 40% undivided interest in the common area of the Condominium. A portion of the Condominium's common area, approximately 6.62 acres, was comprised of vacant baseball fields that have been utilized by the City of Greenfield's little league program since 1958 (the "Baseball Fields"). The two units of the Condominium, Unit A and Unit B, and common area, including the Baseball Fields are hereinafter collectively referred to as the "Premises."

The City of Greenfield (the "City") expressed interest in purchasing the entire Premises in 2010 shortly after the Debtor filed its Chapter 11 case. Prior to committing to a purchase, the City explored and entered into protracted negotiations with the Applicant on the Debtor's behalf to lease the Premises, which never came to fruition. Later the Applicant engaged in lengthy negotiations regarding a right of first refusal to the City. The right of first refusal also failed to come to fruition. The City was concerned about a title issue and that the Premises may be

environmentally contaminated. The City's concerns about contamination resulted in extensive negotiations involving the Applicant on behalf of the Debtor, Realty and the City.

The Applicant negotiated and prepared an agreement among the Debtor, Realty and the City granting the City the option to purchase the Premises ("OTP"). The OTP presented an opportunity to determine the extent of any environmental contamination on the Premises, while providing the Debtor with funding to pay costs and expenses to maintain and insure the Premises. On behalf of the Debtor, the Applicant engaged in extensive negotiations with S&W and ultimately they entered into an Agency Agreement (the "Agency Agreement") that granted the Debtor the right to control the negotiations and sale of the Premises and obligated the Debtor to resolve title issues relating to the Premises.

In this Chapter 11 case, an official creditors committee has been appointed (the "Committee"). The Committee alleged that the Debtor had claims against S&W and Lunt and S&W and Lunt alleged to have claims against the Debtor, including without limitation, administrative priority claims and general unsecured claims previously filed with the Clerk of this Court. As such, an unresolved controversy existed between the Debtor and S&W as to the validity and extent of their respective claims. After the Applicant's extensive negotiations to resolve these various claims, Lunt, the Debtor and S&W entered into an agreement for compromise and releases of claims (the "Agreement for Compromise and Releases"), approved by the Committee, which released the various claims against one another and compromised the allocation of the proceeds from the potential sale of the Premises: the Debtor was entitled to 62% of the net proceeds, while S&W was entitled to 38% of the net proceeds. This Court approved the OTP, Agency Agreement and Agreement for Compromise and Releases on January 20, 2011.

The City performed under the OTP by paying the Debtor a fee, which enabled the Debtor, a non-operating entity, to maintain the Premises. The City also hired a professional to conduct Phase I and II site assessments to determine the extent of environmental contamination to the Premises. The City and Debtor obtained commercial real estate appraisals as required under the OTP. The Baseball Fields had an appraised value of \$660,000.

The Debtor performed under the Agency Agreement by utilizing the fees provided by the City under the OTP to maintain and preserve the Premises for the estate, and by engaging in significant negotiations for the sale of the Premises to the City.

The Applicant encountered numerous challenges from the Massachusetts Department of Environmental Protection and the Environmental Protection Agency with regard to potential contamination on the Premises.

The Applicant negotiated a purchase and sale agreement on behalf of the Debtor which was executed on December 31, 2012 for the sale of the entire Premises to the City. Although the Debtor and Realty were ready and able to perform, that sale was not consummated by the City. Thereafter, on behalf of the Debtor, the Applicant canceled the Debtor's lease with the City of Greenfield's little league and issued no trespass notices to prohibit unauthorized use. Then the Applicant listed the Premises for sale with a reputable Court-approved broker for an entire year to no avail.

Although the sale of the entire Premises fell through, the City remained interested in purchasing at least a portion of the Premises, the Baseball Fields, for continued use by the City of Greenfield's little league program. The DEP established a deadline of June 15, 2014 to submit a Tier Classification or Response Action Outcome Statement Report with respect to Unit B. The

Applicant prepared and filed an Application to Employ O'Reilly, Talbot and Okun ("OTO") to perform this work, as well as a Site Assessment as to the Baseball Fields.

The Applicant negotiated and prepared a new purchase and sale agreement with the City for only the Baseball Fields (the "Sale") for \$660,000 and a motion to sell which was approved by this Court. The Sale was consummated on or about July 11, 2014.

Because the Applicant had performed significant and meaningful services towards the disposition of the Debtor's remaining assets, but had not been remunerated since September 2, 2010, on August 15, 2014, the Applicant filed a Second Interim Application in the total amount of \$107,404.50 and expenses of \$709.53, which amounted to only *one half of the then outstanding invoice* relating *only* to the Asset Disposition Matter. On October 1, 2014, this Court awarded a second interim fee to the Applicant of \$50,000 plus \$709.53 in expenses.

The total amount paid to the Applicant relating to this case is \$134,927.23 which includes fees and expenses as described above and as set forth in the summary chart below.

<b>Fees Paid</b>	<b>Expenses Paid</b>	<b>Source</b>
\$46,673.63	\$3,326.37	Prepetition retainer for fees and expenses in anticipation of the Chapter 11 filing
\$33,337.00	\$880.70	First Interim Application re: Auction and RBC Carve-Out
\$50,000	\$709.53	Second Interim Application
<b>\$130,010.63</b>	<b>\$4,916.60</b>	

The Applicant's Third Application for Compensation is pending before this Court. In the Third Application, the Applicant requested payment of legal fees in the amount of \$365,703.50

and expenses of \$7,812.79. The hearing on the Third Application was continued generally in the Chapter 11 case. Contemporaneously herewith, the Applicant has filed a motion for a hearing on the Third Application requesting that it be heard at the same time as this Final Application.

## **II. Approximate Value of Assets of the Estate**

The Applicant delivered the contents of the Debtor's Operating Account to the Chapter 7 Trustee, Jonathan Goldsmith, Esquire in the amount of \$264,185.40. In addition, the Applicant delivered to Attorney Goldsmith an amount of \$10,782.30 which represented an amount available to counsel for the Unsecured Creditors' Committee, Gary Weiner, Esquire for his work relating to the Auction and RBC Carveouts. Attorney Weiner has not filed an application seeking compensation for his work in those matters to date. The Applicant is holding \$1,039 which represents the Chapter 11 filing fee that was requested in the Third Application. The bankruptcy estate also holds a note and mortgage valued up to \$200,000.

## **III. Narrative of Services Performed for Final Application for Compensation**

The Applicant has performed services in various categories summarized in detail below.

### ***A. Asset Analysis and Recovery (Matter No. LUN003-100005)***

The services in this matter commenced December 4, 2014 through January 22, 2016. The Applicant provided legal services to obtain insurance proceeds for damage to the Debtor's real property. The insurance company wrote two checks for insurance proceeds in both the names of the Debtor and City of Greenfield. The City of Greenfield did not readily sign the insurance proceeds over to the Debtor, despite the Debtor's exclusive right to the proceeds. The Applicant prepared a complaint for turnover against the City of Greenfield but ultimately did not file it as the City eventually conceded.

The Applicant became actively involved in a Land Court action commenced by the City of Greenfield against a non-debtor, S&W Realty, Corp. (“S&W”) for a tax taking of Units A-1 and A-2 of the 298 Federal Street Commercial Condominium. The Debtor was an interested party in the Land Court action as it has a mortgage on Unit A. Prior to this case being converted from a Chapter 11 to a Chapter 7, the Applicant was able to negotiate and secure a stipulation from the City of Greenfield that the Debtor’s mortgage would survive a tax taking and would not be extinguished, thereby protecting an asset of the Debtor.

The itemized invoice totaling \$4,298.00 for this matter is attached as Exhibit A and a summary as required by Local Rule 2016-1(a)(2) is as follows:

<b>Professional</b>	<b>Initials</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
Beverly LaBombard, Para.	BBL	\$160.00	2.1	\$336.00
Cynthia Lippman, Para.	CL	\$160.00	.70	\$112.00
Steven Weiss, Esquire	SW	\$345.00	.30	\$103.50
Edward V. Sabella, Esquire	EVS	\$346.47	1.7	\$589.00
L. Alexandra Hogan, Esquire	LAH	\$200.00	11.40	\$2,280.00
Michael Fenton, Esquire	MAF	\$225.00	3.9	\$877.50
				<b>\$4,298.00</b>

*B. Asset Disposition (Matter No. LUN003-100006)*

The Applicant monitored the potential sale of Unit A, to unrelated third parties. The Applicant worked with S&W’s attorney to enable the sale through negotiations to accept partial mortgage payoffs, as Unit A would be split and sold separately as Units A-1 and A-2. The Applicant made a motion to this Court to permit a partial releases of the mortgage, which the

Court granted. Ultimately Unit A was not split, as both sales fell through. Counsel to S&W reports that Unit A is under contract with a new, unrelated buyer.

The itemized invoice totaling \$1,765.50 for this matter is attached as Exhibit B and a summary as required by Local Rule 2016-1(a)(2) is as follows:

<b>Professional</b>	<b>Initials</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
LaBombard, Beverly, Para.	BBL	\$160.00	.40	\$64.00
Cynthia Lippman, Para.	CL	\$160.00	.50	\$80.00
Edward V. Sabella, Esquire	EVS	\$345.00	4.70	\$1,621.50
				<b>\$1,765.50</b>

*C. Case Administration (Matter No. LUN003-100008)*

The services in this matter commenced December 1, 2014 through March 2, 2016. The Applicant held many telephone conferences with the US Trustee's Office as well as counsel to the Official Unsecured Creditors Committee, and private counsel to James H. Lunt to discuss the case strategy. The accountants hired in this case as professionals required guidance and information from the Applicant to perform their services in the administration of the case. The Applicant received, reviewed, met with the Debtor and filed monthly operating reports and communicated with the accountants regarding the same. The Applicant addressed matters concerning potential conversation of the Chapter 11 case and engaged in negotiations with administrative creditors in an effort to enable a distribution to creditors. The Applicant addressed routine telephone calls and monitored the Debtor's Operating Account. As counsel to the Debtor, the foregoing administration services were necessary for the survival of the case.

The itemized invoice totaling \$7,825.00 for this matter is attached as Exhibit C and a summary as required by Local Rule 2016-1(a)(2) is as follows:

<b>Professional</b>	<b>Initials</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
Beverly LaBombard, Para.	BBL	\$160.00	6.9	\$1,104.00
Cynthia Lippman, Para.	CL	\$160.00	6.70	\$1,072.00
Edward V. Sabella, Esquire	EVS	\$345.00	8.20	\$2,829.00
L. Alexandra Hogan, Esq.	LAH	\$200.00	14.10	\$2,820.00
				<b>\$7,825.00</b>

*D. Claims Administration and Objections (Matter No. LUN003-100009)*

The services in this matter commenced February 11, 2015 through September 24, 2015.

In this matter, the Applicant addressed creditor inquires.

The itemized invoice totaling \$200.00 for this matter is attached as Exhibit D and a summary as required by Local Rule 2016-1(a)(2) is as follows:

<b>Professional</b>	<b>Initials</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
L. Alexandra Hogan, Esq.	LAH	\$200.00	1.00	<b>\$200.00</b>

*E. Fee Applications and Objections (Matter No. LUN003-100012)*

The services in this matter commenced December 5, 2014 through July 8, 2015. In this matter, the Applicant prepared its third application for fees and expenses and discussed fee applications with various other administrative professionals seeking payment for services.

The itemized invoice totaling \$4,443.00 for this matter is attached as Exhibit E and a summary as required by Local Rule 2016-1(a)(2) is as follows:

<b>Professional</b>	<b>Initials</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
Beverly LaBombard, Para.	BBL	\$160.00	13.10	\$2,096.00
Edward V. Sabella, Esquire	EVS	\$345.00	.60	\$207.00
L. Alexandra Hogan, Esq.	LAH	\$200.00	10.70	\$2,140.00
				<b>\$4,443.00</b>

*F. Plan and Disclosure Statements (Matter No. LUN003-100016)*

The services in this matter commenced on August 18, 2015 through November 2, 2015. The Applicant engaged in numerous discussions with administrative professionals to negotiate a settlement to reduce fees in order to enable a distribution to unsecured creditors. General terms of the settlement were reached and the Applicant intended to file a plan and disclosure statement. However, a plan and disclosure statement was premature prior to the sale of Unit A which would yield a sum certain payment to the Debtor on S&W's mortgage. During this time period, the sales of Units A-1 and A-2 were pending. The Applicant had frequent discussions with S&W's counsel to monitor the sales and reported to this Court at various hearings, as a motion to convert from the US Trustee's office was pending. This case converted prior to the sales and therefore the plan and disclosure statements were not completed.

The itemized invoice totaling \$2,788.00 for this matter is attached as Exhibit F and a summary as required by Local Rule 2016-1(a)(2) is as follows:

<b>Professional</b>	<b>Initials</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
Ann-Marie Lewkowicz, Para.	AML	130.00	.30	\$39.00
Cynthia Lippman, Para.	CL	160.00	4.40	\$704.00
Edward V. Sabella, Esq.	EVS	345.00	1.00	\$345.00

L. Alexandra Hogan, Esq.	CMP	\$200.00	8.50	\$1,700.00
				<b>\$2,788.00</b>

*G. Out of Pocket Expenses*

A Summary Chart relating to the Applicant's actual and necessary expenses in the amount of \$246.24 is attached as Exhibit G pursuant to Local Rule 2016-1(a)(2).

**IV. Reasonable and Necessary Fees and Expenses**

The Applicant has no retainer for payment of legal fees (\$21,319.50) and expenses (\$246.24). All of the services rendered by the Applicant were performed by attorneys and paralegals that are experienced in bankruptcy law and are skilled in the administration and representation of Chapter 11 Debtors. Biographical entries for each person included in this Application are attached hereto as Exhibit H. No agreement or understanding exists between the Applicant and any third person for sharing or division of compensation. All of the services for which compensation is requested in this Application were rendered at the request of the Debtor for the benefit of the estate. A copy of the engagement agreement between the Debtor and Applicant is attached as Exhibit I; a copy of the orders<sup>1</sup> approving the Applicant are attached as Exhibit J. Although Attorneys Edward V. Sabella and L. Alexandra Hogan spent considerable time in this case, this Applicant certifies that no compensation is sought for duplicate services.

Section 330(a)(1)(A) and (B) of the Bankruptcy Code allows the payment of:

- (A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and

<sup>1</sup> On December 18, 2009, the Applicant filed an Application to Employ Shatz, Schwartz and Fentin, P.C. as Counsel to the Debtor, which this Court approved on January 5, 2010. On February 25, 2010, the Debtor filed a Renewed Application to Employ Shatz, Schwartz and Fentin, P.C. as Counsel, due to a procedural defect in its initial application, which the Court approved on March 17, 2010.

(B) reimbursement for actual, necessary expenses.

The Applicant has calculated its compensation requested in this Application by applying its standard hourly rates which are well within the range charged by comparable firms in other large bankruptcy cases. The amount of the Applicant's requested compensation is not unusual given the complexity of the Debtor's Chapter 11 case and the fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar Chapter 11 cases. The Applicant's legal services and expenses incurred during the Application period are set forth in this Application and constitute only those necessary expenses that were incurred for the benefit of the Debtor's estate. The time records annexed to this Application constitute only a general statement of the services rendered and time expended without description of the pressure and constraints under which the Applicant actually rendered these services. The considerable challenge of this cases was attended to and managed by the Applicant at all levels, promptly, expertly, and often to the exclusion of other matters in the Applicant's office. The Applicant therefore submits that its fees and expenses were actual, necessary, reasonable, and justified, and should be allowed in full.

**V. Request for Limited Notice**

Request is hereby made to limit notice regarding this Application upon the individuals and entities served this Application which are as follows: the U.S. Trustee, the Debtor, the top twenty unsecured creditors, including the creditors committee, Gary Weiner, Esquire as counsel to the creditors committee, James H. Lunt and his counsel Donald Allison, Esquire, the state and federal taxing authorities and all parties requesting notice. The Applicant submits that due to the nature of this Application, no further service is necessary.

WHEREFORE, The Applicant, Shatz, Schwartz and Fentin, P.C., respectfully requests this Court to enter an order:

1. Approving the payment of compensation of professional services rendered by this Applicant in the amount of \$21,319.50;
2. Approving the reimbursement of the actual and necessary out-of-pocket expenses incurred by this Applicant in the amount of \$246.24; and
3. For such further relief as this Court deems just and proper.

Dated this 19th day of June, 2016.

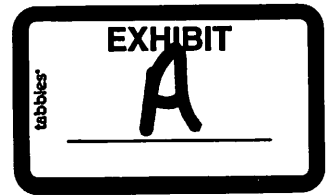
SHATZ, SCHWARTZ AND FENTIN, P.C.

By: /s/ Edward V. Sabella  
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For the Debtor

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Federal Tax ID # 04-2485418

June 8, 2016



Greenfield Silver, Inc.  
f/k/a Lunt Silversmiths, Inc.  
P.O. Box 249  
Greenfield, MA 01302

Invoice # 107477 EVS  
Our File # LUN003 100005  
Billing through 03/02/2016

**ASSET ANALYSIS AND RECOVERY**

Balance forward as of invoice dated 05/13/15	\$4,856.50
Accounts receivable balance carried forward	<u>\$4,856.50</u>

**PROFESSIONAL SERVICES**

12/04/2014	BBL	Prepare overnight correspondence to Hampshire County Registry of Deeds with original mortgage for recording regarding Unit A, 298 Federal Street, Greenfield		
		\$160.00 / hr	0.20 hrs.	\$32.00
12/11/2014	EVS	Telephone call from Attorney Allison		
		\$345.00 / hr	0.30 hrs.	\$103.50
12/15/2014	BBL	Prepare UPS overnight to Franklin County Registry of Deeds with Mortgage including exhibit a		
		\$160.00 / hr	0.30 hrs.	\$48.00
01/06/2015	BBL	Telephone call from client regarding valuation of Unit A		
		\$160.00 / hr	0.20 hrs.	\$32.00
02/03/2015	BBL	Prepare correspondence to Attorney Allison regarding insurance check		
		\$160.00 / hr	0.20 hrs.	\$32.00
03/26/2015	LAH	Analysis of owership of insurance proceeds		
		\$200.00 / hr	0.60 hrs.	\$120.00
03/26/2015	LAH	Telephone call to James Lunt re: insurance proceeds		
		\$200.00 / hr	0.10 hrs.	\$20.00
03/30/2015	LAH	Review court orders, title, purchase and sale agreement, deeds, conduct analysis of entitlement to insurance proceeds and		

		prepare letter to Attorney Gordon Quinn re: same		
		\$200.00 / hr	1.30 hrs.	\$260.00
03/31/2015	BBL	Proofread, finalize and compile exhibits for correspondence to Gordon Quinn regarding vandalism insurance proceeds		
		\$160.00 / hr	0.10 hrs.	\$16.00
04/09/2015	LAH	Analysis of law re: turnover of assets and preparation of complaint against Greenfield		
		\$200.00 / hr	2.10 hrs.	\$420.00
04/10/2015	EVS	Preparation of revisions to Complaint against the City of Greenfield		
		\$345.00 / hr	0.60 hrs.	\$207.00
04/10/2015	LAH	Telephone call to Attorney Don Allison re: affidavit and damages to property		
		\$200.00 / hr	0.10 hrs.	\$20.00
04/13/2015	EVS	Receipt and review of email from Attorney Gordon		
		\$345.00 / hr	0.10 hrs.	\$34.50
04/13/2015	BBL	Review insurance checks for expiration dates		
		\$160.00 / hr	0.10 hrs.	\$16.00
04/14/2015	LAH	Telephone conference with Attorney Don Allison re: factual allegations against City of Greenfield		
		\$200.00 / hr	0.10 hrs.	\$20.00
04/14/2015	LAH	Telephone call to Berkshire Insurance re: vandalism claims		
		\$200.00 / hr	0.30 hrs.	\$60.00
04/14/2015	LAH	Revise Complaint against City of Greenfield		
		\$200.00 / hr	0.30 hrs.	\$60.00
04/15/2015	SW	Review and edit complaint for turnover		
		\$345.00 / hr	0.30 hrs.	\$103.50
04/16/2015	LAH	Revise letter to Berkshire Insurance Group		
		\$200.00 / hr	0.30 hrs.	\$60.00
04/16/2015	BBL	Prepare correspondence to Berkshire Insurance requesting replacement check		
		\$160.00 / hr	0.20 hrs.	\$32.00
04/20/2015	EVS	Receipt and review of email from Attorney Gordon re: insurance proceeds; Telephone call to Attorney Gordon		
		\$345.00 / hr	0.20 hrs.	\$69.00
04/22/2015	LAH	Telephone call to Attorney Gordon Quinn re: insurance proceeds		
		\$200.00 / hr	0.20 hrs.	\$40.00

04/22/2015	LAH	Telephone call to Attorney Allison re: payment of contractors from insurance proceeds			
		\$200.00 / hr	0.10 hrs.		\$20.00
04/22/2015	LAH	Telephone call from Attorney Don Allison re: contractor claim			
		\$200.00 / hr	0.10 hrs.		\$20.00
04/22/2015	LAH	Letter to Attorney Gordon Quinn re: insurance proceeds			
		\$200.00 / hr	0.50 hrs.		\$100.00
04/22/2015	LAH	Correspondence to client re: outstanding payments to creditors and contractor for vanalium repairs			
		\$200.00 / hr	0.40 hrs.		\$80.00
04/23/2015	BBL	Finalize correspondence to Attorney Quinn for hand delivery			
		\$160.00 / hr	0.30 hrs.		\$48.00
04/27/2015	LAH	Receipt and review of one settlement proceeds check			
		\$200.00 / hr	0.10 hrs.		\$20.00
05/01/2015	BBL	Telephone call to Berkshire Insurance regarding replacement check			
		\$160.00 / hr	0.10 hrs.		\$16.00
05/01/2015	BBL	Email to Attorney Alex Hogan and Attorney Ed Sabella regarding replacement insurance check status			
		\$160.00 / hr	0.10 hrs.		\$16.00
05/05/2015	BBL	Conference with and email to Dianne Charko regarding check clearing			
		\$160.00 / hr	0.10 hrs.		\$16.00
05/11/2015	BBL	Prepare draft email to client regarding new insurance check for Attorney Alex Hogan review			
		\$160.00 / hr	0.10 hrs.		\$16.00
05/18/2015	LAH	Correspondence to Attorney Don Allison re: status of Unit A sale			
		\$200.00 / hr	0.10 hrs.		\$20.00
05/18/2015	LAH	Correspondence to and from Paul Carey re: sale of Unit A and hearings			
		\$200.00 / hr	0.20 hrs.		\$40.00
05/18/2015	LAH	Conference call with Attorney Ed Sabella and Attorney Gary Weiner			
		\$200.00 / hr	0.10 hrs.		\$20.00
05/19/2015	LAH	Correspondence from and to Attorney Gary Weiner re: sale of Unit A			
		\$200.00 / hr	0.10 hrs.		\$20.00

05/19/2015	LAH	Correspondence to and from Attorney Don Allison re: sale of Unit A and timing \$200.00 / hr	0.10 hrs.	\$20.00
05/29/2015	EVS	Telephone call from Attorney Allison \$350.00 / hr	0.20 hrs.	\$70.00
05/29/2015	BBL	Email to client regarding new insurance check status \$160.00 / hr	0.10 hrs.	\$16.00
06/08/2015	LAH	Letter to Gordon Quinn, Esquire re: insurance proceeds check \$200.00 / hr	0.30 hrs.	\$60.00
06/17/2015	CL	Follow-up with Attorney Alex Hogan on monthly escrow statement \$160.00 / hr	0.10 hrs.	\$16.00
06/19/2015	EVS	Telephone call to Attorney Newman \$350.00 / hr	0.30 hrs.	\$105.00
09/03/2015	LAH	Review of correspondence from Don Allison re: Unit A \$200.00 / hr	0.30 hrs.	\$60.00
09/08/2015	LAH	Review of multiple correspondence from Attorney Allison re: status of Unit A sales and conference call with administrative creditors \$200.00 / hr	0.50 hrs.	\$100.00
09/24/2015	LAH	Prepare notice of hearing for partial release \$200.00 / hr	0.50 hrs.	\$100.00
10/30/2015	LAH	Email from Steve Meunier and to Don Allison re: status of closings \$200.00 / hr	0.30 hrs.	\$60.00
11/17/2015	LAH	Email to Attorney Don Allison re: sale issues \$200.00 / hr	0.10 hrs.	\$20.00
11/17/2015	LAH	Telephone call from Attorney Dawn Blook re: Greenfield's order to appear \$200.00 / hr	0.20 hrs.	\$40.00
11/17/2015	LAH	Telephone call from Hank Geberth re: Greenfield's order to appear \$200.00 / hr	0.20 hrs.	\$40.00
11/24/2015	LAH	Prepare Stipulation with City of Greenfield and telephone call to Dawn Bloom, Esquire re: same \$200.00 / hr	0.80 hrs.	\$160.00
12/03/2015	MAF	Prepare answer to tax title proceedings; Conference with Attorney Bloom; Draft stipulation		

		\$225.00 / hr	2.00 hrs.	\$450.00
12/07/2015	MAF	Conference with Attorney Ed Sabella regarding tax court proceedings		
		\$225.00 / hr	0.30 hrs.	\$67.50
12/14/2015	MAF	Draft stipulation; Conference with Dawn Bloom		
		\$225.00 / hr	0.50 hrs.	\$112.50
01/05/2016	MAF	Correspondence with Gordon Quinn regarding stipulation and CC vote required		
		\$225.00 / hr	0.30 hrs.	\$67.50
01/06/2016	LAH	Review stipulation by court; Confer with Attorney Ed Sabella and Michael Fenton		
		\$200.00 / hr	0.80 hrs.	\$160.00
01/06/2016	MAF	Conference with Gordon Quinn		
		\$225.00 / hr	0.40 hrs.	\$90.00
01/19/2016	MAF	Analyze stipulation signed by Mayor; Correspondence with Gordon Quinn		
		\$225.00 / hr	0.40 hrs.	\$90.00
01/22/2016	LAH	Correspondence with Paul Carey and Don Allison re: Units A1 and A2		
		\$200.00 / hr	0.20 hrs.	\$40.00
01/22/2016	CL	File Stipulation re: Tax Lien Foreclosure and Mortgage, Notice and COS with Bankruptcy Court		
		\$160.00 / hr	0.60 hrs.	\$96.00
			<b>Total Fees</b>	<b>\$4,298.00</b>

**EXPENSES****Total Expenses** \$0.00**Recap of Professional Services**

LaBombard, Beverly B	2.10	Hrs @	\$160.00 / hr	\$336.00
Lippman, Cynthia	0.70	Hrs @	\$160.00 / hr	\$112.00
Fenton, Michael A	3.90	Hrs @	\$225.00 / hr	\$877.50
Hogan, L. Alex	11.40	Hrs @	\$200.00 / hr	\$2,280.00
Sabella, Edward V	1.20	Hrs @	\$345.00 / hr	\$414.00
Sabella, Edward V	0.50	Hrs @	\$350.00 / hr	\$175.00
Weiss, Steven	0.30	Hrs @	\$345.00 / hr	\$103.50
<b>Total Fees</b>	<b>20.10</b>	<b>Hrs</b>		<b>\$4,298.00</b>

**BILLING SUMMARY**

Total professional services

\$4,298.00

Total of new charges for this invoice

\$4,298.00

SHATZ, SCHWARTZ AND FENTIN, P.C.

1441 Main Street Suite 1100  
Springfield, MA 01103-1491  
Telephone (413) 737-1131  
Fax (413) 736-0375  
Federal Tax ID # 04-2485418

June 8, 2016



Greenfield Silver, Inc.  
f/k/a Lunt Silversmiths, Inc.  
P.O. Box 249  
Greenfield, MA 01302

Invoice # 107478 EVS  
Our File # LUN003 100006  
Billing through 03/02/2016

**ASSET DISPOSITION**

Balance forward as of invoice dated 05/13/15	\$178,541.50
Accounts receivable balance carried forward	\$178,541.50

**PROFESSIONAL SERVICES**

12/04/2014	BBL	Review status of Deed to City regarding Unit B		
		\$160.00 / hr	0.20 hrs.	\$32.00
12/04/2014	BBL	Email from Attorney Alex Hogan regarding status of Unit B Deed		
		\$160.00 / hr	0.10 hrs.	\$16.00
01/05/2015	EVS	Telephone call to Attorney Allison re: sale of Unit A		
		\$345.00 / hr	0.30 hrs.	\$103.50
05/11/2015	BBL	Receipt and review of email from Mark Henry regarding April statement		
		\$160.00 / hr	0.10 hrs.	\$16.00
06/02/2015	EVS	Telephone call from Attorney Allison		
		\$345.00 / hr	0.30 hrs.	\$103.50
09/30/2015	EVS	Represent client in court re: Motion for Partial Release of Mortgage		
		\$345.00 / hr	2.00 hrs.	\$690.00
09/30/2015	CL	Prepare documents for Attorney Ed Sabella re: Hearing on Motion for Partial Release		
		\$160.00 / hr	0.50 hrs.	\$80.00
11/03/2015	EVS	Telephone call from Attorney Carey		
		\$345.00 / hr	0.10 hrs.	\$34.50

11/19/2015	EVS	Telephone call to Attorney Weiner		
		\$345.00 / hr	0.10 hrs.	\$34.50
11/19/2015	EVS	Telephone call from Attorney Allison		
		\$345.00 / hr	0.10 hrs.	\$34.50
12/02/2015	EVS	Telephone call from Attorney Allison re: Planning Board Approval		
		\$345.00 / hr	0.10 hrs.	\$34.50
02/04/2016	EVS	Telephone call from Attorney Allison		
		\$345.00 / hr	0.20 hrs.	\$69.00
02/18/2016	EVS	Telephone call from Attorney Allison re: sale of property		
		\$345.00 / hr	0.80 hrs.	\$276.00
02/24/2016	EVS	Telephone call from Attorney Allison re: sale of Real Estate		
		\$345.00 / hr	0.20 hrs.	\$69.00
02/26/2016	EVS	Telephone call from Attorney Allison re: sale of Real Estate		
		\$345.00 / hr	0.30 hrs.	\$103.50
03/02/2016	EVS	Receipt and review of Offer to Purchase		
		\$345.00 / hr	0.20 hrs.	\$69.00

**Total Fees** \$1,765.50

**EXPENSES**

**Total Expenses** \$0.00

**Recap of Professional Services**

LaBombard, Beverly B	0.40	Hrs @	\$160.00 / hr	\$64.00
Lippman, Cynthia	0.50	Hrs @	\$160.00 / hr	\$80.00
Sabella, Edward V	4.70	Hrs @	\$345.00 / hr	\$1,621.50
Total Fees	5.60	Hrs		\$1,765.50

**BILLING SUMMARY**

Total professional services	\$1,765.50
Total of new charges for this invoice	<u>\$1,765.50</u>

SHATZ, SCHWARTZ AND FENTIN, P.C.

1441 Main Street Suite 1100  
Springfield, MA 01103-1491  
Telephone (413) 737-1131  
Fax (413) 736-0375  
Federal Tax ID # 04-2485418  
June 8, 2016



Greenfield Silver, Inc.  
f/k/a Lunt Silversmiths, Inc.  
P.O. Box 249  
Greenfield, MA 01302

Invoice # 107479 EVS  
Our File # LUN003 100008  
Billing through 03/02/2016

**CASE ADMINISTRATION**

Balance forward as of invoice dated 05/13/15	\$58,431.50
Accounts receivable balance carried forward	<u>\$58,431.50</u>

**PROFESSIONAL SERVICES**

12/01/2014	BBL	Prepare correspondence to Trustee with October MOR		
		\$160.00 / hr	0.30 hrs.	\$48.00
12/04/2014	EVS	Receipt and review of email from John Doherty		
		\$345.00 / hr	0.10 hrs.	\$34.50
12/04/2014	LAH	Receipt and review of email from John Doherty and prepare response		
		\$200.00 / hr	0.30 hrs.	\$60.00
12/04/2014	BBL	Conference with Donna Skibel regarding information for new bank account		
		\$160.00 / hr	0.10 hrs.	\$16.00
12/08/2014	EVS	Telephone call to Attorney Allison		
		\$345.00 / hr	0.20 hrs.	\$69.00
12/09/2014	BBL	Email to client regarding EIN for Rogers Lunt & Bowlen		
		\$160.00 / hr	0.10 hrs.	\$16.00
12/09/2014	BBL	Telephone call from client regarding EIN for Rogers Lunt & Bowlen		
		\$160.00 / hr	0.10 hrs.	\$16.00
12/22/2014	BBL	Scan/email IOLTA ledger to accountant		
		\$160.00 / hr	0.10 hrs.	\$16.00
12/23/2014	BBL	Email to client regarding November MOR		

		\$160.00 / hr	0.10 hrs.	\$16.00
12/23/2014	BBL	Receipt and review of November MOR from accountant		
		\$160.00 / hr	0.10 hrs.	\$16.00
01/07/2015	BBL	Prepare correspondence to US Trustee regarding November MOR		
		\$160.00 / hr	0.20 hrs.	\$32.00
01/07/2015	BBL	Receipt and review of email from client regarding November MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
01/09/2015	BBL	Email December bank statement to accountant for MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
01/20/2015	LAH	Emails to and from Gary Weiner re: amounts retained in IOLTA for counsel to creditor committee fees and fee applications		
		\$200.00 / hr	0.30 hrs.	\$60.00
01/20/2015	BBL	Research regarding IOLTA accounts		
		\$160.00 / hr	1.00 hrs.	\$160.00
01/20/2015	BBL	Email to accountant regarding IOLTA account		
		\$160.00 / hr	0.20 hrs.	\$32.00
01/21/2015	LAH	Receipt and review of correspondence from accountant and prepare response re: bank account balances and transactions		
		\$200.00 / hr	0.50 hrs.	\$100.00
01/21/2015	BBL	Research emails and correspondence regarding escrow account		
		\$160.00 / hr	0.30 hrs.	\$48.00
01/26/2015	BBL	Research and prepare check request for quarterly fee to U.S. Trustee		
		\$160.00 / hr	0.30 hrs.	\$48.00
01/28/2015	LAH	Review of accountant's billing statements		
		\$200.00 / hr	0.50 hrs.	\$100.00
01/28/2015	BBL	Prepare correspondence to US Trustee with December MOR and quarterly payment		
		\$160.00 / hr	0.30 hrs.	\$48.00
02/03/2015	EVS	Receipt and review of correspondence from Attorney Allison; Telephone call to Attorney Allison		
		\$345.00 / hr	0.30 hrs.	\$103.50
02/13/2015	BBL	Scan and email January bank statement to Mark Henry for MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
02/17/2015	BBL	Email January MOR to client for signature		

		\$160.00 / hr	0.10 hrs.	\$16.00
02/20/2015	BBL	Conference with Attorney Alex Hogan regarding escrow account and MOR		
		\$160.00 / hr	0.20 hrs.	\$32.00
02/23/2015	BBL	Prepare correspondence to Attorney King with January MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
02/25/2015	BBL	Receipt and review of email from Howard Charles, Inc. re: updated address and update files		
		\$160.00 / hr	0.10 hrs.	\$16.00
03/05/2015	BBL	Receipt and review of February bank statement		
		\$160.00 / hr	0.10 hrs.	\$16.00
03/05/2015	BBL	Email to Mark Henry with February bank statement for MOR preparation		
		\$160.00 / hr	0.10 hrs.	\$16.00
03/10/2015	LAH	Correspondence with Attorney Weiner		
		\$200.00 / hr	0.30 hrs.	\$60.00
03/13/2015	BBL	Email February MOR to client for signature		
		\$160.00 / hr	0.10 hrs.	\$16.00
03/19/2015	BBL	Receive and scan signed MOR for February 2015		
		\$160.00 / hr	0.10 hrs.	\$16.00
03/19/2015	BBL	Prepare correspondence to U.S. Trustee with February 2015 MOR		
		\$160.00 / hr	0.20 hrs.	\$32.00
03/19/2015	BBL	Email to Attorney Weiner with February MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
03/30/2015	LAH	Review inquiry from US Trustee and review IOLTA account		
		\$200.00 / hr	0.20 hrs.	\$40.00
03/30/2015	LAH	Correspondence to US Trustee re: accounting issue		
		\$200.00 / hr	0.10 hrs.	\$20.00
03/30/2015	LAH	Correspondence to and from Accountant re: US Trustee inquiry		
		\$200.00 / hr	0.10 hrs.	\$20.00
04/02/2015	LAH	Investigate and report to John Doherty on inquiry re: MOR		
		\$200.00 / hr	0.60 hrs.	\$120.00
04/08/2015	BBL	Scan and email March bank statement to KAF for MOR preparation		
		\$160.00 / hr	0.10 hrs.	\$16.00
04/10/2015	BBL	Email March MOR to client for execution		

		\$160.00 / hr	0.10 hrs.	\$16.00
04/16/2015	BBL	Prepare draft correspondence to U.S. Trustee with March MOR and quarterly payment		
		\$160.00 / hr	0.20 hrs.	\$32.00
04/23/2015	BBL	Finalize correspondence to US Trustee with March MOR and quarterly payment		
		\$160.00 / hr	0.50 hrs.	\$80.00
04/29/2015	LAH	Telephone call from Attorney Paul Carey and preparation of correspondence to Attorney Carey re: fees, expenses, and assets of the estate		
		\$200.00 / hr	1.20 hrs.	\$240.00
05/05/2015	LAH	Arrange for payment of contractor		
		\$200.00 / hr	0.10 hrs.	\$20.00
05/05/2015	LAH	Correspondence to John Doherty re: insurance		
		\$200.00 / hr	0.10 hrs.	\$20.00
05/11/2015	BBL	Email to Mark Henry regarding April statement		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/11/2015	BBL	Email to Donna Skibel regarding April statement		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/14/2015	BBL	Email from Mark Henry regarding 4/27/15 deposit		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/14/2015	BBL	Email to Mark Henry regarding 4/27/15 deposit		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/14/2015	BBL	Email from Diane Donaher at KAF with April MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/14/2015	BBL	Email to client regarding April MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/18/2015	LAH	Conference call with Attorney Ed Sabella and Attorney Steve Meunier		
		\$200.00 / hr	0.30 hrs.	\$60.00
05/18/2015	BBL	Telephone call from/to Joseph Rafferty regarding update address		
		\$160.00 / hr	0.20 hrs.	\$32.00
05/19/2015	BBL	Efile notice of address change for Joseph Rafferty		
		\$160.00 / hr	0.30 hrs.	\$48.00
05/20/2015	BBL	Prepare correspondence to U.S. Trustee with April MOR with electronic cc to Attorney Weiner		
		\$160.00 / hr	0.20 hrs.	\$32.00

05/27/2015	LAH	Emails from vendor and debtor re: past due oil invoice \$200.00 / hr	0.30 hrs.	\$60.00
06/01/2015	LAH	Receipt and review of Motion to Convert \$200.00 / hr	0.20 hrs.	\$40.00
06/15/2015	LAH	Respond to client's inquiry re: administration of estate in Chapter 7 \$200.00 / hr	0.30 hrs.	\$60.00
06/15/2015	LAH	Prepare letter to Scapes Builders \$200.00 / hr	0.30 hrs.	\$60.00
06/18/2015	LAH	Correspondence to and from accountant re: financial transactions \$200.00 / hr	0.20 hrs.	\$40.00
06/29/2015	LAH	Correspondence to client re: operating report \$200.00 / hr	0.10 hrs.	\$20.00
06/29/2015	CL	Receipt and review of motion \$160.00 / hr	0.20 hrs.	\$32.00
07/01/2015	CL	Telephone call from John Foster re: status of case and new address update \$160.00 / hr	0.20 hrs.	\$32.00
07/02/2015	CL	Telephone call to John Foster re: his inquiry \$160.00 / hr	0.10 hrs.	\$16.00
07/06/2015	LAH	Receipt and review of correspondence from Richard King re: operating report \$200.00 / hr	0.10 hrs.	\$20.00
07/06/2015	CL	Prepare mailings to Trustee and Attorney Weiner re: May 2015 Operating Report \$160.00 / hr	0.40 hrs.	\$64.00
07/07/2015	LAH	Instructions to paralegal re: monthly operating report \$200.00 / hr	0.10 hrs.	\$20.00
07/07/2015	CL	Prepare email to Mark Henry attaching Monthly escrow report \$160.00 / hr	0.10 hrs.	\$16.00
07/08/2015	LAH	Telephone call from client re: oil bill and response correspondence to oil company re: same \$200.00 / hr	0.40 hrs.	\$80.00
07/09/2015	LAH	Confer with Attorney Steve Weiss re: conversion issues \$200.00 / hr	0.30 hrs.	\$60.00
07/09/2015	LAH	Correspondence to Attorney Carey re: settlement negotiations \$200.00 / hr	0.10 hrs.	\$20.00

07/13/2015	LAH	Correspondence with Paul Carey and from Steve Meunier re: negotiations \$200.00 / hr	0.20 hrs.	\$40.00
07/13/2015	LAH	Conference call with Paul Carey, Esquire and Attorney Ed Sabella \$200.00 / hr	0.30 hrs.	\$60.00
07/15/2015	EVS	Conference call with Attorney Meunier, Attorney Carey, Attorney Weiner and Attorney Alexandra Hogan \$345.00 / hr	0.80 hrs.	\$276.00
07/15/2015	LAH	Conference call with parties re: settlement negotiations \$200.00 / hr	0.50 hrs.	\$100.00
07/15/2015	LAH	Prepare for conference call and review estate assets and liabilities \$200.00 / hr	0.50 hrs.	\$100.00
07/17/2015	EVS	Conference call with Attorney Weiner, Attorney L. Alexandra Hogan and Attorney Carey \$345.00 / hr	0.60 hrs.	\$207.00
07/17/2015	LAH	Preparation for settlement conference \$200.00 / hr	0.70 hrs.	\$140.00
07/17/2015	LAH	Settlement conference \$200.00 / hr	0.60 hrs.	\$120.00
07/20/2015	LAH	Coordinate June operating report \$200.00 / hr	0.10 hrs.	\$20.00
07/21/2015	CL	Prepare letter to Trustee with June Operating Statement \$160.00 / hr	0.20 hrs.	\$32.00
07/31/2015	CL	Receipt and review of email from client \$160.00 / hr	0.10 hrs.	\$16.00
08/06/2015	CL	Prepare email of monthly statement to Mark Henry \$160.00 / hr	0.10 hrs.	\$16.00
08/24/2015	CL	Prepare letter with monthly bank information to U.S. Trustee \$160.00 / hr	0.20 hrs.	\$32.00
08/24/2015	CL	Prepare email to G. Weiner attaching letter to Trustee \$160.00 / hr	0.10 hrs.	\$16.00
08/31/2015	CL	Prepare amended service list \$160.00 / hr	1.30 hrs.	\$208.00
09/09/2015	CL	Prepare email to Mr. Mark Henry with monthly escrow statement		

		\$160.00 / hr	0.10 hrs.	\$16.00
09/17/2015	CL	Prepare letter to Trustee with signed monthly operating report and escrow statement for August 2015		
		\$160.00 / hr	0.20 hrs.	\$32.00
09/17/2015	CL	Prepare email to Attorney Weiner with copy of letter to Trustee		
		\$160.00 / hr	0.10 hrs.	\$16.00
09/23/2015	LAH	Prepare motion for partial release of mortgage		
		\$200.00 / hr	1.60 hrs.	\$320.00
09/24/2015	LAH	Prepare correspondence to Attorney Don Allison		
		\$200.00 / hr	0.40 hrs.	\$80.00
09/28/2015	CL	Prepare Notice of Hearing re: November 4, 2015 Hearing on Conversion for filing and creditor mailings		
		\$160.00 / hr	1.00 hrs.	\$160.00
10/07/2015	LAH	Telephone call from Lyle and Associates		
		\$200.00 / hr	0.10 hrs.	\$20.00
10/09/2015	CL	Prepare email to Mark Henry with escrow account statement		
		\$160.00 / hr	0.10 hrs.	\$16.00
10/15/2015	CL	Receipt and review email from Mark Henry; Prepare email to client re: monthly operating report		
		\$160.00 / hr	0.10 hrs.	\$16.00
10/23/2015	CL	Prepare letter to Trustee re: monthly operating report with quarterly payment		
		\$160.00 / hr	0.20 hrs.	\$32.00
10/23/2015	CL	Prepare email to Attorney Weiner with monthly operating report		
		\$160.00 / hr	0.10 hrs.	\$16.00
11/03/2015	LAH	Emails to and from accountant		
		\$200.00 / hr	0.30 hrs.	\$60.00
11/03/2015	LAH	Research account balances and report to US Trustee		
		\$200.00 / hr	0.50 hrs.	\$100.00
11/04/2015	EVS	Represent client at Hearing on Motion to Convert		
		\$345.00 / hr	1.00 hrs.	\$345.00
11/04/2015	LAH	Correspondence to accountant re: report		
		\$200.00 / hr	0.40 hrs.	\$80.00
11/04/2015	CL	Prepare documents for Hearing on Conversion for Attorney Ed Sabella		
		\$160.00 / hr	0.30 hrs.	\$48.00
11/04/2015	CL	Prepare letter to Mayor of Greenfield re: Court Order on		

		Appearance		
		\$160.00 / hr	0.20 hrs.	\$32.00
11/13/2015	LAH	Review and comment on revised operating report		
		\$200.00 / hr	0.10 hrs.	\$20.00
11/16/2015	LAH	Review operating report and provide it to client for execution		
		\$200.00 / hr	0.30 hrs.	\$60.00
11/18/2015	EVS	Represent client at Hearing on Motion to Convert		
		\$345.00 / hr	1.60 hrs.	\$552.00
11/23/2015	CL	Prepare letter to Trustee with revised monthly operating report for September		
		\$160.00 / hr	0.10 hrs.	\$16.00
11/23/2015	CL	Prepare email to Attorney Gary Weiner with copy of letter to Trustee and report		
		\$160.00 / hr	0.10 hrs.	\$16.00
12/04/2015	CL	Prepare Monthly Operating Report and letter to Trustee		
		\$160.00 / hr	0.20 hrs.	\$32.00
12/11/2015	CL	Prepare email to Mark Henry with escrow statement		
		\$160.00 / hr	0.10 hrs.	\$16.00
12/14/2015	CL	Prepare email to client		
		\$160.00 / hr	0.10 hrs.	\$16.00
12/16/2015	EVS	Represent client at Hearing re: Trustee's Motion to Convert to Chapter 7		
		\$345.00 / hr	1.00 hrs.	\$345.00
12/17/2015	CL	Prepare Monthly Operating Report mailing to Trustee		
		\$160.00 / hr	0.10 hrs.	\$16.00
01/13/2016	CL	Prepare email with escrow statement to Mark Henry		
		\$160.00 / hr	0.10 hrs.	\$16.00
01/14/2016	CL	Prepare email to client with December 2015 MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
01/21/2016	CL	Prepare letter to Trustee with MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
02/04/2016	LAH	Correspondence to Gary Weiner and Paul Carey		
		\$200.00 / hr	0.50 hrs.	\$100.00
02/16/2016	CL	Prepare email to client with MOR		
		\$160.00 / hr	0.10 hrs.	\$16.00
02/24/2016	CL	Prepare letter to Trustee with MOR and email to Gary Weiner		

		\$160.00 / hr	0.20 hrs.	\$32.00
03/01/2016	EVS	Telephone call from Attorney Meunier re: conversion of case		
		\$345.00 / hr	0.60 hrs.	\$207.00
03/02/2016	EVS	Represent client at hearing on Motion to Convert Case to Chapter 7		
		\$345.00 / hr	2.00 hrs.	\$690.00
<b>Total Fees</b>				<b>\$7,825.00</b>

**EXPENSES**

**Total Expenses**                      \$0.00

**Recap of Professional Services**

LaBombard, Beverly B	6.90	Hrs @	\$160.00 / hr	\$1,104.00
Lippman, Cynthia	6.70	Hrs @	\$160.00 / hr	\$1,072.00
Hogan, L. Alex	14.10	Hrs @	\$200.00 / hr	\$2,820.00
Sabella, Edward V	8.20	Hrs @	\$345.00 / hr	\$2,829.00
Total Fees	35.90	Hrs		\$7,825.00

**BILLING SUMMARY**

Total professional services	<u>\$7,825.00</u>
Total of new charges for this invoice	\$7,825.00

SHATZ, SCHWARTZ AND FENTIN, P.C.

1441 Main Street Suite 1100  
Springfield, MA 01103-1491  
Telephone (413) 737-1131  
Fax (413) 736-0375  
Federal Tax ID # 04-2485418  
June 8, 2016



Greenfield Silver, Inc.  
f/k/a Lunt Silversmiths, Inc.  
P.O. Box 249  
Greenfield, MA 01302

Invoice # 107480 EVS  
Our File # LUN003 100009  
Billing through 03/02/2016

**CLAIMS ADMINISTRATION AND OBJECTIONS**

Balance forward as of invoice dated 05/13/15	\$8,982.00
Accounts receivable balance carried forward	<u>\$8,982.00</u>

**PROFESSIONAL SERVICES**

02/11/2015	LAH	Telephone call from Creditor, Kane Associates		
		\$200.00 / hr	0.50 hrs.	\$100.00
07/22/2015	LAH	Telephone call from Richard Kane		
		\$200.00 / hr	0.30 hrs.	\$60.00
09/24/2015	LAH	Telephone call from Steve Rodolakus re: creditor claim		
		\$200.00 / hr	0.20 hrs.	\$40.00
			<b>Total Fees</b>	\$200.00

**EXPENSES**

**Total Expenses** \$0.00

**Recap of Professional Services**

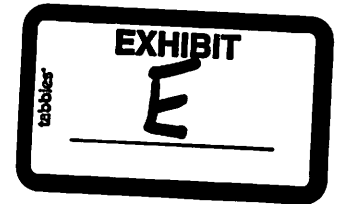
Hogan, L. Alex	1.00	Hrs @	\$200.00 / hr	\$200.00
Total Fees	1.00	Hrs		\$200.00

**BILLING SUMMARY**

Total professional services	\$200.00
Total of new charges for this invoice	<u>\$200.00</u>
Plus net balance forward	

SHATZ, SCHWARTZ AND FENTIN, P.C.

1441 Main Street Suite 1100  
Springfield, MA 01103-1491  
Telephone (413) 737-1131  
Fax (413) 736-0375  
Federal Tax ID # 04-2485418  
June 8, 2016



Greenfield Silver, Inc.  
f/k/a Lunt Silversmiths, Inc.  
P.O. Box 249  
Greenfield, MA 01302

Invoice # 107481 EVS  
Our File # LUN003 100012  
Billing through 03/02/2016

**FEE APPLICATIONS AND OBJECTIONS**

Balance forward as of invoice dated 05/13/15	\$15,105.50
Accounts receivable balance carried forward	<u>\$15,105.50</u>

**PROFESSIONAL SERVICES**

12/05/2014	LAH	Begin preparation of Third Interim Fee Application		
		\$200.00 / hr	1.20 hrs.	\$240.00
12/08/2014	LAH	Preparation of Third Interim Fee Application		
		\$200.00 / hr	3.50 hrs.	\$700.00
12/09/2014	LAH	Continued preparation of fee application		
		\$200.00 / hr	2.00 hrs.	\$400.00
01/12/2015	BBL	Continued revision of SSF third interim fee application		
		\$160.00 / hr	2.50 hrs.	\$400.00
01/13/2015	BBL	Download accountant documentation for fee application		
		\$160.00 / hr	0.50 hrs.	\$80.00
01/22/2015	BBL	Compile accountant supporting documentation for fee application for Attorney Alex Hogan review		
		\$160.00 / hr	0.20 hrs.	\$32.00
01/26/2015	BBL	Review printed documentation from accountants		
		\$160.00 / hr	0.30 hrs.	\$48.00
02/04/2015	BBL	Prepare updated accountant fee application for Attorney Alex Hogan review		
		\$160.00 / hr	1.20 hrs.	\$192.00
02/04/2015	BBL	Revise SSF third interim fee application for Attorney Alex Hogan review		

		\$160.00 / hr	1.90 hrs.	\$304.00
02/06/2015	BBL	Continued revision of SSF third fee application		
		\$160.00 / hr	0.60 hrs.	\$96.00
02/06/2015	BBL	Continued revision to accountant fee application		
		\$160.00 / hr	0.30 hrs.	\$48.00
02/06/2015	BBL	Email revised fee application to accountant for review		
		\$160.00 / hr	0.20 hrs.	\$32.00
02/09/2015	BBL	Efile, serve and upload SSF third interim fee application		
		\$160.00 / hr	2.00 hrs.	\$320.00
02/09/2015	BBL	Efile, upload and serve KAF fee application		
		\$160.00 / hr	0.70 hrs.	\$112.00
02/11/2015	BBL	Telephone call from Paula at Bankruptcy Court requesting courtesy copy of SSF fee application		
		\$160.00 / hr	0.10 hrs.	\$16.00
02/11/2015	BBL	Prepare correspondence to Paula at Bankruptcy Court re: copy of SSF fee application		
		\$160.00 / hr	0.20 hrs.	\$32.00
02/17/2015	BBL	Prepare certificate of service regarding hearing notice for KAF fee application		
		\$160.00 / hr	0.40 hrs.	\$64.00
02/17/2015	BBL	Prepare certificate of service regarding hearing notice for SSF fee application		
		\$160.00 / hr	0.40 hrs.	\$64.00
02/17/2015	BBL	Efile certificates of service regarding KAF and SSF fee applications		
		\$160.00 / hr	0.30 hrs.	\$48.00
03/16/2015	LAH	Telephone call from Attorney Paul Carey on behalf of accountants		
		\$200.00 / hr	0.40 hrs.	\$80.00
03/26/2015	LAH	Receipt and review of email from Attorney Weiner and response re: questions		
		\$200.00 / hr	0.50 hrs.	\$100.00
03/30/2015	EVS	Telephone call from Attorney Carey re: extension of hearing		
		\$345.00 / hr	0.20 hrs.	\$69.00
03/30/2015	BBL	Receipt and review of electronically filed documents regarding upcoming hearing		
		\$160.00 / hr	0.10 hrs.	\$16.00
03/30/2015	BBL	Conference with Attorney Alex Hogan and Attorney Ed Sabella		

		regarding assented to motion to continue hearing on applications for compensation		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/18/2015	EVS	Telephone call to Attorney Weiner; Telephone call to Attorney Meunier		
		\$345.00 / hr	0.40 hrs.	\$138.00
05/18/2015	LAH	Telephone conference with Attorney Steve Meunier re: SSF Fee application		
		\$200.00 / hr	0.30 hrs.	\$60.00
05/19/2015	LAH	Review of fee applications and prepare spreadsheet for Attorney Steve Meunier		
		\$200.00 / hr	1.60 hrs.	\$320.00
05/19/2015	LAH	Correspondence to Steven Meunier re: fees and unpaid professionals		
		\$200.00 / hr	0.30 hrs.	\$60.00
05/19/2015	LAH	Correspondence to Attorney Paul Carey re: accountant's fee application and future work		
		\$200.00 / hr	0.10 hrs.	\$20.00
05/20/2015	BBL	Receipt, review and download Motion to Continue/Cancel hearing		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/20/2015	BBL	Receipt and review of Order on motion to continue/cancel hearing regarding fee applications		
		\$160.00 / hr	0.10 hrs.	\$16.00
05/21/2015	LAH	Telephone call to Richard Kane re: rescheduling of hearing		
		\$200.00 / hr	0.30 hrs.	\$60.00
05/22/2015	BBL	Finalize, file, serve and upload certificate of service		
		\$160.00 / hr	0.40 hrs.	\$64.00
05/22/2015	BBL	Prepare draft certificate of service for Notice of Further Continued Hearings for Attorney Alex Hogan review		
		\$160.00 / hr	0.50 hrs.	\$80.00
06/08/2015	LAH	Receipt and review of communication from John Santaniello re: appraisal issue and prepare correspondence in response		
		\$200.00 / hr	0.30 hrs.	\$60.00
07/08/2015	LAH	Receipt and review of correspondence from Attorney Paul Carey and provide response		
		\$200.00 / hr	0.20 hrs.	\$40.00
			<b>Total Fees</b>	<b>\$4,443.00</b>

**EXPENSES**

**Total Expenses** \$0.00

**Recap of Professional Services**

LaBombard, Beverly B	13.10	Hrs @	\$160.00 / hr	\$2,096.00
Hogan, L. Alex	10.70	Hrs @	\$200.00 / hr	\$2,140.00
Sabella, Edward V	0.60	Hrs @	\$345.00 / hr	\$207.00
Total Fees	24.40	Hrs		\$4,443.00

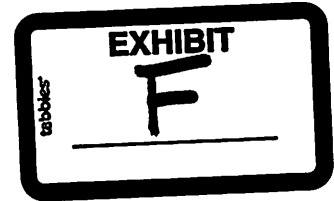
**BILLING SUMMARY**

Total professional services	\$4,443.00
Total of new charges for this invoice	<u>\$4,443.00</u>

SHATZ, SCHWARTZ AND FENTIN, P.C.

1441 Main Street Suite 1100  
Springfield, MA 01103-1491  
Telephone (413) 737-1131  
Fax (413) 736-0375  
Federal Tax ID # 04-2485418

June 8, 2016



Greenfield Silver, Inc.  
f/k/a Lunt Silversmiths, Inc.  
P.O. Box 249  
Greenfield, MA 01302

Invoice # 107482 EVS  
Our File # LUN003 100016  
Billing through 03/02/2016

**PLAN AND DISCLOSURE STATEMENT**

**PROFESSIONAL SERVICES**

08/18/2015	LAH	Research and analysis re: plan and disclosure combination with telephone call to Steve Meunier and email to Gary Weiner		
		\$200.00 / hr	1.60 hrs.	\$320.00
08/27/2015	LAH	Conference call with Gary Weiner		
		\$200.00 / hr	0.30 hrs.	\$60.00
08/31/2015	EVS	Preparation of revisions to Motion to Combine Disclosure Statements		
		\$345.00 / hr	0.30 hrs.	\$103.50
08/31/2015	LAH	Prepare motion for combined statement and plan		
		\$200.00 / hr	1.00 hrs.	\$200.00
09/01/2015	LAH	Prepare revisions to service list for motion to combine and prepare notice of filing and certificate of service		
		\$200.00 / hr	0.70 hrs.	\$140.00
09/01/2015	CL	File Assented-To Motion to Combine		
		\$160.00 / hr	0.50 hrs.	\$80.00
09/02/2015	LAH	Conference call with Don Allison		
		\$200.00 / hr	0.30 hrs.	\$60.00
09/02/2015	LAH	Correspondence to Don Allison re: note and mortgage for discussion in the plan/disclosure		
		\$200.00 / hr	0.30 hrs.	\$60.00
09/02/2015	LAH	Correspondence to Gary Weiner and Paul Carey re: Plan and Disclosure and sale of Unit A		

		\$200.00 / hr	0.30 hrs.	\$60.00
09/02/2015	LAH	Correspondence to Gary Weiner re: joint plan and disclosure		
		\$200.00 / hr	0.30 hrs.	\$60.00
09/02/2015	LAH	Review court order		
		\$200.00 / hr	0.20 hrs.	\$40.00
09/02/2015	CL	File Notice of Filing with Certificate of Service		
		\$160.00 / hr	0.30 hrs.	\$48.00
09/02/2015	CL	Prepare mailings to Creditors		
		\$160.00 / hr	0.70 hrs.	\$112.00
09/08/2015	EVS	Conference call with Attorneys Weiner and Carey		
		\$345.00 / hr	0.30 hrs.	\$103.50
09/22/2015	LAH	Meeting with Gary Weiner and Paul Carey		
		\$200.00 / hr	0.50 hrs.	\$100.00
09/23/2015	LAH	Prepare motion to continue deadlines and hearing re: plan and disclosure		
		\$200.00 / hr	1.70 hrs.	\$340.00
09/23/2015	CL	Prepare COS and Notices, and file new assented-to motions with Bankruptcy Court		
		\$160.00 / hr	1.40 hrs.	\$224.00
09/24/2015	AML	Finalize notice of hearing; File with the court and serve the same		
		\$130.00 / hr	0.30 hrs.	\$39.00
09/25/2015	CL	Prepare creditor mailings of Notices and Assented-To Motions		
		\$160.00 / hr	1.50 hrs.	\$240.00
09/30/2015	LAH	Telephone call from Paul Carey		
		\$200.00 / hr	0.10 hrs.	\$20.00
10/26/2015	LAH	Telephone call from Don Allison re: status of sales		
		\$200.00 / hr	0.30 hrs.	\$60.00
11/02/2015	EVS	Telephone calls to Attorney Allison, Attorney Meunier and Attorney Carey		
		\$345.00 / hr	0.40 hrs.	\$138.00
11/02/2015	LAH	Conference call with Steve Meunier and John Doherty		
		\$200.00 / hr	0.30 hrs.	\$60.00
11/02/2015	LAH	Conference call with Don Allison re: status of closings		
		\$200.00 / hr	0.30 hrs.	\$60.00
11/02/2015	LAH	Telephone conference with Gary Weiner		
		\$200.00 / hr	0.10 hrs.	\$20.00
11/02/2015	LAH	Conference call with Paul Carey		

\$200.00 / hr

0.20 hrs.

\$40.00

**Total Fees**

\$2,788.00

**EXPENSES****Total Expenses**

\$0.00

**Recap of Professional Services**

Lippman, Cynthia	4.40	Hrs @	\$160.00 / hr	\$704.00
Hogan, L. Alex	8.50	Hrs @	\$200.00 / hr	\$1,700.00
Lewkowicz, Ann-Marie	0.30	Hrs @	\$130.00 / hr	\$39.00
Sabella, Edward V	1.00	Hrs @	\$345.00 / hr	\$345.00
Total Fees	14.20	Hrs		\$2,788.00

**BILLING SUMMARY**

Total professional services	\$2,788.00
Total of new charges for this invoice	<u>\$2,788.00</u>
<b>Total Balance Now Due</b>	<b>\$2,788.00</b>

SHATZ, SCHWARTZ AND FENTIN, P.C.

1441 Main Street Suite 1100  
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Federal Tax ID # 04-2485418  
June 8, 2016



Greenfield Silver, Inc.  
f/k/a Lunt Silversmiths, Inc.  
P.O. Box 249  
Greenfield, MA 01302

Invoice # 107483 EVS  
Our File # LUN003 140466  
Billing through 03/02/2016

**DISBURSEMENTS / CHAPTER 11**

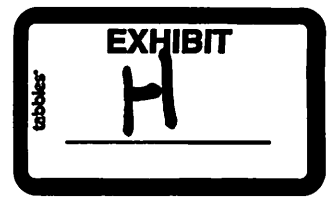
Balance forward as of invoice dated 05/13/15	\$7,812.79
Accounts receivable balance carried forward	<u>\$7,812.79</u>

**EXPENSES**

UPS Fee	\$31.64
Photocopies	\$29.90
Computer Research	\$9.70
Recording Mortgage	\$175.00
<b>Total Expenses</b>	<b>\$246.24</b>

**BILLING SUMMARY**

Total expenses incurred	\$246.24
Total of new charges for this invoice	<u>\$246.24</u>



**BIOGRAPHIES - SHATZ, SCHWARTZ AND FENTIN, P.C.**

**EDWARD V. SABELLA, ESQUIRE**

Attorney Sabella joined the firm of Shatz, Schwartz and Fentin, P.C. in August 2002. He was admitted to the Massachusetts and U.S. District Court, District of Massachusetts, 1976; Education: St. Michaels College (B.A. 1972); Western New England College (J.D. 1976) Member: Commercial Law League of America, Hampden County and Massachusetts Bar Associations. Concentration: Bankruptcy; Creditors Rights; Business/Corporate; Commercial Litigation; Civil Litigation.

**L. ALEXANDRA HOGAN, ESQUIRE**

Attorney Hogan has been employed with Shatz, Schwartz and Fentin, P.C. since March, 2005. From that time until May 2008, Attorney Hogan was a paralegal concentrating in the areas of Bankruptcy, Creditors Rights, Business/Corporate, and Civil Litigation. She has total of 10 years of paralegal experience. Attorney Hogan graduated from Bay Path College *summa cum laude* with a Bachelor of Science in Legal Studies. From 2004 through 2008, Attorney Hogan attended Western New England College School of Law. She was also a member of Western New England Law Review, which published her student note. Attorney Hogan graduated from Western New England College School of Law in May 2008 with *cum laude* honors and was admitted to practice law in Massachusetts in December 2008, and in Connecticut in June 2009. Attorney Hogan continues her employment with Shatz, Schwartz and Fentin, P.C. as an associate attorney concentrating in Bankruptcy, Creditors Rights, Business/Corporate, and Civil Litigation.

**STEVEN WEISS, ESQUIRE**

Steven Weiss is a partner at the firm of Shatz, Schwartz and Fentin, P.C., where his practice is concentrated in bankruptcy and creditor's rights. From August, 1986 through February, 1994, he was an associate and then a partner at the firm of Cooley, Shrair, P.C. He received his B.A. degree from Michigan State University in 1980, and his law degree from Boston University School of Law in 1984. Attorney Weiss has served as a law clerk to the Honorable Arthur J. Spector, United States Bankruptcy Judge, Eastern District of Michigan, Northern Division from 1984-1986. He has also been a member of the Panel of Chapter 7 Trustees for the District of Massachusetts since November, 1987.

Mr. Weiss is the author of several articles which have appeared in publications such as The Annual Survey of Bankruptcy Law, The Banking Law Journal and The Robert Morris Journal. He is a member of the Massachusetts and Hampden County Bar Associates, the Commercial Law League of America, the National Association of Bankruptcy Trustees and the American Bankruptcy Institute ("ABI"), and the Turnaround Management Association. Mr. Weiss has conducted several seminars and workshops for the ABI and for Massachusetts Continuing Legal Education ("MCLE") on a variety of bankruptcy topics.

**MICHAEL A. FENTON**

Attorney Michael A. Fenton concentrates his practice in the areas of business planning, commercial real estate, estate planning, and elder law.

Michael represents principals in business formation and succession planning, businesses in the purchase and sale of enterprises, developers in the acquisition and permitting of projects, and high net worth individuals in establishing comprehensive and sophisticated estate plans.

As an attorney with background in tax and a master's degree in business administration, Michael provides added value to clients with business planning concerns. In addition, Attorney Fenton has extensive land use experience that includes zoning, subdivision, project permitting and environmental matters. A significant part of Michael's practice revolves around estate planning and elder law. He develops sophisticated estate plans and elder law documents to facilitate access to public services and the preservation of assets. When litigation arises as a result of these dealings, Attorney Fenton has expertise in litigating these matters.

**BEVERLY B. LABOMBARD**

Beverly B. LaBombard recently joined Shatz, Schwartz and Fentin, P.C. in the position of Paralegal. Beverly earned her Paralegal Certificate from Boston University in 2014. Most recently, Beverly has worked in the areas of commercial litigation, commercial and residential real estate and financing, commercial acquisitions and sales, municipal law, estate planning and corporate law.

**ANN-MARIE LEWKOWICZ**

Ms. Lewkowicz has been with Shatz, Schwartz and Fentin, P.C. since July, 2004. She is a Paralegal to Steven Weiss, Esquire, where his practice is concentrated in bankruptcy and creditor's rights. Ms. Lewkowicz has 6 years prior legal experience.

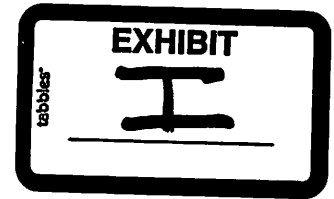
**CYNTHIA LIPPMAN**

Ms. Lippman began with Shatz, Schwartz and Fentin, P.C. in June 2015. She is a Paralegal to Edward Sabella, Esquire and L. Alexandra Hogan, Esquire, where their practices are concentrated in bankruptcy.

Shatz,  
Schwartz and  
Fentin, P.C.

Counsellors at Law

October 14, 2009



VIA ELECTRONIC MAIL

Mr. James H. Lunt  
Lunt Silversmiths, Inc.  
298 Federal Street  
Greenfield, MA 01301

Re: Chapter 11 Bankruptcy

Dear Jim:

Pursuant to our conversation regarding your decision for either Lunt Silversmiths, Inc. ("Lunt") to file a court proceeding for relief under Chapter 11 of the Bankruptcy Code, it is important that we memorialize our understanding concerning payment for legal services. The purpose of this letter is to set forth the terms that will apply to future legal representation by this law firm in connection with Lunt's Chapter 11 Bankruptcy.

In connection therewith, our law firm will prepare and file all documents required in a Chapter 11 proceeding, including, but not limited to the bankruptcy petition with Exhibit "A", schedules, list of 20 largest unsecured creditors, summaries, statement of financial affairs, "first day motions", cash collateral motions, the disclosure statements, motions for approval of disclosure statement, a plan of reorganization and other documents required by the Bankruptcy Code and rules of court. We will also appear at all hearings and meetings necessary to protect Lunt's interest in this matter.

As we discussed, there is an extensive amount of highly specialized legal work that must be done, often within extremely short time frames, both before filing a Chapter 11 case and within the first few months afterwards. The Bankruptcy Code has statutory restrictions concerning the timing of fee payments once the case is filed. Therefore, we must ask, first, that the filing entity make an advance retainer payment, to cover, so far as possible, legal fees and our out-of-pocket expenses already incurred and expected legal fees and expenses during the first three or four months after the filing. The retainer due to this firm will be \$50,000.00. This amount will be initially deposited into a trustee account and thereafter drawn upon by this firm in accordance with the provisions of the United States Bankruptcy Code. We are required by law to disclose the source of the retainer fee paid in this case. The actual time spent by this law firm will possibly exceed the initial retainer in the event the entity is able to effectively reorganize under the provisions of Chapter 11 of the Bankruptcy Code, or in the event that unanticipated problems or extraordinary matters arise in connection with this case, or in the event of a

liquidation. We will request the Court to approve fees in excess of the retainer should any of these situations arise.

Except as otherwise stated below, the Chapter 11 case and any associated proceedings, matters and legal services will be handled on a time-spent basis. Charges for attorneys' time will be at each attorney's hourly rate at the time of rendition of the service. The current hourly rates are: Edward V. Sabella \$345.00; Steven Weiss \$345.00; Alexandra Hogan \$200.00, and for paralegal's time, \$130.00.

Lunt will also be responsible for incidental expenses such as courier services, automated data research, document preparation, court fees, and transportation expenses. The initial court filing fee for a Chapter 11 case is \$1,039.00 which must be paid to the Clerk of Court at the time of the filing and is in addition to the retainer set forth above.

Upon filing the Chapter 11 Petition, the Lunt becomes a "Debtor-in-Possession" and its assets, liabilities and business as of the date and time of filing will be continually referred to as the "bankruptcy estate". Lunt has been advised by this firm of its various rights, duties and obligation as a Debtor-in-Possession in a Chapter 11 proceeding, including, but not limited to, monthly and periodic detailed reporting of Lunt's finances and business activity to the U.S. Trustee's Office, payment of quarterly fees and prompt payment of all post-petition obligations of Lunt.

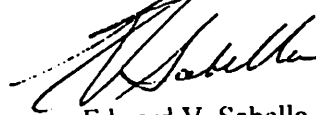
For Lunt's protection, bankruptcy law requires that once a Chapter 11 case is filed, all legal fees and expenses that are payable from assets of the bankruptcy estate are subject to prior court approval. We will of course comply with these legal requirements. We reserve the right to request the court to approve fees in excess of those reflected by the hourly rates if the results achieved on behalf of Lunt are beyond what could ordinarily be expected through the expenditure of that amount of time. In addition, subject to the bankruptcy court's review, we will send statements to Lunt that will include our fees and expenses to the end of each period but will not be payable until court approval has been obtained.

It has been explained to you that the attorney owes special fiduciary duties to the bankruptcy estate, Bankruptcy Court and the creditors, to disclose all information which may have a bearing on the case, including information regarding the ethical and competent conduct of Lunt relevant to the bankruptcy case, the finances and assets of the estate, and the good faith of Lunt as a Debtor-in Possession. Lunt hereby waives the attorney-client privilege against disclosure of any such information (if any) which may come to the attention of the firm after the firm has been retained as of the date of this agreement, in the event the law firm feels obligated to report it.

Thank you for your confidence you have placed in this firm. I look forward to a lasting and mutually beneficial relationship.

If these terms are agreeable to you, please sign and return a copy of this letter to my office as soon as possible.

Very truly yours,



Edward V. Sabella

I understand and accept the terms as stated above. I acknowledge receipt of a copy of this agreement this \_\_\_\_ day of October, 2009.

LUNT SILVERSMITHS, INC.

By: \_\_\_\_\_  
James H. Lunt, President

09\0185\retainer letter.4801

*Nancy J. DeB...*

1. (On the date hereof (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtor is liquidating its assets and managing its affairs as a debtor-in-possession. A creditors' committee has been appointed in this Chapter 11 case.

2. (On December 18, 2009, the Debtor filed with this Court its Application to Employ Counsel (the "Application"). A copy of the Application is attached hereto as Exhibit B and is incorporated by reference herein.

**Background**

"Affidavit", attached hereto as Exhibit A, and further states as follows:

Employ Counsel, the Debtor relies of the affidavit of Edward V. Sabella (the "Sabella Affidavit"), attached hereto as Exhibit A, and further states as follows:

as mandated by Local Bankruptcy Rule 9013-3. In support of this Renewed Application to Employ Counsel filed with this Court on December 18, 2009 was not served upon the parties in interest this renewed application is that, through inadvertence, the Debtor's Application to Employ Shatz, Schwartz and Fenton, P.C. ("SSF") as its counsel as of the Petition Date. The reason for hereby submits this renewed application for entry of an order authorizing the Debtor's retention of debtor-in-possession by and through its Counsel, in the above-captioned Chapter 11 case, and NOW COMES Greenfield Silver, Inc. (the "Debtor") and

**RENEWED APPLICATION TO EMPLOY COUNSEL**

In re:

GREENFIELD SILVER, INC.

W/a Lant SilverSmiths, Inc.

DEBTOR

Chapter 11  
Case No. 09-32228-HJB



UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION



In re:

LUNT SILVERSMITHS, INC.

DEBTOR

Chapter 11

Case No. 09-32228-HJB

APPLICATION TO EMPLOY COUNSEL

NOW COMES Lunt Silversmiths, Inc., (the "Debtor") and debtor-in-possession in the above-captioned Chapter 11 case, and hereby submits this application (the "Application"), pursuant to sections 327(a) and 1107(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure, and Rule 2014-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Massachusetts, for entry of an order authorizing the Debtor's retention of Shatz, Schwartz and Fentin, P.C. ("SSF") as its counsel as of the Petition Date. In support of this Application, the Debtor relies on the affidavit of Edward V. Sabella (the "Sabella Affidavit"), attached hereto as Exhibit A, and further states as follows:

Background

1. On the date hereof (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtor is liquidating its assets and managing its affairs as a debtor-in-possession.
2. As of the date hereof, no creditors' committee, trustee or examiner has been appointed in this Chapter 11 case.

1/5/2010 GRANTED. NO OBJECTIONS HAVE BEEN FILED. ALL COMPENSATION SUBJECT TO FINAL COURT APPROVAL.