

09-2-08315-6 34757289 AGOR 08-02-10

HONORABLE FRANK E. CUTHBERTSON

Hearing Date July 30 2010

FILED
IN OPEN COURT
DEPT 21

JUL 30 2010

PIERCE COUNTY, Clerk

By *[Signature]*
DEPUTY

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

In Re:

Case No. 09-2-08315-6

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.

STIPULATIONS AND AGREED ORDER RE MOTION FOR PAYMENT OF FEES AND COSTS OF PETITIONERS AS AN ADMINISTRATIVE EXPENSE

STIPULATIONS

The parties hereto, as evidenced by the signatures below of the parties and/or their respective attorneys of record, represent and stipulate as follows:

1. Michael Hinrichsen and Thomas Neu ("Claimants") have brought a Motion for Payment of Fees and Costs of Petitioners as an Administrative Expense (the "Motion").
2. The Receiver has responded to Claimants' Motion, citing objections to the claims stated.
3. The subject matter of Claimants' Motion has been resolved between the Claimants and the Receiver by way of a negotiated settlement, through their respective counsel.

1 4. On behalf of the Receivership Estate, the Receiver has agreed to pay Claimants and
 2 Claimants have agreed to accept the sum of Thirty Five Thousand and no/100 Dollars
 3 (\$35,000.00) in full and final satisfaction of Claimants' claims for payment of fees and costs of
 4 Claimants associated with Claimants' roles as Petitioners in the present Receivership action, and
 5 agree to the entry of an Order to this effect.

6 5. Notwithstanding resolution of the administrative expenses claimed here, Claimants may
 7 file general unsecured creditor's claims in the Receivership Estate for fees and/or cost advances
 8 that are the subject of Claimants' Motion. The Receiver shall evaluate and adjudicate the
 9 validity and propriety of any such general unsecured creditor's claims in the future in the same
 10 manner as all other general unsecured creditor claims filed in the Receivership Estate, *except*
 11 *that*, the payment specified in Paragraph 4 above shall be treated as an offset against any claim(s)
 12 so made by either Claimant, with such offset(s) being applied in the amount of \$21,000 for
 13 Mr. Hinrichsen and \$14,000 for Mr. Neu.

14 6. James W. Miller has filed an objection with respect to Claimants' motion. Mr. Miller has
 15 telephonically and via e-mail represented that the agreed payment is a reasonable settlement of
 16 the claims made here.

17 7. Eric Boos has filed an objection with respect to Claimant's motion. Mr. Boos has
 18 telephonically represented that he continues to object to the payment of any monies to Claimants
 19 for the claims made here.


20 8. The parties are unaware of any other objections having been filed.

21 STIPULATIONS DATED this 30th day of July 2010.

22 ANDERSON LAW FIRM PLLC

KARR TUTTLE CAMPBELL

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 25 MARK B. ANDERSON, WSBA #25895
 Attorneys for William L. Beecher, Receiver

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 25 DIANA K. CAREY, WSBA #16239
 MICHAELANNE EHRENBERG, WSBA #25615
 Attorneys for Petitioners Neu and Hinrichsen

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PIERCE, FENNER & SMITH, LLP
DEPUTY

ORDER

THIS MATTER came on before this Court for hearing on the Motion of Michael
Hinrichsen and Thomas Neu ("Claimants") for Payment of their Fees and Costs as
Administrative Expense of the Receivership Estate. This Court has reviewed and considered the
Stipulations of the parties, has reviewed and considered the files and records herein, and is fully
advised in the premises. On the foregoing bases, it is hereby

ORDERED, ADJUDGED AND DECREED as follows:

1. The Receiver shall, from the Receivership Estate, pay an aggregated sum of Thirty Five
Thousand and no/100 Dollars (\$35,000.00) over to Claimants or their counsel, within thirty (30)
days of entry of this Order. The Receiver's payment of these funds shall fully and finally satisfy
the Claimants' individual and joint claims for payment of fees and costs as administrative
expenses associated with their roles as Petitioners in the present Receivership action.

2. Claimants shall be permitted to file general unsecured creditor's claims in the Receivership
Estate for the remainder of the expenses that are the subject of Claimants' Motion. The Receiver
shall evaluate and adjudicate the validity and propriety of any such general unsecured creditor's
claim(s) in the future in the same manner as all other general unsecured creditor claims filed in the
Receivership Estate, *except that*, the payment specified in Paragraph 1 of this Order shall be treated
as an offset against any claim(s) so made by either Claimant, with such offset(s) being applied in
the amount of \$21,000 for Mr. Hinrichsen and \$14,000 for Mr. Neu.


DONE IN OPEN COURT this 30 day of July 2010.



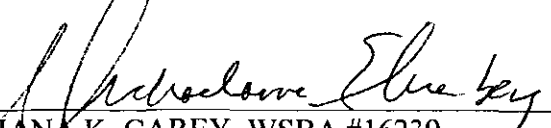
JUDGE/COURT COMMISSIONER

Presented by:
ANDERSON LAW FIRM PLLC

KARR TUTTLE CAMPBELL



MARK B. ANDERSON, WSBA #25895
Attorneys for William L. Beecher, Receiver



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