

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

In re:

FISKER INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Obj. Deadline: November 21, 2024 at 4:00 p.m. (ET)

**FOURTH MONTHLY FEE STATEMENT OF MORRIS, NICHOLS, ARSHT &
TUNNELL LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTORS AND
DEBTORS IN POSSESSION, FOR ALLOWANCE OF MONTHLY
COMPENSATION AND FOR REIMBURSEMENT OF ALL ACTUAL AND
NECESSARY EXPENSES INCURRED FOR THE PERIOD
SEPTEMBER 1, 2024, THROUGH AND INCLUDING SEPTEMBER 30, 2024**

Name of Professional: MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Authorized to Provide
Professional Services to: Debtors and Debtors in Possession

Date of Retention: July 16, 2024, *nunc pro tunc* to June 17, 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: \$292,866.80 (80% of \$366,083.50)

Amount of reimbursement sought as
actual, reasonable and necessary: \$14,815.30

This is a x monthly ___ interim ___ final application

The total time expended for preparation of this fee statement is approximately 22.9 hours and the corresponding compensation requested is approximately \$15,279.50.²

¹ 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.

² Allowance for compensation for such time is not requested in this application, but may be sought in a subsequent fee statement.



If this is not the first fee statement filed, disclose the following for each prior fee statement:

DATE FILED	PERIOD COVERED	REQUESTED FEES/EXPENSES	APPROVED FEES/EXPENSES
8/1/24 D.I. 363	6/17/24-6/30/24	\$438,920.50/\$15,236.71	\$351,136.40/\$15,236.71
8/2/24 D.I. 369	7/1/24-7/31/24	\$872,323.00/\$27,042.00	\$697,858.40/\$27,042.00
9/25/24 D.I. 594	8/1/24-8/31/24	\$477,529.50/\$17,862.10	\$382,023.60/\$17,862.10

COMPENSATION BY PROFESSIONAL

FISKER INC., et al.
(Case No. 24-11390 (TMH))

September 1, 2024, through September 30, 2024

Name of Professional	Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Billing Rate	Total Billed Hours	Total Compensation
Robert J. Dehney	Partner/Bankruptcy. Partner since 1999. Joined firm as an associate in 1996. Member of the DE Bar since 1997.	1,695	23.0	38,985.00
Andrew R. Remming	Partner/Bankruptcy. Partner since 2016. Joined firm as an associate in 2008. Member of the DE Bar since 2008.	1,145	56.2	64,349.00
Daniel B. Butz	Senior Counsel/Bankruptcy. Joined the firm as an associate in 2002. Member of the DE Bar since 2002.	965	41.4	39,951.00
Tamara K. Mann	Special Counsel/Bankruptcy. Joined the firm as an associate in 2011. Member of the DE Bar since 2011.	965	1.5	1,447.50
Brenna A. Dolphin	Special Counsel/Bankruptcy. Joined the firm as special counsel in 2023. Member of the DE Bar since 2011.	965	151.9	146,583.50
Jonathan M. Weyand	Associate/Bankruptcy. Joined the firm as an associate in 2022. Member of the DE Bar since 2022.	665	0.4	266.00
Sophie Rogers Churchill	Associate/Bankruptcy. Joined the firm as an associate in 2021. Member of the DE Bar since 2022.	635	42.0	26,670.00
Echo Qian	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2024.	595	53.4	31,773.00
Casey B. Sawyer	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	545	0.8	436.00
Brianna N. V. Turner	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the DE Bar since 2024.	545	9.9	5,395.50

Name of Professional	Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Billing Rate	Total Billed Hours	Total Compensation
J. Luke Brzozowski	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the DE Bar since 2024.	545	2.1	1,144.50
John Lawrence	Paralegal	395	1.0	395.00
Rebecca L. Weidman	Paralegal	395	17.5	6,912.50
Marie Reed	Legal Assistant	355	4.6	1,633.00
Valerie Walker	Legal Assistant	355	0.4	142.00
Total		717.11	406.1	366,083.50
BLENDED RATE: \$717.11				
ATTORNEY BLENDED RATE: \$933.09				

COMPENSATION BY PROJECT CATEGORY

FISKER INC., et al.
(Case No. 24-11390 (TMH))
September 1, 2024, through September 30, 2024

Project Category	Total Hours	Total Fees
Case Administration	0.90	469.50
Asset Analysis and Recovery	4.20	4,489.00
Asset Dispositions/363 Sales	16.60	15,800.00
Automatic Stay Matters	39.30	41,705.50
Creditor Communications and Meetings	5.50	4,123.50
Fee Applications (MNAT - Filing)	22.90	15,279.50
Fee Applications (Others - Filing)	2.10	1,601.50
Executory Contracts/Unexpired Leases	19.40	16,257.00
Other Contested Matters	17.50	17,699.50
Governmental/Regulatory Matters	0.30	289.50
Financing Matters/Cash Collateral	5.50	4,322.50
Tax Matters	1.30	1,035.50
Insurance Matters	26.10	24,069.50
Court Hearings	69.50	64,178.50
Claims Objections and Administration	25.70	24,760.50
Plan and Disclosure Statement	110.10	94,426.50
Litigation/Adversary Proceedings	10.00	9,555.00
Professional Retention (Others - Filing)	13.30	11,798.50
General Corporate Matters (including Corporate Governance)	2.30	2,159.50
General Case Strategy	5.50	5,150.50
Schedules/SOFA/U.S. Trustee Reports	8.10	6,912.50
TOTAL	406.1	\$366,083.50

EXPENSE SUMMARY

FISKER INC., et al.
(Case No. 24-11390 (TMH))
September 1, 2024, through September 30, 2024

Expense Category	Total Expenses
In-House Printing - black & white	1,877.90
Pacer	263.40
In-House Printing - color	3,549.60
Supplemental Tech Trial Support Services	721.21
Computer Research - Westlaw	387.30
Support Staff Overtime	1,157.15
Meals	2,101.51
Courier/Delivery Service	527.00
Transcripts	1,306.25
Messenger Service	5.00
In-House Duplicating	36.24
In-House Duplicating - color	232.74
Use of Facilities/Equipment	2,650.00
Grand Total Expenses	\$14,815.30

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

In re:

FISKER INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Obj. Deadline: November 21, 2024 at 4:00 p.m. (ET)

**FOURTH MONTHLY FEE STATEMENT OF MORRIS, NICHOLS, ARSHT &
TUNNELL LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTORS AND
DEBTORS IN POSSESSION, FOR ALLOWANCE OF MONTHLY
COMPENSATION AND FOR REIMBURSEMENT OF ALL ACTUAL AND
NECESSARY EXPENSES INCURRED FOR THE PERIOD
SEPTEMBER 1, 2024, THROUGH AND INCLUDING SEPTEMBER 30, 2024**

Morris, Nichols, Arsht & Tunnell LLP (“Morris Nichols”), as bankruptcy counsel for the debtors and debtors in possession in the above-captioned cases (the “Debtors”), submits this fee statement (the “Fee Statement”) for monthly and interim allowance of compensation for professional services rendered by Morris Nichols to the Debtors for the period of September 1, 2024, through September 30, 2024 (the “Statement Period”), and reimbursement of actual and necessary expenses incurred by Morris Nichols during the Statement Period pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective

¹ 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.

November 1, 2013 (the “U.S. Trustee Guidelines”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (D.I. 350) (the “Interim Compensation Procedures Order”).² In support of this Fee Statement, Morris Nichols represents as follows:

JURISDICTION

1. This Court has jurisdiction over this Fee Statement pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, as supplemented by Bankruptcy Rule 2016, Local Rule 2016-2, the U.S. Trustee Guidelines, and the Interim Compensation Procedures Order.

BACKGROUND

3. On June 17 and 19, 2024 (each a “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code thereby commencing these chapter 11 cases. The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On July 2, 2024, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Creditors’ Committee”).

5. On October 16, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order, Approving the Disclosure Statement on a Final Basis, Confirming the Debtors’ Joint Chapter 11 Plan of Liquidation, and Granting Related Relief* (D.I. 277) (the “Confirmation”).

² Capitalized terms used but not defined herein are defined in the Interim Compensation Procedures Order.

Order”). On October 17, 2024, the effective date of the Debtors’ chapter 11 plan of liquidation occurred (D.I. 730).

MORRIS NICHOLS’S RETENTION

6. Prior to the commencement of these chapter 11 cases, the Debtors retained Morris Nichols to provide advice regarding, among other things, preparing for, commencing, and prosecuting these cases under chapter 11 of the Bankruptcy Code. On June 25, 2024, the Debtors filed the *Application of Debtors for Authority to Employ and Retain Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors Nunc Pro Tunc to the Petition Date* (D.I. 72) (the “Morris Nichols Retention Application”).

7. On July 16, 2024, this Court granted the Morris Nichols Retention Application pursuant to the *Order Approving Application of Debtors for Authority to Employ and Retain Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors Nunc Pro Tunc to the Petition Date* (D.I. 232) (the “Morris Nichols Retention Order”).

INTERIM COMPENSATION PROCEDURES ORDER

8. The Court entered the Interim Compensation Procedures Order on July 31, 2024. The Interim Compensation Procedures Order sets forth the procedures for interim compensation and reimbursement of expenses for all retained Professionals in these cases.

9. In particular, the Interim Compensation Procedures Order provides that Professionals may file and serve a Monthly Fee Statement following the month or months for which compensation is sought, for interim approval and allowance of compensation for services rendered and reimbursement of expenses incurred during the immediately preceding month. Parties in interest will have 14 days (or the next business day if such day is not a business day) after the filing of a Monthly Fee Statement (the “Objection Deadline”) to object to the requested

compensation for services rendered and reimbursement of expenses incurred. Provided that there are no objections to such Monthly Fee Statement filed before the expiration of the Objection Deadline, the Professional may file a certificate of no objection (the “Certificate of No Objection”) with the Court.

10. Upon the filing of a Certificate of No Objection, the Debtors are authorized to pay such Professional 80 percent of the fees and 100 percent of the expenses requested in such Monthly Fee Statement.

RELIEF REQUESTED

11. Morris Nichols submits this Fee Statement for (a) allowance of reasonable compensation for the actual, reasonable, and necessary professional services that it has rendered as co-counsel for the Debtors in these cases during the Statement Period and (b) reimbursement of actual, reasonable, and necessary expenses incurred by Morris Nichols in representing the Debtors during the Statement Period.

12. During the Statement Period, Morris Nichols incurred fees in the amount of \$366,083.50. For the same period, Morris Nichols incurred actual, reasonable, and necessary expenses totaling \$14,815.30. As of the date of this Fee Statement, Morris Nichols has received no payments with respect to these amounts.

13. Set forth on the foregoing “Compensation by Project Category” is a summary, by subject matter category, of the time expended by Morris Nichols’s timekeepers billing time to the Debtors’ cases during the Statement Period.

14. **Exhibit A** attached hereto contains logs, sorted by case project category, which show the time recorded by professionals, paraprofessionals, and other support staff, as well as descriptions of the services provided.

15. **Exhibit B** attached hereto contains a breakdown of actual, reasonable, and necessary expenses incurred by Morris Nichols during the Statement Period.

16. Morris Nichols charges \$.10 per page for photocopying and printing. Morris Nichols does not charge for outgoing domestic facsimiles or incoming facsimiles.

17. In accordance with Local Rule 2016-2, Morris Nichols has reduced its request for compensation for non-working travel, if any, to 50% of its normal rate.

18. Morris Nichols has endeavored to represent the Debtors in the most expeditious and economical manner possible. Tasks have been assigned to attorneys, paralegals, and other support staff at Morris Nichols so that work has been performed by those most familiar with the particular matter or task and, where attorney or paralegal involvement was required, by the lowest hourly rate professional appropriate for a particular matter. Moreover, Morris Nichols has endeavored to coordinate with the other professionals involved in these cases so as to minimize any duplication of effort and to minimize attorneys' fees and expenses to the Debtors. Morris Nichols believes it has been successful in this regard.

19. No agreement or understanding exists between Morris Nichols and any other person for the sharing of compensation received or to be received for services rendered in or in connection with these cases.

20. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies to the best of his or her information, knowledge, and belief that this Fee Statement complies with that Rule.

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WHEREFORE, Morris Nichols respectfully requests that the Debtors pay Morris Nichols \$307,682.10, which is equal to the sum of 80% (\$292,866.80) of Morris Nichols's requested compensation (\$366,083.50) and 100% (\$14,815.30) of Morris Nichols's requested expense reimbursement.

Dated: November 7, 2024
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill
Robert J. Dehney, Sr. (No. 3578)
Andrew R. Remming (No. 5120)
Brenna A. Dolphin (No. 5604)
Sophie Rogers Churchill (No. 6905)
Echo Yi Qian (No. 7330)
1201 N. Market Street, 16th Floor
Wilmington, Delaware 19801
Tel.: (302) 658-9200
rdehney@morrisnichols.com
aremming@morrisnichols.com
bdolphin@morrisnichols.com
srchurchill@morrisnichols.com
eqian@morrisnichols.com

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

In re:

FISKER INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Obj. Deadline: November 21, 2024 at 4:00 p.m. (ET)

NOTICE OF FILING OF FEE STATEMENT

PLEASE TAKE NOTICE that today, Morris, Nichols, Arsht & Tunnell LLP (the “Professional”) filed the attached *Fourth Monthly Fee Statement of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period September 1, 2024, through and Including September 30, 2024* (the “Fee Statement”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Fee Statement must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (D.I. 350) (the “Interim Compensation Order”) and served no later than **November 21, 2024 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”) upon on the following parties (the “Fee Notice Parties”): (a) the Debtors, c/o Fisker Inc., 14 Centerpointe Drive, La Palma, CA 90623 (Attn: John C. DiDonato, jdidonato@hcg.com); (b) 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.,

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darren.klein@davispolk.com; Richard J. Steinberg, Esq., at richard.steinberg@davispolk.com and Amber Leary, Esq., at amber.leary@davispolk.com); (c) counsel to the Debtors, Morris Nichols Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801 (Attn: Robert J. Dehney, Sr., Esq., rdehney@morrisonichols.com; Andrew R. Remming, Esq., aremring@morrisonichols.com; Brenna A. Dolphin, Esq., bdolphin@morrisonichols.com; Sophie Rogers Churchill, Esq., srchurchill@morrisonichols.com); (d) proposed counsel to the Official Committee of Unsecured Creditors in the above-captioned Chapter 11 Cases (the “Committee”), Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019-9601 (Attn: Lorenzo Marinuzzi, Esq., lmarinuzzi@mfofo.com; Douglas Mannal, Esq., dmannel@mfofo.com; Benjamin Butterfield, Esq., bbutterfield@mfofo.com; and Miranda K. Russell, Esq., mrussell@mfofo.com and Cole Schotz, P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801 (Attn: Justin R. Alberto, Esq., jalberto@coleschotz.com); and (e) 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 if an objection to the Fee Statement is served prior to the Objection Deadline, the Debtors shall be authorized by the Interim Compensation Procedures Order to pay the Professional 80% of the fees and 100% of the expenses requested in the Fee Statement not subject to such objection without the need for further order of the Court. Pursuant to the Interim Compensation Procedures Order, if the objecting party and the Professional are unable to resolve an objection within fourteen (14) days, the objecting party shall file an objection (the “Objection”) with the Court within three (3) days and serve such Objection on the Fee Notice Parties and the Professional. After receipt of the Objection, the Professional shall have

the option to (a) file a response to the Objection with a request for payment of the disputed amount with the Court, or (b) forgo payment of the disputed amount until the next interim fee application hearing.

PLEASE TAKE FURTHER NOTICE that if no objections to the Fee Statement are served prior to the Objection Deadline, the Professional may file a certificate of no objection with the Court, after which the Debtors shall be authorized by the Interim Compensation Procedures Order to pay the Professional an amount equal to 80% of the fees and 100% of the expenses requested in the Fee Statement without the need for further order of the Court.

PLEASE TAKE FURTHER NOTICE that if you fail to respond in accordance with this notice, the court may grant the relief requested in the Fee Statement without further notice or hearing.

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Dated: November 7, 2024
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill
Robert J. Dehney, Sr. (No. 3578)
Andrew R. Remming (No. 5120)
Brenna A. Dolphin (No. 5604)
Sophie Rogers Churchill (No. 6905)
Echo Yi Qian (No. 7330)
1201 N. Market Street, 16th Floor
Wilmington, Delaware 19801
Tel.: (302) 658-9200
rdehney@morrisnichols.com
aremming@morrisnichols.com
bdolphin@morrisnichols.com
srchurchill@morrisnichols.com
eqian@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)
Darren S. Klein (admitted *pro hac vice*)
Richard J. Steinberg (admitted *pro hac vice*)
Amber Leary (admitted *pro hac vice*)
450 Lexington Avenue
New York, New York 10017
Tel.: (212) 450-4000
brian.resnick@davispolk.com
darren.klein@davispolk.com
richard.steinberg@davispolk.com
amber.leary@davispolk.com

Counsel to the Debtors and Debtors in Possession

EXHIBIT A**COMPENSATION BY PROJECT CATEGORY**

FISKER INC., et al.
(Case No. 24-11390 (TMH))

September 1, 2024, through September 30, 2024

Project Category	Total Hours	Total Fees
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Insurance Matters	26.10	24,069.50
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General Corporate Matters (including Corporate Governance)	2.30	2,159.50
General Case Strategy	5.50	5,150.50
Schedules/SOFA/U.S. Trustee Reports	8.10	6,912.50
TOTAL	406.1	\$366,083.50

Time Detail**Task Code:** B110 Case Administration

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Weidman, Rebecca	Update docket folder with recently filed pleadings (.1); Revise critical dates (.1)	0.2	79.00
09/04/24	Weidman, Rebecca	Update docket folder with recently filed pleadings	0.1	39.50
09/04/24	Dolphin, Brenna	Confer with Verita re service costs	0.2	193.00
09/10/24	Weidman, Rebecca	Update docket folder with recently filed pleadings	0.1	39.50
09/11/24	Weidman, Rebecca	Update docket folder with recently filed pleadings and revise critical dates	0.1	39.50
09/12/24	Weidman, Rebecca	Update docket folder with recently filed pleadings	0.1	39.50
09/30/24	Weidman, Rebecca	Revise critical dates	0.1	39.50
Total			0.9	469.50

Task Code: B120 Asset Analysis and Recovery

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/16/24	Butz, Daniel B.	Review email from M Western re: asset recovery (.1); email to group re: same and email to M Western re: same (.1); review email from M Western re: same (.1)	0.3	289.50
09/24/24	Butz, Daniel B.	Review email from A Leary re: turnover of collateral (.1); email to MNAT group re: same (.1); emails with A Remming re: same (.1); research re: same (.3); email to A Leary re: same (.1); confer and emails with B Turner and S Churchill re: same (.1); review email from A Leary re: same (.1)	0.9	868.50
09/24/24	Remming, Andrew	Review precedent re turnover issue and emails re same with A. Leary, D. Butz.	0.2	229.00
09/24/24	Rogers Churchill, Sophie	Confer with D. Butz and B. Turner re: turnover of collateral	0.1	63.50
09/24/24	Turner, Brianna	Confer with D. Butz and S. Rogers Churchill re: turnover of collateral	0.1	54.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/26/24	Dehney, Robert J.	Email from DPW re asset recovery issue (.1); emails from MNAT team re same (.2); email from A. Remming with additional details re same (.1).	0.4	678.00
09/26/24	Rogers Churchill, Sophie	Confer with A. Remming re turnover issue.	0.1	63.50
09/26/24	Butz, Daniel B.	Review email from A Leary on asset recovery issue (.1); emails with MNAT group re: same (.1); email to A Leary re: same (.1); review email from A Remming with additional details re: same (.1)	0.4	386.00
09/26/24	Butz, Daniel B.	Attend call with R Steinberg and A Remming and A Leary re: asset recovery	0.4	386.00
09/26/24	Remming, Andrew	Research re turnover issues, draft summary of research and email same to MNAT team.	0.6	687.00
09/26/24	Remming, Andrew	Call with D. Butz, R. Steinberg, A. Leary re surety bond issue.	0.4	458.00
09/26/24	Remming, Andrew	Confer with S. Rogers Churchill re turnover issue.	0.1	114.50
09/27/24	Butz, Daniel B.	Review email from A Leary re: turnover of pledged collateral	0.1	96.50
09/27/24	Remming, Andrew	Review email from A. Leary re turnover research.	0.1	114.50
Total			4.2	4,489.00

Task Code: B130 Asset Dispositions/363 Sales

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Dolphin, Brenna	Discuss de minimis asset sales with J. Mueller re limited procedures governing sales under \$150,000	0.2	193.00
09/03/24	Dolphin, Brenna	Call with J. Mueller re de minimis sales to be conducted	0.1	96.50
09/03/24	Dolphin, Brenna	Draft notice of asset sales conducted under the limited de minimis asset sale procedures (.5); circulate to Huron (.1) and discuss details with J. Mueller (.1)	0.7	675.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/04/24	Dolphin, Brenna	Confer with S. Rogers Churchill re ordinary course of business charger sales and de minimis asset wall box sales	0.2	193.00
09/04/24	Dolphin, Brenna	Advise J. Mueller re de minimis asset sale procedures re miscellaneous parts	0.2	193.00
09/04/24	Dolphin, Brenna	Discuss categories of miscellaneous assets to be sold pursuant to de minimis asset sale procedures with J. Mueller	0.3	289.50
09/04/24	Rogers Churchill, Sophie	Confer with B. Dolphin re ordinary course of business charger sales and de minimis asset wall box sales	0.2	127.00
09/05/24	Dolphin, Brenna	Confer with D. Garcia and J. Mueller re de minimis asset sale of miscellaneous equipment	0.3	289.50
09/05/24	Dolphin, Brenna	Communicate with counsel for Heights re de minimis asset sales to be conducted under limited procedures	0.2	193.00
09/05/24	Dolphin, Brenna	Communicate with committee counsel re de minimis asset sales to be conducted under limited procedures (.2); respond to question re miscellaneous assets being sold (.1); confer with Huron re VINs (.2); respond to question from committee counsel re VINs (.1); respond to committee counsel question re marketing of assets (.2); review budget (.1) and confer with Huron (J. Mueller, J. Palacios, and J. Wu) re same (.3)	1.2	1,158.00
09/05/24	Dolphin, Brenna	Respond to inquiry from J. Mueller re notice of de minimis asset sales to be conducted under the limited procedures	0.1	96.50
09/05/24	Dolphin, Brenna	Communicate with counsel for Magna re de minimis asset sales to be conducted under limited procedures (.2); respond to question from counsel for Magna (.3); review confirmation that Magna has no objection (.1)	0.6	579.00
09/05/24	Dolphin, Brenna	Revise notice re de minimis asset sales conducted under limited procedures	0.2	193.00
09/05/24	Rogers Churchill, Sophie	Confer with B. Dolphin re de minimis sale.	0.1	63.50
09/05/24	Remming, Andrew	Review draft amended fleet sale order and email re same from R. Steinberg.	0.2	229.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/24	Dolphin, Brenna	Review the draft order approving second amended fleet sale order	0.1	96.50
09/06/24	Dolphin, Brenna	Draft certification of counsel re order approving second amended fleet sale order	0.7	675.50
09/06/24	Dolphin, Brenna	Provide draft certification of counsel and comments to second amended sale order to R. Steinberg	0.1	96.50
09/06/24	Dolphin, Brenna	Discuss additional asset to be sold under the limited de minimis asst sale procedures with J. Mueller (.2); revise de minimis asset sale notice (.1)	0.3	289.50
09/06/24	Remming, Andrew	Review draft COC re amended fleet sales order and email re same from B. Dolphin.	0.2	229.00
09/07/24	Dolphin, Brenna	Revise notice of filing order approving second amendment to fleet sales order (.4); communicate with R. Steinberg re strategy for same (.2)	0.6	579.00
09/07/24	Butz, Daniel B.	Review proposed fleet sale emails (.2); review current versions (.2); emails with MNAT group and co-counsel re: same (.2)	0.6	579.00
09/07/24	Rogers Churchill, Sophie	Respond to email from A. Remming re amended fleet sale order.	0.1	63.50
09/07/24	Remming, Andrew	Review and edit revised version of COC re: amended fleet sales order (.3) and emails re same with R. Steinberg, B. Dolphin, D. Butz (.1).	0.4	458.00
09/07/24	Remming, Andrew	Review and edit COC re amended fleet sale order and emails re same with B. Dolphin.	0.2	229.00
09/08/24	Dolphin, Brenna	Draft notice of filing of order approving second amendment to fleet sales order	0.5	482.50
09/08/24	Dolphin, Brenna	Communicate with U.S. Trustee re order approving second amendment to fleet sales order	0.2	193.00
09/08/24	Dolphin, Brenna	Oversee filing notice and order approving second amendment to fleet sales order (.3); coordinate with Verita re service of same (.2)	0.5	482.50
09/10/24	Dolphin, Brenna	Update draft notice of de minimis asset sale (limited procedures) and provide to J. Mueller and J. Palacios	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Dolphin, Brenna	Provide notice of de minimis asset sales to be conducted under limited procedures to committee (.1), Magna (.1), and CVI (.1)	0.3	289.50
09/11/24	Dolphin, Brenna	Respond to question from counsel to Magna re assets to be sold pursuant to limited de minimis asset sale procedures	0.2	193.00
09/11/24	Dolphin, Brenna	Call counsel to La Palma landlord re connecting Huron and landlord to discuss de minimis asset sales of miscellaneous personal property located on the premises (.2); update J. Mueller re same (.1)	0.3	289.50
09/12/24	Reed, Marie	Review and respond to email from B. Dolphin re filing COC (.1); prepare and e-file Certification of Counsel Regarding Order Approving Second Amendment to Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter Into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief (.2)	0.3	106.50
09/12/24	Dolphin, Brenna	Discuss sale of miscellaneous assets and whether ordinary course or de minimis with J. Mueller and R. Steinberg	0.3	289.50
09/12/24	Dolphin, Brenna	Confer with R. Steinberg re order approving second amendment to fleet sales order	0.1	96.50
09/12/24	Dolphin, Brenna	Draft certification of counsel re order approving second amendment to fleet sales order	0.7	675.50
09/12/24	Dolphin, Brenna	Coordinate filing certification of counsel and order approving second amendment to fleet sales order	0.2	193.00
09/12/24	Butz, Daniel B.	Review email from R Steinberg re: Fleet sale order	0.1	96.50
09/12/24	Remming, Andrew	Confer with B. Dolphin re amended fleet sale order.	0.2	229.00
09/12/24	Remming, Andrew	Review draft COC re amended fleet sale order (.2) and emails re same from B. Dolphin and R. Steinberg (.1).	0.3	343.50
09/12/24	Dolphin, Brenna	Confer with A. Remming re amended fleet sale order.	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/13/24	Dolphin, Brenna	Communicate with counsel for Magna re de minimis asset sales (.3); discuss proposed de minimis asset sale with J. Mueller (.2)	0.5	482.50
09/13/24	Dolphin, Brenna	Communicate with Chambers re order approving second amendment to fleet sales order	0.2	193.00
09/13/24	Dolphin, Brenna	Circulate order approving second amendment to fleet sales order to Davis Polk	0.1	96.50
09/13/24	Dolphin, Brenna	Discuss de minimis asset sale logistics and miscellaneous personal property located at La Palma with J. Mueller	0.2	193.00
09/13/24	Butz, Daniel B.	Review email from B Dolphin re: amendment to sale order	0.1	96.50
09/13/24	Remming, Andrew	Review update from B. Dolphin re order approving amendment to fleet sales order.	0.1	114.50
09/17/24	Dolphin, Brenna	Circulate de minimis asset sale notice to J. Mueller, J. Palacios, R. Steinberg, and A. Leary (.2); discuss timing of two categories of de minimis assets with J. Mueller (.1)	0.3	289.50
09/19/24	Dolphin, Brenna	Revise de minimis asset sale notice (.3); circulate to J. Mueller (.1) and confirm with Huron (.1)	0.5	482.50
09/20/24	Dolphin, Brenna	Circulate final version of de minimis asset sale notice (limited procedures) to Huron and R. Steinberg	0.2	193.00
09/20/24	Dolphin, Brenna	Finalize de minimis asset sale notice	0.1	96.50
09/20/24	Dolphin, Brenna	Coordinate with R. Weidman re filing de minimis asset sale notice	0.2	193.00
09/20/24	Weidman, Rebecca	Prepare and file de minimis asset sale notice (.2); Correspondence with B. Dolphin re: same (.1); Coordinate service of same (.1)	0.4	158.00
09/26/24	Dolphin, Brenna	Read update from J. Mueller re additional de minimis asset sale (.1); notify committee counsel (.1), CVI counsel (.1) and Magna counsel (.1) re sale	0.4	386.00
09/28/24	Remming, Andrew	Review email from R. Steinberg re fleet sale issue.	0.1	114.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/29/24	Remming, Andrew	Review further email from R. Steinberg re fleet sale issue.	0.1	114.50
09/30/24	Dolphin, Brenna	Draft notice of de minimis asset sales (limited procedures) (.3); circulate to Huron for review and comment (.1)	0.4	386.00
Total			16.6	15,800.00

Task Code: B140 Automatic Stay Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/24	Dolphin, Brenna	Review update re status of Tom Tom motion for relief from stay and update re hearing scheduled for September 12, 2024	0.1	96.50
09/06/24	Remming, Andrew	Review update from R. Steinberg re TomTom motion for relief from stay.	0.1	114.50
09/09/24	Dolphin, Brenna	Circulate draft motion to use D&O proceeds and allow payment of defense costs to R. Steinberg (.2) and Orrick (.2) for review	0.4	386.00
09/11/24	Dolphin, Brenna	Read update from N. D'Angelo re motion to enforce automatic stay and motion to shorten notice of same	0.1	96.50
09/11/24	Dolphin, Brenna	Review D&O policies re motion to allow payment of defense costs re directors and officers	0.2	193.00
09/11/24	Remming, Andrew	Review update re Toccata situation from N. D'Angelo.	0.1	114.50
09/12/24	Reed, Marie	Review and respond to email from B. Dolphin re filing motion (.1); prepare and e-file Debtors' Emergency Motion to (I) Enforce the Automatic Stay and (II) Recover Costs Related to Toccata Automotive Group, Inc.'s Violations of the Automatic Stay (.2)	0.3	106.50
09/12/24	Reed, Marie	Review and respond to email from B. Dolphin re filing motion (.1); prepare and e-file Motion of Debtors to Shorten Notice of Debtors' Emergency Motion to (I) Enforce the Automatic Stay and (II) Recover Costs Related to Toccata Automotive Group, Inc.'s Violations of the Automatic Stay, and upload order (.2)	0.3	106.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/24	Dolphin, Brenna	Draft motion to shorten notice re motion to enforce automatic stay (Toccata)	1.6	1,544.00
09/12/24	Dolphin, Brenna	Revise draft motion to shorten notice to incorporate comments from D. Butz	0.6	579.00
09/12/24	Dolphin, Brenna	Review draft motion to enforce automatic stay (Toccata) and suggest revisions to same (.4); circulate to A. Remming and D. Butz (.1)	0.5	482.50
09/12/24	Dolphin, Brenna	Communicate with N. D'Angelo re logistics of filing the motion to enforce the automatic stay (Toccata) and motion to shorten notice re same	0.3	289.50
09/12/24	Dolphin, Brenna	Revise draft motion to shorten notice of motion to enforce automatic stay (Toccata) to incorporate comments from N. D'Angelo	0.3	289.50
09/12/24	Dolphin, Brenna	Communicate with committee counsel re position on motion to shorten notice of motion to enforce automatic stay (Toccata)	0.2	193.00
09/12/24	Dolphin, Brenna	Communicate with U.S. Trustee re position on motion to shorten notice re motion to enforce automatic stay (Toccata) (.2); review U.S. Trustee's position (.1); revise draft motion to shorten (.1)	0.4	386.00
09/12/24	Dolphin, Brenna	Revise draft form of order re enforcing automatic stay (.3); review stipulation between Toccata, debtors, and committee (.2)	0.5	482.50
09/12/24	Dolphin, Brenna	Confer with A. Remming re motion to enforce automatic stay and motion to shorten notice re same (Toccata)	0.1	96.50
09/12/24	Dolphin, Brenna	Review update from N. D'Angelo re Toccata's position on the motion to shorten (.1) and emails re strategy for approaching scheduling motion to enforce automatic stay with J. McClammy, N. D'Angelo, and A. Remming (.3)	0.4	386.00
09/12/24	Dolphin, Brenna	Revise motion to shorten notice re enforcing stay	0.2	193.00
09/12/24	Dolphin, Brenna	Communicate with company representatives re relief requested in motion to enforce automatic stay re Toccata	0.3	289.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/24	Dolphin, Brenna	Provide revised draft motion to enforce automatic stay to J. McClammy and N. D'Angelo for final review and approval for filing	0.3	289.50
09/12/24	Dolphin, Brenna	Provide revised draft motion to shorten notice to J. McClammy and N. D'Angelo for final review and approval for filing	0.2	193.00
09/12/24	Dolphin, Brenna	Coordinate filing of motion to enforce automatic stay (.2) and motion to shorten notice (.1)	0.3	289.50
09/12/24	Dolphin, Brenna	Coordinate with Verita re service of motion to enforce automatic stay (re Toccata) and motion to shorten notice of same	0.1	96.50
09/12/24	Dolphin, Brenna	Provide as-filed motion to enforce automatic stay and motion to shorten notice to J. McClammy and N. D'Angelo	0.1	96.50
09/12/24	Butz, Daniel B.	Review stay violation motion (.3); review emails from J Mueller, J McClammy, N D'Angelo re: same (.1); review comment from A Remming re: same and confer with A Remming re: same (.1)	0.5	482.50
09/12/24	Butz, Daniel B.	Review proposed motion to expedite and email to B Dolphin re: revisions to same	0.4	386.00
09/12/24	Butz, Daniel B.	Make further revisions to motion to expedite (.3); review motion for sanctions (.3); review email from N D'Angelo re: revisions to motion to shorten and review revisions (.1); review emails from B Dolphin and N D'Angelo re: motion prep and UST and committee contact (.1); email to N D'Angelo and B Dolphin re: same (.1); review emails from UST and B Dolphin re: same (.1)	1.0	965.00
09/12/24	Butz, Daniel B.	Review expedition stay papers (.3); emails with N D'Angelo re: same (.1); confer with A Remming re: same (.1); review email from N D'Angelo re: same (.1)	0.6	579.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/24	Butz, Daniel B.	Review email from J McClammy re: form of order for stay motion (.1); review emails from N D'Angelo and B Dolphin re: same (.1); review emails from A Remming and J McClammy re: scheduling (.1); review emails from R Dehney, A Remming and N D'Angelo re: same (.1)	0.4	386.00
09/12/24	Butz, Daniel B.	Review proposed revisions to motion to expedite and stay motion (.1); review emails from N D'Angelo, J McClammy, and B Dolphin re: same (.1); review final docs (.3); review filing emails from B Dolphin re: same (.1)	0.6	579.00
09/12/24	Dehney, Robert J.	Email to Bose Law re dealer issue (.1); numerous emails from MNAT team and DPW re strategy/stay violation motion and review revised drafts of motion (1.5); emails with DPW re same (.1).	1.7	2,881.50
09/12/24	Remming, Andrew	Review and edit draft of motion to enforce automatic stay.	0.3	343.50
09/12/24	Remming, Andrew	Review and edit draft of motion to shorten re motion to enforce automatic stay (.6); review local rules re same (.2); emails with N. D'Angelo, J. McClammy and R. Dehney re same (.2).	1.0	1,145.00
09/12/24	Remming, Andrew	Review revised draft motion to shorten notice re Toccata (.3) and emails re same with B. Dolphin (.2).	0.5	572.50
09/12/24	Remming, Andrew	Review and edit draft motion to enforce stay re Toccata (1.1); review further revised versions of same (.4); review and edit revised motion to shorten notice re same (.7); emails with J. McClammy, N. D'Angelo, R. Dehney and B. Dolphin re same and strategy re Toccata issues, hearing timing (.6).	2.8	3,206.00
09/12/24	Remming, Andrew	Confer with B. Dolphin re motion to enforce automatic stay and motion to shorten notice re same (Toccata)	0.1	114.50
09/12/24	Remming, Andrew	Confer with D. Butz re stay violation motion	0.1	114.50
09/12/24	Remming, Andrew	Confer with D. Butz re automatic stay papers.	0.1	114.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/13/24	Dolphin, Brenna	Review and summarize Toccata's objection to motion to shorten notice and provide same to J. McClammy and N. D'Angelo (.3); meet with J. McClammy, N. D'Angelo, A. Remming, and D. Butz re strategy for addressing same (.2)	0.5	482.50
09/13/24	Dolphin, Brenna	Emails with D. Butz and A. Remming re reply in support of motion to shorten notice re motion to enforce automatic stay re Toccata (.3); email with DPW re same (.1)	0.4	386.00
09/13/24	Dolphin, Brenna	Communicate with Chambers re scheduling status conference on motion to shorten notice (re Toccata and automatic stay) (.1); update co-counsel re same (.1)	0.2	193.00
09/13/24	Dolphin, Brenna	Communicate with counsel to Toccata re scheduling of status conference re motion to shorten notice of automatic stay issues	0.2	193.00
09/13/24	Dolphin, Brenna	Draft notice of status conference re motion to shorten notice (re automatic stay issues and Toccata) (.5); circulate to A. Remming and D. Butz (.1) and provide to Davis Polk (.1); emails from Davis Polk (J. McClammy and N. D'Angelo) re filing notice (.1)	0.8	772.00
09/13/24	Dolphin, Brenna	Coordinate filing notice of status conference re motion to shorten notice re motion to enforce automatic stay (Toccata) (.2); coordinate with Verita re service of notice (.1)	0.3	289.50
09/13/24	Butz, Daniel B.	Review email from B Dolphin re: Toccata reply and review same (.2); review emails from N D'Angelo and R Dehney, J McClammy and others re: same (.1)	0.3	289.50
09/13/24	Butz, Daniel B.	Attend call on stay motion with A Remming, B Dolphin and co-counsel (.2); emails with A Remming re: same (.1); review emails from B Dolphin re: same (.1)	0.4	386.00
09/13/24	Butz, Daniel B.	Emails with B Dolphin and A Remming on email to chambers	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/13/24	Butz, Daniel B.	Review email from N D'Angelo re: proposed email to chambers; review emails from B Dolphin re: zoom hearing on Monday (.1); review emails from N D'Angelo and A Remming re: same (.1); review email from R Dehney re: same (.1); review emails from A Remming and B Dolphin re: same and notice of same (.1)	0.4	386.00
09/13/24	Butz, Daniel B.	Review email from B Dolphin re: notice and agenda for stay hearing and review same (.1); review email from A Remming re: same (.1); review emails from B Dolphin re: agenda and hearing issues (.1); review emails from N D'Angelo and A Remming re: same (.1); review email from and J McClammy re: same (.1)	0.5	482.50
09/13/24	Dehney, Robert J.	Review dealer's objection to motion to shorten re stay violation motion (.2); emails with MNAT team and DPW re same (.1).	0.3	508.50
09/13/24	Dehney, Robert J.	Email from B. Dolphin with dealer's objection to debtors' stay violation motion; review (.1); emails with MNAT team and DPW re same (.1); email from B. Dolphin re 9/16 status conference (.1); emails from MNAT team and DPW re same (.1); review draft notice of 9/16 status conference (.1); email from DPW with draft reply to dealer's objection; review (.1).	0.6	1,017.00
09/13/24	Remming, Andrew	Call with J. McClammy, N. D'Angelo, B. Dolphin and D. Butz re Toccata issues.	0.2	229.00
09/13/24	Remming, Andrew	Review notice re Toccata status conference and emails re same with B. Dolphin.	0.2	229.00
09/13/24	Remming, Andrew	Review correspondence to counsel to Toccata from B. Dolphin re hearing date.	0.1	114.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/13/24	Remming, Andrew	Review and edit notice of status conference re Toccata motion (.3), review revised draft of correspondence to chambers re reply in support of motion to shorten (.1); emails re same and strategy re Toccata motion with B. Dolphin, N. D'Angelo, R. Dehney and J. McClammy (.3).	0.7	801.50
09/13/24	Remming, Andrew	Review objection from Toccata re motion to shorten (.4); emails with D. Butz and B. Dolphin re draft communication to chambers re same (.1).	0.5	572.50
09/13/24	Dehney, Robert J.	Email from B. Dolphin with Toccata's opposition to motion to shorten (.1); review same (.1); email from DPW re same (.1); emails with A. Remming re same (.1); review email from B. Dolphin to chambers re debtors' reply to same (.1); emails from B. Dolphin, A. Remming and DPW re status conference re same (.1).	0.6	1,017.00
09/14/24	Dolphin, Brenna	Review draft reply in support of motion to shorten notice re motion to enforce automatic stay re Toccata	0.2	193.00
09/14/24	Butz, Daniel B.	Review stay reply (.2); review emails from N D'Angelo, R Dehney re: same (.1)	0.3	289.50
09/14/24	Dehney, Robert J.	Email from DPW with draft reply to dealer's objection to motion to shorten re stay violation motion; review (.1); emails with MNAT team and DPW re same (.1).	0.2	339.00
09/14/24	Remming, Andrew	Review draft reply in support of motion to shorten notice re Toccata motion (.2) and emails re same from N. D'Angelo and R. Dehney (.1).	0.3	343.50
09/15/24	Butz, Daniel B.	Review email from N D'Angelo re: Toccata reply and review same (.3); review emails from R Dehney and N D'Angelo re: Toccata stipulation (.1); review emails from J McClammy and N D'Angelo and B Dolphin re: Toccata claim (.2)	0.6	579.00
09/15/24	Dehney, Robert J.	Emails with DPW re draft reply to dealer's objection to motion to shorten re stay violation motion.	0.1	169.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/15/24	Remming, Andrew	Review and edit revised version of reply in support of motion to shorten notice (.4), review further revised draft of same (.3) and emails re same with N. D'Angelo, R. Dehney, J. McClammy and B. Dolphin (.2)	0.9	1,030.50
09/16/24	Dolphin, Brenna	Review draft reply in support of motion to shorten notice re automatic stay enforcement (.1); discuss the reply with N. D'Angelo (.1)	0.2	193.00
09/16/24	Dolphin, Brenna	Finalize reply in support of motion to shorten notice (.1); coordinate with R. Weidman re filing same (.1)	0.2	193.00
09/16/24	Dolphin, Brenna	Circulate as filed reply in support of motion to shorten and hearing agenda to J. McClammy, N. D'Angelo, and R. Steinberg	0.1	96.50
09/16/24	Weidman, Rebecca	Prepare and file reply in support of motion to shorten re: Toccata matter (.2); Coordinate service of same (.1)	0.3	118.50
09/16/24	Butz, Daniel B.	Review email from J McClammy re: reply and email from N D'Angelo re: same (.1); review final version of reply (.2); review emails from B Dolphin, J McClammy, and N D'Angelo re: same (.1)	0.4	386.00
09/16/24	Remming, Andrew	Review further revised version of reply in support of motion to shorten re Toccata (.2) and emails re same with J. McClammy, N. D'Angelo and B. Dolphin (.1).	0.3	343.50
09/17/24	Dolphin, Brenna	Confer with N. D'Angelo regarding ongoing discussions re resolution with Toccata	0.2	193.00
09/17/24	Dolphin, Brenna	Read Judge Horan's comments from the September 16th hearing transcript re motion to enforce the automatic stay (Toccata)	0.1	96.50
09/17/24	Dolphin, Brenna	Communicate with counsel for Toccata re Court scheduling of the zoom hearing re motion to enforce the automatic stay	0.1	96.50
09/17/24	Butz, Daniel B.	Review email from B Dolphin re: stay motion hearing	0.1	96.50
09/17/24	Remming, Andrew	Confer with B. Dolphin re Toccata issues.	0.1	114.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/24	Remming, Andrew	Call with B. Dolphin re Toccata stay violation motion and hearing agenda re same.	0.2	229.00
09/17/24	Dolphin, Brenna	Call with A. Remming re Toccata stay violation motion and hearing agenda re same.	0.2	193.00
09/18/24	Dolphin, Brenna	Communicate with Chambers re deadline for objections to motion to enforce automatic stay (Toccata)	0.2	193.00
09/18/24	Dolphin, Brenna	Revise form of order shortening notice to include objection deadline (.2) and provide to Chambers for entry (.1)	0.3	289.50
09/18/24	Dolphin, Brenna	Communicate with counsel for Toccata re objection deadline provided by the Court re motion to shorten notice of motion to enforce the automatic stay	0.1	96.50
09/18/24	Dolphin, Brenna	Confer with co-counsel re order shortening notice and deadline for objections to be filed	0.2	193.00
09/18/24	Dolphin, Brenna	Confer with N. D'Angelo re status of settlement negotiations with Toccata	0.1	96.50
09/18/24	Dolphin, Brenna	Communicate with co-counsel re Toccata objection deadline	0.1	96.50
09/18/24	Butz, Daniel B.	Review stay order	0.1	96.50
09/18/24	Butz, Daniel B.	Review emails from J McClammy and B Dolphin re: stay objection	0.1	96.50
09/18/24	Remming, Andrew	Review order shortening notice re motion to enforce re Toccata and emails re same from B. Dolphin and J. McClammy.	0.2	229.00
09/19/24	Weidman, Rebecca	Prepare certificate of no objection re: Toccata motion to enforce the automatic stay for filing	0.1	39.50
09/19/24	Dolphin, Brenna	Discuss strategy re motion to enforce the automatic stay with R. Dehney, A. Remming, and S. Rogers Churchill	0.1	96.50
09/19/24	Dolphin, Brenna	Provide draft certificate of no objection to J. McClammy (.1); discuss selection of new counsel by Toccata (.1)	0.2	193.00
09/19/24	Dolphin, Brenna	Revise form of order enforcing the automatic stay (Toccata) (.3) provide to J. McClammy (.1)	0.4	386.00
09/19/24	Dolphin, Brenna	Provide form of order to counsel for Toccata	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/19/24	Dolphin, Brenna	Draft certification of counsel regarding order enforcing automatic stay	0.5	482.50
09/19/24	Dolphin, Brenna	Circulate certification of counsel regarding order enforcing automatic stay to J. McClammy	0.1	96.50
09/19/24	Butz, Daniel B.	Review email from R Dehney re: automatic stay hearing (.1); review emails from R Dehney and B Dolphin re: same (.1); review CNO (.1); draft revisions to same (.2); emails with R Dehney re: same (.1); review emails from R Dehney and J McClammy re: Toccata counsel (.1); review email from B Dolphin with revised notice (.1)	0.8	772.00
09/19/24	Butz, Daniel B.	Review email from B Dolphin re: hearing/stay issues and email from J McClammy re: same	0.1	96.50
09/19/24	Butz, Daniel B.	Review emails from B Dolphin and J McClammy re: form of order (.1); review form of order (.1); review certification from B Dolphin re: same (.1)	0.3	289.50
09/19/24	Remming, Andrew	Review draft COC re Toccata stay violation motion.	0.2	229.00
09/19/24	Dehney, Robert J.	Email to MNAT team re automatic stay hearing (.1); emails with B. Dolphin re same (.1); emails with D. Butz re draft revisions to CNO (.1); emails with DPW re Toccata counsel (.1); email from B. Dolphin with revised notice (.1).	0.5	847.50
09/19/24	Remming, Andrew	Review draft COC re order enforcing automatic stay re Toccata and emails re B. Dolphin re same.	0.2	229.00
09/19/24	Remming, Andrew	Review revised draft order re motion to enforce re Toccata and emails re same with B. Dolphin, J. McClammy.	0.2	229.00
09/19/24	Remming, Andrew	Further emails re Toccata issues with R. Dehney, J. McClammy and B. Dolphin.	0.1	114.50
09/20/24	Dolphin, Brenna	Confer with J. McClammy (.4) and A. Remming (.3) re submitting order regarding enforcing the automatic stay re Toccata under certification of counsel; notify counsel for Toccata re submitting to the Court (.1)	0.8	772.00
09/20/24	Dolphin, Brenna	Revise certification of counsel re order enforcing automatic stay (Toccata)	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/20/24	Dolphin, Brenna	Coordinate with R. Weidman re filing certification of counsel re order enforcing automatic stay (Toccata)	0.2	193.00
09/20/24	Dolphin, Brenna	Circulate order enforcing automatic stay to J. McClammy	0.1	96.50
09/20/24	Weidman, Rebecca	Prepare certification of counsel re: Toccata automatic stay matter for filing (.3); Correspondence with B. Dolphin re: same (.1); File same (.1); Upload order to Court site (.1); Download Court entered order re: same and coordinate service (.1)	0.7	276.50
09/20/24	Butz, Daniel B.	Review email from B Dolphin re: automatic stay order (.1); review email from J McClammy re: same (.1); review email from A Remming re: same (.1); review email from B Dolphin re: form of order to opposing counsel (.1)	0.4	386.00
09/20/24	Butz, Daniel B.	Review emails from B Dolphin re: COC for auto stay order	0.1	96.50
09/20/24	Butz, Daniel B.	Review email from J McClammy re: stay order	0.1	96.50
09/20/24	Butz, Daniel B.	Review email from B Dolphin re: stay order	0.1	96.50
09/20/24	Remming, Andrew	Review and edit updated COC re Toccata motion (.2) and email re same with B. Dolphin and J. McClammy (.1).	0.3	343.50
09/20/24	Remming, Andrew	Emails re correspondence with Toccata's counsel re order re motion to enforce with B. Dolphin.	0.1	114.50
09/20/24	Remming, Andrew	Confer with B. Dolphin re submitting order regarding enforcing the automatic stay re Toccata under certification of counsel	0.3	343.50
09/25/24	Remming, Andrew	Review update from R. Steinberg re Toccata stip.	0.1	114.50
Total			39.3	41,705.50

Task Code: B150 Creditor Communications and Meetings

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Qian, Echo	Call with creditor.	0.1	59.50
09/03/24	Qian, Echo	Call with customer.	0.3	178.50
09/03/24	Qian, Echo	Call with vehicle owner.	0.3	178.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Qian, Echo	Call with former employee.	0.1	59.50
09/09/24	Butz, Daniel B.	Review email from VC re: UCC reporting	0.1	96.50
09/09/24	Remming, Andrew	Review questions from V. Chauhan re UCC reporting.	0.1	114.50
09/10/24	Remming, Andrew	Emails with B. Dolphin and SR Churchill re information request from UCC.	0.2	229.00
09/11/24	Butz, Daniel B.	Review email from B Dolphin re: UCC info requests and confer with B Dolphin re: same	0.1	96.50
09/11/24	Butz, Daniel B.	Call with Huron and others re: reporting	0.3	289.50
09/11/24	Butz, Daniel B.	Call with J Palacios re: reporting	0.3	289.50
09/11/24	Rogers Churchill, Sophie	Call with J. Palacios re request from Committee re professional fees.	0.1	63.50
09/11/24	Remming, Andrew	Review update from E. Qian re UCC reporting.	0.1	114.50
09/16/24	Remming, Andrew	Review inquiry from vehicle owner and email same to MNAT team.	0.1	114.50
09/17/24	Qian, Echo	Return 8 creditors' phone calls.	0.8	476.00
09/17/24	Butz, Daniel B.	Review email from E Qian re: claimant	0.1	96.50
09/19/24	Qian, Echo	Respond to consumers re case inquiry.	0.3	178.50
09/20/24	Qian, Echo	Answer call from creditor.	0.1	59.50
09/23/24	Dolphin, Brenna	Confer with E. Qian re customer inquiry re car titling problem and DMV issue	0.1	96.50
09/23/24	Qian, Echo	Return 2 creditors phone calls (0.3), update creditor tracker re the same (0.1), confer with B Dolphin re creditor inquiry (0.1), email Verita re related claim forms (0.1).	0.6	357.00
09/23/24	Qian, Echo	Email J Palacios re creditor request.	0.2	119.00
09/24/24	Qian, Echo	Call with a shareholder who received an opt-out form.	0.2	119.00
09/24/24	Qian, Echo	Call with L Simon, an attorney presenting an owner re title registration.	0.2	119.00
09/24/24	Butz, Daniel B.	Review emails from R Dehney and S Churchill re: creditor inquiry	0.1	96.50
09/24/24	Dehney, Robert J.	Emails with S. Rogers Churchill re creditor inquiry.	0.1	169.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/24/24	Remming, Andrew	Emails from R. Dehney and SR Churchill re creditor inquiry.	0.1	114.50
09/27/24	Qian, Echo	Two calls with creditor and consumer.	0.4	238.00
Total			5.5	4,123.50

Task Code: B160 Fee Applications (MNAT - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/16/24	Rogers Churchill, Sophie	Review exhibits to August fee application for privilege and confidentiality issues.	3.7	2,349.50
09/17/24	Rogers Churchill, Sophie	Revise exhibits to August fee application for privilege and confidentiality issues.	2.3	1,460.50
09/18/24	Rogers Churchill, Sophie	Continue reviewing exhibits to August fee application for privilege and confidentiality.	3.0	1,905.00
09/18/24	Remming, Andrew	Review and edit draft MNAT August fee application.	1.1	1,259.50
09/20/24	Rogers Churchill, Sophie	Continue reviewing August fee application.	3.6	2,286.00
09/24/24	Rogers Churchill, Sophie	Confer with A. Remming re August fee application.	0.1	63.50
09/24/24	Remming, Andrew	Review and edit August draft MNAT fee application	0.5	572.50
09/24/24	Remming, Andrew	Confer with S. Rogers Churchill re August fee application.	0.1	114.50
09/25/24	Reed, Marie	Review and respond to email from S. Rogers Churchill re filing fee application (.1); prepare and e-file Third Monthly Fee Statement of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Co-Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period August 1, 2024, Through and Including August 31, 2024 (.2)	0.3	106.50
09/25/24	Rogers Churchill, Sophie	Review and revise exhibits to September fee application to remove any privileged or confidential information.	2.6	1,651.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/25/24	Weidman, Rebecca	Revise Morris Nichols August monthly fee application (2.0); Correspondence with A. Bruce and S. Rogers Churchill re: same (.1)	2.1	829.50
09/25/24	Remming, Andrew	Review and edit revised draft of MNAT August fee application.	0.9	1,030.50
09/29/24	Rogers Churchill, Sophie	Revise September fee application exhibits.	2.6	1,651.00
Total			22.9	15,279.50

Task Code: B165 Fee Applications (Others - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/04/24	Dolphin, Brenna	Review first monthly fee application of Morrison & Foerster	0.1	96.50
09/04/24	Dolphin, Brenna	Review first monthly fee application of Cole Schotz	0.1	96.50
09/04/24	Dolphin, Brenna	Review first monthly fee application of M3	0.1	96.50
09/05/24	Dehney, Robert J.	Email from S. Rogers Churchill re fee applications.	0.1	169.50
09/05/24	Rogers Churchill, Sophie	Call with K. Winiarski re fee applications (.1); respond to email from K. Winiarski re same (.1); email to R. Dehney and A. Remming re same (.1).	0.3	190.50
09/05/24	Remming, Andrew	Review update re fee applications from SR Churchill.	0.1	114.50
09/25/24	Rogers Churchill, Sophie	Finalize DPW August fee application, prepare exhibits, and file.	0.5	317.50
09/25/24	Rogers Churchill, Sophie	Respond to email from J. Palacios re Huron August staffing report.	0.1	63.50
09/25/24	Weidman, Rebecca	Draft notice of DPW's third monthly fee application	0.3	118.50
09/25/24	Remming, Andrew	Emails with SR Churchill, E. Bae re August fee apps from DPW and MNAT.	0.1	114.50
09/27/24	Rogers Churchill, Sophie	Review Huron retention order, interim compensation procedures order, and proposed Plan re final fee statements for Huron.	0.2	127.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/30/24	Dolphin, Brenna	Call from J. Palacios re deadline to file August fee statement for Huron	0.1	96.50
Total			2.1	1,601.50

Task Code: B185 Executory Contracts/Unexpired Leases

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/10/24	Mann, Tamara K.	Confer with B. Dolphin re lease rejection issues (.3); emails from A. Remming and B. Dolphin re same (.2); emails from J. DiDonato and G. Gupta re leased property (.2).	0.7	675.50
08/30/24	Butz, Daniel B.	Confer with B Dolphin re: contract rejections (.1); review email from J Palacios re: same (.1)	0.2	193.00
09/03/24	Dolphin, Brenna	Confer with K. Winiarski and J. Palacios re second notice of rejection of leases and executory contracts	0.3	289.50
09/04/24	Dolphin, Brenna	Begin drafting second rejection notice	0.2	193.00
09/05/24	Dolphin, Brenna	Discuss rejection of service contract with J. Palacios and respond to questions regarding same	0.4	386.00
09/06/24	Dolphin, Brenna	Discuss second contract rejection notice with J. Palacios (.2); revise second rejection notice (.1)	0.3	289.50
09/08/24	Dolphin, Brenna	Communicate with committee counsel to provide notice re second rejection notice	0.1	96.50
09/08/24	Dolphin, Brenna	Confer with J. Palacios re second rejection notice	0.1	96.50
09/08/24	Dolphin, Brenna	Confer with J. Palacios re second rejection notice (.1) and notice sent to committee counsel re same (.1)	0.2	193.00
09/12/24	Dolphin, Brenna	Discuss second notice of executory contract rejection with J. Palacios (.2) and confirm content (.1)	0.3	289.50
09/13/24	Reed, Marie	Review and respond to email from B. Dolphin re filing notice (.1); prepare and e-file Second Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property) (.2)	0.3	106.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/13/24	Dolphin, Brenna	Confer with J. Palacios re contract rejection notice (.1); discuss same with R. Steinberg (.1); coordinate and oversee filing of second rejection notice (.2); review creditor matrix for additional service addresses for contract counter parties (.1); advise Verita re service of same (.1)	0.6	579.00
09/16/24	Dolphin, Brenna	Confer with D. Butz re Corte Madera lease	0.1	96.50
09/16/24	Remming, Andrew	Review update from D. Butz re lease issue.	0.1	114.50
09/17/24	Dolphin, Brenna	Meet with J. Palacios and S. Rogers Churchill re questions re rejection issues	0.3	289.50
09/17/24	Rogers Churchill, Sophie	Call with J. Palacios and B. Dolphin re rejection issues.	0.3	190.50
09/19/24	Dolphin, Brenna	Communicate with counsel to the La Palma landlord (.2); discuss inquiry and addressing same with D. Butz (.1); communicate with Huron re inquiry (.1)	0.4	386.00
09/19/24	Dolphin, Brenna	Revise third notice of contract rejection to include comments from J. Palacios (.3); discuss same with J. Palacios (.1); discuss strategy re rejection notices with R. Steinberg (.1)	0.5	482.50
09/19/24	Butz, Daniel B.	Review email from J Palacios re: rejection notice and review draft exhibit for same	0.1	96.50
09/19/24	Butz, Daniel B.	Confer with B Dolphin re: landlord inquiry	0.1	96.50
09/19/24	Butz, Daniel B.	Review email from B Dolphin re: landlord inquiry and sale/rejection issues	0.1	96.50
09/19/24	Butz, Daniel B.	Review email from B Dolphin re: rejection notice and review same	0.1	96.50
09/19/24	Dolphin, Brenna	Confer with D. Butz re: landlord inquiry	0.1	96.50
09/20/24	Dolphin, Brenna	Confer with J. Palacios regarding finalizing the third and fourth rejection notice as well as notifying committee counsel regarding same	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/20/24	Dolphin, Brenna	Revise third rejection notice to incorporate comments from J. Palacios (.2); draft fourth rejection notice (.4); review creditor matrix for addresses re counterparties on the fourth rejection notice (.2); circulate to company representatives, Huron representatives, R. Steinberg, and A. Leary for approval (.1)	0.9	868.50
09/20/24	Dolphin, Brenna	Notify committee counsel re contracts and leases to be rejected in September	0.2	193.00
09/20/24	Dolphin, Brenna	Read and respond to email from counsel to La Palma landlord (.2); confer with J. Palacios (.1) and J. Mueller (.1) regarding inquiry from landlord	0.4	386.00
09/20/24	Butz, Daniel B.	Review email from B Dolphin re: rejection notice	0.1	96.50
09/20/24	Butz, Daniel B.	Review email from J Palacios re: rejection notice information	0.1	96.50
09/20/24	Butz, Daniel B.	Review email from B Dolphin re: rejection notice	0.1	96.50
09/20/24	Remming, Andrew	Review revised version of third contract rejection notice and emails re same from B. Dolphin and J. Palacios.	0.2	229.00
09/23/24	Reed, Marie	Review and respond to email from B. Dolphin re filing notice (.1); prepare and e-file Third Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property) (.2)	0.3	106.50
09/23/24	Dolphin, Brenna	Finalize third rejection notice (.1); circulate to J. Palacios (.1) and confirm filing same (.1); coordinate with M. Reed re filing (.1); advise Verita re service of same (.1)	0.5	482.50
09/23/24	Dolphin, Brenna	Draft response to inquiry from counsel to La Palma landlord (.4); discuss same with J. Palacios (.1) and R. Steinberg (.1)	0.6	579.00
09/23/24	Dolphin, Brenna	Respond to inquiry from counsel to La Palma landlord	0.1	96.50
09/23/24	Qian, Echo	Research re lease rejection motion and email L Brzozowski re the same.	0.3	178.50
09/23/24	Qian, Echo	Confer with L Brzozowski re lease rejection extension motion (0.3), confer with B Dolphin re the same (0.1),	0.4	238.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/23/24	Brzozowski, Luke	Draft Lease Rejection Deadline Extension Motion.	2.0	1,090.00
09/23/24	Butz, Daniel B.	Confer with B Dolphin re: La Palma location (.1); review email from B Dolphin re: same (.1); emails with B Dolphin re: same (.1)	0.3	289.50
09/23/24	Butz, Daniel B.	Review email from B Dolphin re: rejection notice and review same	0.1	96.50
09/23/24	Butz, Daniel B.	Review emails from B Dolphin and R Steinberg re: La Palma	0.1	96.50
09/23/24	Brzozowski, Luke	Confer with E. Qian re lease rejection extension motion	0.1	54.50
09/23/24	Dolphin, Brenna	Confer with E. Qian re lease rejection extension motion	0.1	96.50
09/24/24	Qian, Echo	Confer with L Brzozowski re lease rejection deadline extension motion.	0.1	59.50
09/24/24	Qian, Echo	Attend call with S R Churchill, D Butz (in part) and B Dolphin (in part) re rejection of lease (0.3), confer with S R Churchill and B Dolphin re the same (0.1), review lease rejection extension motion (0.3).	0.7	416.50
09/24/24	Dolphin, Brenna	Call with J. Mueller and F. Alvarez Rivas re lease rejection and move out status	0.1	96.50
09/24/24	Dolphin, Brenna	Read update from J. Mueller re turnover of key for Vista location	0.1	96.50
09/24/24	Dolphin, Brenna	Read communication from counsel to La Palma landlord (.1); confer with J. Mueller re same (.2) review updates regarding status of moving out and surrendering premises to landlord (.2)	0.5	482.50
09/25/24	Qian, Echo	Review and revise lease rejection deadline extension motion and email L Brzozowski re the same.	0.7	416.50
09/25/24	Dolphin, Brenna	Read update from J. Mueller re La Palma move out and coordination with landlord re same	0.1	96.50
09/25/24	Dolphin, Brenna	Update committee counsel re extension to respond/object to Toccata motion for allowance and payment of secured claim	0.1	96.50
09/26/24	Dolphin, Brenna	Communicate with J. Mueller re fourth rejection notice and description of personal property being abandoned	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/26/24	Dolphin, Brenna	Email HYG re retrieval of forklift from La Palma	0.1	96.50
09/26/24	Dolphin, Brenna	Confer with F. Alvarez Rivas re HYG and forklift issues	0.2	193.00
09/26/24	Butz, Daniel B.	Review emails from FA Rivas re: forklift issues and emails from B Dolphin re: same	0.1	96.50
09/27/24	Dolphin, Brenna	Call with J. Mueller re La Palma move out	0.1	96.50
09/27/24	Dolphin, Brenna	Call with J. Mueller re status update on latest discussion had with landlord (La Palma)	0.1	96.50
09/27/24	Dolphin, Brenna	Email HYG and Wells Fargo re retrieval of forklift from La Palma	0.1	96.50
09/27/24	Dolphin, Brenna	Notify committee counsel re rejection of forklift equipment lease	0.1	96.50
09/27/24	Dolphin, Brenna	Confer with A. Remming, D. Butz, and S. Rogers Churchill re La Palma move out updates and questions from J. Mueller	0.2	193.00
09/27/24	Dolphin, Brenna	Review update from F. Alvarez Rivas re commencement date of Vista lease	0.1	96.50
09/27/24	Dolphin, Brenna	Update fourth rejection notice	0.1	96.50
09/27/24	Rogers Churchill, Sophie	Review invoice from landlord and prior communications and respond to inquiry from J. Palacios re same.	0.2	127.00
09/27/24	Rogers Churchill, Sophie	Review updates re La Palma lease.	0.1	63.50
09/27/24	Butz, Daniel B.	Review email from Dolphin re: contract rejection	0.1	96.50
09/27/24	Butz, Daniel B.	Review emails from J Mueller re: La Palma lease/forklift issue (.1); and emails from B Dolphin and A Remming re: same (.1)	0.2	193.00
09/27/24	Remming, Andrew	Confer with B. Dolphin, D. Butz, and S. Rogers Churchill re La Palma move out updates and questions from J. Mueller	0.2	229.00
09/27/24	Rogers Churchill, Sophie	Confer with B. Dolphin, D. Butz, and A. Remming re La Palma move out updates and questions from J. Mueller	0.2	127.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/27/24	Butz, Daniel B.	Confer with B. Dolphin, S. Rogers Churchill, and A. Remming re La Palma move out updates and questions from J. Mueller	0.2	193.00
09/30/24	Dolphin, Brenna	Revise fourth rejection notice (.3); review updates from J. Mueller re surrender of Vista (.1), San Francisco (.1), and La Palma (.1) locations; review update from F. Alvarez Rivas re lease commencement for Vista (.1); confer with Huron re final and ready to file (.1)	0.8	772.00
09/30/24	Dolphin, Brenna	Finalize fourth rejection notice (.1); coordinate with R. Weidman re filing (.1); confer with Verita re service (.1)	0.3	289.50
09/30/24	Weidman, Rebecca	Prepare fourth rejection notice for filing (.1); Correspondence with B. Dolphin re: same (.1); File same (.2)	0.4	158.00
Total			19.4	16,257.00

Task Code: B190 Other Contested Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/01/24	Remming, Andrew	Review comments from UST to 9019 settlement.	0.1	114.50
09/02/24	Dolphin, Brenna	Draft objection to shareholder's motion to unseal committee's objection to motion to convert	3.0	2,895.00
09/02/24	Dolphin, Brenna	Respond to questions from B. Resnick (.2) and N. D'Angelo (.1) re objecting to motion to unseal committee's objection to motion to convert; review J. McClammy outline of position re objection to motion to unseal (.1)	0.4	386.00
09/02/24	Dolphin, Brenna	Communicate with committee counsel re responding to the motion to unseal committee objection to motion to convert	0.2	193.00
09/02/24	Dolphin, Brenna	Coordinate with claims and noticing agent re identifying shareholder and locating service address re objection to motion to unseal (.2); update N. D'Angelo re no record of shareholder found (.1)	0.3	289.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/02/24	Dehney, Robert J.	Review shareholder's motion to unseal committee's objection to conversion (.2); review emails from White & Case and DPW re strategy re same (.1); emails with MNAT team and DPW re same (.5).	0.8	1,356.00
09/02/24	Butz, Daniel B.	Review emails from R Dehney, B Resnick, S Churchill, J McClammy, R Steinberg, B Dolphin and email to R Dehney, all re: motion to unseal	0.4	386.00
09/02/24	Dehney, Robert J.	Prepare for and attend conference call with MNAT team, DPW, Klehr and White & Case re unsealing objections.	0.5	847.50
09/02/24	Remming, Andrew	Further emails re draft response to unsealing motion with R. Dehney and D. Butz.	0.1	114.50
09/03/24	Dolphin, Brenna	Call with A. Remming re response to the motion to unseal	0.1	96.50
09/03/24	Dolphin, Brenna	Revise draft objection to motion to unseal	0.3	289.50
09/03/24	Dolphin, Brenna	Call U.S. Trustee re motion to unseal	0.1	96.50
09/03/24	Dolphin, Brenna	Provide draft objection to N. D'Angelo (.1) and discuss substance of objection to motion to unseal (.1)	0.2	193.00
09/03/24	Dolphin, Brenna	Revise draft objection to motion to unseal per comments from DPW	0.3	289.50
09/03/24	Dolphin, Brenna	Discuss status and provide update to A. Remming re objection to motion to unseal	0.1	96.50
09/03/24	Dolphin, Brenna	Provide draft objection to motion to unseal to Delaware counsel for CVI	0.2	193.00
09/03/24	Dolphin, Brenna	Provide draft objection to motion to unseal to Delaware counsel to committee	0.2	193.00
09/03/24	Dolphin, Brenna	Review suggested addition received from Delaware counsel to Heights (.1); confer with J. McClammy re suggested addition (.1); incorporate revision into draft objection to motion to unseal (.1); respond to Delaware counsel to Heights to confirm inclusion of addition into final draft (.1)	0.4	386.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Dolphin, Brenna	Coordinate with R. Weidman and oversee filing of objection to motion to unseal	0.2	193.00
09/03/24	Dolphin, Brenna	Confirm with J. McClammy re filing objection to motion to unseal	0.1	96.50
09/03/24	Dolphin, Brenna	Communicate with Verita re service of objection to motion to unseal	0.3	289.50
09/03/24	Dolphin, Brenna	Provide the as-filed objections to motion to unseal from Heights, Committee, and debtors to DPW and Morris Nichols teams	0.1	96.50
09/03/24	Weidman, Rebecca	Prepare and file objection to motion to unseal (.2); Correspondence with B. Dolphin re: same (.1)	0.3	118.50
09/03/24	Remming, Andrew	Review emails re draft objection/joinder re motion to unseal from B. Dolphin.	0.1	114.50
09/03/24	Remming, Andrew	Review and edit draft joinder to CVI objection to motion to unseal (.2) and emails re same with B. Dolphin (.1)	0.3	343.50
09/03/24	Remming, Andrew	Review revisions to joinder re motion to unseal from R. Beck.	0.1	114.50
09/03/24	Remming, Andrew	Review update re motion to unseal from B. Dolphin.	0.1	114.50
09/03/24	Remming, Andrew	Call with B. Dolphin re response to the motion to unseal	0.1	114.50
09/03/24	Remming, Andrew	Discuss status update re objection to motion to unseal with B. Dolphin	0.1	114.50
09/04/24	Remming, Andrew	Review responses to UST questions/comments re 9019 motion.	0.1	114.50
09/05/24	Remming, Andrew	Review email re 9019 motion from M. Bates.	0.1	114.50
09/06/24	Dolphin, Brenna	Review update from status of 9019 settlement motion and extension of deadline to object to same provided to Heights	0.1	96.50
09/06/24	Dolphin, Brenna	Confer with Verita re motion to unseal committee's objection to the motion to convert	0.2	193.00
09/06/24	Dolphin, Brenna	Communicate with Verita and R. Steinberg re expected weekend filings	0.1	96.50
09/07/24	Remming, Andrew	Review update re 9019 motion from B. Resnick.	0.1	114.50
09/07/24	Remming, Andrew	Review update re service on movant re motion to unseal from B. Dolphin.	0.1	114.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/07/24	Remming, Andrew	Review update re 9019 motion/settlement from B. Resnick.	0.1	114.50
09/08/24	Qian, Echo	Review emails re 9019 motion from DPW and MNAT	0.2	119.00
09/08/24	Qian, Echo	Draft 9019 revised order notice and email S R Churchill and B Dolphin re the same.	0.3	178.50
09/08/24	Dehney, Robert J.	Office conference with B. Dolphin re status/finalizing 9019 settlement.	0.1	169.50
09/08/24	Remming, Andrew	Review update from B. Resnick re 9019 motion.	0.1	114.50
09/08/24	Remming, Andrew	Review update from R. Dehney re 9019 motion.	0.1	114.50
09/09/24	Dolphin, Brenna	Read update from White & Case re 9019 settlement status	0.1	96.50
09/09/24	Dolphin, Brenna	Discuss finalizing and filing 9019 order and redline under a notice with E. Qian	0.2	193.00
09/09/24	Dolphin, Brenna	Draft order denying motion to unseal committee's objection to the CVI motion to convert (.4); draft certification of counsel re same (.2); provide to R. Steinberg (.1)	0.7	675.50
09/09/24	Dolphin, Brenna	Revise draft order denying motion to unseal to incorporate edits from R. Steinberg	0.1	96.50
09/09/24	Dolphin, Brenna	Confer with R. Steinberg and A. Leary re 9019 order	0.1	96.50
09/09/24	Butz, Daniel B.	Review email from A Leary re: 9019 order revisions and review same	0.2	193.00
09/09/24	Remming, Andrew	Review revised version of 9019 order (.2) and emails re same from A. Leary, R. Steinberg and E. Qian (.1); review update re same from R. Beck (.1).	0.4	458.00
09/10/24	Weidman, Rebecca	Prepare and upload 9019 order to Court site per B. Dolphin (.1); Download Court entered order re: same and coordinate service (.1)	0.2	79.00
09/10/24	Dolphin, Brenna	Communicate with counsel to Magna re status of entry of 9019 order via multiple emails	0.5	482.50
09/10/24	Dolphin, Brenna	Communicate with DPW re 9019 order statues (.1); review confirmation from DPW (A. Leary) re 9019 order (.1)	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Dolphin, Brenna	Coordinate with R. Weidman re uploading 9019 order	0.2	193.00
09/10/24	Dolphin, Brenna	Update counsel for Magna re 9019 order upload	0.1	96.50
09/10/24	Dolphin, Brenna	Draft certification of counsel re 9019 order	0.3	289.50
09/10/24	Dolphin, Brenna	Communicate with Chambers re 9019 order	0.4	386.00
09/10/24	Dolphin, Brenna	Review form of order received from Delaware counsel to CVI re denying motion to unseal (.1); confer with R. Steinberg re same (.1)	0.2	193.00
09/10/24	Remming, Andrew	Emails re 9019 order with B. Dolphin.	0.1	114.50
09/10/24	Remming, Andrew	Review email from R. Beck re order denying motion to unseal.	0.1	114.50
09/11/24	Dolphin, Brenna	Confer with R. Steinberg re draft form of order from CVI denying motion to unseal (.2); respond to R. Beck (CVI counsel) re form of order (.2)	0.4	386.00
09/11/24	Butz, Daniel B.	Review email from B Dolphin re: order on unsealing motion (.1); confer with S Churchill re: same (.1) and review emails from R Steinberg and B Dolphin re: same (.1)	0.3	289.50
09/11/24	Remming, Andrew	Review draft order denying motion to unseal and emails re same from B. Dolphin, R. Steinberg.	0.2	229.00
09/11/24	Rogers Churchill, Sophie	Confer with D. Butz re: order on unsealing motion	0.1	63.50
09/12/24	Weyand, Jonathan	Confer w/ B. Dolphin and T. Mann re: assertion of secured claim / garagemen lien.	0.4	266.00
09/20/24	Dolphin, Brenna	Confer with R. Steinberg re motion to allow advancement and payment of defense costs under D&O policies	0.2	193.00
09/25/24	Dolphin, Brenna	Oversee and coordinate filing of motion for allowance and payment of defense cost for insureds under D&O policies	0.4	386.00
09/29/24	Dolphin, Brenna	Confer with E. Qian re drafting certifications of counsel and certificate of no objection	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/29/24	Qian, Echo	Confer with B. Dolphin re drafting certifications of counsel and certificate of no objection	0.1	59.50
Total			17.5	17,699.50

Task Code: B200 Governmental/Regulatory Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/04/24	Butz, Daniel B.	Review emails from B Resnick re: regulatory inquiry (.1); review emails from D Klein and J McClammy re: same (.1); review emails from B Resnick and S Churchill re: related solicitation issues (.1)	0.3	289.50
Total			0.3	289.50

Task Code: B230 Financing Matters/Cash Collateral

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Qian, Echo	Internal emails re cash collateral reporting	0.4	238.00
09/03/24	Qian, Echo	Email Huron re cash collateral reporting.	0.1	59.50
09/03/24	Remming, Andrew	Emails with E. Qian, SR Churchill re cash collateral reporting.	0.1	114.50
09/04/24	Butz, Daniel B.	Review email from J Palacios re: budget	0.1	96.50
09/04/24	Dolphin, Brenna	Review budget variance report	0.1	96.50
09/04/24	Remming, Andrew	Review update re cash collateral budget from J. Palacios.	0.1	114.50
09/09/24	Remming, Andrew	Emails with E. Qian re cash collateral reporting.	0.1	114.50
09/11/24	Dolphin, Brenna	Review variance re week ending September 6th	0.1	96.50
09/11/24	Butz, Daniel B.	Review email from J Palacios re: budget (.1); review email from M Bates re: same (.1); review emails from J DiDonato and R Steinberg and J Mueller re: same (.1)	0.3	289.50
09/11/24	Remming, Andrew	Review updated cash collateral budget and emails re same from J. Palacios, R. Steinberg and J. Mueller.	0.2	229.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/24	Dolphin, Brenna	Review communication between Huron and U.S. Trustee re variance report (week ending September 6th)	0.1	96.50
09/12/24	Butz, Daniel B.	Review email from J Palacios re: variance report	0.1	96.50
09/12/24	Remming, Andrew	Review update from J. Palacios re UST questions re cash collateral budget.	0.1	114.50
09/16/24	Qian, Echo	Emails re cash collateral reporting.	0.1	59.50
09/16/24	Butz, Daniel B.	Review email from M Bates re: budget issues	0.1	96.50
09/16/24	Remming, Andrew	Review update from E. Qian re cash collateral reporting.	0.1	114.50
09/16/24	Remming, Andrew	Emails with E. Qian and SR Churchill re cash collateral reporting.	0.1	114.50
09/17/24	Dolphin, Brenna	Provide August 19th hearing transcript to K. Winiarski re ongoing cash collateral discussions	0.1	96.50
09/18/24	Dolphin, Brenna	Review weekly variance report	0.1	96.50
09/18/24	Butz, Daniel B.	Review email from J Palacios re: budget (.1); review email from J DiDonato re: accounts (.1); review email from B Dolphin re: same (.1)	0.3	289.50
09/18/24	Butz, Daniel B.	Review email from J Palacios re: closing accounts	0.1	96.50
09/18/24	Remming, Andrew	Review update re cash collateral reporting from J. Palacios.	0.1	114.50
09/23/24	Qian, Echo	Internal emails re cash collateral reporting	0.1	59.50
09/23/24	Remming, Andrew	Emails with E. Qian and SR Churchill re cash collateral reporting issues.	0.2	229.00
09/28/24	Turner, Brianna	Research re cash collateral / surety bonds.	2.2	1,199.00
Total			5.5	4,322.50

Task Code: B240 Tax Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/04/24	Dolphin, Brenna	Discuss tax attributes status with A. Remming and strategy re same	0.1	96.50
09/04/24	Remming, Andrew	Discuss tax attributes status with B. Dolphin and strategy re same	0.1	114.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Remming, Andrew	Review inquiry from state taxing authority and email re same from R. Steinberg.	0.1	114.50
09/11/24	Qian, Echo	Research re reporting requirement (0.3), call with Huron re reporting requirement under first day orders (0.3).	0.6	357.00
09/11/24	Dolphin, Brenna	Meet with J. Palacios, J. Wu, D. Butz, and E. Qian re monthly reporting requirements under first day order	0.3	289.50
09/27/24	Rogers Churchill, Sophie	Respond to email from Arkansas taxing authority.	0.1	63.50
Total			1.3	1,035.50

Task Code: B260 Insurance Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/05/24	Dolphin, Brenna	Begin drafting motion to allow advancement and payment of defense costs under D&O policies	3.5	3,377.50
09/05/24	Dolphin, Brenna	Discuss drafting motion for advancement under D&O Policies with R. Dehney	0.1	96.50
09/05/24	Dehney, Robert J.	Office conference with B. Dolphin re motion for advancement.	0.1	169.50
09/05/24	Rogers Churchill, Sophie	Call with R. Steinberg re Orrick insurance motion.	0.1	63.50
09/05/24	Remming, Andrew	Review draft D&O insurance order and emails re same from R. Steinberg and R. Dehney.	0.2	229.00
09/05/24	Remming, Andrew	Review email from R. Dehney re draft D&O motion.	0.1	114.50
09/05/24	Dehney, Robert J.	Emails with DPW re draft D&O Insurance order (.1); email to B. Dolphin re same (.1).	0.2	339.00
09/06/24	Dolphin, Brenna	Research precedent re modifying automatic stay to allow advancement and payment of defense costs of current and former directors and officers	0.4	386.00
09/06/24	Dolphin, Brenna	Continue drafting motion to allow advancement and payment of defense costs of current and former directors and officers under the D&O policies	3.3	3,184.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/07/24	Dolphin, Brenna	Research re recent precedent orders approving advancement and payment of defense costs	0.9	868.50
09/07/24	Dolphin, Brenna	Continue drafting motion re advancement under D&O policy	0.6	579.00
09/08/24	Dolphin, Brenna	Continue drafting motion for allowance of advancement and payment of defense costs under D&O policies	3.5	3,377.50
09/08/24	Dolphin, Brenna	Review and revise draft motion for authority to use D&O insurance proceeds for defense costs	1.9	1,833.50
09/08/24	Dolphin, Brenna	Confer with D. Butz re motion to allow advancement and payment of defense costs under D&O policies	0.1	96.50
09/08/24	Dolphin, Brenna	Discuss motion to allow advancement and payment of defense costs under D&O policies with R. Dehney	0.2	193.00
09/08/24	Dehney, Robert J.	Office conference with B. Dolphin re motion/D&O policies.	0.2	339.00
09/08/24	Remming, Andrew	Review draft of D&O motion.	0.3	343.50
09/08/24	Remming, Andrew	Review and respond to email from B. Dolphin re D&O motion.	0.1	114.50
09/08/24	Butz, Daniel B.	Confer with B. Dolphin re motion to allow advancement and payment of defense costs under D&O policies	0.1	96.50
09/09/24	Remming, Andrew	Initial review of revised draft D&O insurance motion and emails re same from B. Dolphin and K. Askew.	0.2	229.00
09/11/24	Remming, Andrew	Review revised version of D&O motion and emails re same from K. Askew.	0.2	229.00
09/12/24	Remming, Andrew	Review update from K. Askew re revised D&O motion.	0.1	114.50
09/16/24	Dolphin, Brenna	Revise motion for authority to use D&O insurance proceeds to advance and pay defense costs (1.1); circulate revised draft to K. Askew (Orrick) (.1)	1.2	1,158.00
09/16/24	Remming, Andrew	Review update re D&O motion from B. Dolphin.	0.1	114.50
09/17/24	Dolphin, Brenna	Confer with R. Steinberg re D&O motion (.1); respond to K. Askew re same (.1); respond to question from K. Askew re timing of filing (.1)	0.3	289.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/24	Remming, Andrew	Review update re D&O motion from B. Dolphin.	0.1	114.50
09/22/24	Remming, Andrew	Review update from K. Askew re D&O motion.	0.1	114.50
09/23/24	Dolphin, Brenna	Circulate motion to allow advancement and payment of defense costs to committee counsel (.2)	0.2	193.00
09/23/24	Dolphin, Brenna	Circulate motion to allow advancement and payment of defense costs to counsel for CVI (.2)	0.2	193.00
09/23/24	Dolphin, Brenna	Call with K. Askew (Orrick) re motion for allowance of advancement and payment of defense costs under D&O policies and withdrawal of Orrick OCP retention	0.1	96.50
09/23/24	Dolphin, Brenna	Revise motion for allowance and payment of advancement and defense costs for insured persons under D&O policies to incorporate comments from insurance carrier	1.1	1,061.50
09/23/24	Dolphin, Brenna	Provide revised draft motion for allowance and payment of advancement and defense costs under D&O policies to DPW and Orrick	0.1	96.50
09/23/24	Dolphin, Brenna	Discuss status of finalizing and filing the motion for allowance and payment of advancement and defense costs under D&O policies with A. Remming	0.1	96.50
09/23/24	Remming, Andrew	Review update from B. Dolphin re D&O motion.	0.1	114.50
09/24/24	Qian, Echo	Draft notice for Motion to Allow Advancement Under D&O Policies.	0.2	119.00
09/25/24	Reed, Marie	Review and respond to email from B. Dolphin re filing motion (.1); prepare and e-file Motion of Debtors for Entry of an Order Allowing the Advancement and Payment of Defense Costs and Settlement Amounts of Insured Persons Pursuant to the D&O Policies (.2)	0.3	106.50
09/25/24	Turner, Brianna	Research re surety bonds.	3.3	1,798.50
09/25/24	Dolphin, Brenna	Communicate with K. Askew (Orrick) (.2) and DPW (.2) re finalizing and filing the motion for allowance and payment of defense costs for insureds under D&O policies	0.4	386.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/25/24	Dolphin, Brenna	Provide as-filed motion to K. Askew (Orrick) (.1); coordinate with Verita re service of motion for allowance and payment of defense costs for insureds under D&O policies (.1)	0.2	193.00
09/25/24	Remming, Andrew	Review updated version of D&O motion and emails re same from B. Dolphin and R. Steinberg.	0.2	229.00
09/29/24	Dolphin, Brenna	Revise form of order re motion to allow and pay defense costs under D&O policies to incorporate comments from committee (.2); confer with M. Russell re same (.1)	0.3	289.50
09/30/24	Dolphin, Brenna	Revise form of order re allowance and payment of defense costs under D&O policies (.2) to incorporate comments from committee; circulate revised draft to committee counsel (.1); provide revised form of order to DPW for review (.2)	0.5	482.50
09/30/24	Dolphin, Brenna	Review update from committee counsel re additional comments to order authorizing allowance and payment of defense costs under D&O policies expected after call with U.S. Trustee	0.1	96.50
09/30/24	Qian, Echo	Draft COC for D&O motion (0.3) and email B Dolphin re the same (0.1).	0.4	238.00
09/30/24	Remming, Andrew	Review update from B. Dolphin re D&O motion.	0.1	114.50
Total			26.1	24,069.50

Task Code: B300 Court Hearings

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Weidman, Rebecca	Revise 9/9 hearing agenda	1.2	474.00
09/04/24	Weidman, Rebecca	Revise 9/12 hearing agenda (.4); Correspondence with E. Qian re: 9/9 hearing agenda (.1); Revise same (.2); Compile documents for 9/9 hearing binder production (.2)	0.9	355.50
09/04/24	Qian, Echo	Review and revise agenda for 9/9 hearing.	0.4	238.00
09/04/24	Qian, Echo	Revise agenda for 9.9 hearing and email DPW re the same.	0.2	119.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/04/24	Qian, Echo	Email R Dehney re hearing prep.	0.1	59.50
09/04/24	Dehney, Robert J.	Email from E. Qian re hearing prep.	0.1	169.50
09/04/24	Remming, Andrew	Review draft agenda for 9/9 hearing and emails re same with E. Qian.	0.2	229.00
09/05/24	Lawrence, John	File agenda for 9.9.24 hearing. Coordinate delivery of binder to chambers.	0.2	79.00
09/05/24	Qian, Echo	Hearing prep including preparing materials, review court documents, email J Lawrence re the same.	0.7	416.50
09/05/24	Qian, Echo	Email DPW re agenda.	0.1	59.50
09/05/24	Qian, Echo	Confer with S R Churchill re hearing prep.	0.1	59.50
09/05/24	Qian, Echo	Emails to J Lawrence re filing of agenda and prep for hearing (0.3), email DPW re revised agenda (0.1).	0.4	238.00
09/05/24	Qian, Echo	Confer with S R Churchill re agenda and review DPW comments re agenda.	0.1	59.50
09/05/24	Qian, Echo	Email S R Churchill re materials for court and email DPW re agenda.	0.1	59.50
09/05/24	Butz, Daniel B.	Review agenda and comments from K Winiarski re: same	0.1	96.50
09/05/24	Remming, Andrew	Review revised version of agenda for 9/9 hearing (.4) and emails re same from E. Qian and K. Winiarski (.1).	0.5	572.50
09/05/24	Rogers Churchill, Sophie	Confer with E. Qian re hearing prep.	0.1	63.50
09/05/24	Rogers Churchill, Sophie	Confer with E. Qian re agenda and review DPW comments re agenda.	0.1	63.50
09/06/24	Lawrence, John	Draft amended agenda for 9.9.24 hearing.	0.2	79.00
09/06/24	Qian, Echo	Email J Lawrence re amended agenda.	0.1	59.50
09/06/24	Qian, Echo	Revise amended agenda.	0.1	59.50
09/06/24	Dolphin, Brenna	Meet with B. Resnick, R. Steinberg, N. D'Angelo, A. Leary, K. Winiarski, R. Dehney, A. Remming, D. Butz, S. Rogers Churchill, and E. Qian re strategy for responding to U.S. Trustee objection to solicitation procedures and overall strategy for September 9, 2024 hearing	0.5	482.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/24	Lawrence, John	Update amended agenda.	0.2	79.00
09/07/24	Rogers Churchill, Sophie	Respond to email from R. Dehney re hearing prep.	0.1	63.50
09/07/24	Dehney, Robert J.	Email from S. Rogers Churchill re hearing prep.	0.1	169.50
09/07/24	Remming, Andrew	Emails with R. Dehney and SR Churchill re hearing preparation.	0.1	114.50
09/08/24	Qian, Echo	Email S R Churchill re hearing prep.	0.1	59.50
09/08/24	Qian, Echo	Hearing prep including confer with S R Churchill, preparing materials, etc.	1.5	892.50
09/08/24	Qian, Echo	Prepare for hearing including several conferences with MNAT and DPW, discuss strategies and prepare materials.	6.0	3,570.00
09/08/24	Dehney, Robert J.	Work with DPW re prep for 9/9 hearing.	6.0	10,170.00
09/08/24	Rogers Churchill, Sophie	Prepare materials for hearing; coordinate with E. Qian.	1.0	635.00
09/08/24	Rogers Churchill, Sophie	Attend (in part) prep call with J. McClammy and Huron for hearing.	0.3	190.50
09/08/24	Remming, Andrew	Call with J McClammy, SR Churchill and Huron teams re hearing prep.	0.6	687.00
09/08/24	Remming, Andrew	Prepare for 9/9 hearing, including reviewing documents and numerous strategy conferences and calls w/ DPW and MNAT teams.	4.5	5,152.50
09/08/24	Rogers Churchill, Sophie	Prepare for disclosure statement hearing, including numerous conferences, calls, and preparing documents.	0.6	381.00
09/09/24	Qian, Echo	Prepare for hearing, including compiling/organizing materials and numerous conferences.	6.2	3,689.00
09/09/24	Qian, Echo	Attend hearing on zoom.	1.4	833.00
09/09/24	Dehney, Robert J.	Attend 9/9 hearing.	2.5	4,237.50
09/09/24	Lawrence, John	Finalize and file amended agenda for 9.9.24 hearing.	0.2	79.00
09/09/24	Lawrence, John	Finalize and file second amended agenda for 9.9.24 hearing.	0.2	79.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/09/24	Dolphin, Brenna	Attend hearing re solicitation procedures, 9019 motion, and motion to unseal	2.5	2,412.50
09/09/24	Dolphin, Brenna	Discuss Court's schedule with B. Resnick	0.1	96.50
09/09/24	Dolphin, Brenna	Communicate with Chambers re Court's schedule (.2); provide update to DPW (.1)	0.3	289.50
09/09/24	Dolphin, Brenna	Oversee filing of further revised solicitation procedures order (.2); coordinate with Verita re service (.1)	0.3	289.50
09/09/24	Dolphin, Brenna	Communicate with Chambers to request a delayed start of hearing (.1); communicate with committee counsel (S. Newman) (.1) and U.S. Trustee re delayed start (.1)	0.3	289.50
09/09/24	Dolphin, Brenna	Respond to U.S. Trustee email re hearing	0.1	96.50
09/09/24	Dehney, Robert J.	Work with MNAT team and DPW re prep for 9/9 hearing.	4.2	7,119.00
09/09/24	Remming, Andrew	Attend hearing re solicitation procedures, 9019 motion, and motion to unseal	2.5	2,862.50
09/09/24	Remming, Andrew	Review draft amended agenda for 9/9 hearing and emails re same from E. Qian.	0.2	229.00
09/10/24	Reed, Marie	Review and respond to email from B. Dolphin re filing notice (.1); prepare and e-file Notice of Joint Hearing for Final Approval of the Disclosure Statement and Confirmation of the Plan (.2)	0.3	106.50
09/10/24	Qian, Echo	Emails and communication to S R Churchill re agenda (0.3), confer with B Dolphin re the same (0.2), confer with R Weidman re the same (0.1), draft agenda for cancelled hearing (0.5), confer with D Vale re the same (0.1)	1.2	714.00
09/10/24	Weidman, Rebecca	Download and circulate 9/9 hearing transcript (.1); Revise 9/12 agenda to cancel the hearing (.2); Correspondence with B. Dolphin, D. Vale and E. Qian re: same (.1); File same (.1); Coordinate service of same (.1)	0.6	237.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Dolphin, Brenna	Discuss agenda for September 12th hearing and status of matters scheduled to go forward with E. Qian (.1) and R. Weidman (.1)	0.2	193.00
09/10/24	Dolphin, Brenna	Coordinate with R. Weidman re filing an agenda canceling the September 12th hearing	0.1	96.50
09/10/24	Dolphin, Brenna	Provide agenda cancelling September 12th hearing to Chambers	0.1	96.50
09/10/24	Remming, Andrew	Review emails from chambers re solicitation procedures order and cancellation of 9/12 hearing.	0.1	114.50
09/11/24	Weidman, Rebecca	Draft 10/9 hearing agenda	1.0	395.00
09/12/24	Weidman, Rebecca	Revise 10/9 hearing agenda	0.4	158.00
09/13/24	Reed, Marie	Review and respond to email from B. Dolphin re filing notice (.1); prepare and e-file Notice of Status Conference Regarding Debtors' Motion to Shorten Notice of Debtors' Emergency Motion to (I) Enforce the Automatic Stay and (II) Recover Costs Related to Toccata Automotive Group, Inc.'s Violations of the Automatic Stay (.2)	0.3	106.50
09/13/24	Dolphin, Brenna	Revise draft agenda re status conference	0.3	289.50
09/13/24	Weidman, Rebecca	Draft 9/16 agenda for hearing re: emergency motion to enforce the automatic stay	0.7	276.50
09/16/24	Qian, Echo	Email B Dolphin re status conference prep (0.1), email K Winiarski re the same (0.1).	0.2	119.00
09/16/24	Qian, Echo	Communication and emails to B Dolphin and R Weidman re status conference prep.	0.2	119.00
09/16/24	Qian, Echo	Attend status conference (0.3), confer with MNAT team re strategies (0.2).	0.5	297.50
09/16/24	Dolphin, Brenna	Coordinate hearing preparation.	0.1	96.50
09/16/24	Dolphin, Brenna	Revise hearing agenda	0.3	289.50
09/16/24	Dolphin, Brenna	Coordinate with R. Weidman re filing hearing agenda for September 16th status conference	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/16/24	Dolphin, Brenna	Respond to email from Chambers re hearing materials	0.2	193.00
09/16/24	Dolphin, Brenna	Attend status conference re motion to shorten notice re enforcement of automatic stay	0.4	386.00
09/16/24	Weidman, Rebecca	Prepare and file 9/16 status conference agenda (.2); Correspondence with B. Dolphin re: same (.1); Coordinate service of same (.1); Coordinate binder production of same (.3); Correspondence with chambers re: same and re: Zoom link for status conference (.2)	0.9	355.50
09/16/24	Dehney, Robert J.	Prepare for and attend continuation of court status conference.	1.0	1,695.00
09/16/24	Dolphin, Brenna	Discuss additional omnibus hearing dates with A. Remming	0.1	96.50
09/16/24	Butz, Daniel B.	Attend status conference re: Toccata	0.4	386.00
09/16/24	Remming, Andrew	Attend 9/16 status conference re Toccata issues.	0.5	572.50
09/17/24	Qian, Echo	Review agenda (.1); numerous emails re hearing preparation (.4)	0.5	297.50
09/17/24	Weidman, Rebecca	Correspondence with Reliable, B. Dolphin and E. Qian re: 9/16 status conference transcript (.1); Download and circulate same (.1); Draft 9/19 hearing agenda (.2); Draft certification of counsel re: November, December and January 2025 omnibus hearing dates (.2); Correspondence with B. Dolphin re: same (.1)	0.7	276.50
09/17/24	Dolphin, Brenna	Communicate with Chambers re additional omnibus hearing dates	0.2	193.00
09/17/24	Dolphin, Brenna	Confer with co-counsel re omnibus hearing dates received from Chambers	0.1	96.50
09/17/24	Dolphin, Brenna	Review draft hearing agenda re September 19th (.1) and discuss with A. Remming (.1); circulate to DPW (.1)	0.3	289.50
09/17/24	Dolphin, Brenna	Confer with N. D'Angelo regarding Toccata hearing	0.2	193.00
09/17/24	Butz, Daniel B.	Review emails from B Dolphin and N D'Angelo re: agenda	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/24	Remming, Andrew	Review and edit draft agenda for 9/19 hearing (.3) and emails re same with B. Dolphin and N. D'Angelo (.1).	0.4	458.00
09/17/24	Remming, Andrew	Review update from B. Dolphin re 9/19 hearing re Toccata.	0.1	114.50
09/18/24	Weidman, Rebecca	Revise 9/19 hearing agenda (.4); Correspondence with B. Dolphin re: same (.1); File same (.2); Coordinate service of same (.1); Coordinate binder production for Judge Shannon (.2); Correspondence with chambers re: same (.1); Download Court entered order shortening notice re: 9/19 emergency hearing and coordinate service (.1)	1.2	474.00
09/18/24	Dolphin, Brenna	Review agenda re September 19th hearing and authorizing filing	0.1	96.50
09/18/24	Remming, Andrew	Review update from B. Dolphin re 9/19 hearing.	0.1	114.50
09/19/24	Qian, Echo	Review emails from MNAT and DPW re toccata hearing.	0.1	59.50
09/19/24	Qian, Echo	Attend hearing re Toccata motion.	0.3	178.50
09/19/24	Weidman, Rebecca	Revise amended and rescheduled 9/19 hearing agenda (.5); Correspondence with B. Dolphin re: same (.2); Correspondence with chambers re: same (.1); File same (.2); Coordinate service of same (.1)	1.1	434.50
09/19/24	Dolphin, Brenna	Review amended agenda re September 19th hearing on motion to enforce automatic stay (Toccata)	0.2	193.00
09/19/24	Dolphin, Brenna	Communicate with Chambers re delaying hearing start time to accommodate additional negotiations between the parties	0.3	289.50
09/19/24	Dolphin, Brenna	Confer with K. Winiarski re delaying hearing start (re motion to enforce automatic stay)	0.1	96.50
09/19/24	Dolphin, Brenna	Review amended hearing agenda re September 19th	0.1	96.50
09/19/24	Dolphin, Brenna	Email amended hearing agenda to new counsel for Toccata	0.1	96.50
09/19/24	Dolphin, Brenna	Communicate with J. McClammy re status update to provide to Chambers (.1); update Chambers re hearing to go forward on the merits (.1)	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/19/24	Dolphin, Brenna	Advise co-counsel re Court's schedule	0.1	96.50
09/19/24	Dolphin, Brenna	Attend hearing re motion to enforce the automatic stay	0.4	386.00
09/19/24	Butz, Daniel B.	Review emails from B Dolphin re: adjourned hearing (.1); review email from R Dehney re: settlement (.1); review emails from J McClammy and B Dolphin re: same (.1)	0.3	289.50
09/19/24	Butz, Daniel B.	Review emails from J McClammy and B Dolphin re: hearing and agenda	0.1	96.50
09/19/24	Dehney, Robert J.	Prepare for and attend hearing.	0.3	508.50
09/19/24	Remming, Andrew	Participate in 9/19 hearing re motion re Toccata stay violation.	0.5	572.50
09/19/24	Remming, Andrew	Review amended agenda for 9/19 hearing and emails re same and scheduling issues with K. Winiarski, B. Dolphin, R. Dehney and J. McClammy.	0.2	229.00
09/20/24	Weidman, Rebecca	Download and circulate 9/19 hearing transcript	0.1	39.50
09/24/24	Weidman, Rebecca	Prepare and file certification of counsel re: November, December, and January 2025 omnibus hearing dates (.1); Correspondence with B. Dolphin re: same (.1); Upload order to Court site (.1); Download Court entered order re: same and coordinate service (.1)	0.4	158.00
09/24/24	Dolphin, Brenna	Confer with DPW re omnibus hearing dates (November, December, and January) (.1); coordinate with R. Weidman re submitting order under certification of counsel (.2)	0.3	289.50
09/24/24	Remming, Andrew	Review update from B. Dolphin re omnibus hearing dates.	0.1	114.50
09/25/24	Remming, Andrew	Review emails re prep for confirmation hearing from R. Dehney and B. Dolphin.	0.1	114.50
09/30/24	Qian, Echo	Confer with S R Churchill re hearing prep.	0.2	119.00
09/30/24	Weidman, Rebecca	Revise 10/9 hearing agenda	0.9	355.50
09/30/24	Rogers Churchill, Sophie	Confer with E. Qian re hearing prep.	0.2	127.00

			Total	69.5	64,178.50
Task Code:		B310	Claims Objections and Administration		
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	
09/03/24	Butz, Daniel B.	Review email from M Western re: planning for claims objections (.1); review email from M Western re: tax claims (.1); review email from M Yoon re: same (.1)	0.3	289.50	
09/04/24	Butz, Daniel B.	Review claims info from M Western	0.1	96.50	
09/05/24	Butz, Daniel B.	Review email from S Ewing re: claims issues (.1); review emails from M Western and S Churchill and S Ewing re: same (.1)	0.2	193.00	
09/05/24	Rogers Churchill, Sophie	Respond to email from Verita re admin claim administration (.1); confer with T. Mann re same (.1).	0.2	127.00	
09/05/24	Remming, Andrew	Review emails re admin claim motions from S. Ewing, SR Churchill.	0.1	114.50	
09/05/24	Mann, Tamara K.	Confer with S. Rogers Churchill re admin claim administration	0.1	96.50	
09/11/24	Dolphin, Brenna	Summarize framework re challenging unauthorized post petition services and asserted secured claim and circulate to D. Butz	0.6	579.00	
09/11/24	Dolphin, Brenna	Research re unauthorized post petition services and strategy for challenging asserted secured claim	6.8	6,562.00	
09/11/24	Dolphin, Brenna	Summarize the fleet sales order, the bench ruling on the objection from Ideal Motors (.4), and provide summary to D. Butz (.1)	0.5	482.50	
09/11/24	Dolphin, Brenna	Read stipulation between Toccata, debtors, and committee re sale proceeds	0.1	96.50	
09/11/24	Dolphin, Brenna	Call with N. D'Angelo and D. Butz re research and strategy for responding to Toccata's motion for allowance and payment of secured claim	0.2	193.00	
09/11/24	Dolphin, Brenna	Read Toccata's motion for allowance and payment of secured claim	0.3	289.50	
09/11/24	Dolphin, Brenna	Provide Toccata's motion for allowance and payment of secured claim to J. McClammy and N. D'Angelo	0.1	96.50	

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/11/24	Dolphin, Brenna	Communicate with N. D'Angelo re strategy for responding to Toccata motion for allowance and payment of secured claim	0.1	96.50
09/11/24	Butz, Daniel B.	Review email from B Dolphin re: dealer allowance of a secured claim motion and review motion (.4); review email from J McClammy re: same (.1)	0.5	482.50
09/11/24	Butz, Daniel B.	Confer with R Dehney and J McClammy re: Toccata issues (.1); confer with B Dolphin re: same (.2); call with B Dolphin to N D'Angelo re: same (.2)	0.5	482.50
09/11/24	Butz, Daniel B.	Confer with B Dolphin re: research (.2); review dealer stipulation (.1)	0.3	289.50
09/11/24	Butz, Daniel B.	Emails with B Dolphin re: research on dealer issues	0.1	96.50
09/11/24	Dehney, Robert J.	Emails with DPW re dealer issue	0.1	169.50
09/11/24	Dehney, Robert J.	Prepare for and attend conference call with D. Butz and DPW re strategy/dealer issue.	0.1	169.50
09/11/24	Dehney, Robert J.	Email to Bose Law re dealer issue.	0.1	169.50
09/11/24	Remming, Andrew	Review Toccata motion for payment of claim (.3) and emails re same from R. Dehney, J. McClammy, N. D'Angelo and B. Dolphin (.1).	0.4	458.00
09/12/24	Dolphin, Brenna	Confer with T. Mann re strategy for objecting to the Toccata motion for allowance and payment of secured claim	0.7	675.50
09/12/24	Dolphin, Brenna	Continue researching re objection to Toccata motion for allowance and payment of secured claims	0.8	772.00
09/12/24	Dolphin, Brenna	Communicate with H. Yan (committee counsel) re strategy for responding to Toccata's motion for allowance and payment of secured claim	0.2	193.00
09/12/24	Mann, Tamara K.	Confer with B. Dolphin re secured claim issue	0.7	675.50
09/15/24	Dolphin, Brenna	Confer with J. Palacios and J. Mueller re post petition invoices	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/15/24	Dolphin, Brenna	Communicate re strategy for responding to Toccata motion for allowance and payment of secured claim and enforcing the automatic stay with J. McClammy, N. D'Angelo, and R. Dehney (1.6); confer with Verita to obtain filed proof of claim (.2)	1.8	1,737.00
09/16/24	Butz, Daniel B.	Review email from M Western re: rent questions (.1); research re: same (.4); email to M Western re: same (.1)	0.6	579.00
09/17/24	Dolphin, Brenna	Confer with N. D'Angelo (.3) and D. Butz (.2) re strategy for addressing Toccata's motion for allowance and payment of secured claim	0.5	482.50
09/17/24	Dolphin, Brenna	Research re precedent governing secured claim based on post-petition services	0.7	675.50
09/17/24	Dolphin, Brenna	Review and analyze terms of sixth interim cash collateral order re Toccata's assertion of a secured claim (1.6); begin summarizing analysis (.4)	2.0	1,930.00
09/17/24	Dolphin, Brenna	Review and analyze claim amount asserted in proof of claim (.1) and claim amount asserted in motion for allowance and payment of secured claim (re Toccata) (.2)	0.3	289.50
09/17/24	Butz, Daniel B.	Review email from N D'Angelo re: research on claim and stay issues (.1); email to N D'Angelo re: same (.1); email from N D'Angelo re: bar date issues (.1); email to N D'Angelo re: same (.1); review email from B Dolphin re: same (.1)	0.5	482.50
09/17/24	Butz, Daniel B.	Confer with B Dolphin re: claims objection	0.2	193.00
09/17/24	Butz, Daniel B.	Review email from R Loh re: emissions credits	0.1	96.50
09/18/24	Dolphin, Brenna	Research re opposition to Toccata motion for allowance and payment of secured claim	1.8	1,737.00
09/19/24	Rogers Churchill, Sophie	Respond to email from R. Dehney re dealer motion.	0.1	63.50
09/21/24	Dolphin, Brenna	Discuss objection to Toccata motion for allowance and payment of secured claim	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/23/24	Dolphin, Brenna	Communicate with J. Butler re possible resolution of Toccata motion for allowance and payment of secured claim via stipulation (.1) and advise on procedure (.1)	0.2	193.00
09/23/24	Dolphin, Brenna	Confer with D. Butz re possible resolution of Toccata's motion for allowance and payment of secured claim	0.1	96.50
09/24/24	Qian, Echo	Email B Dolphin re Toccata motion objection deadline.	0.1	59.50
09/24/24	Dolphin, Brenna	Read update from DPW re resolution of Toccata's motion for allowance and payment of secured claim	0.2	193.00
09/24/24	Dolphin, Brenna	Review draft stipulation regarding Toccata motion for allowance and payment of secured claim	0.2	193.00
09/24/24	Dolphin, Brenna	Respond to K. Winiarski re status update on Toccata's motion for allowance and payment of secured claim	0.1	96.50
09/25/24	Butz, Daniel B.	Review lien research from B Turner	0.2	193.00
09/25/24	Butz, Daniel B.	Review email from R Steinberg re: Toccata resolution (.1); review stipulation (.3)	0.4	386.00
09/30/24	Dolphin, Brenna	Confer with J. McClammy re extension of time for debtors to respond/object to Toccata motion for allowance and payment of secured claim	0.1	96.50
09/30/24	Butz, Daniel B.	Review email from R Steinberg re: Toccata stipulation (.1); review emails from M Bates and R Steinberg re: same (.1)	0.2	193.00
09/30/24	Rogers Churchill, Sophie	Analyze inquiry from DPW re bar date order (.2); review same (.2); confer with D. Butz re same (.1); emails with B. Dolphin re same (.1); respond to email from K. Winiarski (.1).	0.7	444.50
09/30/24	Remming, Andrew	Review update from R. Steinberg re Toccata stipulation.	0.1	114.50
09/30/24	Butz, Daniel B.	Confer with S. Rogers Churchill re bar date order	0.1	96.50
Total			25.7	24,760.50

Task Code: B320 Plan and Disclosure Statement

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/04/24	Qian, Echo	Review emails from DPW and A Remming re solicitation.	0.1	59.50
09/04/24	Dehney, Robert J.	Email from SEC re solicitation procedures motion (.1); emails from DPW re same (.1).	0.2	339.00
09/04/24	Butz, Daniel B.	Attend claims estimation call (.5); confer with S Churchill re: same (.1)	0.6	579.00
09/04/24	Butz, Daniel B.	Call with M Western and company reps re: tax claims	0.4	386.00
09/04/24	Dolphin, Brenna	Participate in part of the call with A. Salinas, J. DiDonato, M. Western, D. Butz, and S. Rogers Churchill re claim estimation	0.3	289.50
09/04/24	Rogers Churchill, Sophie	Call with Huron and DPW re plan claim estimations (.5); confer with D. Butz re same (.1).	0.6	381.00
09/04/24	Remming, Andrew	Emails from B. Resnick and N. D'Angelo re release precedent.	0.1	114.50
09/04/24	Remming, Andrew	Review informal comments to DS motion from SEC (.3); review revised versions of same (.5); extensive email discussion re same with MNAT and DPW teams (.5).	1.3	1,488.50
09/04/24	Remming, Andrew	Emails re DS hearing prep with K. Winiarski, SR Churchill, R. Dehney.	0.2	229.00
09/04/24	Dehney, Robert J.	Emails with A. Remming, S. Rogers Churchill and DPW re prep for DS hearing.	0.2	339.00
09/05/24	Dolphin, Brenna	Discuss strategy and logistics re disclosure statement approval, solicitation, and plan confirmation with A. Remming	0.1	96.50
09/05/24	Remming, Andrew	Confer with B Dolphin re plan confirmation workstreams.	0.1	114.50
09/06/24	Qian, Echo	Attend zoom conference with DPW and MNAT team re disclosure statement hearing strategy (0.5), confer with MNAT re hearing prep (0.3).	0.8	476.00
09/06/24	Qian, Echo	Research re UST Objection to plan.	3.3	1,963.50
09/06/24	Dolphin, Brenna	Revise solicitation procedures order to incorporate comments from the SEC and from the committee (.5); communicate with DPW regarding changes made (.2)	0.7	675.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/24	Dolphin, Brenna	Review U.S. Trustee objection to the solicitation procedures and interim approval of the disclosure statement	0.3	289.50
09/06/24	Dehney, Robert J.	Email from client re objection extension.	0.1	169.50
09/06/24	Dehney, Robert J.	Email from S. Rogers Churchill with proposed liquidation analysis for disclosure statement; review; email from DPW with edits to same; review.	0.2	339.00
09/06/24	Butz, Daniel B.	Review email from R Steinberg re: ballot revisions and solicitation comments (.1); review emails from B Dolphin and S Churchill re: same (.1); review revised papers from B Dolphin (.1)	0.3	289.50
09/06/24	Butz, Daniel B.	Review email from S Churchill re: liquidating analysis and review same (.2); review email from R Steinberg re: same (.1)	0.3	289.50
09/06/24	Butz, Daniel B.	Review email from B Resnick re: objection extension	0.1	96.50
09/06/24	Butz, Daniel B.	Review email from K Winiarski re: liquidation analysis and review comments (.2); confer with and emails with S Churchill re: same (.1)	0.3	289.50
09/06/24	Butz, Daniel B.	Review UST objection to interim approval (.2); attend call with DPW, A Remming, E Qian, S Churchill re: same and hearing prep (.5); confer with A Remming, E Qian, S Churchill re: same (.3); email to E Qian re: same (.1)	1.1	1,061.50
09/06/24	Butz, Daniel B.	Review email from N D'Angelo re: draft reply to UST objection (.1); review email from S Churchill, N D'Angelo, R Steinberg, and others re: same (.1)	0.2	193.00
09/06/24	Dehney, Robert J.	Call with MNAT team and DPW team re strategy/reply to US Trustee's objection to solicitation procedures and 9/9 hearing.	0.5	847.50
09/06/24	Rogers Churchill, Sophie	Draft liquidation analysis.	1.8	1,143.00
09/06/24	Rogers Churchill, Sophie	Review draft committee letter re plan support (.2); review precedent and respond to email from R. Steinberg re same (.2).	0.4	254.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/24	Rogers Churchill, Sophie	Respond to email from R. Steinberg re solicitation procedures motion.	0.1	63.50
09/06/24	Rogers Churchill, Sophie	Email to J. Palacios re liquidation analysis.	0.1	63.50
09/06/24	Rogers Churchill, Sophie	Research re plan release precedent.	0.3	190.50
09/06/24	Rogers Churchill, Sophie	Call with MNAT and DPW re reply in support of disclosure statement (.5); follow up conference with A. Remming, D. Butz and E. Qian (.3).	0.8	508.00
09/06/24	Rogers Churchill, Sophie	Draft response to certain U.S. Trustee arguments re disclosure statement.	1.1	698.50
09/06/24	Remming, Andrew	Review and edit draft liquidation analysis insert for DS/plan.	0.5	572.50
09/06/24	Remming, Andrew	Call with MNAT and DPW re plan/DS hearing (.5); meeting with MNAT re same (.3)	0.8	916.00
09/06/24	Remming, Andrew	Confer with B. Dolphin re UST DS objection.	0.2	229.00
09/06/24	Remming, Andrew	Review analysis of release issue from D. Butz.	0.1	114.50
09/06/24	Remming, Andrew	Initial review of UST objection to DS approval.	0.2	229.00
09/06/24	Remming, Andrew	Review comments to solicitation/DS order (.3) and emails re same from R. Steinberg, B. Dolphin and SR Churchill (.1).	0.4	458.00
09/06/24	Remming, Andrew	Emails re recent confirmation precedent summary from R. Dehney and SR Churchill.	0.1	114.50
09/06/24	Remming, Andrew	Emails re recent decisions re plan release issues from R. Dehney and SR Churchill.	0.1	114.50
09/06/24	Rogers Churchill, Sophie	Confer with D. Butz re: liquidation analysis	0.1	63.50
09/06/24	Dolphin, Brenna	Office confer with A. Remming re UST DS objection.	0.2	193.00
09/07/24	Dolphin, Brenna	Draft joint hearing notice re final approval of disclosure statement and confirmation of plan	1.1	1,061.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/07/24	Dolphin, Brenna	Draft publication notice re joint hearing on final approval of disclosure statement and confirmation of plan	0.5	482.50
09/07/24	Dolphin, Brenna	Emails with Verita, R. Steinberg, A. Leary, K. Winiarski, S. Rogers Churchill, and E. Qian re solicitation procedures and joint hearing notice and publication notice re final approval of disclosure statement and confirmation of plan	0.3	289.50
09/07/24	Qian, Echo	Email A Remming re revision to UST response, revise re the same and email DPW re the same.	0.3	178.50
09/07/24	Butz, Daniel B.	Review draft reply to UST objection and research re: same	1.1	1,061.50
09/07/24	Rogers Churchill, Sophie	Respond to emails from B. Dolphin and Verita re confirmation hearing notice.	0.1	63.50
09/07/24	Rogers Churchill, Sophie	Research re UST objection to disclosure statement and respond to email from N. D'Angelo re same.	0.7	444.50
09/07/24	Rogers Churchill, Sophie	Research re releasing parties.	0.4	254.00
09/07/24	Remming, Andrew	Review and edit draft section of reply brief for DS motion (.2) and emails re same with SR Churchill (.1).	0.3	343.50
09/07/24	Remming, Andrew	Review draft reply brief re DS approval motion from N. D'Angelo (.4) and emails re same with SR Churchill, N. D'Angelo, R. Steinberg (.1).	0.5	572.50
09/07/24	Remming, Andrew	Review draft liquidation analysis insert for DS (.2) and emails re same with SR Churchill and K. Winiarski (.1).	0.3	343.50
09/07/24	Remming, Andrew	Emails re revisions to reply brief in support of DS approval motion with DPW and MNAT teams (.1) and review revisions to DS reply brief (.5).	0.6	687.00
09/08/24	Dolphin, Brenna	Circulate a revised form of solicitation procedures order to Heights (.3), committee (.3), and SEC (.3) with redline and track changes	0.9	868.50
09/08/24	Qian, Echo	Draft notice for revised Plan and DS and notice for solicitation order.	0.7	416.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/08/24	Qian, Echo	Revise notices as per S R Churchill comments.	0.2	119.00
09/08/24	Butz, Daniel B.	Review reply	0.9	868.50
09/08/24	Sawyer, Casey	Research re lender exculpation provisions, and email A. Remming re same.	0.8	436.00
09/08/24	Dolphin, Brenna	Confer with R. Dehney, S. Rogers Churchill, and E. Qian re service of solicitation materials and providing notice to creditors and interest holders (.1); discuss applicability of state law to third party releases (.1)	0.2	193.00
09/08/24	Dolphin, Brenna	Respond to and circulate revised solicitation procedures order to M. Russell with redline	0.1	96.50
09/08/24	Dolphin, Brenna	Read draft reply in support of approval of the solicitation procedures motion	0.3	289.50
09/08/24	Dolphin, Brenna	Review responses to the U.S. Trustee's objection to interim approval of the disclosure statement and to solicitation procedures	0.6	579.00
09/08/24	Dolphin, Brenna	Communicate via multiple emails re strategy for replying to U.S. Trustee objection with B. Resnick (.2), J. McClammy (.1), and N. D'Angelo (.2); and discuss timing of filing same (.1)	0.6	579.00
09/08/24	Dolphin, Brenna	Advise Verita re solicitation procedures and solicitation materials respond to questions re same	0.3	289.50
09/08/24	Dolphin, Brenna	Finalize reply to U.S. Trustee objection re solicitation procedures motion	0.4	386.00
09/08/24	Dolphin, Brenna	Discuss status of finalizing 9019 settlement with B. Resnick (.1), R. Steinberg (.1) and R. Dehney (.1) and filing revised form of order re same	0.3	289.50
09/08/24	Dolphin, Brenna	Confer with R. Steinberg, K. Winiarski, S. Rogers Churchill, and E. Qian re filings before disclosure statement hearing	0.2	193.00
09/08/24	Dolphin, Brenna	Prepare for hearing re compile materials for presenting the 9019 settlement and solicitation procedures	0.8	772.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/08/24	Dehney, Robert J.	Office conference with S. Rogers Churchill, B. Dolphin and E. Qian re service of solicitation materials and notice (.1) and third-party releases (.1).	0.2	339.00
09/08/24	Rogers Churchill, Sophie	Research re reply to UST objection; draft language; respond to N. D'Angelo.	0.7	444.50
09/08/24	Remming, Andrew	Confer with R. Steinberg, SR Churchill and E. Qian re UST DS objection issues.	0.3	343.50
09/08/24	Remming, Andrew	Review email from E. Qian re released party plan issue.	0.1	114.50
09/08/24	Remming, Andrew	Review update from B. Resnick re exculpation issue.	0.1	114.50
09/08/24	Remming, Andrew	Review and edit email memo re exculpation issue; research re same.	0.5	572.50
09/08/24	Remming, Andrew	Review revised version of solicitation procedures order (.2) and emails re same from B. Dolphin (.1).	0.3	343.50
09/08/24	Remming, Andrew	Review revised draft of reply in support of DS approval (.4) and emails re same from R. Steinberg, N. D'Angelo, B. Resnick, J. McClammy and B. Dolphin (.2).	0.6	687.00
09/08/24	Remming, Andrew	Review revisions to draft chapter 11 plan/DS (.2) and emails re same from R. Steinberg and B. Resnick (.1).	0.3	343.50
09/08/24	Remming, Andrew	Review emails from R. Dehney and B. Resnick re exculpation issues.	0.1	114.50
09/08/24	Dehney, Robert J.	Emails with DPW re exculpation issues.	0.1	169.50
09/08/24	Rogers Churchill, Sophie	Confer with R. Dehney, B. Dolphin, and E. Qian re service of solicitation materials and providing notice to creditors and interest holders	0.1	63.50
09/08/24	Rogers Churchill, Sophie	Confer with R. Steinberg, K. Winiarski, B. Dolphin, and E. Qian re filings before disclosure statement hearing	0.2	127.00
09/08/24	Rogers Churchill, Sophie	Office conference with R. Dehney, B. Dolphin and E. Qian re service of solicitation materials and notice (.1) and third-party releases (.1).	0.2	127.00
09/08/24	Rogers Churchill, Sophie	Confer with R. Steinberg, A. Remming and E. Qian re UST DS objection issues.	0.3	190.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/09/24	Qian, Echo	Prepare for filing of revised plan documents and filing the same.	1.5	892.50
09/09/24	Qian, Echo	Post hearing conference with B Dolphin (.2), review plan documents (.8) and draft COC for revised solicitation order (.3).	1.3	773.50
09/09/24	Dolphin, Brenna	Coordinate with DPW re filing revised combined disclosure statement and plan, redline, reply to U.S. Trustee objection, and revised solicitation procedures order (.2); oversee filing of notice of revised combined plan and disclosure statement (.4), reply in support of solicitation procedures motion (.3); and notice of revised 9019 order (.4); coordinate with Verita re service of same (.1)	1.4	1,351.00
09/09/24	Dolphin, Brenna	Revise solicitation procedures order (1.5); circulate revised draft to J. McClammy, N. D'Angelo, and R. Steinberg for review (.1); incorporate edit from R. Steinberg (.2)	1.8	1,737.00
09/09/24	Dolphin, Brenna	Draft summary of solicitation procedures as part of hearing preparation for R. Steinberg	1.7	1,640.50
09/09/24	Dolphin, Brenna	Summarize solicitation deadlines (.2); provide to K. Winiarski (.1)	0.3	289.50
09/09/24	Dolphin, Brenna	Revise certification of counsel re solicitation procedures order (.3) and discuss with R. Steinberg (.2)	0.5	482.50
09/09/24	Dolphin, Brenna	Respond to inquiry from Verita re equity holders (.3); emails with D. Butz re same (.2)	0.5	482.50
09/09/24	Dolphin, Brenna	Communicate with DPW and Morris Nichols teams re final 9019 order (.1); revised solicitation procedures order (.1) and revised combined disclosure statement and plan (.1)	0.3	289.50
09/09/24	Dolphin, Brenna	Provide revised solicitation procedures order to U.S. Trustee	0.2	193.00
09/09/24	Dolphin, Brenna	Circulate revised solicitation procedures order to committee counsel	0.2	193.00
09/09/24	Dolphin, Brenna	Provide revised solicitation procedures order to CVI counsel	0.2	193.00
09/09/24	Butz, Daniel B.	Review voting amount spreadsheet from Verita	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/09/24	Butz, Daniel B.	Review email from S Greissman re: plan B.	0.1	96.50
09/09/24	Butz, Daniel B.	Review email from M Western re: claims reconciliation for plan purposes (.1); confer with S Churchill re: same (.1); draft email to M Western re: claims issues (.2); emails with M Western re: tax claims (.1)	0.5	482.50
09/09/24	Butz, Daniel B.	Review emails from KCC re certain voting classes (.1); review email from B Dolphin re: same (.1); email to B Dolphin re: same (.1)	0.3	289.50
09/09/24	Remming, Andrew	Emails re exculpation revisions to chapter 11 plan (.4) and office conference with B. Resnick and R. Steinberg re same (.2).	0.6	687.00
09/09/24	Remming, Andrew	Review emails from D. Butz and M. Western re disclosure statement recovery estimates.	0.1	114.50
09/09/24	Remming, Andrew	Review revised version of solicitation procedures order from B. Dolphin and emails re same from B. Dolphin.	0.2	229.00
09/09/24	Remming, Andrew	Review email from M. Bates re exculpation language in chapter 11 plan and UST comments to same.	0.1	114.50
09/09/24	Rogers Churchill, Sophie	Confer with D. Butz re: claims reconciliation for plan purposes	0.1	63.50
09/10/24	Qian, Echo	Research re plan precedents.	0.9	535.50
09/10/24	Weidman, Rebecca	Prepare and file solicitation version of combined plan and disclosure statement (.4); Correspondence with B. Dolphin re: same (.1); Coordinate service of same (.1); Prepare and file redline of combined plan and disclosure statement (.2); Coordinate service of same (.1); Prepare and file certification of counsel re: solicitation procedures order (.2); Upload order to Court site (.1); Download Court entered order re: same and coordinate service (.1)	1.3	513.50
09/10/24	Dolphin, Brenna	Discuss solicitation package materials to be sent to equity holders who filed proofs of claim with Verita (.2), S. Rogers Churchill (.2), and D. Butz (.2)	0.6	579.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Dolphin, Brenna	Communicate with committee counsel re solicitation procedures order	0.2	193.00
09/10/24	Dolphin, Brenna	Call from M. Russell re committee comments to solicitation procedures order	0.1	96.50
09/10/24	Dolphin, Brenna	Review and summarize dockets re status of plan confirmation in other relevant cases (.6); provide summary to DPW (.1)	0.7	675.50
09/10/24	Dolphin, Brenna	Review confirmation from U.S. Trustee re solicitation procedures order (.1); communicate with committee counsel re same and request sign off (.1)	0.2	193.00
09/10/24	Dolphin, Brenna	Call from M . Russell re additional revision to solicitation procedures order (.1); incorporate into form of order (.2) and circulate to DPW for review and comment (.2); discuss strategy for resolving with R. Steinberg (.1) and R. Dehney (.1)	0.7	675.50
09/10/24	Dolphin, Brenna	Communicate with Verita to confirm time by which Verita must receive materials to begin solicitation process (.1); call with D. Calderon (.1); update DPW re cut off (.1)	0.3	289.50
09/10/24	Dolphin, Brenna	Communicate with U.S. Trustee re approval of revised solicitation procedures order to include committee comments (.2); review confirmation of U.S. Trustee sign off (.1)	0.3	289.50
09/10/24	Dolphin, Brenna	Communicate with R. Steinberg re filing solicitation version of final combined disclosure statement and plan and black line version (.3); coordinate with R. Weidman re filing solicitation version and black line version (.2)	0.5	482.50
09/10/24	Dolphin, Brenna	Call from R. Steinberg re obtaining CVI sign off on solicitation version of the combined plan and disclosure statement	0.1	96.50
09/10/24	Dolphin, Brenna	Communicate with White & Case re revised solicitation procedures order and revision incorporated at committee request (.3); review confirmation from N. Abbattista re CVI sign off (.1)	0.4	386.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Dolphin, Brenna	Update and finalize certification of counsel regarding solicitation procedures order	0.2	193.00
09/10/24	Dolphin, Brenna	Coordinate with R. Weidman re filing certification of counsel regarding solicitation procedures order	0.2	193.00
09/10/24	Dolphin, Brenna	Communicate with Chambers re certification of counsel and final solicitation procedures order and to request permission to cancel the September 12th hearing	0.4	386.00
09/10/24	Dolphin, Brenna	Provide certification of counsel regarding solicitation procedures order to A. Hrycak	0.1	96.50
09/10/24	Dolphin, Brenna	Read September 9th hearing transcript re status of solicitation procedures order and 9019 motion	0.4	386.00
09/10/24	Dolphin, Brenna	Finalize solicitation materials - solicitation and tabulation materials (.2), voting combined notice (.2), class 3 ballot (.2), class 4 ballot (.2), beneficial holder ballot (.2), master ballot (.2), non-voting combined notice (.2), beneficial holder non-voting combined hearing notice (.2), and master opt-out form (.2) - and provide to Verita for use in soliciting (.1); call with D. Calderon re same (.1)	2.0	1,930.00
09/10/24	Dolphin, Brenna	Confer with S. Rogers Churchill, E. Qian, and R. Weidman re comment from Texas Workforce Commission	0.1	96.50
09/10/24	Dolphin, Brenna	Circulate precedent from relevant cases to N. D'Angelo	0.1	96.50
09/10/24	Dolphin, Brenna	Revise and finalize the joint hearing notice (.3); email with A. Remming re same (.1); communicate with DPW re approval to file the joint hearing notice (.2); coordinate with M. Reed re filing notice (.1); respond to inquiry from Verita (D. Calderon) re timing of filing notice (.1); provide filed joint hearing notice to Verita (.1)	0.9	868.50
09/10/24	Dolphin, Brenna	Call with D. Calderon (Verita) re information needed to populate ballot	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Butz, Daniel B.	Work on solicitation question--research claims re: same (.9); emails with D Calderon at KCC re: same (.1); review emails from R Steinberg and B Dolphin and UST re: solicitation order (.1); emails with M Western re: tax meeting (.1); review emails from B Dolphin and KCC re: solicitation materials (.1)	1.3	1,254.50
09/10/24	Butz, Daniel B.	Attend call with Huron re: claims estimate process (.3); review email from M Western re: same (.1)	0.4	386.00
09/10/24	Butz, Daniel B.	Finish work on solicitation review (.5); emails with KCC re: same (.1)	0.6	579.00
09/10/24	Butz, Daniel B.	Emails with KCC re: solicitation report (.2); review emails from B Dolphin re: solicitation notice (.1)	0.3	289.50
09/10/24	Dehney, Robert J.	Office conference with B. Dolphin re solicitation procedures order.	0.1	169.50
09/10/24	Remming, Andrew	Review research re release issue (.2) and emails re same from N. D'Angelo and B. Dolphin (.1).	0.3	343.50
09/10/24	Remming, Andrew	Review revised version of joint hearing notice and emails re same from B. Dolphin and R. Steinberg.	0.2	229.00
09/10/24	Remming, Andrew	Review revised version of solicitation procedures order (.2) and emails re same from B. Dolphin, R. Steinberg, R. Dehney and B. Resnick (.1).	0.3	343.50
09/10/24	Remming, Andrew	Review update re UST approval of solicitation procedures order from B. Dolphin.	0.1	114.50
09/10/24	Remming, Andrew	Review UCC letter re plan/solicitation (.1) and emails re same from R. Steinberg, B. Dolphin and D. Calderon (.2).	0.3	343.50
09/10/24	Remming, Andrew	Review emails from B. Dolphin and Kroll team re finalization of solicitation materials.	0.1	114.50
09/10/24	Remming, Andrew	Emails with R. Dehney and R. Steinberg re UCC letter re plan/solicitation.	0.1	114.50
09/10/24	Dehney, Robert J.	Emails with B. Dolphin and DPW re revised solicitation procedures order.	0.1	169.50
09/10/24	Dehney, Robert J.	Emails with A. Remming and DPW re UCC letter re plan/solicitation.	0.1	169.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	Rogers Churchill, Sophie	Confer with B. Dolphin re: solicitation packages	0.2	127.00
09/10/24	Butz, Daniel B.	Confer with B. Dolphin re: solicitating equity	0.2	193.00
09/10/24	Rogers Churchill, Sophie	Confer with B. Dolphin, E. Qian, and R. Weidman re comment from Texas Workforce Commission	0.1	63.50
09/10/24	Qian, Echo	Confer with B. Dolphin, S. Rogers Churchill, and R. Weidman re comment from Texas Workforce Commission	0.1	59.50
09/11/24	Qian, Echo	Review emails from Verita and D Butz re solicitation.	0.2	119.00
09/11/24	Dolphin, Brenna	Call from D. Calderon (Verita) re general bar date cut off (.1); communicate with R. Steinberg re confirmation of general bar date and cut off for voting record date/solicitation purposes (.2)	0.3	289.50
09/11/24	Dolphin, Brenna	Circulate draft joint hearing notice (publication) to DPW for review and approval	0.2	193.00
09/11/24	Dolphin, Brenna	Revise joint hearing notice (publication version) (.6); circulate to DPW for review and approval of same (.1)	0.7	675.50
09/11/24	Dolphin, Brenna	Communicate with Verita re joint hearing notice (publication version)	0.2	193.00
09/11/24	Butz, Daniel B.	Review email from D Calderon re: voting report and solicitation issues	0.1	96.50
09/11/24	Butz, Daniel B.	Review email from company re: tax claim estimations and email from M Western re: same	0.1	96.50
09/11/24	Butz, Daniel B.	Review email from B Dolphin re: publication notice and review same (.1); review email from R Steinberg re: same (.1)	0.2	193.00
09/11/24	Butz, Daniel B.	Review revised hearing publication notice from B Dolphin	0.1	96.50
09/11/24	Butz, Daniel B.	Review email from N D'Angelo re: conference (.1); review email from R Dehney re: same (.1)	0.2	193.00
09/11/24	Butz, Daniel B.	Call with B Dolphin re: bar date and solicitation issues (.1); review email from B Dolphin re: same (.1); review email from D Calderon re: same (.1)	0.3	289.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/11/24	Remming, Andrew	Emails re solicitation questions from Verita from D. Calderon, R. Steinberg and B. Dolphin.	0.1	114.50
09/11/24	Remming, Andrew	Review draft confirmation notice from B. Dolphin and emails re same from R. Steinberg and B. Dolphin.	0.2	229.00
09/11/24	Dolphin, Brenna	Call with D. Butz re: bar date and solicitation issues	0.1	96.50
09/12/24	Dolphin, Brenna	Read update from Verita re ballot sent to CVI and proof of claim filed by CVI	0.1	96.50
09/12/24	Butz, Daniel B.	Review email from D Calderon re: voting spreadsheet	0.1	96.50
09/13/24	Dolphin, Brenna	Discuss publication notice with Verita (.1); communicate with Davis Polk re finalizing publication notice (.1)	0.2	193.00
09/13/24	Butz, Daniel B.	Review email from B Dolphin re: joint hearing notice for publication and review same	0.2	193.00
09/13/24	Remming, Andrew	Review update from B. Dolphin re publication notice.	0.1	114.50
09/13/24	Remming, Andrew	Review update re claims analysis from D. Calderon.	0.1	114.50
09/15/24	Dolphin, Brenna	Review voting spreadsheet from Verita	0.1	96.50
09/15/24	Remming, Andrew	Review update from D. Calderon re voting amounts.	0.1	114.50
09/16/24	Dolphin, Brenna	Communicate with Verita re solicitation.	0.2	193.00
09/17/24	Qian, Echo	Research re assumption schedule in plan supplement.	1.3	773.50
09/17/24	Qian, Echo	Further research on executory contract schedule in plan supplement and email D Butz re the same.	0.5	297.50
09/17/24	Qian, Echo	Email DPW re plan schedule.	0.1	59.50
09/17/24	Qian, Echo	Review Smallhold transcript.	0.8	476.00
09/17/24	Dolphin, Brenna	Review hearing transcripts from Smallhold and Jambys re opt out discussion referenced by U.S. Trustee in objection to solicitation procedures motion	0.4	386.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/24	Dolphin, Brenna	Confer with E. Qian re summarizing Smallhold and Jambys and monitoring outcome of Sticky's Holding re omnibus reply to objections and brief in support of approval of disclosure statement and plan confirmation	0.1	96.50
09/17/24	Dolphin, Brenna	Respond to K. Winiarski re contract assumption schedule to be filed as part of plan supplement	0.1	96.50
09/17/24	Dolphin, Brenna	Confer with E. Qian and D. Butz re contract assumption schedule precedent	0.2	193.00
09/17/24	Butz, Daniel B.	Review email from K Winiarski re: plan supplement issues (.1); review emails from B Dolphin re: same (.1)	0.2	193.00
09/17/24	Butz, Daniel B.	Review email from E Qian re: plan supplement question (.1); email to E Qian re: same (.1)	0.2	193.00
09/17/24	Butz, Daniel B.	Review email from K Winiarski re: trust agreement for plan supplement and email from B Dolphin re: same (.1); review same (.3); review email from E Qian re: plan supplement schedule (.1)	0.5	482.50
09/17/24	Remming, Andrew	Initial review of draft trust agreement and emails re same from K. Winiarski and B. Dolphin.	0.2	229.00
09/17/24	Remming, Andrew	Review research/precedent re plan supplement issues (.4) and emails re with K. Winiarski, B. Dolphin and E. Qian (.1).	0.5	572.50
09/17/24	Qian, Echo	Confer with B. Dolphin re precedent in support of DS approval	0.1	59.50
09/17/24	Butz, Daniel B.	Confer with E. Qian and B. Dolphin re contract assumption schedule precedent	0.2	193.00
09/17/24	Qian, Echo	Confer with D. Butz and B. Dolphin re contract assumption schedule precedent	0.2	119.00
09/18/24	Dolphin, Brenna	Review IP Austria trust agreement	1.1	1,061.50
09/18/24	Remming, Andrew	Review email from B. Dolphin re LTA.	0.1	114.50
09/19/24	Dolphin, Brenna	Communicate with DPW re final version of publication notice (joint hearing to approve disclosure statement and approve plan)	0.2	193.00
09/19/24	Butz, Daniel B.	Review emails from B Dolphin and R Steinberg re: publication notice	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/19/24	Remming, Andrew	Review emails from B. Dolphin and R. Steinberg re publication notice.	0.1	114.50
09/20/24	Dolphin, Brenna	Provide publication notice to Verita re joint hearing	0.1	96.50
09/20/24	Dolphin, Brenna	Review ad proof re joint hearing publication notice from Verita	0.1	96.50
09/20/24	Dolphin, Brenna	Confer with R. Dehney re U.S. Trustee's objection to the combined disclosure statement and plan	0.2	193.00
09/20/24	Qian, Echo	Review Smallhold transcript and summarize and email B Dolphin re the same.	0.9	535.50
09/20/24	Qian, Echo	Email MNAT re Smallhold transcript.	0.2	119.00
09/20/24	Qian, Echo	Review precedent re plan releases	1.0	595.00
09/20/24	Butz, Daniel B.	Review publication notice	0.1	96.50
09/20/24	Remming, Andrew	Review recent precedent re opt-out issue and emails re same from R. Dehney, B. Dolphin and E. Qian.	0.2	229.00
09/20/24	Dehney, Robert J.	Confer with B. Dolphin re U.S. Trustee's objection to the combined disclosure statement and plan	0.2	339.00
09/23/24	Dolphin, Brenna	Revise notice of filing of first amended combined disclosure statement and plan	0.1	96.50
09/23/24	Dolphin, Brenna	Provide draft notice of filing of first combined disclosure statement and plan to A. Leary and discuss filings	0.1	96.50
09/23/24	Dolphin, Brenna	Review solicitation procedures motion and solicitation procedures order (.1); discuss service requirements with S. Rogers Churchill (.1); advise Verita re service of plan supplement and amended combined disclosure statement and plan (.2)	0.4	386.00
09/23/24	Dolphin, Brenna	Discuss status of filing plan supplement with R. Beck, Delaware counsel to CVI	0.3	289.50
09/23/24	Dolphin, Brenna	Discuss plan supplement filing with E. Qian	0.1	96.50
09/23/24	Dolphin, Brenna	Confer with A. Leary re updates on plan supplement filing and filing amended combined disclosure statement and plan	0.3	289.50
09/23/24	Dolphin, Brenna	Draft notice of filing of plan supplement (.7); provide to A. Leary (.1)	0.8	772.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/23/24	Dolphin, Brenna	Discuss plan supplement filing and inquiry from R. Beck with A. Remming	0.1	96.50
09/23/24	Dolphin, Brenna	Revise notice of filing plan supplement to incorporate comments from K. Winiarski	0.1	96.50
09/23/24	Dolphin, Brenna	Assist with finalizing notice of filing plan supplement and finalizing combined disclosure statement and plan for filing	0.7	675.50
09/23/24	Qian, Echo	Draft notice of amended plan and email B Dolphin re upcoming filings.	0.4	238.00
09/23/24	Qian, Echo	Prepare for filing of plan supplement and amended plan, including emails to MNAT re filing plan, emails to paralegals re filing communication with B Dolphin re the same, finalizing the plan documents for filing.	3.0	1,785.00
09/23/24	Butz, Daniel B.	Review emails from S Steinberg and K Winiarski re: plan supplement and revised plan/ds (.1); review same and start prep for filing (.3); email to S Steinberg and K Winiarski re: same (.1); review email from S Churchill re: same and email to E Qian, S Churchill and B Dolphin re: same (.1); review filings (.2)	0.8	772.00
09/23/24	Remming, Andrew	Review plan supplement documents (.3) and emails re same from K. Winiarski, R. Steinberg, D. Butz and E. Qian (.1).	0.4	458.00
09/23/24	Remming, Andrew	Review email from B. Dolphin re plan supplement.	0.1	114.50
09/24/24	Walker, Valerie	Review and respond to emails from E. Qian re: notices (.1); prepare and efile Notice of Filing of Plan Supplement to Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and Its Debtor Affiliates (.2); prepare and efile Notice of Filing of First Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and Its Debtor Affiliates (.1)	0.4	142.00
09/24/24	Qian, Echo	Coordinate filing of plan supplement and amended plan.	0.4	238.00
09/24/24	Dolphin, Brenna	Review voting report from Verita	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/24/24	Butz, Daniel B.	Review email from M Western re: priority claim estimates	0.1	96.50
09/24/24	Butz, Daniel B.	Review email from M Yoon re: tax claim estimation (.1); emails with M Western re: same (.1)	0.2	193.00
09/24/24	Butz, Daniel B.	Attend call with M Western and M Yoon on claims reconciliation and estimation	0.5	482.50
09/24/24	Remming, Andrew	Review revised version of plan/DS.	1.4	1,603.00
09/24/24	Remming, Andrew	Review update re plan voting from D. Calderon.	0.1	114.50
09/25/24	Qian, Echo	Research re exclusivity extension precedent (0.2), email L Brzozowski re the same (0.1), confer with B Dolphin re the same (0.2).	0.5	297.50
09/25/24	Qian, Echo	Email MNAT re Smallhold opinion.	0.3	178.50
09/25/24	Qian, Echo	Confer with D Butz re releases (0.2), analyze Smallhold opinion and email D Butz re the same (1.8)	2.0	1,190.00
09/25/24	Qian, Echo	Further analysis of Smallhold.	0.3	178.50
09/25/24	Dolphin, Brenna	Review opinion from Smallhold re opt out	0.3	289.50
09/25/24	Butz, Daniel B.	Review recent decision on release provisions in connection with plan	1.0	965.00
09/25/24	Butz, Daniel B.	Work with E Qian on analysis of case research	0.3	289.50
09/25/24	Remming, Andrew	Review recent decision re opt-out issue and emails re same with E. Qian, R. Dehney and D. Butz.	0.3	343.50
09/26/24	Butz, Daniel B.	Review email from K Winiarski and S Churchill re: confirmation order	0.1	96.50
09/26/24	Remming, Andrew	Review email from K. Winiarski re draft confirmation order.	0.1	114.50
09/27/24	Turner, Brianna	Confer with S. Rogers Churchill re Confirmation Order.	0.2	109.00
09/27/24	Turner, Brianna	Review and comment on draft confirmation order.	4.1	2,234.50
09/27/24	Rogers Churchill, Sophie	Revise and comment on draft confirmation order (2.3); review precedent re same (2.5); send comments to MNAT team (.1).	4.9	3,111.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/27/24	Rogers Churchill, Sophie	Confer with B. Turner re confirmation order.	0.2	127.00
09/27/24	Rogers Churchill, Sophie	Respond to email from R. Steinberg re plan supplement (.1); call with R. Steinberg re same (.1).	0.2	127.00
09/27/24	Remming, Andrew	Review revised version of draft confirmation order from SR Churchill (.3); emails with SR Churchill re same (.1).	0.4	458.00
09/29/24	Rogers Churchill, Sophie	Research re confirmation order precedent.	1.1	698.50
09/29/24	Remming, Andrew	Review and edit draft confirmation order.	0.8	916.00
09/29/24	Remming, Andrew	Emails with SR Churchill re revisions to confirmation order.	0.1	114.50
09/30/24	Dolphin, Brenna	Call with R. Steinberg, A. Leary, and K. Winiarski re confirmation strategy and issues related to foreign subsidiaries	0.6	579.00
09/30/24	Dolphin, Brenna	Discuss confirmation brief drafting and confirmation related deadlines with S. Rogers Churchill	0.2	193.00
09/30/24	Butz, Daniel B.	Finish review of draft confirmation order (.7); emails with S Churchill re: same (.1)	0.8	772.00
09/30/24	Rogers Churchill, Sophie	Emails with B. Dolphin re confirmation brief.	0.1	63.50
09/30/24	Rogers Churchill, Sophie	Confer with A. Remming re confirmation brief (.1); confer with B. Dolphin re same (.2); confer with D. Butz re same and confirmation order (.1).	0.4	254.00
09/30/24	Rogers Churchill, Sophie	Revise confirmation order and send to DPW.	0.2	127.00
09/30/24	Remming, Andrew	Confer with S. Rogers Churchill re confirmation brief	0.1	114.50
09/30/24	Butz, Daniel B.	Confer with S. Rogers Churchill re confirmation brief and confirmation order	0.1	96.50
Total			110.1	94,426.50

Task Code: B330 Litigation/Adversary Proceedings

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/24	Dolphin, Brenna	Review and summarize the shareholder class action (.2), securities class action (.2), and four shareholder derivative suits (.8)	1.2	1,158.00
09/08/24	Dolphin, Brenna	Review statements of financial affairs for all six debtors (.6); begin drafting motion to extend removal deadline (.4)	1.0	965.00
09/13/24	Dolphin, Brenna	Finish drafting motion to extend removal deadline and proposed form of order (3.8); circulate draft to Davis Polk (.2)	4.0	3,860.00
09/13/24	Butz, Daniel B.	Review emails from A Remming and B Dolphin re: motion for removal extension	0.1	96.50
09/13/24	Remming, Andrew	Review draft of removal motion (.2) and emails re same with B. Dolphin (.1).	0.3	343.50
09/16/24	Reed, Marie	Review and respond to email from B. Dolphin re filing motion (.1); prepare and e-file Motion of Debtors for Entry of an Order Extending the Debtors' Time to File Notices of Removal of Claims and Causes of Action Related to the Debtors' Chapter 11 Cases (.2)	0.3	106.50
09/16/24	Dolphin, Brenna	Revise motion to extend removal deadline (.1); re-circulate to DPW (.1)	0.2	193.00
09/16/24	Dolphin, Brenna	Revise motion to extend removal deadline to incorporate comment from R. Steinberg (.1); recirculate revised version for final DPW review and approval (.1)	0.2	193.00
09/16/24	Dolphin, Brenna	Coordinate with M. Reed re filing motion to extend removal deadline	0.2	193.00
09/16/24	Dolphin, Brenna	Draft notice of motion to extend removal deadline	0.1	96.50
09/16/24	Dolphin, Brenna	Coordinate with Verita re service of motion to extend removal deadline (.1); review SOFAs and provide service information (.2)	0.3	289.50
09/16/24	Butz, Daniel B.	Confer with B Dolphin re: motion to extend removal time	0.1	96.50
09/16/24	Butz, Daniel B.	Review email from B Dolphin re: removal motion (.1); review proposed motion to extend deadline (.2); email to B Dolphin with comments to same (.1)	0.4	386.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/16/24	Butz, Daniel B.	Confer with B Dolphin re: claim issues and extension motion (.1); review email from B Dolphin re: extension motion and email from R Steinberg re: same (.1)	0.2	193.00
09/16/24	Butz, Daniel B.	Confer with B Dolphin re: extension for removal (.1); review email from B Dolphin re: motion to extend removal time (.1); review emails from R Steinberg and B Dolphin re: same (.1)	0.3	289.50
09/16/24	Remming, Andrew	Review further revised version of motion to extend removal deadlines (.3), review further revisions to same (.2) and emails re same with B. Dolphin and R. Steinberg (.1).	0.6	687.00
09/16/24	Dolphin, Brenna	Confer with D Butz re: motion to extend removal time	0.1	96.50
09/16/24	Dolphin, Brenna	Confer with D. Butz re: extension for removal	0.1	96.50
09/29/24	Dolphin, Brenna	Respond to Verita re service of motion to extend time to remove actions	0.1	96.50
09/30/24	Qian, Echo	Draft CNO for motion for removal extension.	0.2	119.00
Total			10.0	9,555.00

Task Code: B360 Professional Retention (Others - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/01/24	Dolphin, Brenna	Review executed declaration re Pension Assurance and 401k audit	0.1	96.50
09/03/24	Reed, Marie	Review and respond to email from E. Qian re filing notice (.1); prepare and e-file First Supplemental Notice of Ordinary Course Professionals (.2)	0.3	106.50
09/03/24	Qian, Echo	Email B Dolphin re filing Pension Assurance OCP declaration.	0.1	59.50
09/03/24	Qian, Echo	Email M Reed and B Dolphin re filing notice of OCP.	0.2	119.00
09/03/24	Qian, Echo	Email Pension Assurance re as-filed OCP notice and re withdrawal of claim.	0.2	119.00
09/03/24	Dolphin, Brenna	Communicate with A. Salinas, Huron and RBSM representatives re retention application process, engagement letter, and connections	0.3	289.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Dolphin, Brenna	Communicate and coordinate with E. Qian re supplemental ordinary course professional notice filing re Pension Assurance (.3); review draft supplemental notice (.1)	0.4	386.00
09/03/24	Remming, Andrew	Review update from B. Dolphin re RBSM retention application.	0.1	114.50
09/03/24	Remming, Andrew	Review emails re OCP issues from SR Churchill and K. Askew.	0.1	114.50
09/04/24	Dolphin, Brenna	Review executed engagement letter re RBSM accountants and 2023 tax return preparation	0.1	96.50
09/04/24	Rogers Churchill, Sophie	Emails with Huron re OCP invoice.	0.1	63.50
09/04/24	Remming, Andrew	Review update re Orrick OCP retention from K. Askew.	0.1	114.50
09/05/24	Dolphin, Brenna	Communicate with S. Berde re RBSM retention application	0.1	96.50
09/06/24	Dolphin, Brenna	Call with J. Palacios re Huron services approved by retention order	0.1	96.50
09/06/24	Dolphin, Brenna	Call with S. Berde re RBSM engagement letter and the Berde declaration in support of the retention application	0.1	96.50
09/10/24	Dolphin, Brenna	Call with M. Russell re Orrick OCP retention and committee question re same	0.1	96.50
09/10/24	Dolphin, Brenna	Update R. Steinberg re committee concern over Orrick OCP retention	0.1	96.50
09/10/24	Dolphin, Brenna	Confirm extension of deadline for committee to respond to Orrick OCP retention to M. Russell	0.1	96.50
09/10/24	Remming, Andrew	Review inquiries re Orrick OCP retention from M. Bates and email re same from K. Askew.	0.1	114.50
09/11/24	Qian, Echo	Update OCP tracker	0.1	59.50
09/11/24	Dolphin, Brenna	Communicate with J. Palacios re status of Orrick OCP retention	0.1	96.50
09/11/24	Dolphin, Brenna	Call with K. Askew re Orrick OCP retention and committee questions re same	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/11/24	Dolphin, Brenna	Read latest communication from U.S. Trustee re Orrick OCP retention forwarded by K. Askew	0.1	96.50
09/11/24	Remming, Andrew	Confer with B. Dolphin re OCP issues.	0.2	229.00
09/11/24	Dolphin, Brenna	Confer with A. Remming re OCP issues.	0.2	193.00
09/12/24	Dolphin, Brenna	Call with B. Butterfield, M. Russell, and R. Steinberg re Orrick OCP retention and motion to allow D&O policies to cover payment and advancement of defense costs	0.3	289.50
09/12/24	Dolphin, Brenna	Read update from K. Askew re responses to U.S. Trustee's questions on Orrick OCP retention	0.1	96.50
09/12/24	Remming, Andrew	Review update from K. Askew re Orrick OCP declaration.	0.1	114.50
09/12/24	Remming, Andrew	Review analysis of OCP issues from K. Askew (Orrick).	0.1	114.50
09/13/24	Dolphin, Brenna	Communicate with M. Russell re extension of time for committee to object to Orrick OCP retention	0.2	193.00
09/13/24	Dolphin, Brenna	Revise RBSM retention application to incorporate comments received from S. Berde	0.8	772.00
09/13/24	Dolphin, Brenna	Review update from K. Askew re ongoing discussion with U.S. Trustee re Orrick OCP retention	0.1	96.50
09/13/24	Dolphin, Brenna	Review update from Nelson Mullins re OCP retention and payment of invoices	0.1	96.50
09/16/24	Dolphin, Brenna	Revise RBSM retention application (.5); circulate to S. Berde for confirmation re potential parties in interest (.2)	0.7	675.50
09/16/24	Dolphin, Brenna	Communicate with U.S. Trustee re Orrick OCP retention	0.1	96.50
09/16/24	Dolphin, Brenna	Review, revise and finalize RBSM retention application to incorporate feedback from S. Berde	0.6	579.00
09/16/24	Dolphin, Brenna	Provide RBSM retention application to J. DiDonato for review and approval	0.1	96.50
09/16/24	Dolphin, Brenna	Provide final draft of RBSM retention application to S. Berde for review and approval	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/16/24	Dolphin, Brenna	Call from M. Russell (committee counsel) re Orrick OCP retention and status of same	0.1	96.50
09/16/24	Dolphin, Brenna	Email to M. Russell confirming extension of deadline for committee to respond or object to Orrick OCP retention	0.1	96.50
09/16/24	Remming, Andrew	Review update from B. Dolphin re RBSM retention application.	0.1	114.50
09/16/24	Remming, Andrew	Review email from M. Bates re Orrick OCP declaration.	0.1	114.50
09/17/24	Dolphin, Brenna	Discuss RBSM retention application and filing same with S. Berde	0.1	96.50
09/17/24	Dolphin, Brenna	Draft notice of withdrawal re Orrick OCP retention (.1); review correspondence from U.S. Trustee re Orrick OCP retention (.1); discuss strategy for addressing with K. Askew (Orrick) (.1) and A. Remming (.1); respond to inquiry from U.S. Trustee re Orrick OCP retention (.1)	0.5	482.50
09/17/24	Remming, Andrew	Confer with B. Dolphin re OCP issues.	0.2	229.00
09/17/24	Remming, Andrew	Review draft notice of withdrawal re Orrick OCP declaration (.1) and emails re same with B. Dolphin, K. Askew (.2).	0.3	343.50
09/18/24	Weidman, Rebecca	Draft notice of RBSM retention application (.2); Correspondence with B. Dolphin re: same (.1); File RBSM retention application (.2); Coordinate service of same (.1)	0.6	237.00
09/18/24	Dolphin, Brenna	Review notice of retention application re RBSM	0.1	96.50
09/18/24	Dolphin, Brenna	Confer with J. DiDonato re authorization to file RBSM retention application	0.2	193.00
09/18/24	Dolphin, Brenna	Confer with S. Berde re filing RBSM retention application	0.1	96.50
09/18/24	Dolphin, Brenna	Circulate as filed RBSM retention application to J. DiDonato (.1); provide as-filed version to S. Berde (.1)	0.2	193.00
09/18/24	Dolphin, Brenna	Communicate with M. Russell (committee counsel) re status of Orrick ordinary course professional retention and proposed resolution of same	0.2	193.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/18/24	Remming, Andrew	Emails re RBSM retention application with B. Dolphin.	0.1	114.50
09/23/24	Dolphin, Brenna	Review email from K. Askew re filing notice of withdrawal of Orrick OCP retention	0.1	96.50
09/23/24	Dolphin, Brenna	Confirm with DPW re filing notice of withdrawal of Orrick OCP retention	0.1	96.50
09/23/24	Remming, Andrew	Review update from K. Askew re OCP declaration.	0.1	114.50
09/25/24	Qian, Echo	Research re OCP list and email S R Churchill re the same.	0.2	119.00
09/25/24	Dolphin, Brenna	Discuss filing notice of withdrawal of Orrick OCP retention with K. Askew (.1) and DPW (.1)	0.2	193.00
09/25/24	Remming, Andrew	Review emails from K. Askew, R. Steinberg and B. Dolphin re status of Orrick OCP declaration.	0.1	114.50
09/29/24	Dolphin, Brenna	Provide order to L. Richenderfer re RBSM retention	0.1	96.50
09/29/24	Dolphin, Brenna	Revise form of order to incorporate comments from U.S. Trustee (.2); communicate with S. Berde re revisions and responses to questions from U.S. Trustee (.3)	0.5	482.50
09/30/24	Dolphin, Brenna	Review fee estimates provided by other accountants re 2023 tax preparation services	0.1	96.50
09/30/24	Dolphin, Brenna	Communicate with S. Berde re RBSM retention application and questions from U.S. Trustee	0.1	96.50
09/30/24	Dolphin, Brenna	Return call from S. Berde re RBSM retention application and U.S. Trustee questions re same	0.1	96.50
09/30/24	Dolphin, Brenna	Call with S. Berde re responses to U.S. Trustee questions re RBSM retention	0.1	96.50
09/30/24	Qian, Echo	Draft COC for RBSM retention app.	0.3	178.50
09/30/24	Qian, Echo	Draft supplemental notice of OCP for Hogan Lovells (0.4), call K Winiarski re the same (0.1) and email Hogan Lovells re the same (0.1).	0.6	357.00
09/30/24	Qian, Echo	Email Hogan Lovells re retention of OCP.	0.1	59.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/30/24	Rogers Churchill, Sophie	Respond to email from K. Winiarski re Hogan Lovells retention (.1); call with E. Qian re same (.1).	0.2	127.00
09/30/24	Rogers Churchill, Sophie	Call with K. Winiarski re Hogan Lovells retention.	0.1	63.50
09/30/24	Qian, Echo	Call with S. Rogers Churchill re Hogan Lovells retention	0.1	59.50
Total			13.3	11,798.50

Task Code: B400 General Corporate Matters (including Corporate Governance)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	Dolphin, Brenna	Call with A. Leary, Huron and S. Rogers Churchill re Canadian entity	0.2	193.00
09/03/24	Dolphin, Brenna	Meet with A. Remming and S. Rogers Churchill re Canadian entity	0.3	289.50
09/03/24	Remming, Andrew	Confer with SR Churchill and B. Dolphin re Canadian issues.	0.3	343.50
09/03/24	Rogers Churchill, Sophie	Confer with A. Remming and B. Dolphin re Canadian issues.	0.3	190.50
09/04/24	Dolphin, Brenna	Call with K. Katsma, K. Zych, J. DiDonato, J. Palacios, J. Mueller, J. Alt, R. Steinberg, and A. Leary re Canada strategy	0.8	772.00
09/04/24	Dolphin, Brenna	Confer with A. Remming re Canada strategy and outcome of call	0.1	96.50
09/04/24	Dolphin, Brenna	Discuss outcome of Canada strategy call with S. Rogers Churchill	0.1	96.50
09/04/24	Remming, Andrew	Confer with B. Dolphin re Canada strategy and outcome of call	0.1	114.50
09/04/24	Rogers Churchill, Sophie	Discuss outcome of Canada strategy call with B. Dolphin	0.1	63.50
Total			2.3	2,159.50

Task Code: B410 General Case Strategy

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/02/24	Remming, Andrew	Review and edit draft objection to motion to unseal (.7) and emails re same with B. Dolphin, B. Resnick, R. Dehney and J. McClammy (.2).	0.9	1,030.50
09/02/24	Remming, Andrew	Review draft CVI objection to motion to unseal (.2) and further emails re same with R. Dehney, J. McClammy, R. Dehney, R. Steinberg (.2).	0.4	458.00
09/03/24	Dolphin, Brenna	Meet with S. Rogers Churchill re upcoming filings and preparation for September 9, 2024 hearing	0.1	96.50
09/03/24	Remming, Andrew	Review and edit email memo from SR Churchill re MORs, AL sale order and NHSTA.	0.6	687.00
09/03/24	Rogers Churchill, Sophie	Meet with B. Dolphin re upcoming filings and preparation for September 9, 2024 hearing	0.1	63.50
09/04/24	Butz, Daniel B.	Confer with S Churchill re: plan and other status	0.1	96.50
09/04/24	Dolphin, Brenna	Review email from S. Rogers Churchill re disclosures in MORs, fleet sale order, and NHTSA issues	0.1	96.50
09/04/24	Rogers Churchill, Sophie	Confer with D. Butz re: plan and other status	0.1	63.50
09/05/24	Dolphin, Brenna	Discuss go forward strategy and work streams with S. Rogers Churchill re approval of disclosure statement and plan confirmation	0.3	289.50
09/05/24	Rogers Churchill, Sophie	Confer with B. Dolphin re plan confirmation WIP and workstreams.	0.3	190.50
09/11/24	Rogers Churchill, Sophie	Confer with B. Dolphin re WIP.	0.3	190.50
09/11/24	Dolphin, Brenna	Confer with S. Rogers Churchill re WIP.	0.3	289.50
09/13/24	Dolphin, Brenna	Call from R. Steinberg re case updates	0.2	193.00
09/16/24	Dolphin, Brenna	Discuss upcoming deadlines and work streams with R. Dehney, A. Remming, and E. Qian	0.1	96.50
09/17/24	Qian, Echo	Update WIP.	0.7	416.50
09/17/24	Remming, Andrew	Confer with SR Churchill and B. Dolphin re Huron questions.	0.2	229.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/24	Rogers Churchill, Sophie	Confer with A. Remming and B. Dolphin re Huron questions.	0.2	127.00
09/17/24	Dolphin, Brenna	Confer with SR Churchill and A. Remming re Huron questions.	0.2	193.00
09/19/24	Remming, Andrew	Review draft CNO re Toccata motion to enforce, review revisions to same and emails re same with R. Dehney, B. Dolphin, SR Churchill and R. Dehney.	0.2	229.00
09/27/24	Remming, Andrew	Emails with B. Dolphin re issues re surrender of lease.	0.1	114.50
Total			5.5	5,150.50

Task Code: B420 Schedules/SOFA/U.S. Trustee Reports

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/02/24	Remming, Andrew	Review update from B. Resnick re motion to unseal.	0.1	114.50
09/03/24	Dolphin, Brenna	Follow up with A. Salinas and Huron re status of July 2024 MORs	0.2	193.00
09/03/24	Dolphin, Brenna	Revise global notes re July MORs to incorporate additional comments from A. Salinas	0.3	289.50
09/03/24	Butz, Daniel B.	Review email from B Dolphin re: MORs (.1); review revisions from A Salinas (.1); review email from B Dolphin re: same (.1)	0.3	289.50
09/04/24	Butz, Daniel B.	Attend call with company and Huron on MORs	0.5	482.50
09/04/24	Butz, Daniel B.	Review notices for MOR from B Dolphin and email from A Salinas re: same	0.1	96.50
09/04/24	Dolphin, Brenna	Revise global notes re July 2024 MORs (.2) and circulate to A. Salinas, Huron, and R. Steinberg for review (.1)	0.3	289.50
09/04/24	Dolphin, Brenna	Discuss strategy re global notes and descriptions contained therein (July MOR) with M. Western and A. Salinas	0.2	193.00
09/04/24	Rogers Churchill, Sophie	Call with company and Huron re July MORs.	0.5	317.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/05/24	Dolphin, Brenna	Communicate with A. Salinas, Huron, and R. Steinberg re status of July 2024 MORs and recall/warranty disclosure issue	0.2	193.00
09/05/24	Dolphin, Brenna	Revise global notes re July 2024 MOR to include update from M. Western (.1); discuss remaining open items to be addressed prior to filing (.1)	0.2	193.00
09/05/24	Butz, Daniel B.	Review email from B Dolphin re: MOR	0.1	96.50
09/05/24	Butz, Daniel B.	Review emails from M Western and B Dolphin re: MOR	0.1	96.50
09/06/24	Reed, Marie	Review and respond to email from B. Dolphin re filing MORs (.1); prepare and e-file July Monthly Operating Report for Fisker Group (24-11377) (.2)	0.3	106.50
09/06/24	Reed, Marie	Prepare and e-file July Monthly Operating Report for Blue Current (24-11393).	0.2	71.00
09/06/24	Reed, Marie	Prepare and e-file July Monthly Operating Report for Fisker Inc (24-11390).	0.2	71.00
09/06/24	Reed, Marie	Prepare and e-file July Monthly Operating Report for Fisker TN (24-11391).	0.2	71.00
09/06/24	Reed, Marie	Prepare and e-file July Monthly Operating Report for Platinum (24-11394).	0.2	71.00
09/06/24	Reed, Marie	Prepare and e-file July Monthly Operating Report for Terra Energy (24-11392).	0.2	71.00
09/06/24	Dolphin, Brenna	Review draft July monthly operating reports for all six debtors (.6); communicate with Huron re same (.2)	0.8	772.00
09/06/24	Dolphin, Brenna	Communicate with Huron re inventory and valuation	0.4	386.00
09/06/24	Dolphin, Brenna	Circulate global notes, schedules, and six July monthly operating reports to A. Salinas and J. DiDonato (.2); review approval from A. Salinas and J. DiDonato re filing same (.1)	0.3	289.50
09/06/24	Dolphin, Brenna	Coordinate with M. Reed re filing six July monthly operating reports and oversee same	0.1	96.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/24	Dolphin, Brenna	Coordinate with Verita re service of six July monthly operating reports	0.2	193.00
09/06/24	Dolphin, Brenna	Provide as-filed July monthly operating reports to A. Salinas and J. DiDonato	0.1	96.50
09/06/24	Butz, Daniel B.	Review email from R Steinberg re: amended sale order and review same (.2); review email from B Dolphin re: COC for same and review same (.2)	0.4	386.00
09/06/24	Butz, Daniel B.	Review emails from VC re: MORs and revised final MORs (.1); confer with B Dolphin re: same (.1); review emails from B Dolphin re: final version (.1); review emails from M Western and VC re: same and email from B Dolphin re: same (.1)	0.4	386.00
09/06/24	Dolphin, Brenna	Confer with D. Butz re: almost-final MORs and revised final MORs	0.1	96.50
09/16/24	Remming, Andrew	Review update from D. Butz re question from Huron re schedules/SOFAs.	0.1	114.50
09/20/24	Butz, Daniel B.	Review email from M Western re: MOR (.1); email to M Western re: same (.1)	0.2	193.00
09/30/24	Dolphin, Brenna	Discuss status of August monthly operating reports with V. Chauhan (.2); review draft global notes re same (.1)	0.3	289.50
09/30/24	Butz, Daniel B.	Review email from VC re: MOR and emails from B Dolphin and VC re: same (.1); review sign off from VC re: same (.1)	0.2	193.00
09/30/24	Remming, Andrew	Review emails re V. Chauhan re MOR.	0.1	114.50
Total			8.1	6,912.50

EXHIBIT B
EXPENSE SUMMARY

FISKER INC., et al.
(Case No. 24-11390 (TMH))

September 1, 2024, through September 30, 2024

Expense Category	Total Expenses
In-House Printing - black & white	1,877.90
Pacer	263.40
In-House Printing - color	3,549.60
Supplemental Tech Trial Support Services	721.21
Computer Research - Westlaw	387.30
Support Staff Overtime	1,157.15
Meals	2,101.51
Courier/Delivery Service	527.00
Transcripts	1,306.25
Messenger Service	5.00
In-House Duplicating	36.24
In-House Duplicating - color	232.74
Use of Facilities/Equipment	2,650.00
Grand Total Expenses	\$14,815.30

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
07/27/24	Transcripts – September 2 deposition related to Toccata contested matter	1.0	575.00
09/02/24	Computer Research - Westlaw	1.0	193.20
09/03/24	Pacer	73.0	7.30
09/03/24	In-House Printing - black & white	113.0	11.30
09/04/24	Pacer	229.0	22.90
09/04/24	In-House Printing - black & white	290.0	29.00
09/04/24	In-House Printing - color	23.0	18.40
09/05/24	Pacer	101.0	10.10
09/05/24	In-House Printing - black & white	3,131.0	313.10
09/05/24	In-House Printing - color	35.0	28.00
09/06/24	In-House Printing - black & white	1,448.0	144.80
09/06/24	Pacer	387.0	38.70
09/06/24	Meals – Lunch for ten people in preparation for September 9 hearing	1.0	237.26
09/08/24	Pacer	21.0	2.10
09/08/24	In-House Printing - black & white	95.0	9.50
09/08/24	Supplemental Tech Trial Support Services for September 9 hearing preparation	1.0	557.74
09/08/24	Support Staff Overtime for September 9 hearing preparation	3.0	940.47
09/08/24	Meals - Dinner for ten people in preparation for September 9 hearing	1.0	443.40
09/08/24	Courier/Delivery Service - Dinner delivery to Morris Nichols in preparation for solicitation/DS hearing	1.0	80.00
09/08/24	Courier/Delivery Service - Lunch delivery to Morris Nichols in preparation for solicitation/DS hearing	1.0	140.00
09/08/24	In-House Printing - color	30.0	24.00
09/09/24	In-House Printing - color	3,959.0	3,167.20
09/09/24	Pacer	433.0	43.30
09/09/24	Supplemental Tech Trial Support Services for September 9 hearing preparation	1.0	163.47
09/09/24	In-House Printing - black & white	11,523.0	1,152.30
09/09/24	Meals - Breakfast for 15 people in preparation for September 9 hearing	1.0	496.75
09/09/24	Meals - Lunch for 15 people in preparation for September 9 hearing	1.0	274.10
09/09/24	Meals - Dinner for ten people relating to September 9 hearing	1.0	650.00
09/09/24	Transcripts - Transcript of 9/9 hearing	1.0	408.70

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
09/09/24	Courier/Delivery Service - Lunch delivery fee for September 9 hearing	1.0	90.00
09/09/24	Courier/Delivery Service - Dinner delivery to Morris Nichols for solicitation/DS hearing	1.0	55.00
09/09/24	Courier/Delivery Service - Document removal from courtroom	1.0	81.00
09/09/24	Courier/Delivery Service - Document delivery to courtroom	1.0	81.00
09/09/24	In-House Duplicating	1,812.0	36.24
09/09/24	In-House Duplicating - color	3,879.0	232.74
09/09/24	Use of Facilities/Equipment – Exclusive use of litigation facilities for September 9 hearing preparation	2.0	2,650.00
09/09/24	Support Staff Overtime for September 9 hearing preparation	2.0	216.68
09/10/24	Pacer	260.0	26.00
09/10/24	In-House Printing - color	234.0	187.20
09/10/24	In-House Printing - black & white	610.0	61.00
09/11/24	In-House Printing - black & white	394.0	39.40
09/11/24	Pacer	69.0	6.90
09/11/24	Computer Research - Westlaw	1.0	138.00
09/12/24	Pacer	142.0	14.20
09/12/24	In-House Printing - black & white	22.0	2.20
09/13/24	In-House Printing - black & white	111.0	11.10
09/13/24	Pacer	130.0	13.00
09/15/24	Pacer	60.0	6.00
09/16/24	Pacer	141.0	14.10
09/16/24	In-House Printing - black & white	107.0	10.70
09/16/24	In-House Printing - color	8.0	6.40
09/16/24	Transcripts – September 16 hearing transcript	1.0	98.55
09/16/24	Transcripts - Transcript of 9/19 hearing	1.0	112.00
09/17/24	Pacer	40.0	4.00
09/17/24	In-House Printing - black & white	114.0	11.40
09/17/24	Computer Research - Westlaw	1.0	27.60
09/18/24	In-House Printing - black & white	320.0	32.00
09/18/24	Pacer	113.0	11.30
09/18/24	In-House Printing - color	26.0	20.80
09/18/24	Messenger Service – Delivery of documents to chambers for September 19 hearing.	1.0	5.00
09/19/24	In-House Printing - color	8.0	6.40
09/19/24	Pacer	3.0	0.30

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
09/19/24	Transcripts - Transcript of 9/23 hearing	1.0	112.00
09/20/24	Pacer	13.0	1.30
09/23/24	Pacer	115.0	11.50
09/24/24	Pacer	3.0	0.30
09/24/24	In-House Printing - color	114.0	91.20
09/24/24	In-House Printing - black & white	40.0	4.00
09/25/24	Pacer	228.0	22.80
09/25/24	In-House Printing - black & white	335.0	33.50
09/26/24	In-House Printing - black & white	42.0	4.20
09/27/24	In-House Printing - black & white	42.0	4.20
09/28/24	Computer Research - Westlaw	1.0	28.50
09/30/24	Pacer	73.0	7.30
09/30/24	In-House Printing - black & white	42.0	4.20
		Total	\$14,815.30