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9 and Debtor in Possession

10 UNITED STATES BANKRUPTCY COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO DIVISION

13 In re:

14 SUKHRAJ S. PAMMA dba SUKHRAJ S.
15 PAMMA FARMS,

16 Debtor.

Case Nos.: 24-23489-B-11

Chapter 11

**SECOND INTERIM FEE
APPLICATION OF DEBTOR'S
COUNSEL LOEB & LOEB LLP FOR
ALLOWANCE AND PAYMENT OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF APRIL 1, 2025
THROUGH DECEMBER 31, 2025**

DC No.: BRG-19

Date: February 24, 2026

Time: 11:00 a.m.

Place: 501 I Street, 6th Floor,
Courtroom 32, Sacramento, CA

Judge: Hon. Christopher D. Jaime

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25 **TO THE HONORABLE CHRISTOPHER D. JAIME, UNITED STATES**
26 **BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE,**
27 **AND ALL INTERESTED PARTIES:**
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Loeb & Loeb LLP (“**Loeb**”), general bankruptcy counsel for debtor-in-possession Sukhraj S. Pamma (the “**Debtor**”), hereby submits its Second Interim Application for Approval of Fees and Reimbursement of Expenses (“**Application**”) for the period of April 1, 2025 through December 31, 2025 (“**Application Period**”), under Bankruptcy Code sections 105(a), 328, and 331, rules 2016 and 2022 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and the Bankruptcy Local Rules for the Eastern District of California (“**LBR**”). The Application is based on the Order Approving Employment of Attorneys [Docket No. 57] (the “**Loeb Employment Order**”) (Exhibit “**A**”¹), the supporting the declaration of Bernard R. Given, II filed concurrently herewith (the “**Given Decl.**”), the Exhibits filed in support of the Application, and all related documents and pleadings previously filed in this bankruptcy case or that may be filed prior to a hearing on this matter, and such other evidence, whether oral or documentary, that the Court may elect to consider. In support of this Application, Loeb respectfully states as follows:

I. INTRODUCTION

1. By this Application, Loeb requests an order from the Court approving its Application seeking \$298,405.50 for services rendered and \$11,832.96 for reasonable expenses incurred from April 1, 2025 through December 31, 2025, for a total of \$310,238.46.

2. This is the second application for allowance of fees filed by Loeb for work performed on behalf of the Debtor. Loeb filed its first application for allowance of fees in the amount of \$432,667.00 and expenses in the amount \$8,359.26 for work performed on behalf of the Debtor for the period from the Petition Date to March 31, 2025 [Docket no. 388]. On May 23, 2025, the Court granted Loeb’s first application for an interim award and permitted payment of \$353,000 for services rendered and \$8,359.26 for reasonable expenses [Docket No. 472] (the “**First Interim Fee Order**”). As of December 29, 2025, Loeb had been paid the entire amount authorized by the First Interim Fee Order.

¹ All exhibits referenced herein are indexed and contemporaneously filed in support hereof.

1 3. Loeb believes that this Application substantially conforms with the United
2 States Trustee's Guidelines in Larger Chapter 11 Cases (the "**Trustee's Guidelines**") for
3 compensation and expense reimbursement for professionals.

4 **II. BACKGROUND AND CASE STATUS**

5 **i) General Background**

6 4. The Debtor commenced his bankruptcy case by filing a voluntary petition
7 for relief under chapter 11 of the Bankruptcy Code on August 7, 2024 (the "**Petition**
8 **Date**").

9 5. Since the Petition Date, the Debtor has operated his business and affairs as
10 Debtor and Debtor-in -Possession.

11 6. No committees or trustees been have appointed. Michael W. Carmel was
12 appointed as examiner (the "**Examiner**") in this case on December 30, 2025 [Docket No.
13 696].

14 **ii) Case Developments**

15 7. Since the first application, Loeb has assisted the Debtor in making
16 substantial progress in the Chapter 11 Case.

17 8. Among other things, Loeb worked to complete the sale of the Debtor's
18 properties that were secured by AgWest's senior lien for \$13,200,000, which was
19 \$5,400,000 higher than the initial stalking horse bid of \$7,800,000. This included
20 correspondence with bidders, directing the auction, liaising with the title company on
21 closing issues, negotiating the proposed order to approve the sale, and drafting and filing
22 all required notices with the Court. Loeb also assisted the Debtor in closing various other
23 sales that the Court approved, including negotiating with purchasers, conferring with the
24 title company, and drafting and filing related sale notices with the Court. These closed
25 asset sales resulted in a substantial reduction of the Debtor's outstanding debt. Loeb also
26 assisted the Debtor in his attempts at selling his walnut processing plant and related assets
27 and in negotiations with the proposed purchaser and Rabobank to try to effectuate the sale.
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1 9. Loeb also worked with the Debtor's financial advisor to ensure that all
2 monthly operating reports have been filed and that the periodic report relating to affiliated
3 entities was filed. Loeb drafted and filed appropriate status conference reports with the
4 Court and attended related status conferences.

5 10. Loeb also drafted and filed amended versions of the Debtor's proposed plan
6 and disclosure statement and attended hearings and status conferences related to approval
7 of the disclosure statement, solicitation of votes on the plan, and confirmation of the plan.
8 Further, Loeb has worked to resolve objections to the plan from the United States Trustee
9 and various creditor parties.

10 11. Loeb has also drafted and filed motions, responses and replies, negotiated
11 with creditors, and attended hearings on contested matters, including requests to convert
12 or dismiss this Chapter 11 Case or to appoint an examiner, for relief from the automatic
13 stay, and to surcharge proceeds of certain asset sales.

14 **III. SERVICES RENDERED AND COSTS INCURRED**

15 12. During the Application Period, Loeb expended an aggregate of 323.3 hours
16 on behalf of the Debtor in this case. A true and correct summary of time expended by
17 each attorney and/or paralegal working on this case and fees charged by each professional
18 is Exhibit "B". Pursuant to the Retention Agreement, Loeb capped its rates for this matter
19 at \$990 for partners, \$750 for associates, and \$450 for paralegals, which is approximately
20 26% lower than the normally charged rates for partners in other similar matters. These
21 rates are well below the standard rates charged by Loeb professionals. (Given Decl., ¶11)
22 A summary of total costs incurred is Exhibit "C". The biographies of the attorneys who
23 have primary responsibility for this case, Bernard R. Given and Bethany D. Simmons, and
24 other professionals who have billed time on this matter are Exhibit "D".
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i) *Itemization of Services Rendered by Service Category*

13. The following itemization breaks down the services rendered by Loeb during the Application Period by the applicable service category indicated.

14. A listing of the billing task code categories (each, a “**Task Code**,” and collectively, the “**Task Code Categories**”) showing the number of professional hours expended and fees incurred under each Service Category are shown below:

SUMMARY BY TASK CODE CATEGORY		
Category	Hours	Fees
A. Case Administration (Category B110)	27.8	\$24,228.00
B. Asset Disposition (Category B130)	83.9	\$83,061.00
C. Relief From Stay/Adequate Protection Proceedings (Category B140)	8.6	\$7,698.00
D. Meetings and Communications with Creditors (Category B150)	0.5	\$495.00
E. Fee/Employment Applications (Category B160)	19.7	\$13,293.00
F. Assumption/Rejection of Lease Contracts (Category B185)	0.3	\$297.00
G. Other Contested Matters (Category B190)	125.5	\$113,061.00
H. Non-Working Travel (Category B195) ²	4.0	\$3,960.00
I. Business Operations (Category B210)	0.5	\$495.00
J. Tax Issues (Category B240)	1.1	\$1,089.00
K. Claims Administration and Objections (Category B310)	3.9	\$3,861.00

² This amount represents 50% of the total time for travel.

L.	Plan and Disclosure Statement (Category B320)	40.2	\$39,750.00
M.	General Bankruptcy Advice/Options (Category B410)	7.3	\$7,117.50

15. A detailed description of all professional services rendered by Loeb to the Debtor and costs incurred during the Application Period is set forth in the invoices at Exhibit “E”. The invoices further organize the services rendered by Loeb professionals by task, as set forth under the American Bar Association’s recommended Bankruptcy and Litigation Code Sets within the Uniform Task-Based Management System used by major U.S. law departments.

ii) Itemization of Services Rendered by Timekeeper

16. The hours spent in this case by timekeeper during the Application Period for which Loeb seeks compensation and the resulting fees are as follows:

SUMMARY BY PROFESSIONAL		
Full Name	Total Hours Spent by Professional	Total Fees (Hourly Rates Per Engagement)
Bernard R. Given, II (Partner)	131.6	\$130,284.00
Gregory Schwed (Partner)	7.3	\$7,117.50
Bethany D. Simmons (Partner)	116.6	\$115,434.00
Alexis Zobeideh (Associate)	50.2	\$37,650.00
Fiona McKeown (Paralegal)	11.5	\$5,175.00
Ana Manzano (Lit IT Support)	6.1	\$2,745.00
	Total Hours: 323.3	Total Fees: \$298,405.50

17. The blended hourly rate for all services rendered during the Application Period is \$923 per hour.

18. Exhibit “E” (Loeb’s invoices) includes detailed, contemporaneously maintained time entries by each professional in increments of tenths (1/10) of an hour to describe the fees incurred during the Application Period.

iii) *Itemization of Costs*

19. During the Application Period, Loeb advanced funds for costs for which reimbursement is now sought by this Application. A summary of the costs advanced by Loeb is submitted as Exhibit “C”.

20. A detailed statement of the costs advanced by Loeb during the Application Period are itemized in Loeb's invoices (Exhibit "E"). This includes Loeb's expenses incurred for travel, mailing, hiring messenger services, publication costs, online research, and remote court appearances. Loeb generally handles regular and routine photocopying in-house for which Loeb charges clients twenty cents (\$.20) per page. Loeb's photocopy machines automatically record the number of copies made when the person that is photocopying enters the client's account number into a device attached to the photocopy machine. Whenever feasible, Loeb sends large copying projects to outside copy services that charge bulk rates for photocopying. In such instances, Loeb charges clients the same amount that Loeb pays the outside service.

21. All expenses that Loeb advanced on behalf of the Debtor were necessarily incurred and are properly charged as administrative expenses of the Debtor's chapter 11 estate.

IV. CONCLUSION

Based on all of the above, Loeb respectfully requests that this Court enter an order:

22. Approving on an interim basis the amount of \$298,405.50 for services rendered and reimbursement of actual necessary costs of \$11,832.96, totaling \$310,238.46 for fees and expenses incurred during the Application Period;

23. Directing payment of such fees and expenses from the Debtor's estate; and

24. Granting such other and further relief as the Court deems just and proper.

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Dated: January 27, 2026

LOEB & LOEB LLP

/s/ Bernard R. Given II
Bernard R. Given II

*Attorneys for the Debtor and
Debtor-in-Possession*