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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

**FIRST INTERIM FEE APPLICATION
OF DEBTOR'S COUNSEL LOEB &
LOEB LLP FOR ALLOWANCE AND
PAYMENT OF COMPENSATION
AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD OF
AUGUST 7, 2024 THROUGH MARCH
31, 2025**

DC No.: BRG-16

Date: June 3, 2025

Time: 11:00 a.m.

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

Judge: Hon. Christopher D. Jaime

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24 **TO THE HONORABLE CHRISTOPHER D. JAIME, UNITED STATES**
25 **BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE,**
26 **AND ALL INTERESTED PARTIES:**
27
28

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FIRST INTERIM FEE APPLICATION OF DEBTOR'S COUNSEL LOEB & LOEB LLP

Loeb & Loeb LLP (“**Loeb**”), general bankruptcy counsel for debtor-in-possession Sukhraj S. Pamma (the “**Debtor**”), hereby submits its First Interim Application for Approval of Fees and Reimbursement of Expenses (“**Application**”) for the period of August 7, 2024 through March 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 [DOC 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. The Debtor commenced his bankruptcy case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code on August 7, 2024 (the “**Petition Date**”). No Creditors’ Committee having been appointed. By this Application, Loeb requests an order from the Court approving its Application seeking \$432,667.00 for services rendered and \$8,359.26 for reasonable expenses incurred from August 7, 2024 through March 31, 2025, for a total of \$441,026.26. Loeb is currently holding a retainer in the amount of \$35,000.00 and Loeb further seeks permission to apply all sums held as a retainer to the fees and costs approved by this court.

2. This is the first application for allowance of fees filed by Loeb for work performed on behalf of the Debtor.

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

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

II. BACKGROUND AND CASE STATUS

i) General Background

4. On August 7, 2024 (the "**Petition Date**"), the Debtor filed with this Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

5. Since the Petition Date, the Debtor has operated his business and affairs as Debtor and Debtor-in -Possession. No committees or trustees have been appointed in this case.

ii) Case Developments

6. Since the initial filing, the Debtor has filed numerous motions to sell assets of the estate. More specifically, the Debtor has filed and/or had approved motions to sell numerous real properties owned in whole or in part by the Debtor for amounts in excess of \$10 million. The result of the Motions which have already been filed and/or approved, and the Motions to be filed will result in the Debtor retaining only a small portion of the real property associated personal property assets which he owned at the time of filing.

To further the liquidation process, the Debtor filed a Liquidating Plan of Reorganization on April 7, 2025. The hearing on the Disclosure Statement is currently set for May 26, 2025 and the corresponding hearing on the Plan of Organization is set for June 17, 2025.

The Debtor is current on the filing of all of his Monthly Operating Reports required to be filed with the Court and/or served upon the United States Trustees office.

III. SERVICES RENDERED AND COSTS INCURRED

6. During the Application Period, Loeb expended an aggregate of 555.3 hours on behalf of the Debtor in this case but is seeking payment for 501 hours. A true and correct summary of time expended by each attorney and/or paralegal working on

1 this case and fees charged by each professional is Exhibit “B”. Pursuant to the Retention
2 Agreement, Loeb capped its rates for this matter at \$990 for partners, \$750 for
3 associates, and \$450 for paralegals, which is approximately 26% lower than the
4 normally charged rates for partners in other similar matters. Loeb further deducted over
5 54 hours (\$36,903.00 in legal fees) of the total professional time incurred. These rates
6 are well below the standard rates charged by Loeb professionals. (Given Decl., ¶ 10) A
7 summary of total costs incurred is Exhibit “C”. The biographies of the attorneys who
8 have primary responsibility for this case Bernard R. Given and Bethany D. Simmons
9 and other professionals who have billed time on this matter are Exhibit “D”.

10 *i) Itemization of Services Rendered by Service Category*

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

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

SUMMARY BY TASK CODE CATEGORY		
Category	Hours	Fees
A. Case Administration (Category B110)	125.80	\$111,306.00
B. Asset Analysis and Recovery (Category B120)	2.5	\$1,738.00
C. Asset Disposition (Category B130)	145.6	\$120,762.00
D. Relief From Stay/Adequate Protection Proceedings (Category B140)	64.6	\$55,302.00

E.	Meetings and Communications with Creditors (Category B150)	15.60	15,444.00
F.	Fee/Employment Applications (Category B160)	40.6	\$27,574.00
G.	Fee/Employment Objections (Category B170)	7.1	7,029.00
H.	Assumption/Rejection of Lease Contracts (Category B185)	1.3	\$1,287.00
I.	Other Contested Matters (Category B190)	21.5	\$17,751.00
J.	Non-Working Travel (Category B195) ²	2.0	\$1,980.00
K.	Business Operations (Category B210)	7.1	\$7,029.00
L.	Financing/Cash Collections (Category B230)	1.1	\$1,089.00
M.	Tax Issues (Category B240)	.3	\$297.00
N.	Real Estate (Category B250)	1.9	\$1,881.00
O.	Claims Administration and Objections (Category B310)	18.2	\$18,018.00
P.	Plan and Disclosure Statement (Category B320)	41.4	\$40,515.00
Q.	General Bankruptcy Advice/Options (Category B410)	4.1	\$4,059.00

9. A detailed description of all professional services rendered by Loeb to the Debtor and costs incurred during the First Interim Period is set forth in the Loeb invoices

is 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

10. The hours spent in this case during the Application Period for which Loeb seeks compensation, the hourly rate for each attorney and paralegal 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)	189.7	\$187,803.00
Vadim J. Rubinstein (Partner)	10.3	\$10,197.00
Bethany D. Simmons (Partner)	162.0	\$160,380.00
Alexis Zobeideh (Associate)	40.7	\$30,093.00
Fiona McKeown (Paralegal)	97.4	\$43,830.00
Staci Steadman (Research Librarian)	.5	\$190.00
Ana Manzano (Lit IT Support)	.4	\$174.00
	Total Hours: 501	Total Fees: \$432,667.00

11. During the Application Period, Loeb, in its sole and absolute discretion, has made voluntary adjustments to the total amount of fees charged to the Debtor’s estate. Specifically, Loeb did not charge for 54.3 hours of work with a total value of \$36,903.00; this voluntary fee adjustment is not reflected on the invoices. The blended hourly rate for all services rendered during the Application Period is \$864.00 per hour.

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

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

4 *iii) Itemization of Costs*

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

8 14. A detailed statement of the costs advanced by Loeb during the Application
9 Period are itemized in Loeb’s invoices (Exhibit “E”). This includes Loeb’s expenses
10 incurred in photocopying, making long distance telephone calls, telecopying, mailing,
11 and hiring messenger services. Loeb generally handles regular and routine
12 photocopying in-house for which Loeb charges clients twenty cents (\$.20) per page.
13 Loeb’s photocopy machines automatically record the number of copies made when the
14 person that is photocopying enters the client’s account number into a device attached to
15 the photocopy machine. Whenever feasible, Loeb sends large copying projects to
16 outside copy services that charge bulk rates for photocopying. In such instances, Loeb
17 charges clients the same amount that Loeb pays the outside service.

18 15. All expenses that Loeb advanced on behalf of the Debtor were necessarily
19 incurred and are properly charged as administrative expenses of the Debtor’s chapter 11
20 estate

21 **IV. CONCLUSION**

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

24 7. Approving on an interim basis the amount of \$432,667.00 for services
25 rendered and reimbursement of actual necessary costs of \$8,359.26, totaling
26 \$441,026.26 for fees and expenses incurred during the Application Period;

27 8. Directing payment of such fees and expenses from the Debtor’s estate;
28

9. Authorize Loeb to apply all retainer monies it is holding to the approved fees and costs; and

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

Dated: April 9, 2025

LOEB & LOEB LLP

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

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