

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 1:14-cv-23109-RNS

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

PARTNERS IN HEALTH CARE  
ASSOCIATION, INC., *et al.*,

Defendants.

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**RECEIVER'S MOTION FOR APPROVAL OF  
PAYMENT OF FEES AND EXPENSES TO DEEANNA MOORE**

Peter D. Russin, in his capacity as receiver (the "*Receiver*") of Partners in Health Care Association, Inc.; United Solutions Group, Inc.; and their subsidiaries, affiliates, successors and assigns (collectively the "*Receivership Entities*"),<sup>1</sup> appointed pursuant to this Court's Temporary Restraining Order dated August 25, 2014 [ECF No. 9] (the "*TRO*"); the Stipulated Preliminary Injunction Against United Solutions Group, Inc., Constanza Gomez Vargas, and Walter S. Vargas [ECF No. 31] (the "*USGI Preliminary Injunction*"); and the Corrected Preliminary Injunction Against Partners In Health Care Association, Inc., and Gary L. Kieper [ECF No. 36] (the "*PIHC Preliminary Injunction*") and, pursuant to Article XXI of the PIHC Preliminary Injunction, states:

1. Article XXI provides that:

“[T]he Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket

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<sup>1</sup> The administration of the Receivership Entities is referred to herein as the "*Estate*.”

expenses incurred by them, from the Assets now held by, in the possession or control of, or which may be received by, the Receivership Defendant. The Receiver shall file with the Court and serve on the parties periodic requests for the payment of such reasonable compensation, with the first such request filed no more than sixty (60) days after the date of entry of this Order. The Receiver shall not increase the hourly rates used as the bases for such fee applications without prior approval of the Court.”

2. The Receiver has hired DeeAnna Moore to provide administrative services, in preparation of W-2s and 1099s for employees of the Wisconsin Receivership Entities, and Ms. Moore has incurred fees in the amount of \$480.00 and costs in the amount of \$65.00, totaling \$545.00. DeeAnna Moore’s invoice is attached as Exhibit A.

3. Due to the *de minimis* fees requested, the Receiver requests the relief be granted without a hearing.

4. Additionally, given the small amounts at issue, undersigned counsel has not billed the Estate for the preparation and filing of this motion.

WHEREFORE, the Receiver requests the Court authorize the Receiver to make payment to DeeAnna Moore for \$545.00 from the Estate, and grant such other and further relief as is just and appropriate.

Respectfully submitted,

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*Attorneys for Peter D. Russin, Receiver*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing is being delivered to the following parties via transmission of Notices of Electronic Filing on January 29, 2015.

/s/ Lawrence E. Pecan  
Lawrence E. Pecan, Esquire

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Date	Start	End	# hrs	Wage	Total	Reason
1/16/2015	10:00am	11:00am	1	\$12	\$12	met with John Menn to get information for running W2's
1/16/2015	3:00pm	5:00pm	2	\$12	\$24	set up quickbooks on computer and assure files were present
1/18/2015	2:00pm	8:00pm	6	\$12	\$72	created spreadsheets for payroll due for Senior Advantage and TRI Resource Group.
1/22/2015	9:00am	6:00pm	9	\$12	\$108	created W2's for all companies
1/23/2015	9:00am	5:00pm	8	\$12	\$96	redo w2's do to change in information from lawyer
1/25/2015	3:00pm	6:00pm	3	\$12	\$36	finalize W2's
1/28/2015	9:00am	6:00pm	9	\$12	\$108	1099's PIHC, Senior Advantage and TRI Resource Group
1/29/2015	11:00am	1:00pm	2	\$12	\$24	Meet John Menn to give all information to
1/20/2015	n/a	n/a		\$5	\$5	purchase manila envelopes
1/29/2015	n/a	n/a		\$60	\$60	Purchase ink for printer
					\$545	