

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<hr/>	
In re:	) Chapter 11
	)
FISKER INC., <i>et al.</i> ,	) Case No. 24-11390 (TMH)
	)
Debtors. <sup>1</sup>	) (Jointly Administered)
	)
	) <b>Hearing Date: <i>Only if Objections are filed</i></b>
<hr/>	
	) <b>Objection Deadline: November 8, 2024, at 4:00 p.m. (ET)</b>

**SUMMARY OF THIRD MONTHLY FEE APPLICATION OF  
COLE SCHOTZ P.C., DELAWARE CO-COUNSEL TO THE COMMITTEE,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Name of Applicant:	Cole Schotz P.C.
Authorized to provide professional services to:	Official Committee of Unsecured Creditors of Fisker, Inc., <i>et al.</i>
Date of retention:	August 6, 2024, effective as of July 4, 2024
Period for which compensation and reimbursement is sought:	September 1, 2024 through September 30, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$38,209.60 (80% of \$47,762.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$267.81
This is a:	<u>  X  </u> monthly <u>  </u> interim <u>  </u> final application
Prior Applications:	

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or Delaware file numbers, are as follows: Fisker Inc. (0340); Fisker Group Inc. (3342); Fisker TN LLC (6212); Blue Current Holding LLC (6668); Platinum IPR LLC (4839); and Terra Energy Inc. (0739). The address of the debtors' corporate headquarters is 14 Centerpointe Drive, La Palma, CA 90623.



**SUMMARY OF FEES AND EXPENSES REQUESTED**

<b>Monthly Application</b>	<b>Requested Fees and Expenses</b>		<b>Approved Fees and Expenses</b>	
<b>Monthly Fee Period, Application Docket No., and Date Filed</b>	<b>Total Fees Requested</b>	<b>Total Expenses Requested</b>	<b>Total Fees Approved</b>	<b>Total Expenses Approved</b>
07/04/24 – 07/31/24 Docket No. 509 09/03/24	\$294,966.00	\$10,744.60	\$235,972.80	\$10,744.60
08/01/24 – 08/31/24 Docket No. 592 09/24/24	\$85,180.50	\$1,405.41	\$68,144.40	\$1,405.41

**FIKER INC., ET AL.****SUMMARY OF BILLING BY PROFESSIONAL  
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Attorney Name</b>	<b>Year Admitted</b>	<b>Position (Department)</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy)	\$925.00	16.5	\$15,262.50
Patrick J. Reilley	2003	Member (Bankruptcy)	\$900.00	4.4	\$3,960.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$800.00	18.8	\$15,040.00
Michael E. Fitzpatrick	2022	Associate (Bankruptcy)	\$575.00	3.7	\$2,127.50
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$430.00	14.1	\$6,063.00
Larry S. Morton	N/A	Paralegal (Bankruptcy)	\$400.00	7.8	\$2,960.00
Pauline Z. Ratkowiak	N/A	Paralegal (Bankruptcy)	\$405.00	5.8	\$2,349.00
<b>TOTAL</b>				<b>71.1</b>	<b>\$47,762.00</b>

**Blended Rate: \$671.76**

<sup>1</sup> This rate is Cole Schotz P.C.'s regular hourly rate for legal services. All hourly rates are adjusted by Cole Schotz P.C. on a periodic basis (the last such adjustment occurred on September 1, 2024).

**FISKER INC., ET AL.****COMPENSATION BY PROJECT CATEGORY  
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Asset Dispositions, Sales, Uses, and Leases (Section 363)	0.6	\$495.00
Automatic Stay Matters/Litigation	2.1	\$1,476.00
Case Administration	14.7	\$9,353.50
Cash Collateral and DIP Financing	0.0	\$0.00
Claims Analysis, Administration and Objections	0.3	\$277.50
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Disclosure Statement/Voting Issues	1.7	\$1,530.00
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Leases (Real Property)	0.0	\$0.00
Litigation/General (Except Automatic Stay Relief)	6.0	\$4,409.00
Preparation for and Attendance at Hearings	14.0	\$8,891.00
Reorganization Plan	12.7	\$10,456.00
Retention Matters	0.6	\$316.00
<b>TOTAL</b>	<b>71.1</b>	<b>\$47,762.00</b>

**FISKER INC., ET AL.****EXPENSE SUMMARY**  
**SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Delivery/Couriers	Reliable/Parcels	\$65.00
Court Fees	PACER/ECF	\$5.80
Breakfast/Lunch/Dinner Conferences for Hearings		\$114.66
Transcripts		\$82.35
<b>TOTAL</b>		<b>\$267.81</b>

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FOR THE DISTRICT OF DELAWARE**

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In re:	)	Chapter 11
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FISKER INC., <i>et al.</i> ,	)	Case No. 24-11390 (TMH)
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Debtors. <sup>1</sup>	)	(Jointly Administered)
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	)	<b>Hearing Date: <i>Only if Objections are filed</i></b>
	)	<b>Objection Deadline: November 8, 2024, at 4:00 p.m. (ET)</b>

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COLE SCHOTZ P.C., DELAWARE CO-COUNSEL TO THE COMMITTEE,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Cole Schotz P.C. (the “Applicant” or “Cole Schotz”), as Delaware co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Fisker, Inc. and its affiliated debtors and debtors in possession (collectively, the “Debtors”) in the above captioned chapter 11 cases (the “Chapter 11 Cases”), hereby applies (the “Application”), pursuant to (i) sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 350] (the “Interim Compensation Order”),<sup>2</sup> for allowance of compensation for

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or Delaware file numbers, are as follows: Fisker Inc. (0340); Fisker Group Inc. (3342); Fisker TN LLC (6212); Blue Current Holding LLC (6668); Platinum IPR LLC (4839); and Terra Energy Inc. (0739). The address of the debtors’ corporate headquarters is 14 Centerpointe Drive, La Palma, CA 90623.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Interim Compensation Order.

services rendered and reimbursement of expenses for the period from September 1, 2024 through September 30, 2024 (the “Application Period”), and respectfully represents as follows:

### **Jurisdiction and Venue**

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. §1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. The Committee confirms its consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-2.

### **Background**

#### **A. The Chapter 11 Cases**

4. On June 17 and 19, 2024 (collectively, the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Since the Petition Date, the Debtors have remained in possession of their assets and have continued to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On July 2, 2024, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) appointed a seven-member Committee consisting of: (i) U.S. Bank Trust

National Association; (ii) Avnet, Inc.; (iii) Magna International, Inc.; (iv) Keyframe Capital Partners, L.P.; (v) T-Mobile US, Inc.; (vi) Cristian Fleming; and (vii) Mouri Tech LLC. *See* Docket No. 106.

**B. The Retention of Cole Schotz**

6. On July 19, 2024, the Committee applied to the Court for an order authorizing the retention and employment of Cole Schotz as Delaware co-counsel to the Committee, effective as of July 4, 2024. *See* Docket No. 257.

7. On August 6, 2024, the Court entered the *Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of July 4, 2024* authorizing the retention and employment of Cole Schotz as Delaware co-counsel to the Committee. *See* Docket No. 384.

**C. The Interim Compensation Order**

8. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases. Specifically, the Interim Compensation Order provides that on or after the second day of each month following the month for which compensation is sought, each Professional seeking compensation may file a monthly fee statement (each, a “Monthly Fee Statement”) for interim allowance of compensation for services rendered and reimbursement of expenses incurred during the preceding month and serve such Monthly Fee Statement on the Compensation Notice Parties. Provided that there are no objections to the Monthly Fee Statement filed within fourteen (14) days after service of a Monthly Fee Statement, a Professional may file a certificate of no objection with the Court with respect to the unopposed portion of the compensation and expenses requested in its Monthly Fee Statement, after which the Debtors are authorized and directed to pay such Professional eighty



percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Statement.

### **Relief Requested**

9. Pursuant to the Interim Compensation Order and section 331 of the Bankruptcy Code, Cole Schotz is seeking compensation in the amount of \$38,209.60, which is equal to eighty percent (80%) of the \$47,762.00 in fees for professional services rendered by Cole Schotz during the Application Period. This amount is derived solely from the applicable hourly billing rates of Cole Schotz personnel who rendered such services to the Committee. In addition, Cole Schotz is seeking reimbursement of expenses incurred during the Application Period in the amount of \$267.81.

#### **A. Compensation Requested**

10. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by Cole Schotz with respect to the Chapter 11 Cases during the Application Period. This detailed itemization complies with Local Rule 2016-2(d) in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories and all meetings or hearings are individually identified. *See* DEL. BANKR. L.R. 2016-2(d).

11. The attorneys and professionals who rendered services related to each category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought for each category.

#### **B. Expense Reimbursement Requested**

12. Cole Schotz incurred out-of-pocket expenses during the Application Period in the amount of \$267.81. Attached hereto as **Exhibit B** is a description of the expenses actually

incurred by Cole Schotz in the performance of services rendered as Delaware co-counsel to the Committee. The expenses are broken down into categories of charges, including among other things, the following charges: photocopying, scanning and printing, Court fees, filing fees, legal research and other non-ordinary expenses. *See* DEL. BANKR. L.R. 2016-2(e).<sup>3</sup>

### **Valuation of Services**

13. Attorneys and professionals of Cole Schotz have expended a total of 71.1 hours in connection with this matter during the Application Period.

14. The amount of time spent by each of the Cole Schotz professionals providing services to the Committee for the Application Period is set forth in **Exhibit A**. The rates are Cole Schotz's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Cole Schotz for the Application Period as Delaware co-counsel to the Committee in these Chapter 11 Cases is \$47,762.00.

15. Cole Schotz believes that the time entries included in **Exhibit A** attached hereto and the expense breakdown set forth in **Exhibit B** attached hereto are in compliance with the requirements of Local Rule 2016-2.

16. Cole Schotz's itemized time records for professionals performing services for the Committee during the Application Period are attached hereto as **Exhibit C**.

17. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (a) the complexity of these Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

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<sup>3</sup> In accordance with Local Rule 2016-2(e)(iii), Cole Schotz does not charge more than \$0.10 per page for photocopies, does not charge for incoming facsimile transmissions and does not charge more than \$0.25 per page for outgoing facsimiles. Applicant does not surcharge for computerized research. DEL. BANKR. L.R. 2016-2(e)(iii).

**No Prior Request**

18. No prior request for the relief sought in the Application has been made to this or any other court.

**Certificate of Compliance and Waiver**

19. The undersigned representative of Cole Schotz certifies that he has reviewed the requirements of Local Rule 2016-2, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-2, Cole Schotz believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Notice**

20. Cole Schotz will provide notice and serve this Application on the Compensation Notice Parties (as defined and set forth in the Interim Compensation Order). In light of the nature of the relief requested in this Application, Cole Schotz submits that no other or further notice is required.

**Conclusion**

WHEREFORE, Cole Schotz respectfully requests (i) interim allowance of compensation in the amount of \$38,209.60 (80% of \$47,762.00) for professional services rendered and reimbursement for actual and necessary costs in the amount of \$267.81; (ii) payment by the Debtors of the foregoing amounts; and (iii) such other and further relief as the Court deems just and proper.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 25, 2024

*/s/ Justin R. Alberto*

**COLE SCHOTZ P.C.**

Justin R. Alberto (No. 5126)

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Michael E. Fitzpatrick (No. 6797)

500 Delaware Avenue, Suite 1410

Wilmington, DE 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: jalberto@colecshotz.com

preilley@coleschotz.com

snewman@coleschotz.com

mfitzpatrick@coleschotz.com

*Co-Counsel for the Official*

*Committee of Unsecured Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	)	Chapter 11
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FISKER INC., <i>et al.</i> ,	)	Case No. 24-11390 (TMH)
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Debtors. <sup>1</sup>	)	(Jointly Administered)
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	)	<b>Hearing Date: <i>Only if Objections are filed</i></b>
	)	<b>Objection Deadline: November 8, 2024, at 4:00 p.m. (ET)</b>

**NOTICE OF THIRD MONTHLY FEE APPLICATION OF  
COLE SCHOTZ P.C., DELAWARE CO-COUNSEL TO THE COMMITTEE, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

**PLEASE TAKE NOTICE** that on October 25, 2024, the Official Committee of Unsecured Creditors (the “Committee”) of Fisker, Inc. and its affiliated debtors and debtors in possession (collectively, the “Debtors”) in the above captioned chapter 11 cases, by and through its undersigned counsel, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Third Monthly Fee Application of Cole Schotz P.C., Delaware Co-Counsel to the Committee, for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2024 through September 30, 2024* (the “Application”), which seeks approval of professional services rendered to the Committee in the amount of \$38,209.60 (80% of \$47,762.00), together with reimbursement of expenses in the amount of \$267.81.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be **received no later than 4:00 p.m. (ET) on November 8, 2024**: (i) the Debtors, c/o Fisker Inc., 14 Centerpointe Drive, La Palma, CA 90623 (Attn: John C. DiDonato, jdidonato@hcg.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY, 10017 (Attn: Brian M. Resnick, Esq., brian.resnick@davispolk.com; Darren S. Klein, Esq., darren.klein@davispolk.com; Steven Z. Szanzer, Esq., steven.szanzer@davispolk.com; and Richard J. Steinberg, Esq., at richard.steinberg@davispolk.com) and Morris Nichols Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801 (Attn: Robert J. Dehney, Sr., Esq., rdehney@morrisnichols.com; Andrew R. Remming, Esq., aremming@morrisnichols.com; Brenna A. Dolphin, Esq., bdolphin@morrisnichols.com; Sophie Rogers Churchill, Esq.,

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srchurchill@morrisonichols.com; and Evanthea Hammer, Esq., ehammer@morrisonichols.com); (iii) counsel to the Official Committee of Unsecured Creditors, Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019-9601 (Attn: Lorenzo Marinuzzi, Esq., lmarinuzzi@mfo.com; Douglas Mannal, Esq., dmannel@mfo.com; Benjamin Butterfield, Esq., bbutterfield@mfo.com; and Miranda K. Russell, Esq., mrussell@mfo.com) and Cole Schotz, P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801 (Attn: Justin R. Alberto, Esq., jalberto@coleschotz.com); and (iv) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 (Attn: Linda Richenderfer, Esq., linda.richenderfer@usdoj.gov and Malcom M. Bates, Esq., malcolm.m.bates@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE** that pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 350], if no objections are filed and served in accordance with the above procedures, the Debtors will be authorized to pay 80% of the requested fees and 100% of the requested expenses, without further order of the Court.

A HEARING ON THE APPLICATION WILL BE HELD, ONLY IF AN OBJECTION IS TIMELY FILED, OR THE COURT DIRECTS OTHERWISE, AT A DATE AND TIME TO BE SCHEDULED BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 3RD FLOOR, 824 NORTH MARKET STREET, WILMINGTON, DELAWARE 19801.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 25, 2024

*/s/ Justin R. Alberto*

**COLE SCHOTZ P.C.**

Justin R. Alberto (No. 5126)  
Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
Michael E. Fitzpatrick (No. 6797)  
500 Delaware Avenue, Suite 1410  
Wilmington, DE 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: jalberto@coleschotz.com  
preilley@coleschotz.com  
snewman@coleschotz.com  
mfitzpatrick@coleschotz.com

-and-

**MORRISON & FOERSTER LLP**

Lorenzo Marinuzzi (admitted *pro hac vice*)  
Doug Mannal (admitted *pro hac vice*)  
Benjamin Butterfield (admitted *pro hac vice*)  
Miranda K. Russell (admitted *pro hac vice*)  
Darren Smolarski (admitted *pro hac vice*)  
Donghao (Helen) Yan (admitted *pro hac vice*)  
250 West 55th Street  
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dmannal@mofocom  
bbutterfield@mofocom  
mrussell@mofocom  
dsmolarski@mofocom  
hyan@mofocom

*Counsel for the Official Committee  
of Unsecured Creditors*

**EXHIBIT A****FISKER INC., ET AL.****COMPENSATION BY PROJECT CATEGORY**  
**SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
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<b>TOTAL</b>	<b>71.1</b>	<b>\$47,762.00</b>



**FISKER INC., ET AL.****SUMMARY OF BILLING BY PROFESSIONAL  
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Attorney Name</b>	<b>Year Admitted</b>	<b>Position (Department)</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
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**EXHIBIT B****FIKER INC., *ET AL.*****EXPENSE SUMMARY  
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
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Breakfast/Lunch/Dinner Conferences for Hearings		\$114.66
Transcripts		\$82.35
<b>TOTAL</b>		<b>\$267.81</b>

**EXHIBIT C**

**FIKER INC., *ET AL.***

**ITEMIZED TIME RECORDS  
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**



FISKER AUTOMOTIVE, INC.  
C/O VERITA  
222 N. PACIFIC COAST HIGHWAY, SUITE 300  
EL SEGUNDO, CA 90245

Invoice Date: October 9, 2024  
Invoice Number: 988608  
Matter Number: 68099-0001

**Re:** OFFICIAL COMMITTEE OF UNSECURED CREDITORS

---

FOR PROFESSIONAL SERVICES THROUGH SEPTEMBER 30, 2024

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 2

**ASSET DISPOSITIONS, SALES, USES, AND LEASES (SECTION 363) 0.60 495.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/24	MEF	REVIEW NOTICE OF SALE OF DE MINIMIS PROPERTY	0.10	57.50
09/04/24	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING FLEET SALE UPDATE (.1);	0.10	80.00
09/09/24	SLN	REVIEW SECOND AMENDMENT TO FLEET SALES (.1);	0.10	80.00
09/10/24	JRA	REVIEW DE MINIMIS ASSET NOTICE	0.10	92.50
09/20/24	JRA	REVIEW NOTICE OF DEMINIMIS ASSET SALE	0.10	92.50
09/26/24	JRA	EMAIL WITH B. DOLPHIN RE DE MINIMIS ASSET NOTICE	0.10	92.50

**AUTOMATIC STAY MATTERS/LITIGATION 2.10 1,476.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/09/24	JRA	REVIEW AGREED TOMTOM ORDER	0.10	92.50
09/12/24	SLN	CORRESPONDENCE WITH DEBTORS REGARDING CONSENT TO MOTION TO SHORTEN (.1); REVIEW DEBTORS MOTION TO ENFORCE AUTOMATIC STAY AGAINST TOCCATA (.4); REVIEW RELATED MOTION TO SHORTEN NOTICE (.2);	0.70	560.00
09/13/24	MMH	CORRESPONDENCE WITH H. YAN RE: EMERGENCY AUTOMATIC STAY MOTION	0.20	86.00
09/13/24	MEF	REVIEW DEBTORS EMERGENCY MOTION TO ENFORCE THE AUTOMATIC STAY, MOTION TO SHORTEN SAME, AND OPPOSITION TO SAME	0.80	460.00
09/13/24	JRA	REVIEW MOTION TO ENFORCE STAY	0.30	277.50

**CASE ADMINISTRATION 14.70 9,353.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/24	SLN	REVIEW DEBTORS MOTION TO ENTER INTO AUSTRIAN SETTLEMENT (.5); REVIEW DIDONATO DECLARATION IN SUPPORT (.3);	0.80	640.00
09/02/24	SLN	CORRESPONDENCE WITH DEBTORS AND UCC PROFESSIONALS REGARDING RESPONSE TO MOTION TO UNSEAL COMMITTEE CONVERSION OBJECTION (.1); CORRESPONDENCE WITH CVI (.1); REVIEW REVISED UCC STATEMENT IN RESPONSE TO MOTION TO UNSEAL COMMITTEE CONVERSION OBJECTION (.2); CORRESPONDENCE WITH UCC PROFESSIONALS (.2);	0.60	480.00
09/02/24	PJR	REVIEW REVISED JOINDER RE: OBJECTION TO MOTION TO UNSEAL	0.10	90.00
09/02/24	PJR	EMAILS TO AND FROM R. BECK AND J. ALBERTO RE: SEAL ISSUES	0.10	90.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 3

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/24	SLN	CORRESPONDENCE WITH DEBTOR, LENDER AND UCC PROFESSIONALS REGARDING RESPONSE TO MOTION TO UNSEAL COMMITTEE CONVERSION OBJECTION (.4); REVIEW REVISED UCC RESPONSE (.1); REVIEW DEBTORS RESPONSE (.1); REVIEW CVI RESPONSE (.2);	0.80	640.00
09/03/24	MMH	CORRESPONDENCE WITH M3 RE: BUDGET ISSUES	0.20	86.00
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND REVIEW, REVISE AND PREPARE OBJECTION TO MOTION TO UNSEAL DI 300 FOR FILING	0.20	81.00
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND EFILE AND RETRIEVE OBJECTION TO MOTION TO UNSEAL DI 300	0.30	121.50
09/03/24	PJR	CONFERENCE WITH M. HARTLIPP RE: SEAL ISSUES	0.10	90.00
09/03/24	PJR	EMAILS FROM R. BECK RE: SEAL ISSUES (.1); REVIEW AND REVISE RESPONSE TO MOTION TO UNSEAL COMMITTEE OBJECTION (.3)	0.40	360.00
09/04/24	MMH	CORRESPONDENCE WITH M3 RE: BUDGET ISSUES	0.10	43.00
09/05/24	SLN	REVIEW AGENDA FOR 9/9 HEARING (.1); CORRESPONDENCE WITH CS TEAM REGARDING HEARING (.1);	0.20	160.00
09/06/24	MMH	FINALIZE CONFIDENTIALITY AGREEMENT	0.10	43.00
09/06/24	MMH	CORRESPONDENCE WITH J. ALBERTO RE:CONFIDENTIALITY ORDER	0.10	43.00
09/09/24	SLN	REVIEW REVISED 9019 ORDER (.2): PREPARE FOR AND ATTEND 9/9 HEARING (3.2);	3.40	2,720.00
09/09/24	PJR	EMAIL FROM R. BECK RE: SEAL ISSUES	0.10	90.00
09/10/24	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION/FILING DEADLINES AND HEARING DATE	0.40	160.00
09/11/24	SLN	REVIEW TOCCATA MOTION FOR ALLOWANCE OF SECURED CLAIM (.1);	0.10	80.00
09/11/24	MMH	CORRESPONDENCE WITH CS TEAM RE: BUDGET ISSUES	0.10	43.00
09/11/24	MMH	CORRESPONDENCE WITH M3 RE: BUDGET ISSUES	0.10	43.00
09/11/24	PJR	REVIEW SEAL ORDER AND EMAIL R. BECK RE: SAME	0.10	90.00
09/11/24	JRA	EMAILS WITH S. NEWMAN AND M. FITZPATRICK RE OCP ISSUES	0.20	185.00
09/12/24	MMH	CALENDAR UPCOMING DEADLINES	0.10	43.00
09/12/24	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING BUDGET (.1);	0.10	80.00
09/13/24	SLN	REVIEW TOCCATA OBJECTION TO MOTION TO SHORTEN NOTICE (.2); CORRESPONDENCE WITH CS TEAM (.1); REVIEW NOTICE OF STATUS CONFERENCE (.1);	0.40	320.00
09/13/24	LSM	ARRANGE NINE TELEPHONIC APPEARANCES FOR SEPTEMBER 16, 2024 HEARING FOR CS TEAM AND CO-COUNSEL	0.60	240.00
09/14/24	SLN	CORRESPONDENCE WITH CS TEAM REGARDING STATUS CONFERENCE (.1);	0.10	80.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 4

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/24	SLN	REVIEW DEBTORS REPLY IN SUPPORT OF MOTION TO SHORTEN NOTICE (.1); ATTENDANCE AT STATUS CONFERENCE ON DEBTORS MOTION TO ENFORCE STAY AGAINST TOCCATA (.4);	0.50	400.00
09/16/24	LSM	ARRANGE NINE TELEPHONIC APPEARANCES FOR SEPTEMBER 16, 2024 EMERGENCY HEARING	0.70	280.00
09/16/24	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION/FILING DEADLINES AND HEARING DATE	0.30	120.00
09/17/24	MMH	CORRESPONDENCE RE: BUDGET ISSUES	0.10	43.00
09/17/24	MMH	CORRESPONDENCE WITH CS TEAM RE: BUDGET ISSUES	0.10	43.00
09/18/24	SLN	REVIEW ORDER SHORTENING NOTICE OF DEBTORS MOTION TO ENFORCE STAY (.1); REVIEW AGENDA FOR 9/20 HEARING (.1); CORRESPONDENCE WITH CS TEAM REGARDING HEARING AND UCC CALL (.2);	0.40	320.00
09/18/24	LSM	ARRANGE TELEPHONIC APPEARANCE FOR NINE ATTORNEYS FOR SEPTEMBER 19, 2024 HEARING	0.60	240.00
09/19/24	SLN	REVIEW AMENDED AGENDA (.1); CORRESPONDENCE WITH CS TEAM REGARDING HEARING (.1);	0.20	160.00
09/23/24	MMH	CORRESPONDENCE WITH ACCOUNTING RE: BUDGET ISSUES	0.10	43.00
09/23/24	MMH	CORRESPONDENCE TO M3 RE: BUDGET ISSUES	0.10	43.00
09/23/24	LSM	COMPILE, REVIEW AND CIRCULATE TO M. FITZPATRICK THE SEPTEMBER 9, 2024 HEARING TRANSCRIPT	0.20	80.00
09/23/24	LSM	ORDER HEARING TRANSCRIPT FOR SEPTEMBER 9, 2024 HEARING	0.20	80.00
09/24/24	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH UPCOMING HEARING DATES	0.30	120.00
09/25/24	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION AND FILING DEADLINES	0.30	120.00
09/25/24	LSM	REVIEW AND RESOLVE VENDOR INVOICE INQUIRIES	0.40	0.00
09/25/24	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION AND FILING DEADLINES	0.30	120.00

**CLAIMS ANALYSIS, ADMINISTRATION AND OBJECTIONS** **0.30** **277.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/13/24	JRA	EMAILS WITH M3 AND D. MANNAL RE CLAIMS POOL ISSUES	0.30	277.50

**COMMITTEE MATTERS AND CREDITOR MEETINGS** **4.80** **3,596.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/24	SLN	CORRESPONDENCE WITH UCC REGARDING 9019 AND SOLICITATION MOTION (.1);	0.10	80.00
09/04/24	MMH	CORRESPONDENCE WITH H. YAN RE: CONFIDENTIALITY AGREEMENT	0.10	43.00
09/09/24	SLN	CORRESPONDENCE WITH UCC REGARDING DISCLOSURE STATEMENT HEARING (.1);	0.10	80.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 5

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/11/24	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING UCC CALL (.1);	0.10	80.00
09/11/24	JRA	EMAILS WITH S. NEWMAN (.2) AND T/C WITH D. MANNAL RE WEEKLY PROFESSIONALS CALL RE PLAN ISSUES AND WINDOWN MATTERS (.3)	0.50	462.50
09/12/24	SLN	REVIEW AGENDA FOR UCC MEETING (.1); CORRESPONDENCE WITH UCC (.1); ATTENDANCE AT UCC MEETING (.2);	0.40	320.00
09/16/24	SLN	CORRESPONDENCE WITH UCC REGARDING STATUS CONFERENCE (.1);	0.10	80.00
09/17/24	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN (.1);	0.10	80.00
09/18/24	SLN	CORRESPONDENCE WITH UCC REGARDING 9/19 HEARING (.1); REVIEW AGENDA FOR 9/20 UCC MEETING (.1); CORRESPONDENCE WITH UCC (.1);	0.30	240.00
09/18/24	MMH	ATTEND COMMITTEE CO-CHAIR CALL	0.40	172.00
09/18/24	MMH	CORRESPONDENCE TO CS TEAM RE: COMMITTEE CHAIR UPDATE	0.20	86.00
09/18/24	JRA	REVIEW H. YAN UCC UPDATE EMAIL	0.10	92.50
09/18/24	JRA	EMAIL WITH H. YAN RE UCC MEETING AGENDA	0.10	92.50
09/19/24	SLN	CORRESPONDENCE WITH UCC REGARDING HEARING (.1);	0.10	80.00
09/19/24	JRA	PARTICIPATE IN UCC UPDATE CALL WITH D. MANNAL, B. BUTTERFIELD AND UCC MEMBERS	0.30	277.50
09/24/24	SLN	CORRESPONDENCE WITH UCC REGARDING RECENTLY FILED PLEADINGS (.1);	0.10	80.00
09/25/24	SLN	CORRESPONDENCE WITH UCC REGARDING WEEKLY CALL (.1); REVIEW AGENDA (.1);	0.20	160.00
09/26/24	SLN	REVIEW MATERIALS FOR UCC CALL (.2); CORRESPONDENCE WITH UCC REGARDING RECENTLY FILED PLEADINGS (.1);	0.30	240.00
09/26/24	MMH	ATTEND UCC CALL	0.50	215.00
09/26/24	JRA	O/C WITH M. HARTLIPP RE TODAY'S UCC MEETING	0.10	92.50
09/26/24	JRA	PARTICIPATE IN UCC UPDATE CALL WITH D. MANNAL, R. WINNING AND UCC MEMBERS	0.50	462.50
09/27/24	SLN	CORRESPONDENCE WITH UCC REGARDING LIQUIDATING TRUSTEE (.1);	0.10	80.00
<b>DISCLOSURE STATEMENT/VOTING ISSUES</b>			<b>1.70</b>	<b>1,530.00</b>
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/24	PJR	CONFERENCE WITH S. NEWMAN RE: SOLICITATION AND VOTING ISSUES	0.20	180.00
09/03/24	PJR	REVIEW AND ANALYZE SOLICITATION MOTION AND RELATED EXHIBITS	1.30	1,170.00
09/08/24	PJR	REVIEW SOLICITATION EXHIBITS AND RELATED ORDER	0.20	180.00
<b>EXECUTORY CONTRACTS</b>			<b>0.50</b>	<b>380.00</b>



**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 6

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/24	MEF	REVIEW FIRST NOTICE OF REJECTION OF EXECUTORY CONTRACTS	0.20	115.00
09/08/24	SLN	CORRESPONDENCE WITH DEBTORS REGARDING REJECTION NOTICE (.1);	0.10	80.00
09/13/24	JRA	REVIEW SECOND REJECTION NOTICE	0.10	92.50
09/28/24	JRA	EMAIL WITH B. DOLPHIN RE REJECTION NOTICE	0.10	92.50

**FEE APPLICATION MATTERS/OBJECTIONS** **13.10** **6,582.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/24	MEF	EMAILS W/ M. RUSSELL, J. BOFFI, AND M. HARTLIPP RE: COMMITTEE FEE APPS	0.10	57.50
09/03/24	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING FEE APPLICATIONS (.4);	0.40	320.00
09/03/24	MMH	REVISE NOTICE TO M3 FIRST MONTHLY FEE APP	0.10	43.00
09/03/24	MMH	CORRESPONDENCE WITH M3 RE: FILING OF FEE APP	0.10	43.00
09/03/24	MMH	COORDINATE FILING OF CS FIRST MONTHLY FEE APP	0.10	43.00
09/03/24	MMH	DRAFT NOTICE TO MOFO FIRST MONTHLY FEE APP	0.20	86.00
09/03/24	MMH	COORDINATE FILING OF FIRST MONTHLY MOFO FEE APP	0.20	86.00
09/03/24	MMH	CALL M. RUSSELL RE: FEE APP PROVISION RE: SETTLEMENT AGREEMENT	0.10	43.00
09/03/24	MMH	FINALIZE MOFO FEE APP FOR FILING	0.10	43.00
09/03/24	MMH	CORRESPONDENCE WITH MOFO RE: FILING OF FEE APPS	0.10	43.00
09/03/24	MMH	REVISE NOTICE TO FIRST MONTHLY CS FEE APP	0.10	43.00
09/03/24	MMH	REVIEW MOFO FIRST MONTHLY FEE APP	0.20	86.00
09/03/24	MMH	COORDINATE FILING OF M3 FIRST MONTHLY FEE APP	0.10	43.00
09/03/24	JRA	EMAILS WITH M. HARTLIPP RE FEE APPS	0.10	92.50
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND EFILE AND SERVE MOFO JULY FEE APPLICATION	0.40	162.00
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND EFILE AND SERVE M3 ADVISORY JULY FEE APPLICATION	0.40	162.00
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND REVIEW, REVISE AND PREPARE MOFO JULY FEE APPLICATION, NOTICE OF FEE APPLICATION, DECLARATION OF L. MARINUZZI AND EXHIBITS A – E FOR FILING	0.60	243.00
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND REVIEW, REVISE AND PREPARE M3 JULY FEE APPLICATION, NOTICE OF FEE APPLICATION AND EXHIBITS A – E FOR FILING	0.60	243.00
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND EFILE AND SERVE COLE SCHOTZ JULY FEE APPLICATION	0.40	162.00
09/03/24	PVR	EMAIL FROM AND TO M. HARTLIPP AND REVIEW, REVISE AND PREPARE COLE SCHOTZ JULY FEE APPLICATION, NOTICE OF FEE APPLICATION AND EXHIBITS A – C FOR FILING	0.60	243.00
09/09/24	MMH	CORRESPONDENCE WITH S. NEWMAN RE: JULY FEE APP	0.10	43.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 7

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/24	MMH	REVIEW DRAFT INVOICE FOR CONFIDENTIALITY	0.10	43.00
09/11/24	MMH	CONTINUE TO REVIEW DRAFT INVOICE RE: PRIVILEGE	0.20	86.00
09/12/24	JRA	EMAIL WITH S. NEWMAN RE FEE APPS	0.10	92.50
09/12/24	MEF	EMAILS W/ UST RE LEDES FILES AND EMAILS W/ CS TEAM RE SAME	0.20	115.00
09/16/24	SLN	CORRESPONDENCE WITH DEBTOR PROFESSIONALS REGARDING FEE APPS (.1);	0.10	80.00
09/16/24	MMH	BEGIN DRAFT OF CS SECOND MONTHLY FEE APP	0.40	172.00
09/16/24	PJR	EMAILS TO AND FROM B. BUTTERFIELD RE: FEE APPLICATION ISSUES	0.10	90.00
09/17/24	MEF	DRAFT COLE SCHOTZ SECOND MONTHLY FEE APPLICATION (AUGUST 2024) AND CORRES. W/ M. HARTLIPP RE SAME	1.20	690.00
09/18/24	SLN	CORRESPONDENCE WITH CS TEAM REGARDING MONTHLY FEE APPLICATIONS (.1);	0.10	80.00
09/18/24	MMH	CONFER WITH J. ALBERTO RE: FEE APPS	0.10	43.00
09/18/24	JRA	EMAILS WITH D. MANNAL AND M. HARTLIPP RE FEE APPS	0.20	185.00
09/18/24	PVR	EMAIL TO AND FROM P. REILLEY, S. NEWMAN, M. FITZPATRICK, M. HARTLIPP AND L. MORTON, REVIEW DOCKET AND DRAFT CNO'S FOR FIRST MONTHLY FEE APPLICATIONS FOR MOFO, CS AND M3 ADVISORY PARTNERS	0.70	283.50
09/20/24	MMH	CORRESPONDENCE WITH H. YAN RE: AUGUST FEE APPS	0.40	172.00
09/20/24	MMH	REVISE CS AUGUST FEE APP	0.20	86.00
09/24/24	MMH	FURTHER REVISIONS TO FEE APP	0.10	43.00
09/24/24	SLN	REVIEW REVISED COLE SCHOTZ AUGUST MONTHLY FEE APPLICATION (.1): CORRESPONDENCE WITH CS TEAM (.2);	0.30	240.00
09/24/24	MMH	CORRESPONDENCE TO ACCOUNTING RE: FEE APP	0.30	129.00
09/24/24	MMH	COORDINATE FILING OF MOFO AUGUST FEE APP	0.20	86.00
09/24/24	MMH	CORRESPONDENCE WITH M3 RE: AUGUST FEE APP	0.10	43.00
09/24/24	MMH	CORRESPONDENCE WITH H. YAN AND M. RUSSELL RE: FILING OF FEE APP	0.10	43.00
09/24/24	MMH	COORDINATE FILING OF CS AUGUST FEE APP	0.20	86.00
09/24/24	MMH	REVIEW MOFO AUGUST FEE APP	0.10	43.00
09/24/24	MMH	CORRESPONDENCE WITH CS TEAM RE: AUGUST FEE STATEMENT	0.10	43.00
09/24/24	JRA	EMAILS WITH LM RE FEE APPS	0.30	277.50
09/24/24	LSM	FILE AND ORGANIZE ELECTRONIC SERVICE OF TWO SECOND MONTHLY FEE APPLICATIONS FOR COLE SCHOTZ AND MORRISON FOERSTER	0.60	240.00
09/24/24	MEF	REVIEW COLE SCHOTZ SECOND MONTHLY FEE APPLICATION AND EMAILS W/ M. HARTLIPP AND S. NEWMAN RE SAME	0.30	172.50
09/24/24	LSM	REVISE, FINALIZE AND FORWARD TO M. HARTLIPP TWO SECOND MONTHLY FEE APPLICATIONS FOR COLE SCHOTZ AND MORRISON FOERSTER	0.60	240.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 8

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/24	MMH	REVIEW AND COMMENT ON M3 AUGUST FEE APP	0.10	43.00
09/25/24	JRA	EMAILS WITH M. HARTLIPP AND LM RE FEE APPS	0.20	185.00
09/25/24	LSM	REVIEW, FILE AND ORGANIZE SERVICE OF SECOND MONTHLY FEE APPLICATION FOR M3 ADVISORY	0.30	120.00

**LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF) 6.00 4,409.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/24	JRA	REVIEW DRAFT CVI OBJECTION	0.20	185.00
09/02/24	MMH	INCORPORATE J. ALBERTO AND MOFO COMMENTS TO COMMITTEE JOINDER TO MOTION TO SEAL OBJECTION REPSONSE	0.50	215.00
09/02/24	MMH	CIRCULATE DRAFT JOINDER/RESPONSE TO MOTION TO SEAL OBJECTION TO DEBTORS COUNSEL	0.10	43.00
09/02/24	MMH	CIRCULATE REVISED JOINDER TO MOTION TO SEAL OBJECTION TO MOFO AND CS TEAM	0.20	86.00
09/02/24	MMH	REVISE JOINDER TO MOTION TO SEAL OBJECTION PER J. ALBERTO	0.30	129.00
09/02/24	JRA	REVISE JOINDER (.2) AND FURTHER EMAILS WITH M. HARTLIPP RE SAME (.1)	0.30	277.50
09/02/24	JRA	EMAILS WITH R. BECK, M. HARTLIPP AND D. MANNAL RE MOTION TO UNSEAL AND RESPONSE TO SAME	0.60	555.00
09/03/24	MMH	CIRCULATE REVISED RESPONSE TO MOFO TEAM	0.10	43.00
09/03/24	MMH	FINALIZE SEAL MOTION OBJECTION FOR FILING AND COORDINATE FILING	0.30	129.00
09/03/24	MMH	CONFER WITH CS TEAM RE: MOTION TO SEAL RESPONSE	0.20	86.00
09/03/24	MMH	REVISE RESPONSE TO MOTION TO SEAL PER HIEGHTS' COMMENTS	0.50	215.00
09/03/24	JRA	REVIEW REVISED OBJECTION TO MOTION TO UNSEAL (.1); FURTHER EMAILS WITH M. HARTLIPP, M. RUSSELL AND B. BUTTERFIELD RE SAME (.3)	0.40	370.00
09/03/24	JRA	FURTHER EMAILS WITH R. BECK AND M. HARTLIPP RE OBJECTION TO MOTION TO UNSEAL	0.40	370.00
09/03/24	JRA	O/C (.1) AND EMAILS (.2) WITH P. REILLEY AND M. HARTLIPP RE RESPONSE TO OBJECTION TO MOTION TO UNSEAL	0.30	277.50
09/06/24	JRA	EMAILS WITH M. HARTLIPP RE CONFIDENTIALITY AGREEMENT	0.10	92.50
09/09/24	PVR	EMAIL FROM AND TO S. NEWMAN AND RETRIEVE NOTICE OF REVISE 9019 ORDER	0.10	40.50
09/09/24	JRA	EMAILS WITH P. REILLEY AND S. NEWMAN (.2) AND CONFER WITH SAME AND R. BECK (.2) RE MOTION TO UNSEAL	0.40	370.00
09/10/24	JRA	REVIEW ORDER DENYING MOTION TO UNSEAL	0.10	92.50
09/26/24	JRA	REVIEW ADVANCEMENT MOTION	0.80	740.00
09/26/24	JRA	EMAIL WITH H. YAN RE ADVANCEMENT MOTION	0.10	92.50

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 9

<b>PREPARATION FOR AND ATTENDANCE AT HEARINGS</b>			<b>14.00</b>	<b>8,891.00</b>
<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
09/05/24	MMH	CORRESPONDENCE WITH S. NEWMAN AND H. YAN RE: HEARING LOGISTICS FOR 9/9 HEARING	0.10	43.00
09/05/24	MMH	COORDINATE BRIDGE LINE FOR 9/9 HEARING	0.10	43.00
09/05/24	MMH	COORDINATE WITH CS TEAM RE: 9/9 HEARING LOGISTICS	0.10	43.00
09/05/24	PVR	EMAIL TO J. ALBERTO, S. NEWMAN, P. REILLEY, M. HARTLIPP AND L. MORTON AND RETRIEVE AND REVIEW AGENDA FOR SEPTEMBER 9, 2024 HEARING	0.20	81.00
09/05/24	PVR	EMAILS FROM AND TO M. HARTLIPP AND ARRANGE FOR REMOTE APPEARANCES FOR M. HARTLIPP, D. MANNAL, B. BUTTERFIELD, M. RUSSELL AND H. YAN RE: SEPTEMBER 9, 2024 HEARING	0.40	162.00
09/06/24	MMH	CONFER WITH H. YAN RE: HEARING LOGISTICS	0.10	43.00
09/09/24	MMH	COORDINATE PREPARATION OF HEARING BINDERS	0.10	43.00
09/09/24	MMH	VIRTUALLY ATTEND HEARING AND RUN BRIDGE LINE	1.60	688.00
09/09/24	JRA	EMAIL WITH H. YAN RE TODAY'S HEARING	0.10	92.50
09/09/24	PVR	TELEPHONE CALL WITH AND EMAIL TO L. MORTON RE: AGENDA FOR SEPTEMBER 9, 2024 HEARING	0.20	81.00
09/09/24	PJR	CONFERENCE WITH J. ALBERTO AND S. NEWMAN RE: CASE STATUS AND HEARING ISSUES	0.30	270.00
09/09/24	LSM	COMPILE, REVIEW AND CIRCULATE AMENDED AGENDA FOR SEPTEMBER 9, 2024 HEARING TO CS TEAM AND CO-COUNSEL	0.20	80.00
09/09/24	LSM	ASSEMBLE ELECTRONIC AND HARD COPY HEARING BINDERS FOR SEPTEMBER 9, 2024 HEARING AND FORWARD TO M. HARTLIPP	0.80	320.00
09/09/24	LSM	ASSIST WITH HEARING PREPARATIONS FOR SEPTEMBER 9, 2024 HEARING	0.50	200.00
09/09/24	JRA	O/C WITH S. NEWMAN RE TODAY'S HEARING	0.20	185.00
09/09/24	JRA	O/C WITH D. MANNAL AND B. BUTTERFIELD RE HEARING PREP AND STRATEGY (2.5); REVIEW OF REVISED DOCS (1.2)	3.70	3,422.50
09/09/24	JRA	REVIEW AMENDED AGENDA	0.10	92.50
09/13/24	MEF	EMAILS AND CORRES. W/ M. HARTLIPP, J. ALBERTO, S. NEWMAN, AND P. REILLEY RE: 9/16 HEARING ON EMERGENCY MOTION	0.20	115.00
09/13/24	JRA	EMAILS WITH S. NEWMAN AND M. FITZPATRICK RE MOTION TO ENFORCE STAY AND HEARING ON SAME	0.40	370.00
09/14/24	MMH	CORRESPONDENCE WITH CS TEAM RE: 9/16 STATUS CONFERENCE	0.20	86.00
09/14/24	JRA	EMAILS WITH S. NEWMAN RE 9/16 HEARING	0.10	92.50
09/16/24	MMH	COORDINATE HEARING ATTENDANCE FOR 9/16 STATUS CONFERENCE	0.10	43.00
09/16/24	MMH	RUN BRIDGE LINE FOR 9/16 HEARING	0.50	215.00
09/16/24	PJR	EMAIL FROM Y. HAN RE: HEARING ISSUES	0.10	90.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 10

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/24	LSM	ASSIST WITH HEARING PREPARATIONS FOR SEPTEMBER 16, 2024 HEARING	0.50	200.00
09/16/24	JRA	EMAILS (.3) AND O/C (.1) WITH S. NEWMAN AND M. HARTLIPP RE HEARING	0.40	370.00
09/17/24	MEF	EMAILS W/ M. RUSSEL, H. YAN, AND M. HARTLIPP RE 8/16 HEARING	0.20	115.00
09/18/24	MMH	COORDINATE CS, MOFO VIRTUAL ATTENDANCE FOR 9/19 HEARING AND CREATE BRIDGE LINE	0.30	129.00
09/18/24	MMH	CORRESPONDENCE WITH COCOUNSEL RE: 9/19 HEARING	0.10	43.00
09/18/24	PVR	EMAIL TO J. ALBERTO, P. REILLEY, S. NEWMAN, M. FITZPATRICK, M. HARTLIPP AND L. MORTON AND RETRIEVE AND REVIEW AGENDA FOR SEPTEMBER 19, 2024 ZOOM HEARING	0.20	81.00
09/18/24	PVR	RETRIEVE AND REVIEW AGENDA FOR SEPTEMBER 19, 2024 HEARING AND UPDATE CASE CALENDAR	0.20	81.00
09/18/24	PVR	REGISTER TEN ATTORNEYS FOR REMOTE APPEARANCES FOR SEPTEMBER 19, 2024 HEARING	0.30	121.50
09/18/24	JRA	EMAILS WITH S. NEWMAN AND M. HARTLIPP RE HEARING	0.20	185.00
09/19/24	MMH	VIRTUALLY ATTEND HEARING AND RUN BRIDGE LINE	0.50	215.00
09/19/24	MMH	CORRESPONDENCE TO CO-COUNSEL RE: SUMMARY OF HEARING	0.30	129.00
09/19/24	MMH	CORRESPONDENCE TO MOFO RE: CHANGED HEARING TIME	0.10	43.00
09/19/24	JRA	FURTHER EMAILS WITH S. NEWMAN AND M. HARTLIPP RE TODAY'S HEARING	0.20	185.00
09/19/24	JRA	CORRESPOND WITH S. NEWMAN RE TODAY'S HEARING	0.10	92.50
<b>REORGANIZATION PLAN</b>			<b>12.70</b>	<b>10,456.00</b>

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/24	SLN	REVIEW OF AND COMMENTS TO SOLICITATION PROCEDURES MOTION, PROPOSED ORDER, BALLOTS AND NOTICES (2.8); CORRESPONDENCE WITH CS AND MOFO TEAMS (.2); REVIEW OF AND COMMENTS TO DRAFT UCC SOLICITATION LETTER TO GUC (.2); CORRESPONDENCE WITH CS TEAM (.1);	3.30	2,640.00
09/03/24	PJR	REVIEW COMMITTEE SOLICITATION LETTER	0.10	90.00
09/04/24	SLN	CORRESPONDENCE WITH MOKFO AND CS TEAMS REGARDING COMMENTS TO SPM (.1);	0.10	80.00
09/06/24	SLN	CORRESPONDENCE WITH MOFO AND CS TEAMS REGARDING COMMENTS TO SOLICITATION PROCEDURES MOTION (.4);	0.40	320.00
09/06/24	MMH	CALL WITH M. RUSSELL RE: PLAN AND DISCLOSURE STATEMENT	0.20	86.00
09/06/24	MMH	CONFER WITH S. NEWMAN RE: COMMENTS TO PLAN AND DISCLOSURE STATEMENT	0.20	86.00
09/06/24	JRA	REVIEW UST OBJECTION	0.60	555.00
09/07/24	SLN	REVIEW REVISED PLAN (.3);	0.30	240.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 11

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/07/24	JRA	EMAIL WITH M. RUSSELL AND S. NEWMAN RE REVISED PLAN	0.10	92.50
09/08/24	SLN	REVIEW REVISED SOLICITATION PROCEDURES ORDER (.2); CORRESPONDENCE WITH MOFO AND CS TEAMS (.2);	0.40	320.00
09/08/24	JRA	CORRESPOND WITH S. NEWMAN AND P. REILLEY RE SOLICITATION PROCEDURES	0.40	370.00
09/09/24	SLN	REVIEW REVISED PROPOSED DS ORDER (.1); REVIEW REVISED DS/PLAN (.8); REVIEW DEBTORS REPLY TO UST DISCLOSURE STATEMENT OBJECTION (.4); REVIEW FURTHER REVISED PROPOSED DS ORDER (.1); REVIEW REVISED UCC PLAN STATEMENT (.1);	1.50	1,200.00
09/09/24	PJR	REVIEW AND ANALYZE REVISED PLAN DOCUMENTS	0.50	450.00
09/09/24	PJR	REVIEW REPLY IN SUPPORT OF SOLICITATION MOTION	0.20	180.00
09/09/24	JRA	REVIEW DEBTORS' REPLY	0.20	185.00
09/10/24	SLN	REVIEW BLACKLINE PLAN AND DISCLOSURE STATEMENT (.2); REVIEW COC AND REVISED SPM ORDER (.1); REVIEW NOTICE OF CONFIRMATION HEARING (.1);	0.40	320.00
09/10/24	JRA	REVIEW BLACKLINED PLAN/DS	0.80	740.00
09/17/24	SLN	REVIEW UCC COMMENTS TO DRAFT PLAN (.3);	0.30	240.00
09/17/24	PJR	REVIEW AND ANALYZE PLAN	0.50	450.00
09/18/24	JRA	T/C WITH D. MANNAL RE PLAN ISSUES	0.30	277.50
09/23/24	SLN	REVIEW REVISED PLAN (.3); CORRESPONDENCE WITH UCC PROFESSIONALS (.3):	0.60	480.00
09/23/24	JRA	REVIEW REVISED PLAN	0.70	647.50
09/23/24	JRA	EMAILS WITH D. MANNAL AND E. GREENHUAS RE PLAN AND BUDGET ISSUES	0.30	277.50
09/30/24	MMH	CORRESPONDENCE WITH CO-COUNSEL RE: CONFIRMATION ORDER	0.30	129.00

**RETENTION MATTERS****0.60 316.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/24	MMH	CORRESPONDENCE WITH H. YAN RE: ORRICK RETENTION	0.10	43.00
09/10/24	MMH	ANALYZE ORDINARY COURSE PROFESSIONALS RETENTION ORDER	0.10	43.00
09/10/24	MEF	EMAILS W/ M. HARTIPP, M. RUSSELL, AND H. YAN RE OCP DEC INQUIRY	0.20	115.00
09/10/24	MEF	REVIEW OCP DEC W/R/T TO MOFO INQUIRY AND EMAILS W/ CS TEAM RE SAME	0.20	115.00

TOTAL HOURS 71.10

PROFESSIONAL SERVICES:

\$47,762.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 12

**TIMEKEEPER SUMMARY**

<b><u>NAME</u></b>	<b><u>TIMEKEEPER TITLE</u></b>	<b><u>HOURS</u></b>	<b><u>RATE</u></b>	<b><u>AMOUNT</u></b>
Justin R. Alberto	Member	16.50	925.00	15,262.50
Larry S. Morton	Paralegal	7.40	400.00	2,960.00
Larry S. Morton	Paralegal	0.40	0.00	0.00
Melissa M. Hartlipp	Associate	14.10	430.00	6,063.00
Michael E. Fitzpatrick	Associate	3.70	575.00	2,127.50
Patrick J. Reilley	Member	4.40	900.00	3,960.00
Pauline Z. Ratkowiak	Paralegal	5.80	405.00	2,349.00
Stacy L. Newman	Member	18.80	800.00	15,040.00
	<b>Total</b>	<b>71.10</b>		<b>\$47,762.00</b>

**COST DETAIL**

<b><u>DATE</u></b>	<b><u>Description</u></b>	<b><u>QUANTITY</u></b>	<b><u>AMOUNT</u></b>
08/06/24	COURT FEES	4.00	0.40
08/06/24	COURT FEES	4.00	0.40
08/06/24	COURT FEES	3.00	0.30
08/06/24	COURT FEES	5.00	0.50
08/06/24	COURT FEES	5.00	0.50
08/06/24	COURT FEES	3.00	0.30
08/06/24	COURT FEES	5.00	0.50
08/06/24	COURT FEES	4.00	0.40
08/06/24	COURT FEES	4.00	0.40
08/06/24	COURT FEES	5.00	0.50
08/06/24	COURT FEES	5.00	0.50
08/06/24	COURT FEES	3.00	0.30
08/06/24	COURT FEES	5.00	0.50
08/06/24	COURT FEES	3.00	0.30
09/09/24	DELIVERY/COURIERS	1.00	65.00
09/09/24	LUNCHEON/DINNER CONFERENCE-FOR 5 PROFESSIONALS PRIOR TO HEARING	1.00	114.66
09/24/24	TRANSCRIPT	1.00	82.35
	<b>Total</b>		<b>\$267.81</b>

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

Invoice Number 988608  
October 9, 2024  
Page 13

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TOTAL SERVICES AND COSTS: \$ 48,029.81