

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

KENA HARRIS, as Administrator of the
Estate of Chaungene L. Ward, Deceased,
and MONICA NOLAN,

Plaintiffs,

vs.

OLEG VELICHKOV, et al.,

Defendants.

8:09CV349

**STIPULATION FOR
RELEASE OF FUNDS**

WHEREAS, on March 25, 2013, this Court directed the deposit with the Clerk of Court of certain settlement funds; and

WHEREAS, the funds to be deposited include \$114,556.21 in fees owed to Gary, Williams, Parenti, Watson & Gary, P.L. ("Gary, Williams"), counsel for the Estate of Chaungene Ward, Plaintiff in this action (the "Estate"); and

WHEREAS, the funds to be deposited include \$62,994.08 in costs owed to Gary, Williams (collectively with the fees owed to Gary, Williams, the "Funds"); and

WHEREAS, LFG National Capital, LLC ("LFG") and The Northern Trust Company ("Northern Trust") each hold senior liens over all fees and costs owed to Gary, Williams pursuant to secured loans to Gary, Williams which are in default; and

WHEREAS, no creditor of Gary, Williams other than LFG and Northern Trust hold liens senior to the liens of LFG and Northern Trust; and

WHEREAS, \$19,092 of the fees owed to Gary, Williams represents amounts owed by Gary, Williams to Phyllis Gillespie, Esq., an attorney formerly associated with Gary, Williams; and

WHEREAS, \$5,000 of the costs owed to Gary, Williams represents a sum to be held in trust for the payment of further medical bills incurred by the Estate; and

WHEREAS, \$8,471.88 of the costs owed to Gary, Williams represents costs incurred by Gary, Williams but not paid; and

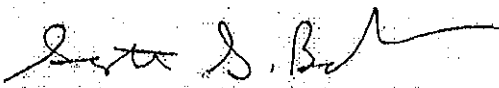
WHEREAS, Gary, Williams, LFG, and Northern Trust wish to arrange for the expeditious release of the Funds, on the terms reflected by this Stipulation; and

WHEREAS, counsel for Defendants asserts no objection to the allocation of fees and costs reflected below;

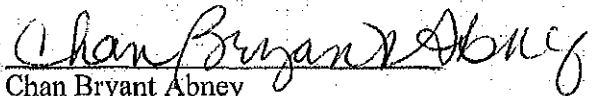
IT IS HEREBY STIPULATED, by and between the undersigned parties, and so ordered by the Court, that from the Funds deposited with the Clerk of Court:

1. The Clerk shall issue a check to The Northern Trust Company in the amount of \$72,498.20;
2. The Clerk shall issue a check to LFG National Capital, LLC in the amount of \$72,498.21;
3. The Clerk shall issue a check to Gary, Williams in the amount of \$27,563.88; and
4. The Clerk shall issue a check to the Estate in the amount of \$5,000.

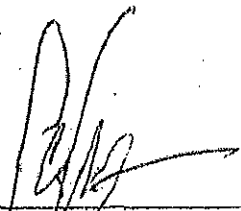
Dated: March 29, 2013



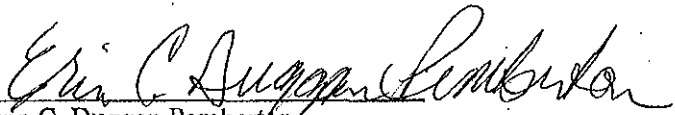
Scott S. Balber
Cooley LLP
1114 Avenue of the Americas
New York, NY 10036
(212) 479-6550
Counsel for LFG National Capital, LLC



Chan Bryant Abney
Gary, Williams, Parenti, Watson & Gary, P.L.
320 S. Indian River Drive
Fort Pierce, FL 34948
(772) 464-2352
Counsel for Gary, Williams



Scott Newman
Holland & Knight
222 Lakeview Avenue, Suite 1000
West Palm Beach, FL 33401
(561) 650-8310
Counsel for The Northern Trust Co.



Erin C. Duggan Pemberton
Wolfe, Snowden, Hurd, Luets & Ahl, LLP
1248 O Street, Suite 800
Lincoln, NE 68508
(402) 474-1507
Counsel for Defendants

SO ORDERED:



Hon. Cheryl R. Zwart, U.S.M.J.

3/29/2013
