

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANAH DIVISION**

<b>In Re:</b>	§	<b>Case No.: 23-40569-EJC</b>
	§	
<b>MASTER LENDING GROUP, LLC,</b>	§	<b>Chapter 7</b>
	§	
<b>Debtor</b>	§	

**OBJECTION TO APPLICATION FOR ALLOWANCE  
OF INTERIM COMPENSATION**

COMES NOW, Tiffany E. Caron, as Chapter 7 Trustee (“**Trustee**”) for the bankruptcy estate of Master Lending Group, LLC (“**Debtor**” or “**MLG**”), and files this *Objection to Application for Allowance of Interim Compensation* (the “**Objection**”), filed by Debtor’s Counsel, Judson Hill and Gastin & Hill (“**Debtor’s Counsel**”), and, in support of this Objection, hereby states as follows:

1. On July 6, 2023, Debtor, Master Lending Group, LLC (“**Debtor**”), filed a Chapter 7 Petition with this Court<sup>1</sup> (the “**Petition Date**”)(Doc No. 1).
2. On July 7, 2023, Tiffany E. Caron was appointed as the Chapter 7 Trustee (“**Trustee**”) in this case (Doc No. 7).
3. On August 29, 2023, Debtor’s Counsel filed an Amended Application for Allowance of Interim Compensation seeking compensation for pre- and post-petition representation of the Debtor (Doc No. 120).
4. On November 1, 2022, the U.S. Trustee filed an Objection to Fee Application (Doc No. 172).

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<sup>1</sup> Petition and Schedules signed by Owner, Gregory M. Hirsch by POA held by Judith Hirsch.

5. In support of this Objection, the Trustee adopts and incorporates herein the Objection to Fee Application filed by the U.S. Trustee on November 1, 2023.

CONFLICT OF INTEREST

6. To the extent the Court finds Debtor's Counsel has a conflict of interest in this case, the Trustee objects to the award of any fees.
7. No fees pre- or post-petition which were not incurred for the benefit of the estate should be allowed.
8. As the U.S. Trustee notes, the Descriptions in the time entries are insufficient in that they do not adequately describe the work performed including the subject of emails, telephone calls, and meetings.
9. In addition, there are specific time entries which appear to be for the benefit of Gregory Hirsch and/or Judith Hirsch and are not properly chargeable to the estate, including:
  - a) Calls, reviews, and emails with T. Roberts, counsel for Judith Hirsch;
  - b) Reviews and emails with "Kennedy", counsel for Gregory Hirsch and his estate;  
and
  - c) Post-petition meeting with J. Tucker.

POST-PETITION FEES

10. On August 22, 2023, the Trustee sent correspondence to Debtor's Counsel advising him that the Estate had no further need for his legal services and demanding turnover and remittance of the remaining balance of the retainer.
11. Debtor's Counsel refused the Trustee's request.
12. The Trustee has not employed Debtor's Counsel to do any work on behalf of the Estate.

13. Debtor's Counsel has increased the costs of the Trustee to administer the Estate due to delays in turnover of records and filing unauthorized amendments, creating significant confusion for the Trustee and investors and resulting in additional research and unnecessary work for the Trustee and her professionals.

14. The Trustee objections to an award of any post-petition fees based on the forgoing.

DISCLOSURE OF ATTORNEY COMPENSATION

15. The Disclosure of Attorney Compensation states that the \$40,000.00 retainer was intended to also cover the costs of experts, accountants, etc.

16. The amount of the retainer reserved for these other costs is not specified.

17. To the best of Trustee's knowledge, no such costs of have been incurred.

18. The funds reserved for these costs should also be turned over to the Estate.

RULE 9011

19. To the extent the Court is otherwise inclined to award fees to Debtor's Counsel in this case, those fees should be reduced by any sanctions imposed under Rule 9011.

WHEREFORE, the Trustee hereby moves this Court for an Order:

- A. Denying the Application for Interim Compensation and ordering turnover of the retainer to the Estate;
- B. Sanctions for violations of the Bankruptcy Code and Rules; and
- B. for such other and further relief the Court deems appropriate under the circumstances.

This 3rd day of November, 2023.

Respectfully submitted,

By: /s/ Tiffany E. Caron

P.O. Box 711  
West Palm Beach, FL 33402  
Tel: (404) 647-4917  
Tiffany.caron@hotmail.com

Tiffany E. Caron  
Georgia Bar Number 745089  
Attorney for Trustee

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**CERTIFICATE OF SERVICE**

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I, the undersigned, do hereby certify that I have served the persons named below by sending a copy of the forgoing Objection by electronic service or by regular U.S. Mail to the address indicated, in envelopes bearing adequate postage to:

Judson C. Hill  
Gastin & Hill  
P O Box 8012  
Savannah, GA 31412

Office of the U.S. Trustee  
33 Bull Street, Suite 400  
Savannah, GA 31401

And all parties automatically receiving notice through the Court's CM/ECF Filing System.

This 3rd day of November, 2023.

By: /s/ Tiffany E. Caron  
Tiffany E. Caron  
Georgia Bar Number 745089  
Attorney for Trustee

P.O. Box 711  
West Palm Beach, FL 33402  
404-647-4917  
tiffany.caron@hotmail.com