

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman, Esq.,
Chapter 7 Trustee
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300
Jay S. Hellman, Esq.
David J. Mahoney, Esq.

Hearing Date: May 31, 2012
Time: 10:00 a.m.

Objections Due: May 25, 2012
Time: 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.

Chapter 7
Case No.: 09-70660 (DTE)
Substantively Consolidated

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**NOTICE OF HEARING ON
TRUSTEE'S APPLICATION TO EXTEND AUTHORIZATION
TO REIMBURSE EXPENSES OF REID COLLINS TSAI LLP AND RUSKIN
MOSCOU FALTISCHEK P.C., AS SPECIAL LITIGATION COUNSEL TO THE TRUSTEE**

PLEASE TAKE NOTICE, that upon the annexed application dated May 14, 2012 of Kenneth P. Silverman, Esq., the Chapter 7 Trustee (the "Trustee") of the substantively consolidated estates of Agape World Inc., *et al.*, by his attorneys, SilvermanAcampora LLP, the Trustee will move this Court before the Honorable Dorothy T. Eisenberg, United States Bankruptcy Judge, in her Courtroom at the Alfonse M. D'Amato United States Bankruptcy Courthouse, located at 290 Federal Plaza, Room 760, Central Islip, New York 11722, on **May 31, 2012 at 10:00 a.m.** (the "Hearing"), in the forenoon of that day, or as soon thereafter as counsel can be heard, for (i) an Order extending the Trustee's authority to reimburse expenses incurred by Reid Collins & Tsai LLP and Ruskin Moscou & Faltischek PC, as special litigation counsel to the Trustee and for such other and further relief as is just and proper. A copy of the proposed Order is attached to the Motion as **Exhibit 1**.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, must be (I) made in writing; (II) electronically filed with the Court; (III) mailed to Chambers of the Hon. Dorothy T. Eisenberg, United States Bankruptcy Judge, Alfonse M. D'Amato United States Bankruptcy Courthouse, located at 290 Federal Plaza, Room 760, Central Islip, New York 11722; (IV) mailed to Silverman Acampora LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: David J. Mahoney, Esq.; and (V) mailed to the Office of the United States Trustee, 290 Federal Plaza, Central Islip, New York 11722, so as to be actually received no later than **May 25, 2012 at 4:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned without further notice other than by announcement of such adjournment in open Court.

Dated: Jericho, New York
May 14, 2012

SILVERMANACAMPORA LLP
Attorneys of Kenneth P. Silverman, Esq.
Chapter 7 Trustee

By: s/ David J. Mahoney
David J. Mahoney
Member of the Firm
100 Jericho Quadrangle-Suite 300
Jericho, New York 11753
(516) 479-6300

SILVERMAN ACAMPORA LLP
Attorneys for Kenneth P. Silverman, Esq.,
the Chapter 7 Trustee
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300
David J. Mahoney, Esq.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK
AT CENTRAL ISLIP

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.

Chapter 7
Case No. 09-70660 (DTE)
Substantively Consolidated

-----X
**APPLICATION TO EXTEND AUTHORIZATION
TO REIMBURSE EXPENSES OF REID COLLINS TSAI LLP AND RUSKIN
MOSCOU FALTISCHEK P.C., AS SPECIAL LITIGATION COUNSEL TO THE TRUSTEE**

**TO: The Honorable Dorothy T. Eisenberg
United States Bankruptcy Judge**

For this application to extend authorization to reimburse expenses of Reid Collins Tsai LLP ("RCT") and Ruskin Moscou Faltischek P.C. ("RMF") as Special Litigation Counsel ("Special Counsel") to the Trustee, Kenneth P. Silverman, Esq., Chapter 7 Trustee of the Agape World, Inc., *et al.* (the "Debtors") estate,¹ by his counsel, Silverman Acampora LLP, respectfully represents:

1. On February 5, 2009, an involuntary Chapter 7 petition was filed by four petitioning creditors (the "Petitioning Creditors") pursuant to §303(b) of title 11 of the United

¹ A copy of the proposed Order is attached hereto as **Exhibit 1**.

States Code (the "Bankruptcy Code"), against Agape World, Inc. ("AWI"), in the United States Bankruptcy Court for the Eastern District of New York.

2. On February 9, 2009, the Petitioning Creditors filed a motion to appoint an interim Chapter 7 trustee under 11 U.S.C. §303(g).

3. On February 12, 2009, this Court granted the Petitioning Creditors' motion and entered an order directing the United States Trustee's Office to immediately appoint an interim Chapter 7 trustee in the AWI case (the "Main Case").

4. On February 12, 2009, Kenneth P. Silverman, Esq., (the "Trustee") was appointed the interim Chapter 7 trustee in the AWI case, has since duly qualified, and is, the permanent trustee in the Debtors' substantively consolidated case.

5. On March 4, 2009, the Court issued an Order for relief in the AWI Chapter 7 case.

6. On April 14, 2009, the Court issued an Order for substantive consolidation of AWI, Agape Merchant Advance LLP, Agape Community LLC, Agape Construction Management LLC, Agape World Bridges LLC, and 114 Parkway Drive South LLC.

7. On January 20, 2010, July 1, 2010, and February 28, 2011, the Court issued orders granting the Trustee's applications to retain RCT² and RMF as special litigation counsel ("Special Counsel") in this case to investigate, bring, and prosecute certain claims against third-parties on behalf of the estate. (1/20/2010 Order, Dkt. No. 2015; 7/1/2010 Order, Dkt. No. 2111; 2/28/2011 Order, Dkt. No. 3468.)

8. Pursuant to those orders and engagement letters attached thereto, \$100,000 was authorized for reimbursement of Special Counsel's out-of-pocket expenses in connection with cases brought against certain commodities trading firms ("CTF's"). (See 7/1/2010 Order, Dkt. No. 2111.) A copy of the July 1, 2010 Order is annexed hereto as **Exhibit 2**. A copy of the

² RCT was called Reid Davis, LLP at the time of the first and second retentions.

Trustee's application for the July 1, 2010 order and the relevant engagement letter can be found on the docket of the Main Case at Dkt. No. 2108.

9. The February 28, 2011 Order provided a general procedure for Special Counsel to seek reimbursement of out-of-pocket expenses from the Trustee. (2/28/2011 Order, Dkt. No. 3468.) A copy of the Court's February 28, 2011 Order is annexed hereto as **Exhibit 3**. A copy of the Trustee's application for the February 28, 2011 Order can be found on the docket of the Main Case at Dkt. No. 3466.

10. Pursuant to and consistent with the procedures for reimbursement outlined in the Court's February 28, 2011 Order, Special Counsel has been reimbursed \$88,046.47 to date for costs and expenses incurred in prosecuting the CTF cases. On April 14, 2011, RCT submitted its first request for reimbursement of out-of-pocket expenses for \$56,543.93 for costs and expenses incurred in prosecuting the CTF claims between February 2010 and March 2011 relating to deposition transcript and preparation costs, court costs, photocopies, research, mediator fees, and expert and witness fees, travel, meals, shipping, and telecommunications.³ On November 23, 2011, RMF submitted its first request for reimbursement of out-of-pocket expenses for \$9,785.38 for costs and expenses incurred in investigating and prosecuting the CTF claims between June 2009 and October 2011.⁴ On December 2, 2011, RCT submitted its second request for reimbursement for out-of-pocket expenses for \$23,717.16 for costs and expenses incurred in prosecuting the CTF claims between March 2011 and November 2011 relating to deposition transcript and preparation costs, court costs, photocopies, research, mediator fees, and expert and witness fees, travel, meals, shipping, and telecommunications.⁵

³ A copy of the April 14, 2011 request for reimbursement of expenses is annexed hereto as **Exhibit 4**.

⁴ A copy of the November 23, 2011 request for reimbursement of expenses is annexed hereto as **Exhibit 5**.

⁵ A copy of the December 2, 2011 request for reimbursement of expenses is annexed hereto as **Exhibit 6**.

11. In each case, these costs and a detailed breakdown of the expenses was submitted to the Trustee as well as to the Office of the United States Trustee. No objection was raised to any part of these applications, and, pursuant to the procedure outlined in the Court's February 28, 2011 Order, these amounts were reimbursed.

12. Of the initial \$100,000 in anticipated expenses for the CTF claims, approximately \$12,000 remains.

13. Since November 2011, Special Counsel has incurred and advanced to the Trustee a further \$47,738.76 in out-of-pocket reimbursable expenses in prosecuting the CTF claims, which exceeds the initial \$100,000 provided for in the engagement. These costs cover costs and expenses which are reasonable and necessary to the prosecution of the CTF claims, including numerous party and non-party depositions, extensive document discovery from parties and non-parties, as well as costs and fees associated with consultants and mediators.

14. As a result of these efforts and during this time period, Special Counsel has reached approved settlements in CTF claims totaling \$2,475,000.

15. Three CTF cases are still active⁶ and Special Counsel has already and will need to advance the Trustee additional out-of-pocket expenses that are expected to total approximately \$100,000, including \$47,638.76 in expenses already incurred in taking required depositions and conducting discovery. Additional out-of-pocket expenses will be incurred and advanced in order to complete the remaining depositions, including the deposition of Mr. Nicholas Cosmo, and the completion of expert reports and expert depositions in each of the three remaining cases. The Trustee agrees with Special Counsel that these costs and expenses are reasonable and necessary for the prosecution of the remaining cases.

⁶ The three remaining active cases are *Silverman v. Alaron Trading Corp.* (Adv. Pro. 8-11-08946 (NHL)), *Silverman v. Penson Futures* (Adv. Pro. 8-11-08831 (NHL)), and *Silverman v. R.J. O'Brien & Associates* (Adv. Pro. 8-11-09019 (NHL)). A fourth case against defendant MF Global has been stayed due to MF Global's bankruptcy. (See Notice of Bankruptcy, Adv. Pro. 8-11-08296 (NHL), Dkt. No. 24.)

16. In the event any of these three cases advances to trial, Special Counsel anticipates further out-of-pocket expenses and the Trustee will make another application to the Court at that time, if needed.

WHEREFORE, the Trustee respectfully requests authorization to extend the procedures outlined in the Court's February 28, 2011 Order governing reimbursement of Special Counsel's expenses in the CTF cases to requests for an additional \$100,000 for reasonable and necessary costs related to the continuing prosecution of these cases.

Dated: Jericho, New York
May 14, 2012

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman,
the Chapter 7 Trustee

By: s/David J. Mahoney
David J. Mahoney
A Member of the Firm
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

AGAPE WORLD, INC., *et al.*,

Debtors.
-----X

Chapter 7
Case No.: 09-70660 (DTE)
(substantively consolidated)

**ORDER EXTENDING TRUSTEE'S AUTHORIZATION
TO REIMBURSE EXPENSES OF REID COLLINS TSAI LLP AND RUSKIN
MOSCOU FALTISCHEK P.C., AS SPECIAL LITIGATION COUNSEL TO THE TRUSTEE**

Kenneth P. Silverman, Esq., as chapter 7 trustee of the substantively consolidated bankruptcy estate of Agape World, Inc., *et al.* ("Plaintiff"), having moved this Court pursuant to a Notice of Motion (the "Notice"), dated May 14, 2012, and upon the application dated May 14, 2012, and the exhibits annexed thereto (the Exhibits, and collectively with the Notice and application, the "Motion") seeking the entry of an order extending the Trustee's authority to reimburse expenses incurred by Reid Collins & Tsai LLP and Ruskin Moscou Faltischek PC as special counsel to the Trustee, and upon the affidavit of service of the Motion, which is on file with the Court; and no objection to the Motion having been interposed; and the Motion having come on for a hearing before the Honorable Dorothy T. Eisenberg, United States Bankruptcy Judge at the United States Bankruptcy Court for the Eastern District of New York on May 31, 2012 (the "Hearing"); and the Trustee, by his attorneys, SilvermanAcampora LLP, having appeared in support of the Motion; and no opposition having been filed and no one appearing in opposition to the Motion at the Hearing; and further notice being neither necessary nor required; and after due deliberation and consideration of all of the facts and circumstances herein; it is hereby

ORDERED, that the relief requested in the Motion is granted and it is further

ORDERED, that the Trustee's authority to reimburse expenses incurred by Reid Collins & Tsai LLP and Ruskin Moscou Faltischek PC as special counsel to the Trustee under the

procedures set forth in the Court's February 28, 2011 Order [Dkt. No. 3468] is extended so as to be capped at a total of \$200,000; and it is further

ORDERED, that any reimbursements made by the Trustee to Reid Collins & Tsai LLP and Ruskin Moscou Faltischek PC as special counsel to the Trustee are made on an interim basis, subject to final order of this Court; and it is

ORDERED, that the Trustee is authorized to do such things, expend such funds and execute those documents necessary to implement the terms of this order.

Dated: Central Islip , New York
May __, 2012

HONORABLE DOROTHY T. EISENBERG
United States Bankruptcy Judge

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----x
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.
-----x

Chapter 7
Case No. 09-70660 (DTE)
Substantively Consolidated

**ORDER FOR RETENTION OF REID DAVIS LLP AND RUSKIN MOSCOU
FALTISCHEK, P.C., AS SPECIAL LITIGATION COUNSEL TO THE TRUSTEE**

Upon the application (the "Application") of Kenneth P. Silverman, Esq., the Chapter 7 Trustee (the "Trustee") of the Agape World, Inc., *et al.*, (the "Debtors") estate, by his attorneys, SilvermanAcampora LLP, seeking the entry of an order authorizing the retention of Reid Davis LLP ("Reid Davis") and Ruskin Moscou Faltischek, P.C. ("RMF" and together with Reid Davis, "Special Counsel"), as of May 25, 2010, as special litigation counsel to the Trustee to pursue certain claims against certain commodities trading firms as directed by the Trustee (the "CTF Claims"), and it appearing that the retention of Special Counsel represents no interest adverse to the Trustee or the Debtors' estate in the matters upon which Special Counsel are to be engaged, and that Special Counsel's employment as special litigation counsel is necessary and would be in the best interest of the estate, and no additional notice being required, it is hereby

ORDERED, that Special Counsel be, and hereby is, retained as special litigation counsel to the Trustee, as of May 25, 2010, upon the terms set forth in the Application and Letter of Engagement, and to the extent provided for herein; it is further

ORDERED, that as special counsel to the Trustee and estate, Special Counsel is authorized to take all steps necessary to investigate and prosecute the CTF Claims; and it is further

ORDERED, Special Counsel is directed to maintain contemporaneous time records of the services performed for the estate in a manner consistent with the Bankruptcy Code and the United States Trustee's Guidelines; and it is further

ORDERED, that no compensation or reimbursement of expenses shall be paid to Special Counsel for professional services rendered to the Trustee, except upon proper application and by further order of this Court.

Dated: Central Islip, New York
June 29, 2010

NO OBJECTION:

s/ Alfred M. Dimino
Office of the United States Trustee

Dated: Central Islip, New York
July 1, 2010



Dorothy Eisenberg

Dorothy Eisenberg
United States Bankruptcy Judge

EXHIBIT 3

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.

-----X

Chapter 7
Case No. 09-70660 (DTE)
Substantively Consolidated

**ORDER AUTHORIZING THE SUPPLEMENTAL
RETENTION OF REID COLLINS TSAI LLP AND RUSKIN
MOSCOU FALTISCHEK, P.C., AS SPECIAL LITIGATION COUNSEL TO THE TRUSTEE**

Upon the application (the "Application") of Kenneth P. Silverman, Esq., the Chapter 7 Trustee (the "Trustee") of the Agape World, Inc., *et al.*, (the "Debtors") estate, by his attorneys, SilvermanAcampora LLP, seeking the entry of an order authorizing the further supplemental retention of Reid Collins Tsai LLP ("RCT") and Ruskin Moscou Faltischek, P.C. ("RMF" and together with RCT, "Special Counsel"), as special litigation counsel to the Trustee to pursue certain claims against Meister Seelig & Fein LLP ("MSF"), UBS Financial Services, Inc. ("UBS"), and related parties, as directed by the Trustee (the "MSF/UBS Claims"), and it appearing that subject to the terms of this Order, the retention of Special Counsel represents no interest adverse to the Trustee or the Debtors' estate in the matters upon which Special Counsel are to be engaged, and that Special Counsel's employment as special litigation counsel is necessary and would be in the best interest of the estate, and no additional notice being required, it is hereby

ORDERED, that Special Counsel's authority to serve as special litigation counsel to the Trustee under the Order granting the Special Counsel Investigatory Retention (Dkt. No. 2005) be, and hereby is, supplemented, upon the terms set forth in the Application and Letter of Engagement, as amended and to the extent provided for herein; it is further

ORDERED, that as special counsel to the Trustee and estate, Special Counsel is authorized to take all steps necessary to investigate and prosecute the MSF/UBS Claims; and it is further

ORDERED, Special Counsel is directed to maintain contemporaneous time records of the services performed for the estate in a manner consistent with the Bankruptcy Code and the United States Trustee's Guidelines; and it is further

ORDERED, that notwithstanding the terms of the Letters of Engagement annexed to the Application as Exhibits A and B, the Trustee shall not reimburse any expenses advanced by Special Counsel unless and until (a) Special Counsel sends a request for interim reimbursement with copies of all relevant documentation to the Trustee and the Office of the United States Trustee; and (b) the Office of the United States Trustee affirmatively states that it has no objection to the interim reimbursement of fees requested, or (c) fourteen days passes without objection from the Office of the United States Trustee; and it is further

ORDERED, that notwithstanding the terms of the Letters of Engagement annexed to the Application as Exhibits A and B, subsequent to the entry of this Order, Special Counsel may not withdraw as counsel to the Trustee except upon proper application and by further order of this Court; and it is further

ORDERED, that no compensation or final reimbursement of expenses shall be paid to Special Counsel for professional services rendered to the Trustee, except upon proper application and by further order of this Court.

Dated: Central Islip, New York
February 28, 2011

NO OBJECTION:

s/ Alfred M. Dimino
Office of the United States Trustee

**Dated: Central Islip, New York
February 28, 2011**



Dorothy Eisenberg
Dorothy Eisenberg
United States Bankruptcy Judge

EXHIBIT 4

April 14, 2011

VIA FEDERAL EXPRESS

Alfred M. Dimino
Office of The United States Trustee
Alfonse D'Amato Federal Courthouse
560 Federal Plaza
Central Islip, NY 11722

Re: *In re: Agape World, Inc., et al.*
Case No. 09-70660
United States Bankruptcy Court, Eastern District of New York

Dear Mr. Dimino:

This firm, Reid Collins & Tsai, LLP (the "**Firm**"), is Special Counsel to Kenneth P. Silverman in his capacity as the Chapter 7 Trustee (the "**Agape Trustee**") for Agape World Inc. and its related entities substantively consolidated into the estate ("**Debtors**"). Pursuant to the attached Exhibit A (Order Authorizing the Supplemental Retention of the Firm), we may submit expenses advanced by the Firm to you for reimbursement.

During the thirteen month period from February 2010 through March 2011, the Firm has advanced a total of \$56,543.93 in expenses. A complete breakdown of our expenses is attached as Exhibit B, hereto. As shown therein, the Firm has advanced the following categories of expenses:

• Deposition transcript preparation expenses	\$ 9,381.03
• Court costs	\$ 208.50
• Photocopies (billed at \$.10 b/w and \$.15 color)	\$ 2,794.60
• Computerized research	\$ 3,901.17
• Shipping and handling	\$ 526.02
• Telecommunications	\$ 64.54
• Travel/Meals	\$11,418.07
• Expert Witness fees	\$24,100.00
• Mediator fees	\$ 4,150.00
Total	\$56,543.93

Alfred M. Dimino
Re: *In re Agape World, Inc., et al.*
April 14, 2011
Page 2

Please do not hesitate to contact me at 512.647.6103 if you have any questions about these expenses. I will be happy to answer any questions that arise. I appreciate your assistance in this matter.

Sincerely,


Barbara Whiten Balliette
Partner, Reid Collins & Tsai, LLP

cc: Kenneth P. Silverman
David J. Mahoney

EXHIBIT 5

RMF
RUSKIN MOSCOU FALTISCHEK P.C.
Counselors at Law

Writer's Direct Dial: (516) 663-6505
Writer's Direct Fax: (516) 663-6705
Writer's E-Mail: jdemaro@rmfpc.com

November 23, 2011

By Federal Express

Alfred M. Dimino
Office of The United States Trustee
Alfonse D'Amato Federal Courthouse
560 Federal Plaza
Central Islip, New York 11722

Re: In Re Agape World, Inc., et al.
Case No. 09-70660
United States Bankruptcy Court, Eastern District of New York

Dear Mr. Dimino:

Ruskin Moscou Faltischek, P.C. (the "Firm") is Special Counsel to Kenneth P. Silverman in his capacity as the Chapter 7 Trustee ("Trustee") for Agape World Inc. and its related entities substantively consolidated into the estate ("Debtors"). Pursuant to the attached Order Authorized the Supplemental Retention of the Firm (Exh. A), we request that the expenses advanced by the Firm that are listed below be reimbursed.

From June 2009 through October 2011, the Firm has advanced a total of \$9,785.38 in expenses. A complete breakdown of our expenses is attached hereto (Exh. B). As shown therein, the Firm has advanced the following categories of expenses

In-House Copies	\$ 400.92
Telephone	38.38
Online Computer Charge - PACER	157.36
Computerized Research - Westlaw	4,411.23
Federal Express	224.19
Messenger Service	75.00
Postage	283.35
Travel	273.93
Travel - Airfare	402.40
Hotel Accommodations	240.55
Litigation Expense	71.67
Court Filing Fees	250.00
Stenographic Transcripts	2,956.40
TOTAL DISBURSEMENTS	\$ 9,785.38



November 23, 2011
Page 2

Please do not hesitate to contact me at (516) 663-6505 if you have any questions about these expenses. I will be happy to answer any questions that you may have. Thank you for your assistance in this matter.

Very truly yours,

John A. DeMaro
For the Firm

Attachment

cc: Kenneth P. Silverman
David J. Mahoney

EXHIBIT 6

December 2, 2011

VIA FEDERAL EXPRESS

Alfred M. Dimino
Office of The United States Trustee
Alfonse D'Amato Federal Courthouse
560 Federal Plaza
Central Islip, NY 11722

Re: *In re: Agape World, Inc., et al.*
Case No. 09-70660
United States Bankruptcy Court, Eastern District of New York

Dear Mr. Dimino:

This firm, Reid Collins & Tsai, LLP (the "**Firm**"), is Special Counsel to Kenneth P. Silverman in his capacity as the Chapter 7 Trustee (the "**Agape Trustee**") for Agape World Inc. and its related entities substantively consolidated into the estate ("**Debtors**"). Pursuant to the attached Exhibit A (Order Authorizing the Supplemental Retention of the Firm), we may submit expenses advanced by the Firm to you for reimbursement.

The Firm was previously reimbursed \$56,543.93 for expenses advanced from February 2010 through March 2011. Since that time, the Firm has advanced a total of \$23,717.16 in additional expenses. A complete breakdown of our expenses is attached as Exhibit B, hereto. As shown therein, the Firm has advanced the following categories of expenses:

• Court costs	\$ 106.05
• Photocopies (billed at \$.10 b/w and \$.15 color)	\$ 5,634.06
• Computerized research	\$ 2,966.29
• Shipping and handling	\$ 1,533.66
• Telecommunications	\$ 13.13
• Travel/Meals	\$ 295.99
• Expert Witness fees	\$ 7,875.00
• Investigators	\$ 82.98
• Mediator fees	\$ 5,210.00
Total	\$23,717.16

Alfred M. Dimino
Re: *In re Agape World, Inc., et al.*
December 2, 2011
Page 2

Please do not hesitate to contact me at 512.647.6103 if you have any questions about these expenses. I will be happy to answer any questions that arise. I appreciate your assistance in this matter.

Sincerely,



Barbara Whiten Balliette
Partner, Reid Collins & Tsai, LLP

cc: Kenneth P. Silverman
David J. Mahoney