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Federal Maritime Commission  
Washington, D.C.

Edaf Antillas, Inc.,

Docket No. 14-04

**FILED**

Complainant

**JUN 9 - 2015**

v.

Federal Maritime Commission  
Office of the Secretary

Crowley Caribbean Logistics, LLC,  
IFS International Forwarding, S.L.  
and IFS Neutral Maritime Services,

Respondents.

VERIFIED PETITION REGARDING ATTORNEY FEES

Pursuant to 46 U.S.C. § 41305(e) and Rule 502 of the Rules of Practice and Procedure of the Federal Maritime Commission, respondents IFS Neutral Maritime Service, Inc. and IFS International Forwarding, S.L. (collectively, "IFS"), by their attorneys Betancourt, Van Hemmen, Greco & Kenyon LLC, hereby file this Verified Petition Regarding Attorney Fees, seeking reasonable attorney fees as the prevailing party entitled to such an award pursuant to 46 U.S.C. § 41305 of the Shipping Act of 1984, as amended. The Declaration of Todd P. Kenyon Regarding Attorney Fees ("Kenyon Dec.") is submitted along with this Verified Petition.

1. Administrative Law Judge Guthridge found that IFS was entitled to reasonable attorney fees for work done after enactment of the Howard Coble Coast Guard Marine and Transportation Act of 2014, Pub. L. No. 113-281, 128 Stat. 3022 (Dec. 18, 2014).

See Initial Decision dated April 15, 2015, Document No. 45.

2. Billing of attorney fees to IFS for this action by Betancourt, Van Hemmen, Greco & Kenyon LLC from December 18, 2014 through June p, 2015, totaled \$18,573.75. Attorneys billed 90.15 hours of attorney time, at an hourly rate ranging from \$175 per hour to \$250 per hour.

3. These billings for attorney services to IFS in this matter are reasonable and are consistent with attorney fees charged for services in matters within the District of Columbia. The hourly rates charged in this matter are well within the range of hourly rates charged by attorneys with similar skill and experience in this jurisdiction, as demonstrated by the Laffey Matrix as prepared by the Civil Division of the United States Attorney's Office for the District of Columbia. The Laffey Matrix is accepted by the United States District Court for the District of Columbia. Salazar v. District of Columbia, 123 F. Supp.2d 8 (D.D.C. 2000). The United States Court of Appeals for the Third Circuit, where the undersigned's office is located, has additionally accepted the Laffey Matrix. Interfaith Community Organization v. Honeywell International, Inc., 426 F.R.D. 694 (3d Cir. 2005).

A copy of the Laffey Matrix is attached to the Kenyon Dec. as Exhibit 1.

4. The legal work on behalf of IFS focused on defending against complainant Edaf Antillas, Inc.'s ("Edaf") allegations of Shipping Act violations. The time billed to IFS for which recovery is sought here includes, inter alia, work to consider legal issues relative

to the case, preparation and filing of pleadings, preparation for and deposition of complainant, and other discovery of complainant. (See the invoices attached as Exhibits 2 through 4 to the Kenyon Dec. for a detailed list of the legal work performed).

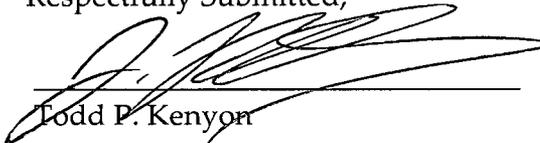
**RELIEF REQUESTED**

IFS respectfully requests that the Federal Maritime Commission and the Administrative Law Judge grant the following relief:

1. Attorney fees incurred in this matter since December 18, 2014, as provided in 46 U.S.C. § 41305(e) and Rule 254 in the total amount of \$18,573.75.
2. Such other and further relief as the Commission and ALJ deem just and proper.

Dated: June 9, 2015

Respectfully Submitted,



Todd P. Kenyon

Joshua S. Parks

Betancourt, Van Hemmen, Greco & Kenyon LLC

151 Bodman Place, Suite 200

Red Bank, NJ 07701

Tel.: 732-530-4646

Fax: 732-530-9536

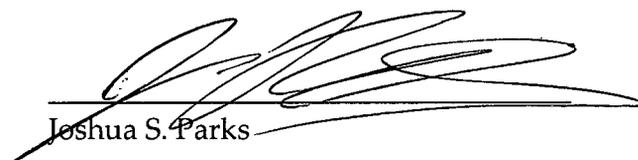
Email: tkenyon@bvgklaw.com

Email: jparks@bvgklaw.com

VERIFICATION

I, Joshua S. Parks, declare under penalty of perjury under the laws of the United States of America that the foregoing Petition Regarding Attorney Fees is true and correct.

Executed on June 9, 2015.

  
Joshua S. Parks

 ORIGINAL

Federal Maritime Commission  
Washington, D.C.

Edaf Antillas, Inc.,

Complainant

Docket No. 14-04

**FILED**

JUN 1 - 2015

v.

Federal Maritime Commission  
Office of the Secretary

Crowley Caribbean Logistics, LLC,  
IFS International Forwarding, S.L.  
and IFS Neutral Maritime Services,

Respondents.

**DECLARATION OF TODD P. KENYON IN SUPPORT OF  
IFS NEUTRAL MARITIME SERVICE, INC.'S AND IFS INTERNATIONAL  
FORWARDING, S.L.'s VERIFIED PETITION REGARDING ATTORNEY FEES**

TODD P. KENYON hereby declares under penalty of perjury:

1. I am an attorney and member of the firm Betancourt, Van Hemmen, Greco & Kenyon LLC, attorneys for respondents IFS Neutral Maritime Service, Inc. and IFS International Forwarding, S.L. (collectively, "IFS"). I submit this Declaration in support of the aforementioned Verified Petition Regarding Attorney Fees.

2. I am familiar with the hourly rates charged by all of the personnel from Betancourt, Van Hemmen, Greco & Kenyon LLC to IFS in this case.

3. True and correct copies of Betancourt, Van Hemmen, Greco & Kenyon LLC's invoices to IFS, showing the amount of time spent on this matter since December 18, 2014, are attached hereto as Exhibits 2 through 4. These invoices reflect work actually performed

and necessary in this case.

4. IFS incurred \$18,573.75 in attorney fees in connection with this matter since December 18, 2014.

5. I am a 1983 graduate of Syracuse University College of Law have been a member of the New York bar since 1984. My time was charged at a rate of \$250 per hour. Additional work in this matter was performed by Joshua Parks, 2012 graduate of Tulane University Law School and a member of the New Jersey bar since 2012. Mr. Parks' time was charged at a rate of \$175 per hour.

6. The hourly rates charged in this matter are within the range of hourly rates charged by attorneys with similar skill and experience, as demonstrated by the Laffey Matrix, as adjusted. A true and correct copy of the adjusted Laffey Matrix is attached hereto as Exhibit 1. The United States District Court for the District of Columbia has accepted the methodology of the adjusted Laffey Matrix. Salazar v. District of Columbia, 123 F. Sup.2d 8 (D.D.C. 2000). The United States Court of Appeals for the Third Circuit, where the undersigned's office is located, has also accepted the methodology of the adjusted Laffey Matrix. Interfaith Community Organization v. Honeywell International, Inc., 426 F.R.D. 694 (3d Cir. 2005).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed at Red Bank, New Jersey this 9<sup>th</sup> day of June, 2015.

  
\_\_\_\_\_  
Todd P. Kenyon

**EXHIBIT 1**

# LAFFEY MATRIX

History

Case Law

Expert Opinions

See the Matrix

Contact us

Home

Links

Year	Adjustmt Factor**	Paralegal/ Law Clerk	Years Out of Law School *				
			1-3	4-7	8-10	11-19	20 +
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); *Salazar v. Dist. of Col.*, 123 F.Supp.2d 8 (D.D.C. 2000).

\* "Years Out of Law School" is calculated from June 1 of each year, when most law students

graduate. "1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). "4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier "1-3" from June 1, 1996 until May 31, 1999, would move into tier "4-7" on June 1, 1999, and tier "8-10" on June 1, 2003.

\*\* The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

**EXHIBIT 2**



BETANCOURT  
VAN HEMMEN  
GRECO &  
KENYON LLC

New Jersey 151 Bodman Place, Suite 200, Red Bank, NJ 07701  
Telephone: 732.530.4646 Telefax: 732.530.9536

New York 46 Trinity Place, New York, NY 10006  
Telephone: 212.297.0050 Telefax: 212.889.8340

April 14, 2015

IFS Int'l Forwarding S.L. & IFS Neutral Maritime Serv, Inc.  
c/o Sanchez-Horneros Abogados  
Pasaje Foraste 19, bajos  
E-08022 Barcelona,

Invoice # 11172

Re: Edaf Antillas Inc. v. IFS, et. al.  
FMC docket no. 14-04  
Our File: 46827-002

**Statement for Professional Services Rendered  
and Disbursements Recorded for the Period  
November 01, 2014 through April 14, 2015**

**PROFESSIONAL SERVICES:**

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
11/03/14	JP	[REDACTED]	4.30
11/06/14	JP	[REDACTED]	3.40
	JVH	[REDACTED]	0.20
	TPK	[REDACTED]	1.00
11/07/14	JVH	[REDACTED]	0.30
	TPK	[REDACTED]	1.50
11/11/14	JP	[REDACTED]	5.60

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
11/12/14	JP	[REDACTED]	6.60
11/13/14	JP	[REDACTED]	7.40
	TPK	[REDACTED]	0.50
11/14/14	JP	[REDACTED]	3.00
	TPK	[REDACTED]	1.00
11/17/14	JP	[REDACTED]	3.30
11/18/14	NBW	[REDACTED]	0.40
	TPK	[REDACTED]	1.00
11/20/14	JP	[REDACTED]	0.60
	TPK	[REDACTED]	0.50
11/21/14	JP	[REDACTED]	0.40
11/24/14	JP	[REDACTED]	0.30
	TPK	[REDACTED]	0.50
11/25/14	JP	[REDACTED]	2.00
11/26/14	TPK	[REDACTED]	0.30
12/02/14	JP	[REDACTED]	0.50

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
12/02/14	TPK	[REDACTED]	0.50
12/03/14	JP	[REDACTED]	0.40
	TPK	[REDACTED]	0.25
12/08/14	JP	[REDACTED]	1.70
	TPK	[REDACTED]	1.00
	TPK	[REDACTED]	0.75
12/09/14	JP	[REDACTED]	0.90
	TPK	[REDACTED]	1.00
12/10/14	JP	[REDACTED]	2.30
12/11/14	JP	[REDACTED]	2.00
	TPK	[REDACTED]	1.00
12/12/14	JP	[REDACTED]	0.50
	TPK	[REDACTED]	1.00
12/15/14	NBW	[REDACTED]	0.30
	TPK	[REDACTED]	0.50
12/16/14	JP	[REDACTED]	3.00
	TPK	[REDACTED]	5.50
12/17/14	JP	[REDACTED]	0.50

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
12/17/14	TPK	[REDACTED]	0.50
12/18/14	TPK	Consider issues and prepare advice to M. Sanchez-Honeros re future handling of case.	3.50
12/29/14	TPK	Prepare e-mail to M. Sanchez-Horneros.	0.10
01/05/15	TPK	Multiple e-mails with M. Sanchez-Horneros re settlement / consider same / prepare settlement proposal to C. Matos.	2.50
01/06/15	TPK	E-mails with counsel re status of case.	0.30
01/07/15	TPK	Multiple e-mails with counsel re status conference call / multiple e-mails with M. Sanchez-Horneros and C. Matos re proposed settlement.	1.25
01/08/15	JP	Preparation of fourth joint status report, incl telecon with all counsel and email re same; numerous discussions re same; preparation of exhibits for depositions of C Matos and S Cosme.	3.00
	TPK	Conference call with counsel re status and prepare status report.	1.00
01/09/15	JP	Continued editing and correspondence with all counsel re joint status report; corres with Secretary re same; preparation of and service of exhibits to be used at upcoming depositions; preparation re depositions.	3.00
	TPK	Multiple e-mails with counsel re contents of status report / amend report / attend to deposition exhibits.	1.00
01/12/15	JP	Finalize fourth joint status report, incl. corres with all parties re same; preparation for deposition of C Matos.	2.00
	TPK	Detailed review and consideration of entire file and all documents in preparation for C. Matos deposition/ consider claims and defenses / detailed consideration of testimony and outline examination / exchange of e-mails with counsel and finalize status report.	9.00
01/13/15	JP	Attended telephonic deposition of C Matos; preparation re same; corres re deposition of complainant's accountant; conf w/ TK re deposition.	3.00
	TPK	Prepare for and take C. Matos deposition.	3.00
01/14/15	JP	Corres with counsel for complainant re postponed deposition of S. Cosme.	0.30
	TPK	Correspondence re accountant deposition.	0.50

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
01/15/15	JP	Preparation of reporting letter, incl. review of briefing schedule and initial disclosures.	0.30
	TPK	Review of court order and prepare correspondence to M. Sanchez-Horneros re status and Matos deposition / consider damages issues.	2.00
01/16/15	JP	Corres with counsel for complainant re postponed deposition.	0.10
01/19/15	JP	Corres with counsel for complainant re deposition of S Cosme and need for same.	0.30
	TPK	Correspondence re accountant deposition.	0.25
01/20/15	JP	Review of recent correspondence and pleadings.	0.50
01/26/15	JP	Corres with C Matos re deposition of Edaf's accountant.	0.10
01/28/15	JP	Telecon with L Nelson re transcript of complainant's deposition; corres with all counsel re IFS' responses to interrogatories.	0.30
	TPK	Correspondence with M. Sanchez-Horneros re witnesses and attend to notice of same.	0.50
01/29/15	JP	Preparation of fifth joint status report.	0.30
01/30/15	JP	Preparation of status report and request for relief (deposition or preclusion of complainant's accountant S Cosme), incl. drafting and filing of same.	2.00
	TPK	Consideration and preparation of status report / review of file re discovery.	1.25
02/02/15	JP	Review of corres to court from co-defendant Crowley re responding to IFS' request for relief.	0.20
02/03/15	JP	Corres to all counsel and to commission re recently-filed IFS' request for relief.	0.40
	TPK	Review of Crowley pleadings and e-mail correspondence with FMC.	0.50
02/05/15	TPK	Review of Matos transcript and correspond with M. Sanchez-Horneros.	0.50
02/06/15	JP	Review of recently-filed opposition to request for relief by co-respondent; strategizing re same; review of Commission Rules and prior decisions.	1.80
	TPK	Review of Crowley pleadings filed with FMC and correspond with M. Sanchez-Horneros re significance of Matos testimony.	1.00

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
02/09/15	JP	Review of deposition transcript of C Matos; review of FMC rules re depositions; corres with C Matos re same.	0.80
	TPK	Attend to Matos transcript and review matrix for determining attorneys fees.	0.50
02/20/15	TPK	Review of Crowley discovery document and correspond re same.	0.30
02/23/15	TPK	Review schedule and consider submissions.	0.30
02/24/15	JP	Preparation of motion to dismiss the complaint and for attorney fees, incl. research re applicable FMC rules, drafting, and filing of same.	1.50
	TPK	Review, consider and finalize motion to dismiss and correspond re same.	1.50
02/25/15	JP	Review of co-respondent CCL's motion to dismiss for failure to prosecute and motion for attorney fees; tending to file re same.	0.50
	TPK	Review Crowley motion to dismiss and consider same.	0.30
02/26/15	TPK	Prepare e-mail to M. Sanchez-Horneros.	0.10
03/02/15	JP	Review of ALJ's order to show cause; preparation and filing of IFS' supplemental motion to dismiss the action; corres with counsel for co-respondent re legal strategy in response to ALJ's Order; corres with client re ALJ's Order.	2.10
	TPK	Review and consideration of ALJ's order to show cause and consider supplement to motion to dismiss the action and review of e-mails with counsel.	0.60
03/09/15	JP	Research re retroactive application of laws generally, and attorney fee provision specifically, review of Bradley and Bowen line of cases.	3.00
03/16/15	JP	Continue research re powers of an administrative law judge to shape relief and powers of federal courts to grant attorney fees; commence drafting of supplemental brief re entitlement to attorney fees.	7.00
03/17/15	JP	Continue preparation of supplemental brief re entitlement to attorney fees, incl. research re Bowen and Bradley lines of cases re retroactive application of a statute and drafting of brief.	2.50
03/18/15	JP	Preparation of brief re entitlement to attorney fees, incl. drafting legal argument and conf with TK re same.	3.00
	TPK	Review and consideration of draft brief on attorneys fees / detailed review and consideration of relevant cases and issues raised / propose edits / conference with AJ re same.	4.00

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
03/19/15	JP	Finalize brief re entitlement to attorney fees, incl. editing and filing of same.	6.00
	TPK	Review and consideration of final briefs of parties re attorneys fees issue.	0.30
03/20/15	JP	Email corres w counsel re recently-filed supplemental brief.	0.10

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jeanne-Marie Van Hemmen	0.50	250.00	\$125.00
Todd P. Kenyon	54.35	250.00	\$13,587.50
Josh Parks	92.80	175.00	\$16,240.00
Nancy B. Weinberger	0.70	100.00	\$70.00
<b>For professional services rendered</b>	<b>148.35</b>		<b>\$30,022.50</b>

**DISBURSEMENTS:**

Copying -- In House	104.76
Deposition Transcript Costs	329.00
FedEx	162.21
On Line Research	262.57
PACER	10.00
Postage	5.81
<b>Total Disbursements</b>	<b>\$874.35</b>

**Total Amount this Bill** \$30,896.85

**EXHIBIT 3**



BETANCOURT  
VAN HEMMEN  
GRECO &  
KENYON LLC

New Jersey 151 Bodman Place, Suite 200, Red Bank, NJ 07701  
Telephone: 732.530.4646 Telefax: 732.530.9536

New York 46 Trinity Place, New York, NY 10006  
Telephone: 212.297.0050 Telefax: 212.889.8340

May 15, 2015

IFS Int'l Forwarding S.L. & IFS Neutral Maritime Serv, Inc.  
c/o Sanchez-Horneros Abogados  
Pasaje Foraste 19, bajos  
E-08022 Barcelona,

Invoice # 15-11179

Re:Edaf Antillas Inc. v. IFS, et. al.  
FMC docket no. 14-04  
Our File: 46827-002

**Statement for Professional Services Rendered  
and Disbursements Recorded for the Period  
April 15, 2015 through May 15, 2015**

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**PROFESSIONAL SERVICES:**

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
04/15/15	JP	Review of ALJ's initial decision dismissing the complaint with prejudice, corres with client re same.	0.40
	TPK	Receipt and review of ALJ's initial decision dismissing the complaint.	0.25
04/16/15	JP	Review case law cited by ALJ in the Initial Decision; consideration of likelihood of appeals/exceptions.	0.50
04/21/15	JP	Consider appeal and petition for attorney fees, incl. corres with counsel for co-respondent; review of Commission rules and regulations; review of petitions.	1.25
04/22/15	JP	Corres re advises concerning exceptions with both client and counsel for co-respondent	0.60
	TPK	Correspond with M. Sanchez Horneros re ALJ's initial decision and possible appeal.	0.20
05/12/15	TPK	Correspond with M. Sanchez Horneros.	0.20

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
05/13/15	JP	Corres with client re status of claim; review of FMC rules and procedures re petitions for attorney fees; strategy re filing petition for attorney fees.	0.60
05/14/15	JP	Corres with client re status of invoicing.	0.10

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Todd P. Kenyon	0.65	250.00	\$162.50
Josh Parks	3.45	175.00	\$603.75
<b>For professional services rendered</b>		<b>4.10</b>	<b>\$766.25</b>

**DISBURSEMENTS:**

Copying -- In House			10.44
Postage			1.88
<b>Total Disbursements</b>			<b>\$12.32</b>
<b>Total Amount this Bill</b>			<b>\$778.57</b>

**EXHIBIT 4**



BETANCOURT  
VAN HEMMEN  
GRECO &  
KENYON LLC

New Jersey 151 Bodman Place, Suite 200, Red Bank, NJ 07701  
Telephone: 732.530.4646 Telefax: 732.530.9536

New York 46 Trinity Place, New York, NY 10006  
Telephone: 212.297.0050 Telefax: 212.889.8340

June 09, 2015

IFS Int'l Forwarding S.L. & IFS Neutral Maritime Serv, Inc.  
c/o Sanchez-Horneros Abogados  
Pasaje Foraste 19, bajos  
E-08022 Barcelona,

Invoice # 15-11186

Re:Edaf Antillas Inc. v. IFS, et. al.  
FMC docket no. 14-04  
Our File: 46827-002

**Statement for Professional Services Rendered  
and Disbursements Recorded for the Period  
May 18, 2015 through June 09, 2015**

**PROFESSIONAL SERVICES:**

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>
05/18/15	JP	Review of Notice Not To Review, corres with Commission re same and review of file.	0.30
	TPK	Review of Notice Not To Review.	0.10
05/21/15	JP	Review of FMC rules re petitions for attorneys fees and review rulings on same.	1.50
05/26/15	JP	Draft petition for attorney fees and declaration in support.	2.50
06/05/15	JP	Preparation of petition for attorneys fees, incl. conf with TK and drafting re same; preparation of spreadsheets re amounts invoiced post 12/18/14.	0.50
06/09/15	JP	Finalize petition for attorneys fees and prepare to file.	0.50
	TPK	Review and finalization of petition for attorneys fees and declaration.	0.50

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Todd P. Kenyon	0.60	250.00	\$150.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Josh Parks	5.30	175.00	\$927.50

<b>For professional services rendered</b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
	<b>5.90</b>	<b>\$1,077.50</b>

**DISBURSEMENTS:**

On Line Research	28.24
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<b>Total Disbursements</b>	<b>\$28.24</b>
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<b>Total Amount this Bill</b>	<b>\$1,105.74</b>
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing IFS Neutral Maritime Service, Inc.'s and IFS International Forwarding, S.L.'s Verified Petition Regarding Attorney Fees and Declaration of Todd P. Kenyon in Support of IFS Neutral Maritime Service, Inc.'s and IFS International Forwarding, S.L.'s Verified Petition Regarding Attorney Fees upon the following addressees by e-mail:

Carlos E. Matos Malec, Esq.  
Edaf Antillas, Inc.  
P.O. Box 11249  
San Juan, PR 00922-1249  
(787) 707-1792  
carlos@forsapr.com

Eric C. Jeffrey, Esq.  
Angela N. Buckner, Esq.  
Nixon Peabody LLP  
401 Ninth Street, N.W., Suite 900  
Washington, D.C. 20004-2128  
(202) 585-8000  
ejeffrey@nixonpeabody.com  
abuckner@nixonpeabody.com

Dated: June 9, 2015

  
Joshua S. Parks