

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**In re:**

<b>MICHAEL D. VICK,</b>	)	<b>Case No. 08-50775-FJS</b>
	)	<b>Chapter 11</b>
<b>Debtor.</b>	)	
_____	)	

**SUPPLEMENT TO CROWELL & MORING LLP'S FIRST INTERIM FEE  
APPLICATION FOR ALLOWANCE AND PAYMENT OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
(Interim Application Period: July 7, 2008 through May 31, 2009)**

Crowell & Moring LLP (“Crowell & Moring” or the “Applicant”), bankruptcy counsel for Michael D. Vick, the debtor and debtor-in-possession (the “Debtor”), submits this supplement (the “Supplement”) to its first interim application for allowance and payment of compensation for services rendered and reimbursement of expenses incurred (the “First Interim Application”) for the period from July 7, 2008 through May 31, 2009 (the “Application Period”), and respectfully represents the following:

1. On July 7, 2009, Crowell & Moring filed its First Interim Application which set forth the (i) professional services rendered by the Applicant during the Application Period

Michael V. Blumenthal, Esq.  
CROWELL & MORING LLP  
590 Madison Avenue, 20<sup>th</sup> Floor  
New York, New York 10022  
(212) 223-4000 – Telephone  
(212) 223-4134 – Facsimile  
*Counsel for Debtor*

Paul K. Campsen, Esq. (VSB No. 18133)  
Dennis T. Lewandowski, Esq. (VSB No. 22232)  
Kaufman & Canoles, P.C.  
150 W. Main Street, Suite 2100  
Norfolk, VA 23510  
(757) 624-3000 – Telephone  
(757) 624-3169 – Facsimile  
*Counsel for Debtor*

representing fees in the amount of \$2,764,571 (less the Applicant's voluntary reduction of fees in the aggregate amount of \$101,756.50), and (ii) the actual expenses incurred by Crowell & Moring during the Application Period in the amount of \$213,056.94.

2. Crowell & Moring has conferred with the various parties in interest, and in particular the United States Trustee (the "U.S. Trustee") and counsel to Joel Enterprises, Inc. ("JEI") regarding its First Interim Application. Based on these discussions, Crowell & Moring has agreed to (i) voluntarily reduce the amount of fees sought in its First Interim Application from \$2,662,814.50 to \$1,500,000, and (ii) limit its total compensation in this case to the \$1,500,000 sought in the First Interim Application, unless there are significant objections to the Debtor's plan of reorganization (the "Plan") requiring that (i) the Plan be approved by cram-down or similar litigation, or (ii) the Plan is not approved at the August 27, 2009 confirmation hearing.

3. In addition, Crowell & Moring has (i) conferred with the US Trustee and JEI's counsel regarding the Applicant's expenses, (ii) provided the U.S. Trustee with additional and detailed backup documentation evidencing and summarizing the expenses, and (iii) reviewed its expenses with the US Trustee line by line. Based on the above, the Applicant has agreed to reduce the reimbursement of expenses sought in its First Interim Application from \$213,056.94 to \$160,191.60. A summary of the disbursements listed in the Applicant's First Interim Fee Application and the reduced amount sought is set forth on Exhibit A annexed hereto. Notwithstanding the above, the Applicant may seek the reimbursement of its reasonable expenses subsequent to June 1, 2009 in a final fee application.

4. Based on the above, it is Applicant's understanding that the U.S. Trustee and JEI have no objection to allowance of the First Interim Application in the reduced amounts set forth herein.

WHEREFORE, Crowell & Moring respectfully requests that the Court (i) approve Crowell & Moring's fees in the reduced amount of \$1,500,000.00 and expenses in the reduced amount of \$160,191.60 for the period of July 7, 2008 through May 31, 2009; and (ii) grant Crowell & Moring such other and further relief as is just and proper.


Dated: July 28, 2009

Respectfully submitted,

CROWELL & MORING LLP

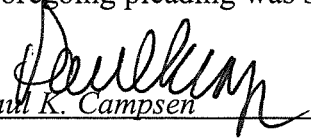
Michael V. Blumenthal, Esq.  
590 Madison Avenue, 20<sup>th</sup> Floor  
New York, New York 10022  
Telephone: (212) 223-4000  
Facsimile: (212) 223-4134  
*Counsel for Debtor*

-and-

KAUFMAN & CANOLES, a  
professional corporation  
By: /s/ Paul K. Campsen   
Paul K. Campsen, Esq. (VSB No. 18133)  
Dennis T. Lewandowski, Esq. (VSB No. 22232)  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I certify that on this 28<sup>th</sup> day of July, 2009, a copy of the foregoing pleading was sent by the Bankruptcy Court's ECF e-mail notification system.

  
/s/ Paul K. Campsen

::ODMA\PCDOCS\DOCSNFK\150888\2