

Cause No C-1-PB-17-000132

IN RE:	§	IN THE PROBATE COURT
	§	
TEL OFFSHORE TRUST	§	NO. ONE OF
	§	
QUALIFIED SETTLEMENT FUND	§	TRAVIS COUNTY, TEXAS

FEE APPLICATION (Seventh)

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Karl Johnson, Trustee of the TEL Offshore Trust Qualified Settlement Fund, and files this Fee Application (Seventh) and would show the Court the following:

I.

Applicant was appointed Trustee by Order dated January 20, 2017 and qualified by filing a bond and oath on January 30, 2017.

II.

The Trustee has 36 years of experience practicing law in Travis County, with a focus upon litigation and probate work.

III.

Incorporated herein as the next paragraph is a Statement of Services for the activity of the Trustee from July 10, 2018 through October 29, 2018.

IV.

LAW OFFICE OF KARL G. JOHNSON, JR., P.C.

704 West 9th Street
Austin, Texas 78701

(512) 482-9113 (Telephone)
(512) 482-9114 (Telefax)

STATEMENT OF SERVICES

October 29, 2018

In Re: TEL Offshore Trust Qualified Settlement Fund
Cause # C-1-PB-17-000132
Probate Court No. One, Travis County, Texas

My file # 17-329

Total for This Invoice: \$14,651.20
Prior Unpaid Balance: \$ 0
Balance Owed: \$14,651.20

DATE	SERVICES	TIME
7/10/18	Receive and review unit holder email/correct mailing list/verify holdings	0.40
7/24	Begin work of reviewing, organizing returned mail, resending those possible	2.00
7/25	Continue work of reviewing, organizing returned mail, resending those possible	2.00
7/26	Receive and research unit holder complaint/respond to same	0.50
7/30	Receive and research unit holder detailed complaint/respond to same	0.70
8/1	Receive and research unit holder complaint/respond to same (2x)	1.00
8/6	Receive and research unit holder detailed complaint/respond to same 0.70; correspondences to unit holders Geissler & Chilenko (2x) with stop payments orders, replacement checks 1.20	1.90
8/13	Receive and review unit holder Gangstad correspondence, research same and respond with payment 0.70; review unit holder Cavallaro complaint, confirm proper payment 0.40	1.10
8/14	Receive unit holder Argenzia inquiry, research same and respond 0.50; receive unit holder Ra inquiry, research same and respond 0.50; receive unit holder Mackenbach inquiry, research same and respond 0.50; receive unit holder Watters inquiry, research same and respond 0.50; review inquiry, correspondence to unit holder Bollinger with stop payment order, replacement check 0.60	2.60
8/24	Receive and research unit holder Bollinger detailed complaint/respond to same 0.70; receive and research unit holder Bounume detailed complaint/respond to same 0.70	1.40
8/29	Receive and research unit holder Valsecchi complaint/respond to same 0.50	0.50
9/12	Receive and research unit holder Lenfesty complaint/respond to same 0.50	0.50
10/23	Begin review of distribution results for report to Court 3.00; review	4.50

DATE	SERVICES	TIME
	unit holder Ellis complaint/verify complaint (applicable to three unit holders) 1.50	
10/24	Review address updates and re-mail checks to fourteen unit holders 2.00; make distribution corrections for Ellis, Tutt and Chilenko 1.20	3.20
10/25	Review unresolved complaints/research and forward replacement checks for survivors joint tenancies who provided death certificates 3.00; research Clifton returned checks/correspondence to Clifton 0.50; review complaint of unit holder Eseppia/correspondence to Eseppia 0.50; review complaint of unit holder Faubert/correspondence to Faubert with replacement checks 0.60; research Charles Schwab documents for unit holder Valsecchi/no correction necessary 0.40; research unit holders White and Bohn returned checks/correspondence to White and Bohn 0.60	5.60
10/27	Draft Motion to Reduce Bond/Order 0.80	0.80
10/29	Review all email communications/resolve complaints, note problems (preparation for report)	4.50

Paralegal time

DATE	SERVICE DESCRIPTION	TIME
6/29/18	Enter NOBO17 checks	6.00
6/30/18	Enter NOBO17 checks	2.00
7/1/18	Enter NOBO17 checks	4.00
7/2/18	Reconcile NOBO17 checks, run checks	4.00
7/5/18	Final recon/check on 1 st distribution of all TEL checks	7.50
7/9/18	Sort through cheks returned inmail	0.50
7/16/18	Review info/records to calculate cost per for min distribution amount	2.00
7/?/18	Research and verify missing distribution: Gangstad	0.30
7/31/18	Research and verify missing distribution: Litwin	0.20
8/2/18	Reconcile cleared checks 2014 distribution	2.00
8/3/18	Reconicile cleared checks 2017 distribution	2.50
8/6/18	Review & verify lost checks 18019-21	0.20
8/15/18	Review returned mail	0.20
8/30/18	Review returned mail	0.20
9/7/18	Reconcile cleared checks 2014 & 2017 distributions	4.50
10/25/18	Review returned mail, research claim issues; reconcile cleared checks	4.70
10/26/18	Continue cleared checks reconciliation; make corrections to RO17	4.30

DATE	SERVICE DESCRIPTION	TIME
	payees in QB	
10/28/18	Correct RO17 payees in QB	4.00

EXPENSES

DATE	DESCRIPTION	AMOUNT
7/25/18	Mailing costs (CMRRR & stamps)	\$26.70

Total for Attorney Services: \$9960.00 (33.2 hours x \$300/hr.)
Total for Paralegal Services: \$4664.50 (49.1 hours x \$100/hr.)
Total for Expenses: \$ 26.70
Grand total due: \$14,651.20

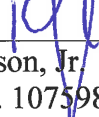
V.

This fee application includes work by my paralegal Gabriela Brice working on the distribution process. This is skilled work, involving proper classification, checking the forms against the lists available of owners of unit holders, creating Excel spreadsheets which will be the foundation of subsequent distributions, printing checks, etc. This work is the nut of being able to make a fair distribution of the settlement funds; were this work not completed by the paralegal, I would have had to do it.

WHEREFORE, the Trustee prays that the Court approve this Fee Application (Seventh) and for other Orders as the Court deems appropriate.

Respectfully submitted,

Law Office of Karl G. Johnson, Jr., P.C.
704 West 9th Street
Austin, Texas 78701
(512) 482-9113
(512) 482-9114 (telefax)
karl@kjlawfirm.com

By:  _____
Karl G. Johnson, Jr.
State Bar No. 10759800
Trustee/Administrator of the TEL Offshore Trust
Qualified Settlement Fund

VERIFICATION


STATE OF TEXAS

COUNTY OF TRAVIS

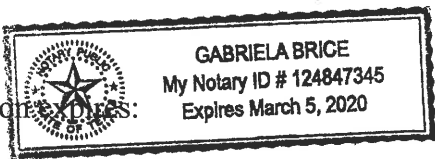
On this day personally appeared before me Karl G. Johnson, Jr., who on his oath stated as follows:

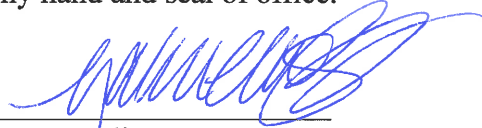
“My name is Karl G. Johnson, Jr. I am the Trustee of the TEL Offshore Trust Qualified Settlement Fund. I am over the age of eighteen years and suffer from no disability that would prevent me from making this affidavit.

I have prepared the Fee Application (Seventh), of which this verification is a part, including the Statement for Services. It is a true and complete statement of the matters stated therein. The attorney’s fees and expenses stated therein are both reasonable and necessary from my personal experience and knowledge.


Karl G. Johnson, Jr.

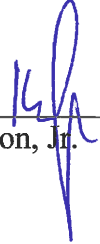
SWORN TO AND SUBSCRIBED BEFORE ME BY Karl G. Johnson, Jr. on the 29th day of October, 2018, to certify which witness my hand and seal of office.

My commission expires: 


Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served or will be served in accordance with the Court’s Orders regarding service dated September 28, 2015 and January 21, 2016.


Karl G. Johnson, Jr.