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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

In Re:

MCUBE PETROLEUM, INC., a Washington corporation;
BASILAM PETROLEUM, LLC, a Washington limited liability company;
DISKI PETROLEUM, LLC, a Washington limited liability company;
HALMAHERA - REMBANG, LLC, a Washington limited liability company;
LARAMIE PETROLEUM, INC., a Washington corporation; and
ORNA INTERNATIONAL, LTD, a British Virgin Islands company.

Case No. 09-2-08315-6

NOTICE TO CREDITORS AND INTERESTED PARTIES OF HEARING ON RECEIVER'S MOTION REGARDING ATTORNEYS' FEES

TO: THE CLERK OF THE COURT
AND TO: THE HONORABLE FRANK E. CUTHBERTSON
AND TO: ALL PARTIES-IN-INTEREST

Hearing Date: Friday, July 16, 2010
Hearing Time: 9:00 a.m.
Response Due: Tuesday, July 13, 2010
Location: Pierce County Superior Court
Judge Cuthbertson, Department 21
930 Tacoma Avenue South, Tacoma, WA 98402

PLEASE TAKE NOTICE that William L. Beecher, in and only in his capacity as Receiver in the above-captioned Receivership proceeding, has filed Motions with this Court seeking an Order fixing the amount of professional fees to be paid to the law firm of

1 Smith Alling Lane P.S. ("SAL") and authorizing payment of the fees in the amount determined
2 by the Court to be payable. SAL began providing services in conjunction with the appointment
3 of the Receiver on May 7, 2009. SAL was terminated for cause on April 5, 2010. SAL has
4 made claims against the Receivership Estate for professional compensation of \$322,000 to
5 \$851,000. The first amount is based on an hourly rate. The second amount is a contingent fee
6 arising from settlements consummated subsequent to the termination of SAL. There are
7 competing claims to the contingent fees from other counsel. The total liability of the
8 Receivership Estate for fees to all claimants would be no more than \$851,000. The Receiver has
9 calculated the reasonable value of SAL's services to be no more than \$213,566. The amount
10 ultimately to be paid to SAL will be determined by the Court.

11 To date, the Receiver has entered into settlement agreements pursuant to which the
12 Receivership Estate will receive gross proceeds of \$2,832,500. Assuming that the entire amount
13 of contingent fees are ultimately awarded, the net receipts to the Receivership Estate will be
14 approximately \$1,854,000. There are additional priority claims of approximately \$300,000
15 pending approval by the Court. The consummation of these settlements will not complete the
16 activities of the Receiver to identify and liquidate assets on behalf of creditors. The Receiver
17 has initiated additional litigation seeking the recovery of about \$8 million in improper transfers
18 of corporate funds. Investigations to identify additional assets or claims are on-going.

19 Any party desiring information as to the details of the Motions may request same from
20 the Clerk of the Court or from the undersigned counsel.

21 IF YOU OPPOSE the Motion, you must file your written Response with the Clerk of the
22 Court, serve two copies on the Judge's chambers and deliver copies to the undersigned NOT
23 LATER THAN THE RESPONSE DATE, which is *Tuesday, July 13, 2010*.

24 IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,
25 GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE, and
26 strike the hearing.

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DATED this 10th day of June, 2010.

BRAIN LAW FIRM PLLC

By: 

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Counsel for William L. Beecher, Receiver