

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
IEH AUTO PARTS HOLDING LLC, et al.,¹)	Case No. 23-90054 (CML)
Debtors.)	(Jointly Administered)

Complex Case Fee Application Coversheet (Hourly)

Name of Applicant:	Kane Russell Coleman Logan PC	
Applicant's Role in Case:	Counsel for the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 427	
Interim Application () No. _____ Final Application (X)	First and Final	
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	02/15/2023	10/06/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? Yes		
Do expense reimbursements represent actual and necessary expenses incurred? Yes		

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.



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Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$1,616,164.00
Total professional hours covered by this Application:	2,784.6
Average hourly rate for professionals:	\$580.39
Total paraprofessional fees requested in this Application:	\$53,239.00
Total paraprofessional hours covered by this Application:	232.6
Average hourly rate for paraprofessionals:	\$228.89
Average hourly rate for all professionals:	\$553.30
Total fees requested in this Application:	\$1,676,903.00 ²
Total expense reimbursements requested in this Application:	\$71,240.34
Total fees and expenses requested in this Application:	\$1,748,143.34
Total fees and expenses awarded in all prior Applications:*	N/A
<p>Plan Status: On June 16, 2023, the Court entered its <i>Order Confirming the Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code</i> [Docket No. 749]. The Plan became effective on October 6, 2023 [Docket No. 922].</p>	
<p>Primary Benefits: Days after retaining KRCL, the Committee filed an extensive Objection to the Debtors' proposed insider DIP Facility and commenced expedited discovery. Several key issues cast an ominous cloud over Unsecured Creditors' receiving any recovery: (i) the proposed Insider-funded DIP Financing was woefully inadequate to pay the costs of the bankruptcy case, leaving the Debtors more than likely administratively insolvent; (ii) the specter of Icahn-related entities purchasing substantially all assets via credit bid without payment to Unsecured Creditors and a resulting Chapter 7 conversion; (iii) significant insider litigation related to the Debtor's previous joint operations and ownership with Pep Boys without any funds to pursue same; (iv) commencing bankruptcy with an immediate and expedited sales process; and (v) the reality that the Debtors were owned and controlled by Mr. Icahn. In the face of these challenges, the Committee met frequently and enjoyed near perfect attendance at all meetings. KRCL first reviewed thousands of documents and took four key depositions in preparing to challenge the insider-funded DIP financing and bring significant insider litigation claims. The Committee's efforts ultimately caused an expedited mediation and successful settlement negotiation with the DIP Lender and related Icahn Entities and an accelerated Bankruptcy Rule 9019 hearing. The settlement, which was ultimately embodied in a confirmed plan, required the DIP Lender to fund payment of (i) all administrative expense monthly claims (estimated between \$60 and \$70 million); (ii) a \$17 million GUC payment for general unsecured creditors; and (iii) \$500,000 to pay for the GUC Trustee's reconciliation and payment to Unsecured Creditors. KRCL was also active in the Debtors' sale process and assisting with approval of the Sale Transactions, including the disqualification of a significant bidder.</p>	

² Includes \$7,500.00 requested for time spent preparing, filing, and attending the hearing on this Application.

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This Application seeks relief pursuant to sections 330, 331, and 503(b)(2) of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Rule 2016-1 of the Local Bankruptcy Rules of this Court (the "**Local Rules**"). This Application is filed pursuant to and in accordance with all applicable provisions of the Plan and the Interim Compensation Order, as each is defined herein.

BACKGROUND

A. PROCEDURAL HISTORY

3. On January 31, 2023 (the "**Petition Date**"), the Debtors each filed voluntary petitions for relief in this Court under Chapter 11 of the Bankruptcy Code. The Debtors' bankruptcy cases were jointly administered under Case No. 23-90054 [Dkt. #25].

4. A description of the background of the Debtors and the events leading up to the filing of the voluntary petitions by the Debtors is provided in the *Declaration Michael Neyrey in Support of Debtors' Chapter 11 Petitions and First Day Motions* [Dkt. #24] (the "**First Day Declaration**").

5. The United States Trustee for Region 7 (the "**U.S. Trustee**") appointed the Committee on February 14, 2023 [Dkt. #99].

6. On or about February 15, 2023, the Committee selected KRCL to serve as its counsel in these bankruptcy cases. KRCL maintains offices for the practice of law at 901 Main

Street, Suite 5200, Dallas, Texas 75202; Tel: (214) 777-4200; Fax: (214) 777-4299; and at 5151 San Felipe, Suite 800, Houston, Texas 77056; Tel: (713) 425-7400; Fax: (713) 425-7700.

7. On March 14, 2023, the Committee filed its *Application to Employ Kane Russell Coleman Logan PC as Counsel for the Official Unsecured Creditors' Committee* [Dkt. #228] (the "**Retention Application**"). On April 27, 2023, the Court entered an *Order Granting Application to Employ Kane Russell Coleman Logan PC as Counsel for the Official Unsecured Creditors' Committee* [Dkt. #427] (the "**Retention Order**") authorizing the Committee to retain KRCL as its counsel, effective as of February 15, 2023, under sections 1103(a) and 327 of the Bankruptcy Code.

8. On March 27, 2023, the Court entered an *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. #264] (the "**Interim Compensation Order**") authorizing professionals in these cases to file monthly fee statements detailing their fees and expenses incurred during the prior month. If no objections were raised, the Debtors were authorized to pay such professionals 80% of the fees and 100% of expenses sought in the fee statement.

9. On June 16, 2023 (the "**Confirmation Date**"), the Court entered its *Order Confirming the Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and its Debtor Affiliates Pursuant to the Chapter 11 of the Bankruptcy Code* [Dkt. #749] confirming the Debtors' *Third Amended of Combined Disclosure Statement and Joint Plan of Liquidation dated June 16, 2023* [Dkt. #738] (the "**Plan**").²

10. The Plan became effective on October 6, 2023 (the "**Effective Date**"), almost four months after the Confirmation Date.

² Capitalized terms not defined herein have the meanings provided in the Plan unless otherwise noted.

B. CASE STATUS

11. The Debtors sold substantially all of its assets under section 363 of the Bankruptcy Code, prior to confirmation of the Plan, pursuant to the Court's Sale Orders. The Plan provides for the wind-down and dissolution of the Debtors, and for the proceeds of the Debtors' assets to be distributed to creditors. As of the Effective Date, a Plan Agent has been appointed to, *inter alia*, reconcile Non-GUC Claims against the Debtors, administer the Debtors' estates, and complete the Wind Down under the Plan. The Plan also appointed a GUC Trustee to reconcile General Unsecured Claims and make distributions to the holders of such Claims.

C. COMMITTEE'S INVOLVEMENT IN THE CASE

12. The Committee played an active and integral role in this case from the time of its appointment, aggressively advocating for unsecured creditors. Days after retaining KRCL, the Committee filed an extensive Objection to the Debtors' proposed insider-funded DIP Facility [Dkt. #150] and commenced expedited discovery. KRCL recognized that, without immediate action, the Debtors' estates would likely become administratively insolvent, leaving the Debtors unable to confirm a plan and no funds available for the Committee's constituency.

13. KRCL immediately noticed depositions for numerous Icahn Entities, including the DIP Lender, American Entertainment Properties Corp., and negotiated for document production on an expedited timeline. KRCL reviewed tens of thousands of documents and took four key depositions in preparing to bring significant insider litigation claims against the DIP Lender and related Icahn Entities. KRCL's efforts ultimately caused an expedited mediation with the DIP Lender and Debtors, where the Committee and KRCL successfully negotiated for the DIP Lender and related Icahn Entities to (i) pay all of the Debtors' administrative expense and priority claims,

and (ii) fund a \$17 million GUC Payment for General Unsecured Claims under the Plan.³ The settlement negotiated by the Committee, as set forth in the 9019 Order, was an integral part of the Debtors' ability to confirm the Plan.

14. KRCL and the Committee remained active in these cases through confirmation of the Debtors' Plan and the occurrence of the Effective Date. In addition to pursuing its objection to the DIP financing and insider-related litigation, KRCL was also very active in the Debtors' sale process, attended the Auction and sale hearings, supported the Sale Transactions, participated as appropriate with the Debtors' efforts to consummate the Sale Transactions, finalized amendments necessary to the Plan, worked to resolve objections to the Plan, and supported the Debtors in confirmation of the Plan.

KRCL'S FEES AND EXPENSES

15. This Application covers the period from **February 15, 2023**, the date of KRCL's retention, through **October 6, 2023**, the Effective Date of the Plan (the "**Application Period**").

A. FEES AND EXPENSES DURING APPLICATION PERIOD

16. KRCL expended a total of 3,017.2 hours of attorney and paralegal time during the Application Period at a blended hourly rate of approximately \$553. KRCL incurred professional fees totaling \$1,669,403.00 during the Application Period, plus actual and necessary expenses totaling \$71,240.34, for total fees and expenses of \$1,740,643.34. KRCL also seeks compensation for fees and expenses incurred in preparing, filing, and attending the hearing on this Application; however, KRCL has agreed to cap its request for such fees and expenses at \$7,500.00.⁴

³ See *Order Approving Debtors' Motion for Entry of an Order Approving the Settlement Between the IEH Debtors, AEP, Pep Boys, The Committee and the Committee Members* [Dkt. #469] (the "**9019 Order**").

⁴ KRCL's actual fees and expenses incurred in connection with this Application will exceed \$7,500.00.

17. Accordingly, KRCL seeks allowance for professional fees in the total amount of **\$1,676,903.00** and reimbursement of expenses in the total amount of **\$71,240.34**, for a total compensation award of **\$1,748,143.34**.

18. All professional fees incurred by KRCL during the Application Period were billed at the hourly rates set forth in KRCL's Retention Application.

B. KRCL'S INTERIM COMPENSATION (MONTHLY FEE STATEMENTS)

19. KRCL has received interim compensation in the total amount of **\$1,350,453.50**, pursuant to the Interim Compensation Order, for amounts requested in the following monthly fee statements filed (collectively, the "**Monthly Fee Statements**"):

- a. *First Monthly Fee Statement of Kane Russell Coleman Logan PC, as Counsel for the Official Unsecured Creditors' Committee, for the Period from February 15, 2023 through February 28, 2023 [Dkt. #380] filed on April 21, 2023;*
- b. *Second Monthly Fee Statement of Kane Russell Coleman Logan PC, as Counsel for the Official Unsecured Creditors' Committee, for the Period from March 1, 2023 through March 31, 2023 [Dkt. #431] filed on April 27, 2023;*
- c. *Third Monthly Fee Statement of Kane Russell Coleman Logan PC, as Counsel for the Official Unsecured Creditors' Committee, for the Period from April 1, 2023 through April 30, 2023 [Dkt. #510] filed on May 11, 2023;*
- d. *Fourth Monthly Fee Statement of Kane Russell Coleman Logan PC, as Counsel for the Official Unsecured Creditors' Committee, for the Period from May 1, 2023 through May 31, 2023 [Dkt. #755] filed on June 20, 2023; and*
- e. *Fifth Monthly Fee Statement of Kane Russell Coleman Logan PC, as Counsel for the Official Unsecured Creditors' Committee, for the Period from June 1, 2023 through June 16, 2023 [Dkt. #784] filed on June 30, 2023.*

True and correct copies of KRCL's Monthly Fee Statement are attached hereto as **Exhibits A-1 thru A-5**.

20. KRCL's Monthly Fee Statements covered the period from February 15, 2023, through the Plan Confirmation Date. The following chart summarizes KRCL's Monthly Fee Statements and the unpaid amounts sought in this Application:

Application Period	Date Filed	Amount Requested	Amount Outstanding
First Monthly Fee Statement 02/15/23 – 02/28/23	04/21/2023 [Dkt. #380]	\$160,523.10 (80% of \$200,586.00 in fees + 100% of \$54.30 in expenses)	\$40,117.20
Second Monthly Fee Statement 03/01/23 – 03/31/23	04/27/2023 [Dkt. #431]	\$351,720.00 (80% of \$432,987.50 in fees + 100% of \$5,330.00 in expenses)	\$86,597.50
Third Monthly Fee Statement 04/01/23 – 04/30/23	05/11/2023 [Dkt. #510]	\$623,190.90 (80% of \$755,535.50 in fees + 100% of \$18,762.50 in expenses)	\$151,107.10
Fourth Monthly Fee Statement 05/01/23 – 05/31/23	06/20/2023 [Dkt. #755]	\$155,581.59 (80% of \$174,451.50 in fees + 100% of \$16,020.39 in expenses)	\$34,890.30
Fifth Monthly Fee Statement 06/01/23 – 06/16/23	06/30/2023 [Dkt. #784]	\$59,437.91 (80% of \$46,752.50 in fees + 100% of \$22,035.91 in expenses)	\$9,350.50
Unbilled Fees from First Monthly Fee Statement Period 02/15/23 – 02/28/23 ⁵	N/A	\$1,602.50 (\$1,602.50 in fees + \$0.00 in expenses)	\$1,602.50
Unbilled Expenses Incurred Prior to Confirmation Date 02/15/23 – 06/16/2023	N/A	\$9,037.24	\$9,037.24
Unbilled Fees 06/17/23 – 10/06/23	N/A	\$57,487.50	\$57,487.50
Unbilled Fees for KRCL's Fee Application 10/07/23 – 11/14/23	N/A	\$7,500.00	\$7,500.00
TOTAL UNPAID FEES AND EXPENSES:			\$397,689.84

⁵ KRCL inadvertently omitted \$1,602.50 in fees from its First Monthly Fee Statement. The Invoice for these omitted fees is attached hereto as **Exhibit A-6**.

C. APPLICATION EXHIBITS (FEE AND EXPENSE DETAIL)

21. KRCL's monthly invoices for the Application Period are attached hereto as **Exhibits A-1 thru A-11** (collectively, the "**Invoices**").⁶ The Invoices are generated by KRCL in the ordinary course of its business and are compiled from daily time records submitted on a contemporaneous basis by the attorneys and paralegals employed by KRCL. The Invoices contain a detailed listing and description of all services performed by KRCL as counsel to the Committee, the time spent and dates on which those services were performed, the hourly rates charged, and the attorneys and paralegals that performed the services. Such descriptions comply with the *Guidelines for Compensation and Expense Reimbursement for Professionals* promulgated by the U.S. Trustee and set forth in the appendices to this Court's Local Rules (the "**Guidelines**"). Pursuant to its ordinary billing practices, KRCL's time records are kept in six-minute increments.

22. The total fees incurred by KRCL during the Application Period is broken down and summarized by professional on the attached **Exhibit B**, and by project category on the attached **Exhibit C**. Similar summaries are set forth in KRCL's Monthly Fee Statements for each applicable monthly period. Time entries on KRCL's Invoices are organized by project category.

23. KRCL's expenses incurred during the Application Period are set forth in detail on the Invoices and summarized on the attached **Exhibit D**. KRCL's expenses are also summarized in each Fee Statement. KRCL has supporting documentation for the expenses and will make such documentation available to a party in interest upon request.

D. FEES INCURRED BY PROJECT CATEGORY

24. The following is a summary, by project category, of the significant professional services KRCL rendered during the Application Period. A summary chart of fees related to each

⁶ Invoices for periods through the Confirmation Date are included with the Fee Statements (**Exs. A-1 thru A-5**).

project category is attached hereto as **Exhibit C**. Time entries on KRCL's Invoices are organized by project category.

- a. **B110 – Case Administration: Fees: \$143,151.00; Hours: 275.5.** These fees include time spent by KRCL attorneys and paraprofessionals providing services relating to Committee organization, Committee By-Laws, in-depth review of pleadings and related information, on-going case status issues, preparing for and attending hearings related to administrative matters.
- b. **B120 – Asset Analysis and Recovery: Fees: \$883,880.00; Hours: 1,681.9.** These fees include time spent by KRCL attorneys and paraprofessionals providing services relating to, among other things: (i) investigation of the Icahn Entities, including the Debtors' inter-relationship with Pep Boys; (ii) preparing, negotiating and serving discovery requests; (iii) reviewing voluminous discovery responses and related documentation; (iv) preparing for and taking four depositions; (v) legal research, analysis and application of discovery facts to applicable legal standards; (vi) drafting a complaint against insiders and related litigation activity; (vii) negotiating an agreement for an expedited mediation together with preparing for and attending such mediation; (viii) post-mediation settlement negotiations, drafting the settlement agreement and motion to approve the Committee's settlement with American Entertainment Properties Corp., other Ichan Entities, and the Debtors (the "**Committee Settlement**") pursuant to Bankruptcy Rule 9019, and attending the hearing to approve the Committee Settlement; and (ix) implementing the Committee Settlement with the DIP Lender, related Icahn Entities and Debtors.
- c. **B130 – Asset Disposition: Fees: \$93,762.00; Hours: 147.1.** These fees include time spent by KRCL attorneys and paraprofessionals providing services relating to the Debtors Sale Process. Specifically, KRCL spent time, among other things, upon: (i) reviewing pleadings applicable to the Debtors' Sale Process; (ii) meetings with the Debtors' professionals, including investment bankers, regarding the Debtors' Sale Process; (iii) efforts by the Committee to find additional industry buyers; (iv) conversations with potential bidders; (v) regular updates both via conversations with the Debtors' professionals and review of materials produced by same; (vi) review of bids and efforts to qualify bidders; (vii) attending the auction; (viii) involvement with the disqualification of one of the bidders and litigation related thereto; and (ix) assisting the Debtor with determination of highest and best bidders, qualification of bidders, and approval at the sale hearing by Judge Lopez.
- d. **B140 – Relief from Stay and Adequate Protection: Fees: \$1,996.50; Hours: 4.2.** These fees include time spent by KRCL attorneys and paraprofessionals providing services relating to examining, responding to, if appropriate, and coordinating with Jackson Walker with regard to motions to lift stay under 11 U.S.C. § 362.
- e. **B150 – Meetings of and Communications with Creditors: Fees: \$76,059.00; Hours: 115.6.** These fees include time spent by KRCL attorneys and

paraprofessionals providing services relating to: (i) preparing for and attending the initial Section 341(a) meeting and continued Section 341(a) meetings; (ii) preparing for, drafting agendas, attending, and finalizing minutes of the Committee's regular Committee Meetings; (iii) numerous individual conversations with the Committee Chair and various Committee members; and (iv) numerous communications with creditors regarding, among other topics, critical vendor program, debtor-in-possession financing objection, administrative insolvency, sale process, discovery, mediation, settlement, auction, plan confirmation.

- f. **B160 – Fee/Employment Applications: Fees: \$34,711.00; Hours: 69.5.** These fees include time spent by KRCL attorneys and paraprofessionals providing services relating to: (i) interviewing and retaining the Committee's other professionals, complying with the Interim Compensation Order [Dkt. No. 176] and related activities, including, without limitation, drafting, reviewing and revising KRCL and FTI's retention applications and orders; and (ii) drafting, reviewing and filing monthly fee applications for KRCL and FTI and obtaining the Committee's approval of same.
- g. **B185 – Assumption and Rejection of Leases and Contracts: Fees: \$8,737.50; Hours: 20.8.** Review and analyze unexpired lease and executory contract issues with particular attention to insider-related executory contract to leases, which were abundant. In addition, KRCL examined the executory contracts of unexpired leases issues relating to the Debtors' Sale Process and stipulations proposed by the Debtor with parties to executory contracts and unexpired leases.
- h. **B190 – Other Contested Matters: Fees: \$35,379.00; Hours: 59.1.** KRCL's fees incurred in this category primarily relate to first day matters other than the Debtors' DIP Financing Motion, including, for example, the Debtors' Cash Management Motion (the Committee objected to the Cash Management Motion at Docket No. 151).
- i. **B195 – Non-Working Travel: Fees: \$22,625.00; Hours: 32.0.** Fees included in this category are for time spent by KRCL's attorneys traveling to Atlanta and Florida for depositions, New York for mediation, and Houston for hearings, the auction, and limited important meetings.
- j. **B210 – Business Operations: Fees: \$8,035.00; Hours: 10.8.** Given the Debtor's insufficient DIP financing and administrative insolvency (until the Committee Settlement) and the fact that the Debtors were in a self-liquidating mode by not purchasing much new inventory purchases, KRCL, in conjunction with FTI, closely monitored the Debtor's business operation, including, review of Monthly Operating Reports, materials produced by the Debtors' financial advisors and related information.
- k. **B230 – Financing and Cash Collateral: Fees: 177,142.00; Hours: 280.5.** These fees include time spent by KRCL attorneys and paraprofessionals providing

services relating to significant analyses of the DIP Facility, much of which was not market given the insider-funded DIP financing. In addition to surveying the market for DIP financing in conjunction with FTI, the Committee conducted extensive research with regard to the "heightened scrutiny" applicable to the insider nature of the DIP financing. Moreover, the Committee and KRCL's attorneys and paraprofessionals were very involved in the analysis of the administrative insolvency that would be caused if the Court approved the proposed DIP financing. Control issues were also analyzed given the Icahn Entities were on both sides of the DIP financing proposal. After filing a very significant objection to the financing, KRCL, on its own and in conjunction with FTI, conducted numerous investigations and analysis, propounded discovery requests, analyzed the information produced pursuant to discovery and information from the Debtor's financial professionals. Furthermore, the final DIP Financing hearing was postponed three separate times necessitating significant preparation and negotiations surrounding each of those postponements, which ultimately lead to the expedited mediation.

- l. **B260 – Corporate Governance and Board Matters: Fees: \$760.5; Hours: 1.8.** These fees include time spent by KRCL professionals providing services relating to demands, correspondence and related activity directed to the Debtor's independent director. The Committee thought it was exceedingly important that the independent director, who was appointed subsequent to the insider funded DIP Financing being approved, to become involved with the issues pertaining to the financing, administrative insolvency, and the expedited sale process.
- m. **B310 – Claims Administration and Objections: Fees: \$31,561.50; Hours: 62.2.** KRCL provided significant assistance to the Debtors with respect to the preparation and filing of three omnibus Claim objections and resolving various other Claims prior to confirmation of the Plan. KRCL also incurred time in this category on matters related to the proposed terms of reconciling and administering claims under the Plan and negotiations related thereto.
- n. **B320 – Plan and Disclosure Statement: Fees: \$99,636.50; Hours: 161.4.** These fees include time spent by KRCL attorneys and paraprofessionals providing services relating to the Debtors proposed a plan of reorganization filed subsequent to both the Committee Settlement and the completion of the Debtor's Sale Process. The Committee was involved in negotiating, revising, working through objections and supporting confirmation. The Committee's active participation in the Plan process included the Plan Supplements, GUC Trust Agreement, Confirmation Order and preparing for and participating in the confirmation hearing.
- o. **L100 – Litigation: Fees: \$42,585.50; Hours: 73.6.** This category includes time spent on litigation matters related to the Committee's investigation of insider litigation claims and discovery conducted in connection therewith, which efforts ultimately led to the expedited mediation and the Committee's settlement incorporated into the Plan.

REQUEST FOR ALLOWANCE OF FEES AND EXPENSES

25. KRCL hereby requests that the Court enter an order (i) awarding KRCL, on a final basis, compensation for professional fees in the total amount of **\$1,676,903.00** and reimbursement of expenses in the total amount of **\$71,240.34**, and (ii) authorizing and directing payment of all unpaid portions of KRCL's allowed fees and expenses.

BASIS FOR ALLOWANCE OF FEES AND EXPENSES

A. EVALUATION STANDARDS

26. Section 330(a)(1) of the Bankruptcy Code provides for the payment of "reasonable compensation for actual, necessary services" rendered by an estate professional and for the professional's "reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). To grant a request for compensation pursuant to section 330, a court must find that the request is reasonable. *In re Cahill*, 428 F.3d 536, 539 (5th Cir. 2005). The United States Court of Appeals for the Fifth Circuit has held that the "lodestar" method is preferred in this Circuit for calculating attorneys' fees in bankruptcy cases. *See Fender v. Transamerican Natural Gas Corp.*, 12 F.3d 480, 487 (5th Cir. 1994); *see also Pennsylvania v. Delaware Valley Citizens Council for Clean Air*, 483 U.S. 711 (1986) (holding that the United States Supreme Court prefers the "lodestar" method in the calculation of attorneys' fees).

27. The "lodestar" is determined by multiplying the number of hours reasonably expended by the prevailing hourly rate in the community for similar work. *See Fender*, 12 F.3d at 487. Following this calculation, "[t]he court then adjusts the lodestar upward or downward depending upon the respective weights of the twelve [*Johnson* factors]." *Id.*

28. The Fifth Circuit employs the *Johnson* factors to aid courts in considering the reasonableness of attorneys' fees, and to assist in the court's findings and reasons upon which an

award of attorneys' fees are based. The twelve *Johnson* factors are: (1) the time and labor involved; (2) the novelty and complexity of the issues involved; (3) the skill required to perform the legal service properly; (4) the preclusion of other employment; (5) the customary fees; (6) whether the fee is fixed or contingent; (7) any time limitations imposed; (8) the amount involved and results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of professional relationship with the client; and (12) awards in similar cases. *See Johnson v. Georgia Highway Exp., Inc.*, 488 F.2d 714 (5th Cir. 1974). In addition to the *Johnson* factors, the United States Supreme Court in *Hensley v. Eckerhart*, 461 U.S. 424 (1983), stated that attorneys "should make a good-faith effort to exclude . . . hours that are excessive, redundant, or otherwise unnecessary." *Id.* at 434.

B. APPLICATION OF THE *JOHNSON* FACTORS

29. This case presented numerous novel and complex issues which required the special skills and experience of KRCL's members. KRCL has previously served as Committee counsel in forty-six Chapter 11 cases in 19 states. Because of its skills and experience, KRCL believes it has minimized fees and other expenses incurred while serving as counsel to the Committee. KRCL's fees and expenses are also justified under the criteria set forth in *Johnson* and in *In re First Colonial Corp.*, 544 F.2d 1291 (5th Cir. 1977). A brief statement with regard to each of the twelve elements set out in the *Johnson* case follows:

a. **The time and labor involved.** KRCL expended a total of 3,017.2 hours in attorney and paralegal time and incurred \$1,669,403.00 in legal fees as counsel to the Committee during the Application Period. A detailed description of the services rendered is provided in the Invoices attached hereto as **Exhibit A**.

b. **The novelty and complexity of the issues involved.** The legal questions encountered in representing the Committee were of a complex and specialized nature, requiring a high degree of analytical skill and understanding in obtaining the results that have been obtained to date. For example, investigating and commencing litigation against insiders related to the Debtors' previous consolidated operations and common ownership with Pep Boys was factually challenging and presented sophisticated legal issues.

c. **The skill required to perform the legal service properly.** Joseph Coleman, Michael Ridulfo, John Kane, Kyle Woodard, and JaKayla DaBera dedicate the vast majority of their respective practices to bankruptcy law. Because of their experience and skill in this specialized area of law, KRCL believes more time could easily have been employed by less experienced counsel. The array of legal considerations presented in this proceeding and KRCL's prompt and skillful action taken to resolve those problems required a meaningful degree of expertise and experience. KRCL's personnel were accordingly utilized as evidenced by the Invoices in Exhibit A.

d. **The preclusion of other employment.** While certain periods of this case were intense, KRCL has not necessarily declined other employment, but has made sure it has sufficient personnel to serve as counsel to the Committee in this case. During the time spent working on behalf of the Committee, certain KRCL attorneys were unavailable to work on other matters.

e. **The customary fees.** The fees applied for herein are equivalent to customary fees in other proceedings for similar services rendered and results to date. That said, KRCL's rate structure is meaningfully less than most of the other law firms principally involved

representing major constituents in this case.⁷ Furthermore, KRCL's total fees and expenses (\$1,740,643.34) are a little more than one-third of Debtors' counsel Jackson Walker's total fees and expenses (\$4,814,345.49).

f. **Whether the fee is fixed or contingent.** Not applicable in this case.

g. **Time limitations.** A summary of the hours spent and a detailed description of the work performed during each of those hours is described in the Invoices included in **Exhibit A**. As counsel to the Committee, prompt and intensive action was required in many of the activities of the case.

h. **The amount involved and results obtained.** Overall, KRCL believes it has performed well in this case, that the Debtor's estates have benefitted from KRCL's efforts, and that its fees are appropriate. Moreover, the Committee members have exposed their satisfaction with KRCL's performance and the results obtained.

i. **The experience, reputation, and ability of the attorneys and paralegals.**

The overwhelming percentage of time billed by KRCL attorneys on this engagement was billed by Joseph Coleman, Michael Ridulfo, John Kane, Kyle Woodard, and JaKayla DaBera.

(i) Mr. Coleman was the lead KRCL attorney on this engagement. He is a founding director of the firm, and he has more than 35 years of practice and experience in Chapter 11 bankruptcy law. To date, Mr. Coleman has represented 47 committees in 19 states, and is ranked by *Chambers USA: America's Leading Lawyers for Business* from 2010 through 2023 and *The Best Lawyers in America*® from 2001 through 2021 as one of the top bankruptcy lawyers in the United States. Mr. Coleman charged a rate of \$775 per hour for time billed during the Application Period. KRCL believes Mr. Coleman's rate is reasonable and justified in light of his experience and is well within, if not below, local market rates.

(ii) Mr. Ridulfo has over 35 years of experience in the areas of creditors' rights, bankruptcy, lender liability defense, business litigation and collection

⁷ KRCL's lawyer and paralegal average rates of \$580.39 and \$228.89, respectively, are less than Debtors' counsel's average rates of \$690.14 for attorneys and \$274.79 for paralegals. Applicant similarly believes that the DIP Lender's counsel, Sidley Austin's, average rates well exceed KRCL's rates.

matters throughout Texas. Mr. Ridulfo has been recognized as both a Super Lawyer by Thomas Reuters, and a Best Lawyer by the global publication Best Lawyers. Mr. Ridulfo charged a rate of \$605 per hour for time billed during the Application Period. KRCL believes Mr. Ridulfo's rate is reasonable and justified in light of his experience and is well within local market rates.

(iii) Mr. Kane was licensed to practice by the Texas State Bar in 2009 and has been practicing in the area of KRCL's Insolvency, Bankruptcy, & Creditor Rights department since that time. Mr. Kane, a director at the firm, has been recognized as a "Rising Star" by Texas Super Lawyers® from 2014 through 2023. Currently, Mr. Kane is the Chairman of KRCL's Insolvency, Bankruptcy, & Creditor Rights department. Mr. Kane charged a rate of \$580 per hour for time billed during the Application Period. KRCL believes Mr. Kane's rate is reasonable and justified in light of his experience and is well within local market rates.

(iv) Mr. Woodard was licensed to practice by the Texas State Bar in 2016 and has been practicing in the area of bankruptcy and creditors' rights since that time. Mr. Woodard charged a rate of \$440 per hour for time billed during the Application Period. KRCL believes Mr. Woodard's rate is reasonable and justified in light of his experience and is well within local market rates.

(v) Ms. DaBera was licensed to practice by the Texas State Bar in 2021. Following law school, Ms. DaBera served as a judicial law clerk to the Honorable John T. Dorsey of the United States Bankruptcy Court for the District of Delaware. Ms. DaBera charged a rate of \$385 per hour for time billed during the Application Period. KRCL believes Ms. DaBera's rate is reasonable and justified in light of his experience and is well within local market rates.

(vi) Similarly, other professionals of KRCL who rendered services to the Committee during the Application Period are well-qualified and skilled to perform the services required.

j. **The undesirability of the case.** KRCL does not feel the subject case or acting as counsel to the Committee in this proceeding was "undesirable."

k. **The nature and length of the professional relationship with the client.** KRCL's relationship with the Committee is a single event.

l. **Awards in similar cases.** KRCL believes that the fees requested herein are reasonable and are less than, or at least in line with, fees for cases of similar difficulty and complexity.

C. KRCL'S REPRESENTATIONS

30. Taking all of the *Johnson* factors into consideration, KRCL respectfully submits that the fees requested in this Application are entirely appropriate. Accordingly, KRCL respectfully requests that compensation of fees and reimbursement of expenses of KRCL in this matter be granted in the amounts requested herein.

31. All fees and expenses incurred by KRCL in this case were billed and charged at the hourly rates and on the terms set forth in KRCL's Retention Application, and in accordance with the Court's Retention Order authorizing KRCL's employment as counsel for the Committee.

32. KRCL further represents that the fees sought are in conformity with fees allowed in similar proceedings for similar services rendered and results obtained. KRCL's expenses incurred on behalf of the Committee are reasonable and are of the kind and price normally charged to non-bankruptcy clients of KRCL. KRCL respectfully requests that the Court take judicial notice of the awards which have been made in similar proceedings in this Court and in other bankruptcy courts in the State of Texas.

33. KRCL has made no agreement for the sharing of compensation of expenses herein, although such fees are shared by members of the firm according to the firm's agreement.

34. KRCL was at all times a "disinterested person" and has not represented or held an interest adverse to the Debtors' estates on the matters for which it was employed, in compliance with section 327(a) of the Bankruptcy Code.

PRAYER

WHEREFORE, KRCL respectfully requests that the Court enter an order: (i) approving a final award of reasonable compensation for professional services rendered as counsel to the Committee during the Application Period in the amount of **\$1,676,903.00**, plus reimbursement of

expenses in the amount of **\$71,240.34**, for a total award of **\$1,748,143.34**; (ii) authorizing and directing payment of all of KRCL's allowed but unpaid fees and expenses; and (iii) granting such other and further relief as this Court deems just and proper.

DATED: November 18, 2023

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Kyle Woodard

Joseph M. Coleman

State Bar No. 04566100

John K. Kane

State Bar No. 24066794

Kyle Woodard

State Bar No. 24102661

Bank of America Plaza

901 Main Street, Suite 5200

Dallas, Texas 75202

Telephone: (214) 777-4200

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**ATTORNEYS FOR THE OFFICIAL
UNSECURED CREDITORS' COMMITTEE**

CERTIFICATION OF COUNSEL

I hereby certify that: (i) I have read this Application; (ii) to the best of my knowledge, information, and belief, formed after reasonable inquiry, the professional fee compensation and expense reimbursements sought in this Application conform with the U.S. Trustee's Guidelines; and (iii) the requested professional fees and expense reimbursements are billed at rates and in accordance with practices no less favorable than those customarily employed by KRCL and generally accepted by KRCL's clients.

/s/ Kyle Woodard

Kyle Woodard

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2023, a true and correct copy of this Application, including all exhibits, was filed with the Court and served via the Court's CM/ECF system upon all parties receiving such service in this bankruptcy case, including the Debtors' counsel and the U.S. Trustee.

/s/ Kyle Woodard

Kyle Woodard

List of Exhibits

Ex. A – Monthly Fee Statements and Invoices

Ex. B – Summary of Fees by Professional

Ex. C – Summary of Fees by Project Category

Ex. D – Summary of Expenses

Exhibit A-1

First Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
IEH AUTO PARTS HOLDING LLC, <i>et al.</i> , ¹)	Case No. 23-90054 (CML)
)	
Debtors.)	(Jointly Administered)

**FIRST MONTHLY FEE STATEMENT OF KANE RUSSELL COLEMAN LOGAN PC,
AS COUNSEL FOR THE OFFICIAL UNSECURED CREDITORS' COMMITTEE,
FOR THE PERIOD FROM FEBRUARY 15, 2023 THROUGH FEBRUARY 28, 2023**

Name of Professional:	Kane Russell Coleman Logan PC	
Professional's Role in Case:	Counsel for the Official Unsecured Creditors' Committee	
Time Period Covered by this Statement:	<u>Beginning of Period:</u> February 15, 2023	<u>End of Period:</u> February 28, 2023
Total Fees incurred during this Period:	\$200,586.00	
Total Expenses during this Period:	\$54.30	
Total Fees and Expenses for the Period:	\$200,640.30	
Summary of Monthly Fee Statement		
Fees sought in this Statement (80%):	\$160,468.80	
Expenses sought in this Statement (100%):	\$54.30	
Monthly Fee Statement Total:	\$160,523.10	
20% Holdback for Professional Fees:	\$40,117.20	

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

Kane Russell Coleman Logan PC ("**KRCL**"), counsel for the Official Unsecured Creditors' Committee (the "**Committee**"), submits this Monthly Fee Statement for the above-stated time period (the "**Statement Period**") pursuant to the *Court's Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. #264] (the "**Interim Compensation Order**")² as follows:

PROFESSIONAL FEES

1. KRCL's invoice for the Statement Period is attached hereto (the "**Invoice**"). The Invoice provides: (i) a description of the services rendered; (ii) the time spent; (iii) the hourly rates charged; and (iv) the name of the attorney or paraprofessional performing the work. Time entries on the Invoice are organized by project category. The Invoice is redacted to protect privileged or otherwise confidential information.

2. KRCL's fees incurred during the Statement Period are summarized as follows:

Summary by Professional

Name	Position	Hourly Rate	Hours	Fees
Joseph Coleman	Director	\$775	94.80	73,470.00
Joseph Coleman	Director	\$0	1.60	0.00
Brian Hail	Director	\$745	16.30	12,143.50
Charles Aster	Director	\$630	7.80	4,914.00
Michael Ridulfo	Director	\$605	24.70	14,943.50
John Kane	Director	\$580	79.60	46,168.00
Brian Clark	Director	\$535	31.40	16,799.00
Kyle Woodard	Associate	\$440	37.20	16,368.00
Collin Delano	Associate	\$395	6.10	2,409.50
JaKayla DaBera	Associate	\$385	15.40	5,929.00
JaKayla DaBera	Associate	\$0	1.80	0.00
Brandon Keaton	Associate	\$345	9.70	3,346.50
Olivia Salvatierra	Paralegal	\$225	18.20	4,095.00
Olivia Salvatierra	Paralegal	\$0	1.30	0.00
TOTAL:			345.90	\$200,586.00

² Capitalized terms that are not defined herein have the meanings provided in the Interim Compensation Order unless otherwise noted.

Summary by Project Category

Task Code	Hours	Fees
B100 - Bankruptcy	0.00	0.00
B110 - Case Administration	54.80	24,374.00
B120 - Asset Analysis and Recovery	86.20	51,207.00
B130 - Asset Disposition	23.00	13,318.00
B140 - Relief from Stay/Adequate Protection Proceedings	0.00	0.00
B150 - Meetings of and Communications with Creditors	18.60	11,779.00
B160 - Fee/Employment Applications	6.50	4,702.50
B170 - Fee/Employment Objections	0.00	0.00
B180 - Avoidance Action Analysis	0.00	0.00
B185 - Assumption/Rejection of Leases and Contracts	0.00	0.00
B190 - Other Contested Matters	22.10	11,176.50
B195 - Non-Working Travel	0.00	0.00
B200 - Operations	0.00	0.00
B210 - Business Operations	0.20	155.00
B220 - Employee Benefits/Pensions	0.00	0.00
B230 - Financing/Cash Collections	128.50	79,854.00
B240 - Tax Issues	0.00	0.00
B250 - Real Estate	0.00	0.00
B260 - Board of Directors Matters	0.00	0.00
B300 - Claims and Plan	0.00	0.00
B310 - Claims Administration and Objections	0.00	0.00
B320 - Plan and Disclosure Statement	0.00	0.00
B400 - Bankruptcy-Related Advice	0.00	0.00
B410 - General Bankruptcy Advice/Opinions	0.00	0.00
B420 - Restructurings	0.00	0.00
L100 - Litigation	6.00	4,020.00
TOTAL:	345.90	\$200,586.00

DISBURSEMENTS

3. KRCL's actual and necessary expenses incurred during the Statement Period are described as follows:

Date	Description	Amount
2/28/2023	Photocopies	54.30
TOTAL:		\$54.30

NOTICE AND OPPORTUNITY TO OBJECT

4. Any party that objects to the fees or expenses sought in this Monthly Fee Statement must serve written notice of such objection upon KRCL and each of the Application Recipients³ by no later than **May 5, 2023 at 4:00 p.m. CDT**. The notice must set forth the precise nature and basis of the objection and the amount at issue, and must otherwise comply with the terms of the Interim Compensation Order. Copies of the Interim Compensation Order may be requested in writing from KRCL, Attn: Olivia Salvatierra (osalvatierra@krcl.com).

RESERVATION

5. The Committee and KRCL have been diligent in attempting to redact any and all privileged or otherwise confidential information from the Invoice. Notwithstanding, however, the Committee and KRCL expressly reserve, and do not waive under any circumstances whatsoever, any privileges, protections, or rights to confidentiality of any kind or character for any purpose.

6. While KRCL has made every effort to include all fees and expenses incurred during the Statement Period, some fees and expenses may not be included in this Monthly Fee Statement due to, *inter alia*, accounting and processing delays during the Statement Period. KRCL reserves the right to seek allowance and payment of any such fees or expenses in accordance with the orders of this Court and the applicable provisions of the Bankruptcy Code and Bankruptcy Rules.

7. KRCL further reserves the right to supplement and/or amend this Monthly Fee Statement for any reason in accordance with the Interim Compensation Order

³ As defined in the Interim Compensation Order, the Application Recipients include the following parties: (a) the Debtors, 112 Townpark Drive NW, Suite 300, Kennesaw, Georgia 30144, Attn: Michael Neyrey; (b) Jackson Walker LLP (via email), 1401 McKinney Street, Suite 1900, Houston, Texas 77010, Attn: Veronica A. Polnick (vpolnick@jw.com) and Vienna Anaya (vanaya@jw.com); (c) the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov); (d) counsel for the Prepetition Lender, Sidley Austin LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Stephen Hessler (shessler@sidley.com) and Anthony Grossi (agrossi@sidley.com); and (e) counsel to any statutory committee appointed in these cases.

DATED: April 21, 2023.

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Kyle Woodard

Joseph M. Coleman

State Bar No. 0456610

SDTX No. 16936

Michael P. Ridulfo

State Bar No. 16902020

SDTX No. 27086

John J. Kane

State Bar No. 24066794

SDTX No. 1069650

Kyle Woodard

State Bar No. 24102661

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Telephone: (214) 777-4200

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Email: jcoleman@krcl.com;

Email: mridulfo@krcl.com

Email: jkane@krcl.com

Email: kwoodard@krcl.com

**PROPOSED ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

CERTIFICATE OF SERVICE

This is to certify that on April 21, 2023, a true and correct copy of this Monthly Fee Statement was filed with the Court and served (i) via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case, and (ii) via e-mail or regular U.S. mail, postage prepaid, upon the following parties:

Debtor:

IEH Auto Parts Holding, LLC, *et al.*
Attn: Michael Neyrey
112 Townpark Drive NW, Suite 300
Kennesaw, GA 30144

Debtors' Counsel:

Jackson Walker LLP
Attn: Veronica A. Polnick (vpolnick@jw.com)
Attn: Vienna Anaya (vanaya@jw.com)

U.S. Trustee:

Office of the US Trustee
Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov)
Attn: Andrew Jimenez (Andrew.Jimenez@usdoj.gov)

Prepetition Lender's Counsel:

Sidley Austin LLP
Attn: Stephen Hessler (shessler@sidley.com)
Attn: Anthony Grossi (agrossi@sidley.com)

/s/ Kyle Woodard

Kyle Woodard

Invoice Date: **03/23/23**

Invoice No.: **492465**

File No.: **74089.00002.000**

Matt Hulteen, matt.hulteen@driv.com

These invoices will have to be approved by the
 Bankruptcy
 Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors

PROFESSIONAL CHARGES

Case Administration

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/15/23	Joseph M. Coleman	Several telephone conferences with Committee members and committee chair regarding organization, to do items, setting up interviews of FAs and related issues(1.3); Examine substantive pleadings and declarations(1.9); E-mail committee regarding initial to do items(.3); Begin internal organization(.4).	3.90	3,022.50
02/15/23	John J. Kane	Work on case strategy matters, to do list, divide and conquer, immediate discovery and research needs and coordinate internal strategy regarding case pressure, financial advisor needs.	1.80	1,044.00
02/15/23	Olivia Salvatierra	Prepare drafts of Application to Employ KRCL, Declaration and Proposed Order and send same to J. Coleman and K. Woodard(.9); Work on Committee Bylaws to J. Coleman(.6).	1.50	337.50
02/16/23	Olivia Salvatierra	Worked on Notices of Appearance for K. Woodard.	0.40	90.00
02/16/23	Joseph M. Coleman	Begin to work on By-Laws(.1); Confer regarding conversation with Debtor(.2).	0.30	232.50

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/17/23	Joseph M. Coleman	Review docket and recent pleadings(.2); Work on critical dates and deadlines and docketing of same(.3); Exchange e-mails with M. Diaz regarding coordination with Debtor and related issues(.2).	0.70	542.50
02/17/23	Michael P. Ridulfo	Confer with J. Coleman regarding action items for Committee.	0.30	181.50
02/18/23	Joseph M. Coleman	Work on organizational matters, contact roster, exchange e-mails with team and to do list(.4); Examine First Day Motions in addition to DIP, Cash management, and related entries on docket(1.2).	1.60	1,240.00
02/19/23	Joseph M. Coleman	Review docket for new filings (.1); Begin working on powerpoint with key themes(1.4).	1.50	1,162.50
02/19/23	S. Kyle Woodard	Update critical dates and deadlines memo.	0.20	88.00
02/20/23	S. Kyle Woodard	Research and draft Bylaws for Committee.	4.40	1,936.00
02/20/23	Joseph M. Coleman	Review e-mail from FTI regarding Agenda for Committee meetings and related issues in First Day Motions(.1); To-do list(.2); Examine e-mails regarding FTI meeting(.1); Begin outlining and preparing power point for Committee and potentially Court (.9); Telephone conference with DRiV's counsel regarding wide array of issues(.5).	1.80	1,395.00
02/20/23	Olivia Salvatierra	Reviewing docket and save pertinent documents and updated Critical Dates & Deadlines Sheet(.1); Correspondence via email with Capital Services finalizing UCC searches for 12-13 entities(.2).	0.30	67.50

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/20/23	Olivia Salvatierra	Review docket updating Critical Dates & Deadlines Sheet, adding Hearing to Calendar(.1); Correspondence via email with Capital Services finalizing UCC searches for 13 entities(.1).	0.20	45.00
02/21/23	Olivia Salvatierra	Review and save documents Dkt# 138-139 (.1); Prepare tabbed Agenda for J. Coleman Committee Meeting today(1.2).	1.30	0.00
02/21/23	JaKayla DaBera	Review critical vendor motion.	0.60	231.00
02/21/23	JaKayla DaBera	Review employee wages motion.	0.60	231.00
02/21/23	Joseph M. Coleman	Examine e-mail from Debtors regarding payment of employee in excess of \$15,100, check with M. Hulteen and respond(.3); Check docket and review new filings(.1).	0.40	310.00
02/21/23	S. Kyle Woodard	Attention to emergency hearing procedures and correspondence with the court regarding the same, as pertaining to 2004 exam (.3); work on 2004 motion (.3).	0.60	264.00
02/21/23	Michael P. Ridulfo	Attend weekly Committee Zoom.	1.00	605.00
02/22/23	Michael P. Ridulfo	Review Data Room index (.2); E-mails to/from FTI regarding same (.2).	0.40	242.00
02/22/23	S. Kyle Woodard	Coordinate service of Committee's objections.	0.40	176.00
02/22/23	S. Kyle Woodard	Work on and prepare Confidentiality Agreements to be used for disclosures to Committee.	1.20	528.00
02/22/23	Joseph M. Coleman	Review new pleadings in the docket(.1); Confirm objection deadlines(.1).	0.20	155.00

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/22/23	Olivia Salvatierra	Research docket, pleadings, SDTX local rules saving Dkts. 146 & 148(.3); Researching W&E List deadline for 2-27-23 Hearing(.2); Reviewed J. Coleman updates on notes from 2-21-23 Committee Meeting(.7); prepare files and pleadings and status outline for J. Coleman(.6).	1.80	405.00
02/23/23	Olivia Salvatierra	Docket search, saving Dkts #151, #154 and #158 (.6); Create folders, exhibit sets, and initial W&E List Binder for 2-27-23 hearing(4.6).	5.20	1,170.00
02/23/23	JaKayla DaBera	Prepare witness and exhibit list for DIP financing hearing(1.7); Label exhibits for same(.5).	2.20	847.00
02/23/23	JaKayla DaBera	Review voluntary petition(.4); Review pitchbook materials(.4); Review Murphy Declaration(.3); Review Neyrey Declaration(.3); Prepare to incorporate notes from review of first day pleadings in a memo that details key facts and dates(.4).	1.80	0.00
02/23/23	Joseph M. Coleman	Review docket and new filings(.1); Examine local rules and Judge Lopez's procedures(.2).	0.30	232.50
02/23/23	S. Kyle Woodard	Prepare exhibits for Committee's witness and exhibit list filing (1.7); File Committee's witness and exhibit list (.8).	2.50	1,100.00
02/24/23	Joseph M. Coleman	Numerous telephone conferences and e-mail exchanges related to Debtors' continuance of the DIP financing and cash management motion from February 27 to March 9 (.8); Examine pleading regarding same(.1).	0.90	697.50

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/24/23	JaKayla DaBera	Complete review of Neyrey declaration(.8); Review DIP Financing motion(.9); Review DIP Term sheet(.9); Review Committee's objection to DIP Financing(1.0); Begin reviewing cash management motion; Prepare to incorporate notes from review of first day pleadings in a memo that details key facts and dates(.9).	4.50	1,732.50
02/24/23	JaKayla DaBera	Add witness and exhibit list deadlines to critical dates memo.	0.30	115.50
02/24/23	Olivia Salvatierra	Review Court's docket and save pleadings to system.	0.20	45.00
02/26/23	Joseph M. Coleman	Memo regarding critical dates and deadlines, to do items and prioritize same and specific responsibility for same(1.3); Follow up regarding production of documents, NDA and related issues(.3).	1.60	0.00
02/26/23	Joseph M. Coleman	Exchanges of e-mails with M. Diaz regarding retention papers, committee meeting and sale process.	0.20	155.00
02/27/23	Joseph M. Coleman	Examine docket regarding new filings(.1); Review e-mails from financial advisors, Debtors' counsel and committee members and return same as appropriate(.3); Outline key tasks and prioritize and assign same(.4).	0.80	620.00
02/27/23	S. Kyle Woodard	Review local rules and bankruptcy rules as pertaining to Committee's objections and upcoming hearings (.5); review case docket and pleadings and update critical dates and deadlines memo (.9).	1.40	616.00

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/27/23	Michael P. Ridulfo	Internal call to discuss action items and scheduling (1.0); Follow up issues regarding same (.3).	1.30	786.50
02/27/23	Olivia Salvatierra	Docket check and update (.2); Review critical dates and deadlines for updates changes (.6); Provide J. Coleman Committee Meeting notes from 2/21/23 (.4).	1.20	270.00
02/27/23	JaKayla DaBera	Update critical dates and deadlines memo; Check docket for any updates.	0.20	77.00
02/28/23	Olivia Salvatierra	Reviewed Docket for new filings and critical updates(.8); Update K. Woodard's critical dates/deadlines form(.3).	1.10	247.50
02/28/23	Michael P. Ridulfo	Review revised Confidentiality Agreement and compare to Committee draft(.8); Initial preparation of redline(.3).	1.10	665.50
02/28/23	Joseph M. Coleman	Examine e-mail from Debtors' counsel regarding Confidentiality Agreement and exchange e-mails regarding same(.2); E-mail Committee members regarding Confidentiality Agreement(.2); Briefly review and confer with M. Ridulfo regarding same(.2).	0.60	465.00
Total			54.80	\$24,374.00

Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/16/23	Joseph M. Coleman	Examine Cash Management Motion and outline objections(1.40); Update memo regarding causes of action(.8).	2.20	1,705.00
02/16/23	Brian N. Hail	Confer regarding investigation of potential lawsuit [REDACTED].	0.70	521.50

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/16/23	Brian N. Hail	Review and analyze key documents regarding same.	2.00	1,490.00
02/16/23	Michael P. Ridulfo	Review memo and issues regarding potential litigation claims.	0.20	121.00
02/16/23	Brian W. Clark	Preliminary investigation and analysis of potential [REDACTED] claims.	3.60	1,926.00
02/17/23	Brian W. Clark	Continue review and analysis of background materials and preliminary investigation and analysis of potential claims [REDACTED] (2.2); Work on document request topics for 2004 examination of debtor (2.8); Zoom meeting with FTI (.5); Investigate information on potential background witnesses (.3); Review research on potential causes of action (.3).	6.10	3,263.50
02/17/23	Brian N. Hail	Draft 2004 discovery to debtor.	1.50	1,117.50
02/17/23	Brian N. Hail	Telephone conference with FTI regarding issues involving debtor.	0.50	372.50
02/17/23	Joseph M. Coleman	Analysis of potential causes of action [REDACTED] (.7); Meeting with litigation team regarding same(.7); Introductory call with FTI regarding same(.5); E-mail Committee regarding investigation(.2); Work on 2004 motion(.3).	2.40	1,860.00
02/17/23	Collin Delano	Began conducting research of potential causes of action(2.7); applicability of certain other causes of action(2.4).	5.10	2,014.50
02/17/23	Olivia Salvatierra	Reviewed Docket for important pleadings filed.	0.20	45.00

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/17/23	Olivia Salvatierra	Secretary of State search [REDACTED] [REDACTED] [REDACTED](.6); Telephone call and e-mail to Capital Services regarding UCC searches for 13 entities(.8).	1.40	315.00
02/18/23	Brandon Keaton	Review and summarize documents from virtual data room.	2.20	759.00
02/18/23	Joseph M. Coleman	Review TSA and SSA, work on objection to Cash Management.	2.90	2,247.50
02/18/23	Brian W. Clark	Review and analyze documents from virtual data room, [REDACTED].	1.50	802.50
02/18/23	Joseph M. Coleman	Exchange e-mails with Committee Chair, Litigation team and M. Diaz(.2); Examine e-mail from Debtor's counsel regarding document delivery and briefly examine list of documents delivered(.3); Examine first days declarations(.6); Review documents produced by the debtors, [REDACTED] [REDACTED] [REDACTED] [REDACTED](3.0).	4.10	3,177.50
02/19/23	Brian W. Clark	Continue analysis of potential claims.	0.80	428.00
02/19/23	Joseph M. Coleman	Examine TSA and e-mail regarding same(.9); Examine documents produced by the Debtor(1.20); Work on 2004 examination(.3).	2.40	1,860.00
02/19/23	Brandon Keaton	Finish reviewing and summarizing documents in virtual data room [REDACTED].	2.90	1,000.50
02/19/23	Collin Delano	Continued conducting research into the plausibility of asserting certain causes of action [REDACTED] [REDACTED](1.0).	1.00	395.00

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02/20/23	Brandon Keaton	Follow-up review and further breakdown and analysis of [REDACTED] key documents: [REDACTED] [REDACTED] [REDACTED].	1.10	379.50
02/20/23	Joseph M. Coleman	Examine e-mail from M. Hulteen, Committee Chair, regarding investigation(.1); Work on investigation of potential causes of actions(.1); Follow up regarding summary of documents produced by the Debtor to date(.1); E-mail same to M. Diaz(.1); Examine memo regarding causes of action(.5); Investigate manner creditors do business with Debtor(.2); Review loan and other documents provided by the Debtor and e-mail Debtors' counsel regarding same(.7).	1.80	1,395.00
02/20/23	Brian W. Clark	Continue review and analysis of key documents(2.0); Work on timeline of key events(.4); Work on 2004 document requests(2.8); Review and analyze research on potential claims(.4); Zoom with FTI(.5).	6.10	3,263.50
02/21/23	Brian W. Clark	Continue working on document requests and topic lists for Debtor (3); Continue review of key documents (.5); Continue analysis of potential claims and causes of action (.7).	4.20	2,247.00
02/21/23	Joseph M. Coleman	Work on Motion for 2004(.5); Conference call regarding Motion for 2002 examinations(.4).	0.90	697.50
02/21/23	Brian N. Hail	Develop 2004 exam topics.	1.20	894.00
02/21/23	Brian N. Hail	Develop 2004 document requests.	1.00	745.00
02/22/23	Brian N. Hail	Analyze [REDACTED] [REDACTED] issues as to various causes of action.	1.00	745.00

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02/22/23	Joseph M. Coleman	Telephone conferences with e-mail exchanges with B. Butler regarding need for documents(.8); Initial review recent production of documents(.9); Telephone conferences regarding 2004 exam and forward same to the Debtors(.4).	2.10	1,627.50
02/22/23	Brian W. Clark	Work on document requests and topics for 2004 exam of Debtor (.5); continue analysis of potential claims (.6).	1.10	588.50
02/23/23	Brian W. Clark	Receipt and review of additional documents from Debtors (.6); revise timeline of key events (.1).	0.70	374.50
02/23/23	Joseph M. Coleman	Work on document review and follow up regarding 2004 exams.	0.30	232.50
02/23/23	Joseph M. Coleman	Draft and e-mail to Debtor's counsel proposed NDA agreement.	0.80	620.00
02/23/23	Brian N. Hail	Review and analyze key documents.	1.50	1,117.50
02/23/23	Brandon Keaton	Review and summarize new batch of documents that are placed into overall case timeline.	3.50	1,207.50
02/23/23	Michael P. Ridulfo	Attention to issues re Debtors' 2004(.5); Teleconference with Debtors' counsel regarding same(.5).	1.00	605.00
02/27/23	Brian N. Hail	Review status of various claims and causes of action.	2.00	1,490.00
02/27/23	Brian N. Hail	Review key documents.	1.50	1,117.50
02/27/23	Brian N. Hail	Review and outline timeline of key events deadline.	1.20	894.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/27/23	Brian W. Clark	Address issues relating to 2004 examination for non-debtors (.4); Work on 2004 examination for DIP Lender (2); Analyze issues relating to document production and analysis of same, including search terms (.7); Analyze and consider issues relating to former executives (.5).	3.60	1,926.00
02/28/23	Brian W. Clark	Review and comment on proposed letter agreement with Debtors' counsel regarding document production(.2); Review and analyze inter-company balance summary(.2); Continue review of key documents(.5); Work on 2004 exam for Icahn Holdings(1.2); Begin outlining search term list for documents produced by debtors and others(.2); Work on 2004 exam for Pep Boys(.8); Coordinate with FTI on additional 2004 document requests(.2); Begin drafting 2004 exam for IAG(.4).	3.70	1,979.50
02/28/23	Brian N. Hail	Analyze potential claims.	1.00	745.00
02/28/23	Brian N. Hail	Draft 2004 discovery.	1.20	894.00
Total			86.20	\$51,207.00

Asset Disposition

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/17/23	Joseph M. Coleman	Examine motion to approve bidding procedures and e-mail M. Ridulfo regarding same(.3); Telephone conference with M. Diaz regarding sale process issues(.2); Begin review of bidding procedures(.3).	0.80	620.00
02/17/23	Joseph M. Coleman	Telephone conference with counsel for potential bidder regarding problems(.4); Follow up telephone conference regarding same(.2).	0.60	465.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/17/23	Michael P. Ridulfo	Attention to Bidding Procedures issues.	0.50	302.50
02/19/23	Joseph M. Coleman	Briefly review motion for bidding procedures (.2).	0.20	155.00
02/19/23	Joseph M. Coleman	Review list of buyers, FTI's list of potential buyers and exchange e-mails with M. Diaz regarding same(.3).	0.30	232.50
02/20/23	Joseph M. Coleman	Begin review of bidding procedures and strategize regarding objection(.2); Examine e-mail from B. Murphy regarding response to additional potential names for sale process(.1).	0.30	232.50
02/20/23	Michael P. Ridulfo	Review Sale/Bid Motion and attached procedures regarding bidding and sale(1.2); Prepare outline of issues regarding same(.5); Review and analyze law and legal issues for basis of objecting to Motion(2.7).	4.40	2,662.00
02/20/23	JaKayla DaBera	Review and outline objections to Bidding Procedures and Milestones.	1.50	577.50
02/20/23	JaKayla DaBera	Examine and list objections for bidding procedures.	3.30	1,270.50
02/21/23	Michael P. Ridulfo	Continued review of law regarding Sale and Bid Procedures Motion and prepare outline of Response(4.8); Confer with FTI re same(.5).	5.30	3,206.50
02/21/23	Joseph M. Coleman	Begin to outline issues with the Debtors' bidding procedures.	0.20	155.00
02/21/23	Joseph M. Coleman	Examine e-mail from potential bidder, along with detailed attachment, and respond(.3).	0.30	232.50
02/22/23	Michael P. Ridulfo	Prepare redline of Bid Procedures Order, Sale Order, Sale Procedures and Assumption and Assignment Procedures(2.0); Initial preparation of objection to Bid Procedures Motion(.5)	2.50	1,512.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/23/23	Michael P. Ridulfo	Continued work on Bidding and Sale Procedures and review of additional caselaw regarding same.	1.60	968.00
02/24/23	Michael P. Ridulfo	Continued work on bid and Sales Procedures issues.	0.80	484.00
02/28/23	Michael P. Ridulfo	Teleconference with Debtors' counsel regarding Bid Procedures redline(.2); Follow up issues re same and review comments from other creditors(.2).	0.40	242.00
Total			23.00	\$13,318.00

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/17/23	Joseph M. Coleman	Telephone conference with Committee member regarding various issues(.3); Follow up call regarding same(.2); Telephone conference with Committee Chair regarding status issues(.2); Examine committee minutes, comment and e-mail to Committee Chair(.5).	1.20	930.00
02/19/23	Joseph M. Coleman	Draft agenda for committee meeting(.3); E-mail Committee Chair and M. Diaz regarding same(.1).	0.40	310.00
02/20/23	Joseph M. Coleman	Examine e-mail from Committee Chair, regarding Committee Meeting and Agenda(.1); Telephone conference with Committee Chair summarizing status issues and answering questions(.5); Put together materials for Committee Call, including agenda, attachments thereto, and e-mail zoom calendar(1.1).	1.70	1,317.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/21/23	Joseph M. Coleman	Examine e-mails from committee members and respond(.2); Telephone conference with Committee Chair regarding committee call, status issues and committee organization(.4); Prepare for committee meeting and discuss same with M. Diaz(1.2); Attend Committee Meeting(1.1); Telephone conference with M. Hulteen regarding same(.2); Finalize committee minutes(.4).	3.50	2,712.50
02/21/23	Olivia Salvatierra	Review agenda and documents in preparation for IEH Committee Meeting(.9); Attend Committee meeting(1.2); Take and type IEH Committee meeting notes for J. Coleman(1.0); IEH research of various matters(1.3).	4.70	1,057.50
02/22/23	Joseph M. Coleman	Telephone conference with in-house counsel for DRiV regarding status and related issues5(.3); Examine e-mail and telephone conference with outside counsel for committee member Axalta(.4); E-mail Committee with status issues(.3).	1.00	775.00
02/27/23	Joseph M. Coleman	Telephone conference with M. Hulteen regarding status and strategy(.3); Telephone conference with attorney for Gates regarding sales process and other items(.4); Begin work on agenda for committee call(.3).	1.00	775.00
02/27/23	Joseph M. Coleman	Draft agenda and then insert numerous attachments for Committee meeting, including exchanging e-mails with Committee Chair regarding same.	1.80	1,395.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/28/23	Joseph M. Coleman	Telephone conference with M. Diaz regarding Committee meeting(.4); Finalize Committee Agenda and e-mail same(.9); Examine e-mail from SMP and telephone conference with E. Pawlish regarding various issues(.3); Follow up with M. Diaz regarding same(.2); Telephone conference with E. Pawlish of SMP(.3); Telephone conference with e-mail L. Miller regarding same(.2); Update M. Diaz(.1).	2.40	1,860.00
02/28/23	Joseph M. Coleman	Examine e-mail and telephone conference with Gates counsel regarding same(.3); Telephone conference with M. Diaz regarding same and e-mail regarding response(.3).	0.60	465.00
02/28/23	Michael P. Ridulfo	Review Agenda and attachments for tomorrow's committee zoom.	0.30	181.50
Total			18.60	\$11,779.00

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/16/23	S. Kyle Woodard	Review and revise application to employ counsel for committee, declaration in support, and proposed order.	1.00	440.00
02/16/23	Joseph M. Coleman	Examine Finance Advisor materials(.4); Telephone conference with Committee Chair regarding same(.3); Conversations with Financial Advisor candidates(.3); Prep for, review materials and interview potential Finance Advisor candidates(3.3); Follow up interview and telephone conference with Committee Chair(.6).	4.90	3,797.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/17/23	Joseph M. Coleman	Exchange e-mails with M. Hulteen regarding retention of FA(.1); Prepare list for FA and zoom with Committee Chair and FA(.4); Follow up e-mail with M. Hulteen regarding FTI and other FA candidates(.1).	0.60	465.00
Total			6.50	\$4,702.50

Other Contested Matters (excl. assumption/rejection motions)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/16/23	S. Kyle Woodard	Begin reviewing cash management motion and considering objections thereto.	0.50	220.00
02/17/23	S. Kyle Woodard	Prepare outline for cash management objection (1.3); Review pleadings and conduct research related to cash management objection (2.3); Work on drafting objection to cash management motion (3.5).	7.10	3,124.00
02/18/23	S. Kyle Woodard	Continue work on objection to cash management motion.	1.00	440.00
02/19/23	S. Kyle Woodard	Conduct research relevant to cash management objection and DIP objection, [REDACTED] (2.6); continue drafting and editing objection to debtors' cash management motion(1.8).	4.40	1,936.00
02/19/23	Joseph M. Coleman	Work on objection to Cash Management Motion (1.90).	1.90	1,472.50
02/20/23	Joseph M. Coleman	Finalize cash management Objection(.6).	0.60	465.00
02/20/23	S. Kyle Woodard	Revise and continue editing and drafting cash management objection (.5); Attention to upcoming service issues (.1).	0.60	264.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/22/23	S. Kyle Woodard	Review interim cash management order and proposed final order (.5); follow up on issues related to TSA and SSA(.3).	0.80	352.00
02/22/23	S. Kyle Woodard	Work on revising and editing objection to cash management motion(.5); Prepare proposed orders for cash management and DIP objections(.5); Finalize and file objections with the court(.4).	1.40	616.00
02/22/23	Joseph M. Coleman	Finalize objection to cash management Order and work on power point for hearing.	0.80	620.00
02/23/23	Joseph M. Coleman	Telephone conference with Creditor's counsel about the case(.3); Telephone conference with Committee Chair regarding cash management Motion(.4); E-mail Committee regarding same(.2); Brief status to Committee on all other issues(.3).	1.20	930.00
02/23/23	S. Kyle Woodard	Work on witness and exhibit list for first day hearings.	0.80	352.00
02/27/23	JaKayla DaBera	Attention to upcoming final DIP financing and cash management hearing including providing support for objections to DIP financing motion and cash management motion.	1.00	385.00
Total			22.10	\$11,176.50

Business Operations

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/20/23	Joseph M. Coleman	Examine AR aging and inventory(.2).	0.20	155.00
Total			0.20	\$155.00

Financing/Cash Collateral

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/15/23	Joseph M. Coleman	Examine DIP Financing Motion(.5).	0.50	387.50
02/15/23	John J. Kane	Work on DIP Financing objection and related research.	4.50	2,610.00
02/16/23	John J. Kane	Work on objection to DIP Financing Motion (4.8); Work on research needs and coordinate with K. Woodard regarding same (.4); Review research notes and secondary source article (.4); Follow up correspondence with J. Coleman on DIP strategy considerations and financial advisor's analysis of DIP terms to market, other matters (.8).	6.40	3,712.00
02/16/23	John J. Kane	Prepare topics and questions list for Debtor-Committee DIP Financing call and coordinate with J. Coleman regarding same.	0.80	464.00
02/16/23	S. Kyle Woodard	Begin reviewing DIP motion and researching case law related to objections.	0.80	352.00
02/16/23	S. Kyle Woodard	Conduct research on numerous issues related to debtor's proposed DIP facility, including [REDACTED] and other issues.	4.30	1,892.00
02/16/23	S. Kyle Woodard	Research case law on [REDACTED] (2.2); Begin outlining objection to cash management motion (.5).	2.70	1,188.00
02/16/23	Joseph M. Coleman	Examine DIP financing and assess market terms and related issues and begin to outline objections(.5); Investigate what is market for roll up and related DIP Terms(.4).	0.90	697.50

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02/17/23	Joseph M. Coleman	Work on DIP Objection (.7); Develop list of documents needed for the Debtors to respond (.8); Review agenda for call with Debtor's team and prepare for call (.2); Call with Debtor's team(.9); Exchange e-mails with B. Murphy regarding data room(.2); Follow up regarding UCC Search(.1); Examine e-mails regarding NDA(.1).	3.30	2,557.50
02/17/23	Joseph M. Coleman	Work on issues with the DIP and objection thereto (.6).	0.60	465.00
02/17/23	John J. Kane	Work on DIP Objection and review financial advisor market terms analysis (1.6); Additional work on DIP Objection (3.5).	5.10	2,958.00
02/18/23	John J. Kane	Work on objection to DIP Financing Motion.	5.40	3,132.00
02/18/23	John J. Kane	Review case research notes, DIP objections, and secondary sources (1.1); Continue to supplement objection to DIP Financing Motion(1.7).	2.80	1,624.00
02/18/23	Joseph M. Coleman	Strategize and work on DIP Objection(.3).	0.30	232.50
02/19/23	Joseph M. Coleman	Work on DIP Objection(1.0); Review applicable loan documents and Murphy Declaration(.80).	1.80	1,395.00
02/19/23	John J. Kane	Work on objection to DIP Financing Motion.	6.20	3,596.00
02/20/23	John J. Kane	Continue to draft objection to DIP financing motion.	8.90	5,162.00
02/20/23	John J. Kane	Coordinate with J. Coleman on DIP Objection strategy and discovery matters(.2); M. Diaz follow up(.1); Work on potential declaration and evidentiary issues related to hearing exhibits and demonstratives(.3).	0.60	348.00

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02/20/23	Joseph M. Coleman	Review DIP term sheet and strategize regarding DIP objection(.9); Review which loan documents have been delivered and which have not and e-mail Debtors' regarding same(.4); Continue to work on DIP Objection(.6); Telephone conference with M. Diaz regarding testimony and alternative DIP(.5).	2.40	1,860.00
02/20/23	JaKayla DaBera	Review corrected DIP motion(.2); Summarize corrections and e-mail same to J. Coleman and J. Kane(.2).	0.40	154.00
02/21/23	Joseph M. Coleman	Work on DIP Objection(2.40); Conference call with FTI regarding DIP Objection and preparation for DIP hearing(.4).	2.80	2,170.00
02/21/23	John J. Kane	Revise and update draft objection to dip financing motion and add supplemental case and secondary source authority (1.2); Work with team on DIP hearing strategy, likely exhibit needs, structure of hearing, power point slides, focus of closing argument (1.6); Work on general outlines of testimony from witness and cross issues for adverse witnesses (.7); Committee meeting to discuss DIP hearing and objection (1.0).	4.50	2,610.00
02/21/23	John J. Kane	Conference with M. Diaz and team regarding DIP Hearing support.	0.90	522.00

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02/22/23	John J. Kane	Review comments from supporting counsel and incorporate same into revised DIP financing objection(1.6); Review and supplement DIP Objection, perform final read through, insert supplemental case authority and citations, supporting legal argument, reform formatting, prepare for filing(3.1); Coordinate filing and circulation of same(.3); Follow up correspondence regarding related issues and review and brief additional case law post-filing(1.0); Work on M. Diaz testimony outline(2.0).	8.00	4,640.00
02/22/23	John J. Kane	Begin to prepare list of exhibits necessary to witness and exhibit list for DIP financing hearing.	0.40	232.00
02/22/23	Michael P. Ridulfo	Review DIP objection and provide comments to same.	0.90	544.50
02/22/23	Joseph M. Coleman	Finalize DIP Financing Objection(3.3); Several telephone conferences related to DIP hearing(.9); Begin review of exhibits for Feb 27th hearing(1.3); Conference call with M. Cavanaugh and L. Freeman regarding DIP issues and hearing(.7); Telephone conference with M. Diaz regarding DIP hearing and related issues(.5); E-mail Debtor's counsel regarding DIP Objection(.2).	6.90	5,347.50
02/22/23	JaKayla DaBera	Search for specific cases(.2); E-mail same to J. Coleman and J. Kane(.1).	0.30	115.50

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02/23/23	Joseph M. Coleman	Examine prepetition loan documents and understand Jan. 30th transaction, including e-mail to debtors' counsel regarding missing loan documents(.5); Work on exhibits and file same(3.5); Examine fifth Amendment to Credit Agreement, [REDACTED] and related issues(1.1); Work on witness examinations(1.9); Exchange emails with counsel for Debtor regarding hearing(.2).	7.20	5,580.00
02/23/23	Joseph M. Coleman	Examine e-mail from Debtors' counsel regarding desire to move DIP Financing Motion and follow up e-mails and telephone conferences regarding same(.3); E-mail Committee regarding status(.1).	0.40	310.00
02/23/23	Michael P. Ridulfo	Attention to Exhibits for DIP Hearing.	0.60	363.00

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02/23/23	John J. Kane	Work with J. Coleman on DIP financing hearing strategy and other major case issues, establish hearing to do list (1.0); Continue to work on M. Diaz testimony outline and circulate same to M. Diaz for review and feedback (2.8); Work on witness and exhibit list, compilation of exhibits, filing and service of same (1.6); Work on tech management for hearing (.4); Follow up calls with M. Diaz and J. Coleman regarding DIP Financing hearing matters (.6); Work on administrative insolvency issues and review supplemental information and documents from debtor (1.2); Follow up correspondence with JW team regarding potential continuance of hearing, timing of same (.4); Additional calls with J. Coleman regarding DIP Financing matters, hearing issues (.4).	8.40	4,872.00
02/23/23	Charles E. Aster	Review loan agreement(1.1); Review multiple amendments(1.6); Draft memo on [REDACTED](1.4); Create power point showing the same(1.9); Meeting with Joe Coleman and John Kane to discuss [REDACTED] [REDACTED](1.0).	7.00	4,410.00

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02/24/23	John J. Kane	Continue to work on testimony outlines for DIP Financing hearing (.9); Work on outline powerpoint presentation for opening (.5); Review information from M. Diaz and coordinate with same regarding demonstrative (.4); Conference calls with JW team, J. Coleman, regarding DIP hearing continuance and correspond with JW team further regarding available dates (.9); Work on research to do list for DIP financing hearing (.2); Follow up with M. Diaz regarding hearing timing, timeline for to do items (.2); review administrative insolvency matters (.3).	3.40	1,972.00
02/25/23	John J. Kane	Outline opening argument powerpoint slides for DIP Hearing and review follow up correspondence from M. Diaz regarding DIP related matters.	2.20	1,276.00
02/26/23	John J. Kane	Review docket entries, updated critical dates and deadlines, and prepare to-do list for postponed DIP hearing.	0.60	348.00
02/26/23	Joseph M. Coleman	Work on DIP Objection hearing prep.	0.40	310.00
02/27/23	Joseph M. Coleman	Work on DIP issues and hearing prep(1.8); Outline need for depositions (.3); Conference call with M. Diaz regarding DIP and related issues(.5); Examine information about budget and exchange e-mails regarding same(.3).	2.90	2,247.50
02/27/23	John J. Kane	Supplemental research for DIP financing hearing.	0.80	464.00

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02/27/23	John J. Kane	Work on DIP hearing exhibits and testimony outlines(2.8); Conference call with M. Diaz regarding DIP matters and deposition topics(.8); Strategize with J. Coleman on Portage Point deposition issues and develop early-case strategy(.6); Follow up with B. Clark on document production relevant to DIP hearing(.4).	4.60	2,668.00
02/27/23	Charles E. Aster	Meeting with J. Coleman regarding Prepetition loan structure(.3); Revise power point for his presentation for the Committee(.5).	0.80	504.00
02/27/23	S. Kyle Woodard	Preparations for hearings on DIP and cash management motions and consider next steps in case.	1.10	484.00
02/28/23	John J. Kane	Follow up correspondence with JW team regarding deposition of Portage Point, DIP hearing matters.	0.10	58.00
02/28/23	John J. Kane	Continue to work on hearing testimony questioning outlines (1.2); Work on Deposition Topic list, coordinate with Debtor's counsel and seek Portage Point deposition (.4); Review correspondence from M. Diaz and process updates (.4); Review committee member correspondence(.2); Review budget variances and briefly coordinate with J. Coleman on [REDACTED] [REDACTED] [REDACTED] (.2).	2.40	1,392.00
02/28/23	John J. Kane	Review correspondence from committee members and coordinate with J. Coleman regarding same, timing of hearing on cash collateral, and related issues.	0.40	232.00

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/28/23	Joseph M. Coleman	Prep for DIP Hearing.	1.80	1,395.00
Total			128.50	\$79,854.00

Litigation

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/16/23	Joseph M. Coleman	Review declarations and begin to outline investigation and information needed(1.1); Meet with team regarding same(.7); Memo regarding initial view of categories of investigation(.6); Analysis of potential causes of action and items to investigate(.6).	3.00	2,325.00
02/20/23	JaKayla DaBera	Review local rules and bankruptcy local rules for any limits to number of discovery requests.	0.40	154.00
02/21/23	JaKayla DaBera	Edit 2004 motion to include emergency relief language.	0.10	38.50
02/21/23	John J. Kane	Work with litigation team on 2004 examination matters and considerations.	0.40	232.00
02/21/23	Michael P. Ridulfo	Attention to issues relating to 2004 Examination of Debtor and production of documents.	1.00	605.00
02/22/23	Michael P. Ridulfo	Revise 2004 Exam and Document Requests to Debtors (.8); E-mails to/from debtors' counsel re same (.1).	0.90	544.50
02/27/23	Michael P. Ridulfo	Review and redline letter agreement from Debtors' counsel regarding 2004 Exam.	0.20	121.00
Total			6.00	\$4,020.00
Total Professional Charges			345.90	\$200,586.00

Invoice Date: 03/23/23

Invoice No.: 492465

File No: 74089.00002.000

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>				<u>Total</u>
Joseph M. Coleman	Director	94.80	hrs at	\$ 775 / hr	73,470.00
Brian N. Hail	Director	16.30	hrs at	\$ 745 / hr	12,143.50
Charles E. Aster	Director	7.80	hrs at	\$ 630 / hr	4,914.00
Michael P. Ridulfo	Director	24.70	hrs at	\$ 605 / hr	14,943.50
John J. Kane	Director	79.60	hrs at	\$ 580 / hr	46,168.00
Brian W. Clark	Director	31.40	hrs at	\$ 535 / hr	16,799.00
Joseph M. Coleman	Director	1.60	hrs at	\$ 0 / hr	0.00
S. Kyle Woodard	Associate	37.20	hrs at	\$ 440 / hr	16,368.00
Collin Delano	Associate	6.10	hrs at	\$ 395 / hr	2,409.50
JaKayla DaBera	Associate	15.40	hrs at	\$ 385 / hr	5,929.00
Brandon Keaton	Associate	9.70	hrs at	\$ 345 / hr	3,346.50
JaKayla DaBera	Associate	1.80	hrs at	\$ 0 / hr	0.00
Olivia Salvatierra	Paralegal	18.20	hrs at	\$ 225 / hr	4,095.00
Olivia Salvatierra	Paralegal	1.30	hrs at	\$ 0 / hr	0.00
Total Professional Charges					\$200,586.00

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/28/23	Photocopies	54.30
Total		\$54.30

INVOICE SUMMARY

Professional Charges	\$ 200,586.00
Disbursements	\$ 54.30
CURRENT INVOICE DUE	\$ <u>200,640.30</u>
TOTAL AMOUNT DUE	\$ <u>200,640.30</u>

Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 03/23/23

Invoice No.: 492465

File No.: 74089.00002.000

Matt Hulteen, matt.hulteen@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through February 28, 2023:

Total Professional Charges	\$	200,586.00
Disbursements	\$	54.30
Current Invoice Due	\$	200,640.30
TOTAL AMOUNT DUE	\$	<u>200,640.30</u>

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.

Exhibit A-2

Second Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) IEH AUTO PARTS HOLDING LLC, <i>et al.</i> , ¹) Debtors.)	Chapter 11) Case No. 23-90054 (CML)) (Jointly Administered))
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**SECOND MONTHLY FEE STATEMENT OF KANE RUSSELL COLEMAN LOGAN
PC, AS COUNSEL FOR THE OFFICIAL UNSECURED CREDITORS' COMMITTEE,
FOR THE PERIOD FROM MARCH 1, 2023 THROUGH MARCH 31, 2023**

Name of Professional:	Kane Russell Coleman Logan PC	
Professional's Role in Case:	Counsel for the Official Unsecured Creditors' Committee	
Date of Retention Order:	April 27, 2023 [Dkt. #427]	
Effective Date of Retention:	February 15, 2023	
Time Period Covered by this Statement:	<u><i>Beginning of Period:</i></u> March 1, 2023	<u><i>End of Period:</i></u> March 31, 2023
Total Fees incurred during this Period:	\$432,987.50	
Total Expenses during this Period:	\$5,330.00	
Total Fees and Expenses for the Period:	\$438,317.50	
Summary of Monthly Fee Statement		
Fees sought in this Statement (80%):	\$346,390.00	
Expenses sought in this Statement (100%):	\$5,330.00	
Monthly Fee Statement Total:	\$351,720.00	
20% Holdback for Professional Fees:	\$86,597.50	

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

Kane Russell Coleman Logan PC ("**KRCL**"), counsel for the Official Unsecured Creditors' Committee (the "**Committee**"), submits this Monthly Fee Statement for the above-stated time period (the "**Statement Period**") pursuant to the *Court's Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. #264] (the "**Interim Compensation Order**")² as follows:

PROFESSIONAL FEES

1. KRCL's invoices for the Statement Period is attached hereto (the "**Invoices**"). The Invoices provides: (i) a description of the services rendered; (ii) the time spent; (iii) the hourly rates charged; and (iv) the name of the attorney or paraprofessional performing the work. Time entries on the Invoices are organized by project category.

2. KRCL's fees incurred during the Statement Period are summarized as follows:

Summary by Professional

Name	Position	Hourly Rate	Hours	Fees
Joseph M. Coleman	Director	\$775	178.60	\$138,415.00
Brian N. Hail	Director	\$745	70.70	\$52,671.50
Charles E. Aster	Director	\$630	8.10	\$5,103.00
Michael P. Ridulfo	Director	\$605	71.10	\$43,015.50
John J. Kane	Director	\$580	70.60	\$40,948.00
Brian W. Clark	Director	\$535	62.00	\$33,170.00
Bruce "Chip" Morris	Director	\$0	1.80	\$0.00
S. Kyle Woodard	Associate	\$440	103.30	\$45,452.00
Andrew Robertson	Associate	\$435	7.30	\$3,175.50
Stephen L. Kirschner	Associate	\$415	2.80	\$1,162.00
Collin Delano	Associate	\$395	9.20	\$3,634.00
JaKayla DaBera	Associate	\$385	110.40	\$42,504.00
Miles Emery	Associate	\$385	2.80	\$1,078.00
Brandon Keaton	Associate	\$345	29.60	\$10,212.00
Reuel Coles	Paralegal	\$275	0.60	\$165.00
Carlos Velazquez	Paralegal	\$265	1.50	\$397.50
Connie Nims	Paralegal	\$235	2.70	\$634.50

² Capitalized terms that are not defined herein have the meanings provided in the Interim Compensation Order unless otherwise noted.

Olivia Salvatierra	Paralegal	\$225	50.00	\$11,250.00
Olivia Salvatierra	Paralegal	\$0	5.30	\$0.00
TOTAL:			788.40	\$432,987.50

Summary by Project Category

Task Code	Hours	Fees
B100 - Bankruptcy	0.00	\$0.00
B110 - Case Administration	35.30	\$18,260.50
B120 - Asset Analysis and Recovery	446.20	\$225,897.00
B130 - Asset Disposition	8.40	\$6,281.00
B140 - Relief from Stay/Adequate Protection Proceedings	0.00	\$0.00
B150 - Meetings of and Communications with Creditors	39.70	\$25,820.50
B160 - Fee/Employment Applications	23.40	\$10,872.00
B170 - Fee/Employment Objections	14.50	\$5,631.50
B180 - Avoidance Action Analysis	0.00	\$0.00
B185 - Assumption/Rejection of Leases and Contracts	0.00	\$0.00
B190 - Other Contested Matters	31.50	\$21,651.00
B195 - Non-Working Travel	0.00	\$0.00
B200 - Operations	0.00	\$0.00
B210 - Business Operations	7.80	\$5,875.00
B220 - Employee Benefits/Pensions	0.00	\$0.00
B230 - Financing/Cash Collections	117.20	\$74,693.50
B240 - Tax Issues	0.00	\$0.00
B250 - Real Estate	3.00	\$1,250.00
B260 - Board of Directors Matters	1.80	\$760.50
B300 - Claims and Plan	0.00	\$0.00
B310 - Claims Administration and Objections	2.00	\$1,047.50
B320 - Plan and Disclosure Statement	0.00	\$0.00
B400 - Bankruptcy-Related Advice	0.00	\$0.00
B410 - General Bankruptcy Advice/Opinions	0.00	\$0.00
B420 - Restructurings	0.00	\$0.00
L100 - Litigation	57.60	\$34,947.50
TOTAL:	788.40	\$432,987.50

DISBURSEMENTS

3. KRCL's actual and necessary expenses incurred during the Statement Period are described as follows:

Date	Description	Amount
3/31/2023	Photocopies	\$2,388.00
3/31/2023	Color Copies	\$121.25
3/31/2023	On-Line Services	\$1,414.47
3/31/2023	Secretarial Overtime	\$252.00
3/31/2023	Courier Expense	\$154.76
3/31/2023	Postage	\$749.52
2/28/2023	Word Processing	\$250.00
TOTAL:		\$5,330.00

NOTICE AND OPPORTUNITY TO OBJECT

4. Any party that objects to the fees or expenses sought in this Monthly Fee Statement must serve written notice of such objection upon KRCL and each of the Application Recipients³ by no later than **May 11, 2023 at 4:00 p.m. CDT**. The notice must set forth the precise nature and basis of the objection and the amount at issue, and must otherwise comply with the terms of the Interim Compensation Order. Copies of the Interim Compensation Order may be requested in writing from KRCL, Attn: Olivia Salvatierra (osalvatierra@krcl.com).

RESERVATION

5. The Committee and KRCL have been diligent in attempting to redact any and all privileged or otherwise confidential information from the Invoice. Notwithstanding, however, the Committee and KRCL expressly reserve, and do not waive under any circumstances whatsoever, any privileges, protections, or rights to confidentiality of any kind or character for any purpose.

³ As defined in the Interim Compensation Order, the Application Recipients include the following parties: (a) the Debtors, 112 Townpark Drive NW, Suite 300, Kennesaw, Georgia 30144, Attn: Michael Neyrey; (b) Jackson Walker LLP (via email), 1401 McKinney Street, Suite 1900, Houston, Texas 77010, Attn: Veronica A. Polnick (vpolnick@jw.com) and Vienna Anaya (vanaya@jw.com); (c) the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov); (d) counsel for the Prepetition Lender, Sidley Austin LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Stephen Hessler (shessler@sidley.com) and Anthony Grossi (agrossi@sidley.com); and (e) counsel to any statutory committee appointed in these cases.

6. While KRCL has made every effort to include all fees and expenses incurred during the Statement Period, some fees and expenses may not be included in this Monthly Fee Statement due to, *inter alia*, accounting and processing delays during the Statement Period. KRCL reserves the right to seek allowance and payment of any such fees or expenses in accordance with the orders of this Court and the applicable provisions of the Bankruptcy Code and Bankruptcy Rules.

7. KRCL further reserves the right to supplement and/or amend this Monthly Fee Statement for any reason in accordance with the Interim Compensation Order

DATED: April 27, 2023.

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Kyle Woodard

Joseph M. Coleman

State Bar No. 0456610

SDTX No. 16936

Michael P. Ridulfo

State Bar No. 16902020

SDTX No. 27086

John J. Kane

State Bar No. 24066794

SDTX No. 1069650

Kyle Woodard

State Bar No. 24102661

SDTX No. 3596595

Bank of America Plaza

901 Main Street, Suite 5200

Dallas, Texas 75202

Telephone: (214) 777-4200

Telecopier: (214) 777-4299

Email: jcoleman@krcl.com;

Email: mridulfo@krcl.com

Email: jkane@krcl.com

Email: kwoodard@krcl.com

**PROPOSED ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

CERTIFICATE OF SERVICE

This is to certify that on April 27, 2023, a true and correct copy of this Monthly Fee Statement was filed with the Court and served (i) via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case, and (ii) via e-mail or regular U.S. mail, postage prepaid, upon the following parties:

Debtor:

IEH Auto Parts Holding, LLC, *et al.*
Attn: Michael Neyrey
112 Townpark Drive NW, Suite 300
Kennesaw, GA 30144

Debtors' Counsel:

Jackson Walker LLP
Attn: Veronica A. Polnick (vpolnick@jw.com)
Attn: Vienna Anaya (vanaya@jw.com)

U.S. Trustee:

Office of the US Trustee
Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov)
Attn: Andrew Jimenez (Andrew.Jimenez@usdoj.gov)

Prepetition Lender's Counsel:

Sidley Austin LLP
Attn: Stephen Hessler (shessler@sidley.com)
Attn: Anthony Grossi (agrossi@sidley.com)

/s/ Kyle Woodard

Kyle Woodard

**KANE RUSSELL
COLEMAN LOGAN**

Invoice Date: **04/27/23**

Invoice No.: **493787**

File No.: **74089.00002.000**

Matt Hulteen, matt.hulteen@driv.com

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors

PROFESSIONAL CHARGES

Case Administration

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	Michael P. Ridulfo	Committee Meeting Zoom(1.0).	1.00	605.00
03/01/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/01/23	Reuel Coles	Telephone call and e-mail to the Southern District Bankruptcy Court regarding presentation of confidential exhibits at hearing on Debtor-In-Possession's Financing Motion.	0.30	82.50
03/02/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/02/23	S. Kyle Woodard	Follow up on various issues regarding motions recently filed by debtors(.3); Correspondence regarding the same(.1).	0.40	176.00

Invoice Date: 04/27/23

Invoice No.: 493787

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/02/23	Joseph M. Coleman	Examine recent pleadings regarding interim comp and emergency motion regarding bar dates and e-mail team regarding same(.1); Follow up regarding opposed confidentiality agreement(.1); Examine Committee's comments to Confidentiality Agreement(.2); Examine e-mail with comments from Committee Member regarding by-laws(.1); Begin to review Confidentiality Agreement(.2); Exchange e-mails with DRiV's counsel(.2).	0.90	697.50
03/02/23	Joseph M. Coleman	Examine recently filed pleadings.	0.10	77.50
03/03/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/05/23	Joseph M. Coleman	Confirmation e-mail to M. Cavanaugh regarding conversations this weekend(.3) Examine e-mails from M. Cavanaugh, V. Flores and J. Kane and respond as appropriate(.2).	0.50	387.50
03/06/23	Joseph M. Coleman	Examine e-mails from Committee Members, debtors' counsel and related counsel and respond as appropriate(.2); Follow up regarding to do items, deadlines and delegation(.2); Examine recent pleadings(.2).	0.60	465.00
03/06/23	JaKayla DaBera	Coordinate calendaring objection deadlines.	0.20	77.00
03/06/23	Olivia Salvatierra	Update Critical Dates & Deadlines and internal firm memo.	0.20	45.00
03/06/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/07/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/07/23	Michael P. Ridulfo	Review and provide comments regarding Committee Status Report.	0.20	121.00

Invoice Date: 04/27/23

Invoice No.: 493787

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/07/23	Joseph M. Coleman	Examine e-mails regarding by-laws; Follow up regarding same(.2).	0.20	155.00
03/07/23	Joseph M. Coleman	Telephone conference with M. Cavanaugh regarding wide array of issues; Follow up with e-mail to M. Cavanaugh(.4); Examine recent pleadings(.1).	0.50	387.50
03/08/23	Joseph M. Coleman	E-mail V. Flores regarding Cash management motion(.1); Examine recently filed matters(.2); Schedule next Committee meeting(.1); Exchange several e-mails with Debtors including Bar Date Motion, question about officers, need for loan documents and one potential store closure in NJ in exchange for \$190,000(.3); Exchange e-mails with creditor regarding open issues(.1).	0.80	620.00
03/08/23	Michael P. Ridulfo	Review Administrative Insolvency Letter.	0.30	181.50
03/08/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/08/23	S. Kyle Woodard	Review docket and update critical dates and deadlines memo.	0.40	176.00
03/09/23	S. Kyle Woodard	Review recent docket pleadings and update calendar and dates memo.	0.20	88.00
03/09/23	S. Kyle Woodard	Review bar date proposed order and certificate of counsel.	0.10	44.00
03/09/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
03/09/23	Michael P. Ridulfo	Review critical dates and deadlines.	0.20	121.00
03/09/23	Joseph M. Coleman	Review recent pleadings(.1); Examine e-mail from debtors' regarding overpayment of employee and e-mail Committee Chair regarding same(.4); E-mail debtors' counsel regarding same(.1).	0.60	465.00

Invoice Date: 04/27/23

Invoice No.: 493787

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/09/23	John J. Kane	Review updated critical dates and deadlines memo and correspondence from debtors' counsel regarding DIP hearing resetting.	0.40	232.00
03/09/23	Joseph M. Coleman	Exchange e-mails with M. Cavanaugh and telephone conference with M. Cavanaugh and L. Freeman(.4); Examine recent ECF filings(.1) ; Review critical dates and deadlines, update to do and make assignments(.8).	1.30	1,007.50
03/10/23	Joseph M. Coleman	Work on KRCL to do, prioritization and assignment of tasks, and critical dates and deadlines(.9); Examine recent pleadings(.1).	1.00	775.00
03/10/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/12/23	Joseph M. Coleman	Work on KRCL to do and prioritize same together with updated critical dates and deadlines, e-mail regarding same(.6).	0.60	465.00
03/13/23	JaKayla DaBera	Attention to Committee's investigation including developing a strategy for searching for matters of public record.	0.70	269.50
03/13/23	JaKayla DaBera	Search for matters of public record including press releases involving debtors.	0.30	115.50
03/13/23	JaKayla DaBera	Review ordinary course professionals compensation procedures motion.	0.30	115.50
03/13/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/13/23	S. Kyle Woodard	Update critical dates and deadlines memo.	0.20	88.00
03/13/23	S. Kyle Woodard	Analysis of outstanding issues and to do items in case.	0.70	308.00

Invoice Date: 04/27/23

Invoice No.: 493787

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/13/23	Reuel Coles	Telephone call and e-mails to and from Cogency Global, Inc. to obtain pricing information for Intellectual Property due diligence searches.	0.30	82.50
03/13/23	Olivia Salvatierra	Creating, organizing and updating electronic case file folder for J. Coleman.	0.20	45.00
03/13/23	Miles Emery	Review and analyze Texas and Federal law governing the process of perfecting a security interest in intellectual property; Draft memo on process of perfecting a security interest in each of patents, common law trademarks, federal trademarks, unregistered copyrights, and registered copyrights.	2.80	1,078.00
03/13/23	Michael P. Ridulfo	Review and analyze action items relating to discovery, sales process and litigation issues.	1.00	605.00
03/14/23	Michael P. Ridulfo	Review and provide comments on Committee Agenda for tomorrow's Committee Meeting.	0.20	121.00
03/14/23	Olivia Salvatierra	Creating, organizing and updating electronic case file folder for J. Coleman.	0.10	22.50
03/14/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/14/23	Joseph M. Coleman	Examine recent ECF pleadings(.2); Telephone conference with V. Polnick regarding wide array of issues(.3).	0.50	387.50
03/15/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/15/23	Michael P. Ridulfo	Prepare for and attend Committee Zoom(1.4).	1.40	847.00
03/15/23	Joseph M. Coleman	Telephone conference with V. Polnick and e-mail regarding a variety of issues(.2); Examine recent pleadings(.1).	0.30	232.50

Invoice Date: 04/27/23

Invoice No.: 493787

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/16/23	Joseph M. Coleman	Examine several e-mails from Committee Members regarding Confidentiality Agreement and Bylaws(.2); E-mail V. Polnick regarding issues with Portage Application and Interim comp comments(.2); Deal with finalizing the confidentiality agreement and Bylaws(.3).	0.70	542.50
03/16/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/17/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/17/23	Olivia Salvatierra	Updating Critical Dates & Deadlines Memo for K. Woodard.	0.30	67.50
03/17/23	S. Kyle Woodard	Review recent docket pleadings(.2); Update critical dates and deadlines(.4); Follow up on outstanding issues(.1).	0.70	308.00
03/20/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
03/20/23	Joseph M. Coleman	Examine recent pleadings(.1).	0.10	77.50
03/21/23	Joseph M. Coleman	Conference call with JW team regarding wide array of issues(.7); Follow up strategy with J. Kane(.2)	0.90	697.50
03/21/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/22/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/22/23	Joseph M. Coleman	Examine recent ECF pleadings(.1); Examine e-mails regarding US Trustee input on Interim Compensation Motion(.1).	0.20	155.00
03/22/23	JaKayla DaBera	Review press releases and other materials on debtors' business.	4.20	1,617.00
03/22/23	JaKayla DaBera	Strategize with O. Salvatierra regarding public information search.	0.30	115.50
03/23/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
03/24/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
03/24/23	Joseph M. Coleman	Examine recent ECF filings(.1); Draft to do list(.1).	0.20	155.00

Invoice Date: 04/27/23

Invoice No.: 493787

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/25/23	S. Kyle Woodard	Work on pre-litigation discovery matters.	0.80	352.00
03/27/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/27/23	Olivia Salvatierra	Docketed reset hearing on DIP motion on internal firm calendar.	0.10	22.50
03/27/23	Joseph M. Coleman	Review recently filed ECF pleadings.	0.10	77.50
03/28/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/28/23	Olivia Salvatierra	Update Critical Dates & Deadlines Memo.	0.30	67.50
03/28/23	S. Kyle Woodard	Correspondence with UST.	0.10	44.00
03/28/23	S. Kyle Woodard	Review docket and update critical dates and deadlines memo.	0.60	264.00
03/29/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
03/29/23	John J. Kane	Strategy and to-do conference with J. Coleman.	0.40	232.00
03/29/23	Joseph M. Coleman	Review recent filings(.1); Organize and prioritize tasks(.3).	0.40	310.00
03/30/23	Joseph M. Coleman	Review pleadings(.1); Exchange e-mails with M. Cavanaugh(.1).	0.20	155.00
03/30/23	JaKayla DaBera	Attention to press release search.	0.10	38.50
03/30/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/31/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
03/31/23	JaKayla DaBera	Download and save schedules and SOFAs.	0.30	115.50
03/31/23	Joseph M. Coleman	Review motion to reject two leases and two executory contracts(.1); Review critical dates and deadlines(.1).	0.20	155.00
Total			35.30	\$18,260.50

Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	JaKayla DaBera	Conduct research regarding derivative standing and send draft memo regarding same.	5.40	2,079.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	Brian W. Clark	Continue working on topics and document requests for non-debtor 2004 examinations(3.8).	3.80	2,033.00
03/01/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.50	337.50
03/02/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.30	292.50
03/02/23	Brian W. Clark	Work on Portage deposition notice and topics(.3); Continue working on 2004 exam topics and document requests for non-debtors(1.4).	1.70	909.50
03/02/23	Brian N. Hail	Continue to review and analyze potentially applicable claims.	2.50	1,862.50
03/03/23	Brian W. Clark	Continue working on 2004 exam topics and document requests for non-debtors(1.6); Analyze issues relating to credit agreements produced by debtors(.4).	2.00	1,070.00
03/03/23	Joseph M. Coleman	Follow up prepetition lien investigation(.2).	0.20	155.00
03/06/23	Brian N. Hail	Review updated 2004 notices.	1.00	745.00
03/06/23	Brian N. Hail	Continued review of key documents.	1.20	894.00
03/06/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.10	247.50
03/07/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.30	292.50
03/07/23	Brian W. Clark	Continue working on document requests and topics for non-debtor 2004 examinations(.3).	0.30	160.50
03/07/23	JaKayla DaBera	Review documents produced by Debtor for all documents related to credit agreement.	1.50	577.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/07/23	John J. Kane	Review disclosure from debtors' counsel regarding resolution of minimal litigation claim in favor of debtor and coordinate with debtors' counsel regarding OCB nature, approval of settlement.	0.30	174.00
03/07/23	Joseph M. Coleman	Work on investigation of prepetition liens as part of the challenge period(.8).	0.80	620.00
03/07/23	Joseph M. Coleman	Work on confidentiality agreement(1.2); Begin to analyze standing issues given debtors' stance outstanding(.2); Examine of loan docs regarding challenge(.4); Finalize Bankruptcy Rule 2004 Notice of Non-Debtors(.3).	2.10	1,627.50
03/08/23	Joseph M. Coleman	Work on letter to the debtors' board regarding admin insolvency concerns, including coordinating with FTI's analysis of postpetition accumulation of payables(4.10); Conference call with FTI regarding same(.7); Telephone conference with M. Diaz regarding additional information from the Debtor(.3); Review FTI chart and comment upon same(.3).	5.40	4,185.00
03/08/23	Brian N. Hail	Coordinate various 2004 Requests.	1.00	745.00
03/08/23	Brian N. Hail	Review correspondence regarding same.	0.30	223.50
03/08/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.20	270.00
03/08/23	S. Kyle Woodard	Begin reviewing documents and working on motion for standing to challenge prepetition liens.	0.70	308.00
03/09/23	S. Kyle Woodard	Work on reviewing prepetition loan docs as pertaining to motion for standing to challenge.	1.40	616.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/09/23	S. Kyle Woodard	Conference regarding prepetition loan docs and work on reviewing the same as pertaining to motion for standing.	1.20	528.00
03/09/23	Olivia Salvatierra	Researching for loan document requests to debtors' counsel for J. Coleman.	0.20	45.00
03/09/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.20	270.00
03/09/23	Joseph M. Coleman	Work on Confidentiality Agreement with debtors(.2); Strategize regarding 2004 examine of non-debtors(.2).	0.40	310.00
03/09/23	Joseph M. Coleman	Work on lien objection of prepetition lender(1.1); Review demands for documents(.5); Several e-mail exchanges with debtors' counsel trying to obtain loan documents(.6).	2.20	1,705.00
03/10/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.10	247.50
03/10/23	S. Kyle Woodard	Brief review of new loan docs from debtors' counsel.	0.40	176.00
03/13/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors. [NO CHARGE]	1.40	0.00
03/13/23	Joseph M. Coleman	Analysis of non-debtor claims and causes of action and 2004 requirements(1.3).	1.30	1,007.50
03/13/23	Joseph M. Coleman	Work on claims against AEPC, documents received and not received and e-mails regarding extension of time regarding same(1.3); Examine e-mail and respond to V. Polnick(.1); Telephone conference with V. Polnick(.3).	1.70	1,317.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/13/23	Brian W. Clark	Review and analyze issues relating to discovery from debtor and non-debtors(.8); Review and analyze new documents provided by debtor(.6).	1.40	749.00
03/13/23	Brian N. Hail	Review critical deadlines.	0.30	223.50
03/13/23	Brian N. Hail	Analyze key documentation on potential claims.	2.00	1,490.00
03/13/23	Brandon Keaton	Review and summarize new batch of documents to be added into case timeline of events.	0.60	207.00
03/13/23	Bruce "Chip" Morris	Review caselaw and revise memo on how to perfect security interests in patents, copyrights and trademarks. [NO CHARGE]	1.50	0.00
03/13/23	JaKayla DaBera	Work on equitable subordination claim.	1.50	577.50
03/13/23	JaKayla DaBera	Attention to asset recovery analysis including research on New York UCC and relevant case law.	2.30	885.50
03/14/23	Brandon Keaton	Review and summarize new batch of documents.	3.20	1,104.00
03/14/23	Brandon Keaton	Review document binder and finalize case timeline chart.	0.60	207.00
03/14/23	Brian N. Hail	Confer with opposing counsel regarding 2004 and other discovery issues.	0.50	372.50
03/14/23	Brian N. Hail	Review and analyze documents and review status on issues.	4.50	3,352.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/14/23	Brian W. Clark	Review and analyze correspondence relating to administrative insolvency concerns(.2); Continue review and analysis of new documents from debtors(1.4); Review and update timeline of key events(.2); Participate in meet and confer call with IAG's counsel(.3); Work on preparations for deposition of DIP Lender(.3); Analyze potential claims against DIP Lender(1.3); Coordinate with FTI regarding documents from debtors(.1).	3.80	2,033.00
03/14/23	Joseph M. Coleman	Follow up regarding 2004's of non-debtor(.2); Work on analysis of potential causes of action(.9).	1.10	852.50
03/14/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.20	270.00
03/15/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.20	270.00
03/15/23	Brian W. Clark	Review and analyze documents relating to impact of fifth amendment to credit agreement(.5); Review and comment on draft motion for standing(.8); Continue preparing for DIP Lender deposition(.4); Participate in meet and confer with Pep Boys' counsel(.3); Analyze issues relating to 2004 depositions(.4); Analyze possible claims against DIP lender(2); E-mails with Pep Boys' counsel regarding document production protocols(.1); Continue review and analysis of documents provided by debtors(.8).	5.30	2,835.50
03/15/23	Brian N. Hail	Confer with opposing counsel regarding 2004 and other scheduling issues.	0.50	372.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/15/23	Brian N. Hail	Review status on applicable remedies relating to transactions.	5.00	3,725.00
03/15/23	Brandon Keaton	Begin review of documents to be summarized and added into case timeline of events.	0.40	138.00
03/16/23	Brian N. Hail	Review document production protocol.	0.30	223.50
03/16/23	Brian N. Hail	Review proposed Confidentiality Agreement.	0.50	372.50
03/16/23	Brian N. Hail	Review and analyze debtor documents.	2.80	2,086.00
03/16/23	Brian N. Hail	Review chronology and timeline.	0.40	298.00
03/16/23	Brian N. Hail	Analyze Auto Plus loan bifurcation.	1.40	1,043.00
03/16/23	Brian W. Clark	E-mails with IAG counsel regarding document production(.1); Work on complaint against DIP Lender and motion for leave(.3); Research and analysis on potential claims against DIP Lender(1.5); Review updated timeline of key events (.1); Analyze possible claims against non-debtors(1.6); Attention to non-debtor discovery issues(.4).	4.00	2,140.00
03/16/23	Brandon Keaton	Review and summarize new batch of documents.	2.30	793.50
03/16/23	Bruce "Chip" Morris	Emails regarding obtaining copyright searches performed on an expedited basis. [NO CHARGE]	0.30	0.00
03/16/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.10	247.50
03/17/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.20	270.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/17/23	Brian W. Clark	Work on complaint against DIP Lender(1.5); Review and analyze documents relating to possible debtor real estate holdings(.2); Continue review and analysis of documents from debtors(.5); Attention to non-debtor discovery issues(.2).	2.40	1,284.00
03/18/23	Joseph M. Coleman	Follow up regarding production of documents based upon debtor and non-debtor 2004's(.2).	0.20	155.00
03/19/23	Brian W. Clark	Work on complaint against DIP Lender (1.1).	1.10	588.50
03/20/23	Brian W. Clark	Continue working on complaint against DIP Lender and motion for standing to assert same(2).	2.00	1,070.00
03/20/23	Joseph M. Coleman	Examine emails from Committee Members and e-mail Committee Members regarding execution of Confidentiality Agreement(.2).	0.20	155.00
03/20/23	Olivia Salvatierra	Researching of lawsuits and background research regarding debtors in Georgia state court	2.30	517.50
03/21/23	Olivia Salvatierra	Researching of lawsuits and background research regarding debtors.	2.40	540.00
03/21/23	Joseph M. Coleman	Work on investigation of non-debtor affiliates(.4).	0.40	310.00
03/21/23	Brian W. Clark	Receipt and review of e-mails from other counsel regarding 2004 examination document requests and timing of production(.1).	0.10	53.50
03/22/23	Brian W. Clark	Teams meeting with FTI regarding discovery issues(.5); Review emails with attorneys for non-debtors regarding discovery(.1); Analyze strategic issues and next steps(.3).	0.90	481.50
03/22/23	Brian N. Hail	Telephone conference with opposing counsel regarding documents on discovery matter.	0.50	372.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/22/23	Brian N. Hail	Analyze potential claims on causes of action.	2.50	1,862.50
03/22/23	Joseph M. Coleman	Work on non-debtor discovery and analysis issues(.5); Strategize regarding expedited discovery and investigation(.3); Follow up regarding 2004 responses and examine e-mails regarding same(.2).	1.00	775.00
03/22/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.(No Charge)	2.40	0.00
03/23/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors. [NO CHARGE]	2.40	540.00
03/23/23	Olivia Salvatierra	Researching docket for Bankruptcy Rule 2004 Examination pleadings and saving them to firm internal electronic case file for J. Coleman.	0.20	45.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/23/23	Joseph M. Coleman	Telephone conference with M. Cavanaugh regarding DIP hearing and Icahn's counsel issues(.2); Prep for and participate in telephone conference with A. Grossi and J. Garvey regarding, among other things, potential global resolution(.9); Exchange e-mails with M. Cavanaugh(.1); Follow up regarding expedited discovery plan(.5); Telephone conference with A. Grossi regarding expedited investigation(.2); Telephone conference with M. Cavanaugh regarding wide array of matters(.3); Exchange e-mails with V. Polnick(.1); Meeting with litigation team regarding expedited discovery and investigation(.5); E-mail Sidley team and JW team regarding expedited discovery(.2); Examine 2004 Notices and insider release from fifth amended Credit Agreement(.5); Team meeting regarding expedited discovery(.3).	3.80	2,945.00
03/23/23	Brian W. Clark	Analyze and outline issues relating to discovery and upcoming depositions(1.4).	1.40	749.00
03/24/23	Brian W. Clark	Review and analyze objections to document requests for 2004 examinations(.6); Plan and prepare for review and analysis of document production(2); Review and analyze previously produced documents(.4); Zoom with opposing counsel(.4); Coordinate with FTI regarding document issues(.2); Review new documents(1.2); Begin identifying key documents for use in depositions(.4); Analyze strategic issues and next steps(.3).	5.50	2,942.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/24/23	Brian N. Hail	Telephone conference with opposing counsel regarding documents on discovery issues.	0.30	223.50
03/24/23	Brian N. Hail	Analyze potential damages and causes of action.	2.00	1,490.00
03/24/23	Brandon Keaton	Research potential claims against non-debtor entities.	0.20	69.00
03/24/23	Brandon Keaton	Compile corporate information on debtor entities.	0.90	310.50
03/24/23	Joseph M. Coleman	Briefly examine document production based upon M. Berger's subpoena and e-mail noting failure to produce documents(.3); Examine changes to Confidentiality Agreement by Sidley and e-mail M. Ridulfo regarding same(.3); Examine several e-mails and respond as appropriate regarding expedited discovery and expedited discovery(.2); Prep for and participate call with Sidley and JW regarding expedited investigation(.8); Follow up call with litigation team(.5); Exchange e-mails with FTI(.2); Examine documents produced in response to Berger deposition Duces Tecum, e-mail FTI regarding same(.5); Conference call with FTI to go through investigation, budget, sale process and related issues(1.20); Telephone conference with V. Polnick(.2); Work through mediation logistics, game plan and related issues(.7); E-mail Sidley and JW regarding mediation(.3); Confer with J. Kane(.2); Follow up telephone conference with V. Polnick(.3).	5.70	4,417.50
03/24/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	2.00	450.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/24/23	Collin Delano	Research to determine unsecured creditors' potential causes of action.	1.30	513.50
03/25/23	Collin Delano	Pre-mediation discovery matters.	0.80	316.00
03/25/23	Joseph M. Coleman	Strategize regarding mediation(.3); Analysis of and organization regarding investigation of insiders(4.8).	5.10	3,952.50
03/25/23	Brandon Keaton	Attention to and work on pre-mediation discovery matters.	0.70	241.50
03/25/23	Andrew Robertson	Analyze draft complaint and key documents in support of same(1.2); Work on pre-mediation discovery matters(0.7).	1.90	826.50
03/25/23	Brian W. Clark	Analyze background information in preparation for depositions and document review(.9).	0.90	481.50
03/25/23	JaKayla DaBera	Analysis of claims and causes of action in preparation for document review.	0.80	308.00
03/26/23	Brian W. Clark	Review documents and information relating to potential claims(.4).	0.40	214.00
03/26/23	Brian N. Hail	Develop issue codes for review of documents to determine potential claims and causes of action.	4.00	2,980.00
03/26/23	Joseph M. Coleman	Work on outline of claims necessary for document review in preparation for mediation and preliminary cause of action analysis(3.3).	3.30	2,557.50
03/27/23	Joseph M. Coleman	Analysis of potential claims and causes of action regarding non-debtors' insiders and affiliates(2.1).	2.10	1,627.50
03/27/23	Joseph M. Coleman	Meeting to do expedited discovery and plan document review(2.20).	2.20	1,705.00
03/27/23	Brandon Keaton	Review IEH documents related to ongoing bankruptcy proceeding for background information.	0.70	241.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/27/23	Brandon Keaton	Review corporate documents of debtor entities to compile corporate information of each entity.	3.10	1,069.50
03/27/23	Brian N. Hail	Continue to refine issue codes for review of documents to determine potential damages.	2.00	1,490.00
03/27/23	Brian N. Hail	Analyze potential claims and causes of action.	4.00	2,980.00
03/27/23	Brian N. Hail	Telephone conference with opposing counsel regarding discovery issues.	0.30	223.50
03/27/23	Brian W. Clark	Continue analysis and investigation of possible claims(3.5); Call with Sidley regarding document production and depositions(.3); Phone with Norton Rose regarding document production and depositions(.5).	4.30	2,300.50
03/27/23	Olivia Salvatierra	Prepare binder of analysis of lawsuits and background research regarding debtors' documents.	0.30	67.50
03/27/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.10	247.50
03/28/23	Olivia Salvatierra	Researching debtors and non-debtors employment background.	2.00	450.00
03/28/23	Brian W. Clark	Continue analysis of potential claims and discovery related thereto(1.4); Review summary analysis of certain debtor documents(.3); E-mails with debtors' counsel regarding discovery issues(.1); Coordinate logistical issues relating to document review and analysis(.3); Phone and e-mails with debtors' counsel regarding document production(.6); Coordinate with FTI on document issues(.1).	2.80	1,498.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/28/23	Brandon Keaton	Finalize document review and summary of debtor entities' corporate information.	0.30	103.50
03/28/23	Brian N. Hail	Review and analyze management structure of debtor entity.	1.00	745.00
03/28/23	Brian N. Hail	Review status of various claims with causes of action.	6.00	4,470.00
03/28/23	Brian N. Hail	Telephone conference with debtors' counsel.	0.40	298.00
03/28/23	Joseph M. Coleman	Work on issues in document review and cause of action development and investigation(1.80); Continued analysis of insider-affiliates claims and causes of action(1.9); Exchange e-mails with JW regarding production of documents(.1).	3.80	2,945.00
03/29/23	Joseph M. Coleman	Work on issues for document review and continued analysis of insider cause of actions(1.9); Topics for depositions for corporate reps in depositions(1.2); Examine e-mails regarding document production(.2); Follow up regarding organization for reviewers(.2).	3.50	2,712.50
03/29/23	John J. Kane	Review corporate structure and organizational documents.	0.80	464.00
03/29/23	Brian N. Hail	Review status of production of debtor documents.	0.80	596.00
03/29/23	Brian N. Hail	Analyze key issues related to documents and potential claims.	2.20	1,639.00
03/29/23	Brian N. Hail	Develop and review 2004 corporate representative topics.	1.00	745.00
03/29/23	Brian N. Hail	Analyze potential equitable subordination claims.	6.00	4,470.00
03/29/23	Brandon Keaton	Review and summarize documents for case timeline.	1.40	483.00

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03/29/23	Brian W. Clark	Prepare for and participate in call with debtors' counsel regarding document production from other parties(.9); Address issues relating to document production(.9); Coordinate with FTI(.6); Continue analysis of possible claims and causes of action against non-debtors(1.7); Work on updated topics for 2004 depositions(1.5); Continue review and analysis of debtor documents(.8); update timeline(.3).	6.70	3,584.50
03/29/23	Connie Nims	Research via Westlaw the corporate information of American Entertainment Properties Corp and American Casino & Entertainment Properties LLC, as well as the docket from Kauffman v. American Casino & Entertainment Properties, et al, and forward all reports to attorneys.	0.50	117.50
03/29/23	Carlos Velazquez	Create new Reveal Review database.	0.50	132.50
03/29/23	Carlos Velazquez	Add all requested users to Reveal database.	0.50	132.50
03/29/23	Olivia Salvatierra	Researching debtors and non-debtors employment background for J. Coleman.	1.30	292.50
03/29/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.10	247.50
03/30/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding debtors.	1.00	225.00
03/30/23	Collin Delano	Pre-mediation discovery related matters.	1.10	434.50
03/30/23	S. Kyle Woodard	Work on prelitigation discovery issues.	0.50	220.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/30/23	Carlos Velazquez	Create requested issue tags in Reveal database.	0.50	132.50
03/30/23	JaKayla DaBera	Review document production.	5.70	2,194.50
03/30/23	Brandon Keaton	Review IEH Auto Parts bankruptcy materials.	0.80	276.00
03/30/23	Brandon Keaton	Attention to and additional work on pre-mediation discovery matters.	0.90	310.50
03/30/23	Brandon Keaton	Review documents and summarize within case timeline.	0.80	276.00
03/30/23	Brandon Keaton	Review document production.	4.50	1,552.50
03/30/23	Andrew Robertson	Work on pre-mediation discovery matters(1.5); Document review of documents produced by IEH and Pep Boys(1.3).	2.80	1,218.00
03/30/23	Brian N. Hail	Draft revised 2004 corporate representative topics.	1.00	745.00
03/30/23	Brian N. Hail	Coordinate review on issue coding of documents.	2.00	1,490.00
03/30/23	Brian N. Hail	Begin preparation of PowerPoint mediation presentation.	2.00	1,490.00
03/30/23	Brian N. Hail	Review of newly produced documents in investigation of potential claims and causes of action.	1.00	745.00
03/30/23	Brian W. Clark	Attention to document review issues(1.6); Continue analysis of possible claims and causes of action(.5); Prepare for depositions(.4); Review and analyze documents from third parties(1.7); Review and analyze PB and IAG production responses(1.3); Coordinate with FTI(.8).	6.30	3,370.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/30/23	Joseph M. Coleman	Begin document review and development of causes of action against non-debtor affiliates(1.10); Exchange e-mails with FTI regarding same(.1); Conference call with FTI regarding investigation of non-debtor affiliates (.8); Follow up call with M. Diaz(.1); Detailed memo to FTI regarding investigation to date and key areas for their focus(.6); Review documents, including operating agreements, leases and loan documents(.9); Analysis of claims and causes of action against non-debtor insiders(.9).	4.50	3,487.50
03/31/23	Joseph M. Coleman	Examine e-mail from Committee Member with comments on Confidentiality Agreement and forward same to M. Ridulfo(.1); Exchange e-mails with JW regarding zoom call on various topics(.2); E-mail to KRCL team regarding potential cause of action(.1); Conference call with Debtors regarding document production problems, mediation, standing and related issues(.4); Examine e-mail from V. Polnick regarding standing motion(.1); Strategize with J. Kane(.1); Review documents and follow up regarding Operating Agreements and UCC analysis (1.20); Examine e-mail from V. Polnick regarding standing and challenge period extension, e-mail Icahn counsel regarding same and follow up with V. Polnick(.2); E-mail exchanges regarding UCC Financing statements(.2); Examine e-mail regarding status of production of documents and respond(.1); Follow up regarding discovery issues and confidentiality agreement(.3).	3.00	2,325.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/31/23	Brian W. Clark	Address document production and review issues (2.8); Zoom with debtors' counsel(.4); Review and analyze documents produced by other parties(1.3); Phone with IAG/Pep Boys counsel(.4).	4.90	2,621.50
03/31/23	Brian N. Hail	Confer with opposing counsel regarding documents and discovery issues.	0.50	372.50
03/31/23	Brian N. Hail	Review status and investigate potential claims and causes of action.	7.00	5,215.00
03/31/23	Andrew Robertson	Document review of documents produced by IEH and Pep Boys.	2.60	1,131.00
03/31/23	Brandon Keaton	Review document production.	8.20	2,829.00
03/31/23	JaKayla DaBera	Review document production.	4.10	1,578.50
03/31/23	Connie Nims	Attention to request by attorneys to create a PowerPoint Presentation that will be used during mediation, and analyze documents which contain information to include in the presentation.	2.20	517.00
03/31/23	Collin Delano	Review of document production(5.5); Legal research regarding unsecured creditors' potential claims(.5).	6.00	2,370.00
03/31/23	Olivia Salvatierra	Drafting chart analysis of all research of written consents and approval forms received 3-17-23.	5.10	1,147.50
Total			304.00	\$164,261.50

Asset Disposition

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/02/23	Joseph M. Coleman	Work on bidding procedures(.4); Finalize limited objection to bidding procedures(.1); Examine e-mail from K. Gluck regarding comments on bidding procedures(.1).	0.60	465.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/23	Michael P. Ridulfo	Review form Asset Purchase Agreement.	0.70	423.50
03/06/23	Joseph M. Coleman	Telephone conference with Landlord offering \$190,000 for debtor to move out of Store #10473, e-mail the debtors' counsel regarding same(.3).	0.30	232.50
03/08/23	Joseph M. Coleman	Follow up regarding bidding procedures(.1).	0.10	77.50
03/08/23	Joseph M. Coleman	Exchange e-mails with potential purchaser regarding bid procedures(.1).	0.10	77.50
03/08/23	Joseph M. Coleman	Respond to debtors' inquiries about sale process and remind the Committee of the importance of same(.6).	0.60	465.00
03/08/23	Joseph M. Coleman	Follow up regarding bidding procedures motion set for Friday(.1).	0.10	77.50
03/09/23	Joseph M. Coleman	Follow up regarding bid procedures and revised language related thereto(.2); Strategize with M. Ridulfo (.3).	0.50	387.50
03/10/23	Joseph M. Coleman	Examine most recent order redline regarding bidding procedures(.2); Telephone conference with M. Ridulfo regarding same(.2); Follow up e-mails, texts and telephone conferences regarding bidding procedures(.4); Attend hearing on bidding procedures(.4); Confer with M. Ridulfo regarding same(.2); Telephone conference with Committee Member counsel regarding same(.2).	1.60	1,240.00
03/10/23	Olivia Salvatierra	Prepared Key Sale Dates draft for J. Coleman.	0.20	45.00
03/14/23	Joseph M. Coleman	E-mail M. Diaz regarding sale process(.1); Follow up regarding bidding procedures(.1).	0.20	155.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/14/23	Joseph M. Coleman	Telephone conference with M. Diaz regarding sale process(.2); Briefly examine bidding procedures hearing transcript(.2).	0.40	310.00
03/16/23	Joseph M. Coleman	Telephone conference with FTI regarding EOIs received to date(.6); Briefly review same(.1).	0.70	542.50
03/19/23	Joseph M. Coleman	Review expressions of interest.	0.30	232.50
03/20/23	Joseph M. Coleman	Exchange e-mails with Committee Member regarding sale process(.2).	0.20	155.00
03/22/23	Joseph M. Coleman	Examine update on the sales process, exchange emails with FTI regarding same(.2).	0.20	155.00
03/24/23	Joseph M. Coleman	Communicate with counsel for potential bidder(.1).	0.10	77.50
03/28/23	Joseph M. Coleman	Telephone conference with bidder's counsel(.3); Telephone conference with M. Diaz regarding same and related issues(.2).	0.50	387.50
03/29/23	Joseph M. Coleman	Exchange e-mails with M. Diaz regarding sale process(.1).	0.10	77.50
03/29/23	Joseph M. Coleman	Examine bidding procedures, auction and bidding notices and update on Sale process(.9).	0.90	697.50
Total			8.40	\$6,281.00

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	John J. Kane	Prepare for and participate on Committee call and update.	1.40	812.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	Joseph M. Coleman	Teleconference with M. Diaz regarding Committee Meeting issues(.2); Prep for Committee Meeting(.6); Teleconference with M. Hulteen regarding topics(.3); Attend Committee Meeting(1.2); Exchange e-mails with Committee Member(.1); Teleconference with M. Diaz regarding follow up from meeting(.2); Teleconference with E. Pawlish regarding current issues, Chapter 5 causes of action and related issues(.4); Teleconference with creditor regarding Critical Vendor and related issues(.4); Finalize minutes from Committee Meeting(.5); Examine e-mail from Committee Chair(.1); Examine e-mail from DRiV Counsel and consider same(.3); Extended teleconference with Committee Member regarding numerous questions and issues(.6).	4.90	3,797.50
03/01/23	Olivia Salvatierra	Take Committee Meeting Minutes; Prepare Minute notes for J. Coleman.	1.60	360.00
03/02/23	Joseph M. Coleman	Brief status update to the Committee(.1); Examine e-mail from Committee Member regarding Confidentiality Agreement(.1).	0.20	155.00
03/02/23	Joseph M. Coleman	Examine e-mail from creditor of IEH regarding bar dates and related issues, e-mail regarding same(.1); Examine e-mail from Creditor with questions and respond(.1); E-mail exchange with Creditor regarding Proof of Claim(.1); Teleconference with Committee member regarding comments to Confidentiality Agreement(.2).	0.50	387.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/23	Joseph M. Coleman	Examine e-mail from Committee Member and respond, e-mail M. Diaz regarding same(.1).	0.10	77.50
03/06/23	Joseph M. Coleman	Detailed telephone conference with M. Hulteen regarding status of all key issues(.4); Review and comment upon Committee's comments and requested modifications to the Committee Bylaws(.5); Follow up regarding Bylaws and examine e-mail to Committee Member regarding their comments to same(.1); Detailed status report to the Committee(1.10); Exchange e-mail with Committee Member(.1).	2.20	1,705.00
03/06/23	Joseph M. Coleman	Follow up regarding diligence upon potential Committee Members involvement in the sales process, exchanging e-mails regarding same(.2).	0.20	155.00
03/06/23	S. Kyle Woodard	Revise Committee Bylaws and send correspondence to Committee Member regarding the same.	0.70	308.00
03/07/23	S. Kyle Woodard	Respond to inquiry from creditor regarding 503(b)(9) claims.	0.30	132.00
03/07/23	Joseph M. Coleman	Finalize and deliver detailed status report to Committee Members(.3); Exchange e-mails with in-house counsel for DRiV regarding by-laws and related matters(.1).	0.40	310.00
03/07/23	JaKayla DaBera	Prepare draft document for Committee Meeting highlighting key points in Lincoln and Portage Point retention applications.	0.70	269.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/08/23	Joseph M. Coleman	Telephone conference with M. Hulteen, Committee Chair, regarding certain priority items(.1); Detailed e-mail to Committee regarding concerns about admin insolvency and related issues(.5); Telephone conference with Committee Member regarding same(.3); Exchange e-mails regarding Committee Member's prior involvement with sale process(.2).	1.10	852.50
03/09/23	Joseph M. Coleman	Telephone conference with M. Hulteen, Committee Chair regarding status issues(.1).	0.10	77.50
03/09/23	Olivia Salvatierra	Updated docket calendar of Critical Dates & Deadlines for K. Woodard.	0.10	22.50
03/09/23	Michael P. Ridulfo	Attend Creditor Meeting.	0.40	242.00
03/10/23	S. Kyle Woodard	Work on preparing exhibits for agenda for next week's Committee Meeting.	0.50	220.00
03/10/23	Joseph M. Coleman	Develop agenda with numerous attachments for Committee call, obtain input and comments from M. Diaz and M. Hulteen regarding Agenda, pull together attachments(1.7); Telephone conference with Committee Member regarding disclosures(.2).	1.90	1,472.50
03/13/23	Joseph M. Coleman	Work on agenda for Committee Meeting with attachments thereto(.9); Communicate with M. Diaz regarding same(.3).	1.20	930.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/14/23	Joseph M. Coleman	Work on and finalize agenda for Committee Meeting(.8); Answer Committee question about Cash Management Order(.4); Prep for Committee Meeting(.6); Work on Confidentiality Agreement for Committee(.2); Telephone conference with M. Hulteen, Committee chair, regarding updates and status(.2).	2.20	1,705.00
03/15/23	Joseph M. Coleman	Prepare for and conduct Committee Meeting(1.8); Telephone conference with M. Diaz following up regarding same(.1); Telephone conference with E. Pawlish, Committee Member, regarding questions about postpetition issues(.3); Follow up e-mail to Committee with time sensitive to do items(.3); Examine e-mail from Committee Member regarding confidentiality agreement(.1); Examine, edit and approve minutes of Committee Call (.3); Telephone conference with Creditor regarding case generally(.1); Examine Bar Date Order and e-mail Committee regarding same(.2).	3.20	2,480.00
03/15/23	Olivia Salvatierra	Take Committee Meeting Minutes; Prepare Minute notes for J. Coleman.	1.30	292.50
03/15/23	Olivia Salvatierra	Creating, organizing and updating electronic case file folder for J. Coleman. (No Charge)	0.20	0.00
03/15/23	S. Kyle Woodard	Prepare execution copy of Committee Bylaws.	0.20	88.00
03/16/23	Olivia Salvatierra	Updating electronic case file folder for J. Coleman.	0.10	22.50
03/16/23	Olivia Salvatierra	Prepared compiled document of fully executed By Laws for J. Coleman	0.10	22.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/16/23	Joseph M. Coleman	Several e-mail exchanges with Committee Chair, M. Hulteen and myself regarding wide array of open issues(.2); Examine and respond as appropriate to e-mails from Committee Members regarding Bylaws and Confidentiality Agreement(.2); Exchange e-mails with SMP(.1); Finalize Confidentiality Agreement among Committee Members and e-mail execution copy(.3); Examine e-mail from Committee Chair(.1).	0.90	697.50
03/20/23	Olivia Salvatierra	Preparing list of signed Confidentiality Agreements from Committee Members for J. Coleman.	0.10	22.50
03/20/23	Joseph M. Coleman	Exchange e-mails with creditor(.1); Extended telephone conference with creditors(.5).	0.60	465.00
03/21/23	Joseph M. Coleman	Exchanges emails with different committee members(.2); Finalize and forward confidentiality agreement for the Debtor's signature(.2).	0.40	310.00
03/23/23	Joseph M. Coleman	Telephone conference with counsel for Committee Member(.3); E-mail Committee Chair regarding next Committee Meeting(.1).	0.40	310.00
03/24/23	Joseph M. Coleman	Communicate with Committee Member regarding developments(.2); Status report to Committee(.9).	1.10	852.50
03/27/23	Joseph M. Coleman	Telephone conference with Committee Chair regarding developments(.4); Telephone conference with Mann-Hummel's counsel(.3); Telephone conference with Gates' counsel(.3); Exchange e-mails with Committee Members(.2); Schedule Committee Call(.1).	1.30	1,007.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/28/23	Olivia Salvatierra	Updated prior minute memo for upcoming Committee Meeting for J. Coleman	0.20	45.00
03/29/23	Joseph M. Coleman	Continue to finalize Agenda with attachment for Committee call tomorrow and forward same(.5); Prep for meeting with Committee(.8).	1.30	1,007.50
03/30/23	Joseph M. Coleman	Prepare for and participate in Committee Meeting(2.30); Telephone conference with Committee Chair(.4); Exchange e-mails with Committee Members regarding next committee meeting and mediation(.2); Begin to work on mediation organization and prep(.5); Revise Minutes to Committee Meeting(.1).	3.50	2,712.50
03/30/23	John J. Kane	Prepare for and participate on committee meeting(1.3).	1.30	754.00
03/30/23	Olivia Salvatierra	Draft memo of Committee Call Minutes 03.30.23 for J. Coleman	1.30	292.50
03/30/23	Olivia Salvatierra	Minute taking for Committee meeting.	1.30	292.50
03/31/23	Joseph M. Coleman	Examine e-mail from committee member and respond(.1); Set next committee meeting(.1).	0.20	155.00
Total			39.70	\$25,820.50

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	S. Kyle Woodard	Follow up on status of KRCL conflicts check(.3); Work on drafting KRCL retention pleadings(.9).	1.20	528.00
03/02/23	Joseph M. Coleman	Work on retention pleadings(.3).	0.30	232.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/23	S. Kyle Woodard	Review JW's fee app as pertaining to Committee representation conflicts check and work on issues related to conflict check.	0.90	396.00
03/03/23	Olivia Salvatierra	Prepare file folders, print, and organize Employee App pleadings for J. DaBera. [NO CHARGE]	1.30	0.00
03/05/23	S. Kyle Woodard	Work issues related to conflicts checks for Committee's counsel retention application.	0.60	264.00
03/06/23	S. Kyle Woodard	Conference regarding conflicts checks and retention application.	0.30	132.00
03/06/23	S. Kyle Woodard	Attention to conflicts check issues.	0.10	44.00
03/06/23	S. Kyle Woodard	Work with E. Menendez on conflicts checks.	0.40	176.00
03/06/23	Joseph M. Coleman	Briefly review Lincoln application(.1); Work on KRCKLs application(.1); Work on objection to Portage's application, i.e. retainer owned on receipt(.1).	0.30	232.50
03/07/23	S. Kyle Woodard	Work on reviewing conflicts checks and drafting declaration in support of application to employ KRCL(3.1); Work on preparing exhibits to declaration(.9).	4.00	1,760.00
03/08/23	S. Kyle Woodard	Update KRCL retention pleadings.	0.50	220.00
03/08/23	Joseph M. Coleman	Work on retention pleadings(.4).	0.40	310.00
03/09/23	S. Kyle Woodard	Work on conflicts check issues and update declaration in support of KRCL retention accordingly(1.7); Update application to employ KRCL and proposed order(.4).	2.10	924.00
03/13/23	S. Kyle Woodard	Update declaration in support of KRCL retention by Committee.	0.60	264.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/14/23	Joseph M. Coleman	Finalize and file KRCL application to be retained as counsel for the Committee, including declaration related thereto (.8); Examine FTI Application, make edits, e-mail M. Diaz(.6); Finalize Portage's Retention Order, make changes relating to objectionable items, e-mail JW regarding same(.4); E-mail M. Diaz regarding redline changes(.1); Exchange e-mails with M. Diaz regarding finalizing application and declaration(.1).	2.00	1,550.00
03/14/23	JaKayla DaBera	Review and edit FTI retention app to insure compliance with local rules; Prepare redline of edits.	2.40	924.00
03/14/23	JaKayla DaBera	Review and file KRCL employment and retention application.	1.10	423.50
03/14/23	JaKayla DaBera	Prepare and file FTI retention application.	0.60	231.00
03/17/23	Joseph M. Coleman	Briefly examine B. Riley retention and e-mail M. Diaz regarding same(.1).	0.10	77.50
03/17/23	S. Kyle Woodard	Review and provide redline comments on interim compensation procedures order.	0.80	352.00
03/19/23	Joseph M. Coleman	Review B. Riley Application and e-mail M. Diaz regarding same(.2).	0.20	155.00
03/21/23	S. Kyle Woodard	Follow up and work on issues related to ordinary course professional retention.	0.40	176.00
03/21/23	S. Kyle Woodard	Review debtors' ordinary course professionals motion and provide comments thereto.	0.80	352.00
03/22/23	S. Kyle Woodard	Correspondence with FA regarding ordinary course professionals motion.	0.20	88.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/22/23	Joseph M. Coleman	Examine, obtain input from FTI, compare budget and outline objection to Ordinary Course Professionals(.3).	0.30	232.50
03/28/23	Joseph M. Coleman	Examine UST's comments to FTI Fee Application and e-mail FTI regarding same(.2); Examine UST's e-mail to KRCL fee application and e-mail UST regarding same(.1); Follow up regarding response to UST's comments(.1); Review Portage's fee application with January time(.1).	0.50	387.50
03/28/23	S. Kyle Woodard	Review and incorporate UST's comments to KRCL employment order.	0.40	176.00
03/28/23	S. Kyle Woodard	Review additional conflicts searches as pertaining to KRCL's employment application.	0.30	132.00
03/29/23	S. Kyle Woodard	Work on monthly fee statement.	0.30	132.00
Total			23.40	\$10,872.00

Fee/Employment Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/23	Joseph M. Coleman	Briefly review debtors' fee applications and determine which to delve into potential objections(.4); Follow up regarding KRCL Application(.1).	0.50	387.50
03/03/23	JaKayla DaBera	Review retention applications; Summarize and send key terms to J. Kane and J. Coleman.	1.50	577.50
03/03/23	JaKayla DaBera	Create chart with all engagement dates of debtors' professionals.	0.40	154.00
03/06/23	JaKayla DaBera	Review fee structure in Lincoln retention application in detail and summarize success fees.	1.80	693.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/06/23	Olivia Salvatierra	Reviewing and Updating docket calendar with objection deadlines for K. Woodard.	1.30	292.50
03/09/23	JaKayla DaBera	Research various issues related to Debtors' employment applications.	1.50	577.50
03/13/23	JaKayla DaBera	Call with M. Diaz regarding employment applications.	0.20	77.00
03/13/23	JaKayla DaBera	Draft Committee edits to Portage Point retention proposed order; Prepare redline of Committee edits against original proposed order.	2.00	770.00
03/13/23	JaKayla DaBera	Continue researching retainer issue.	2.10	808.50
03/14/23	JaKayla DaBera	Revise Committee edits to Portage Point retention proposed order and prepare a redline for J. Coleman's review.	0.40	154.00
03/17/23	JaKayla DaBera	E-mail to V. Polnick.	0.10	38.50
03/20/23	Olivia Salvatierra	Docket court deadline on internal firm calendar.	0.10	22.50
03/21/23	JaKayla DaBera	Review app to employ B. Riley as real estate advisor.	0.80	308.00
03/22/23	JaKayla DaBera	Draft objection to ordinary course professionals retention and compensation motion.	1.40	539.00
03/22/23	John J. Kane	Work on ordinary course professionals objection, budget analysis.	0.40	232.00
Total			14.50	\$5,631.50

Other Contested Matters (excl. assumption/rejection motions)

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	Michael P. Ridulfo	Assimilate comments from other creditor counsel regarding Bid Procedures and confer with creditor counsel regarding same(1.1); Teleconference with debtors' counsel regarding same(.2).	1.30	786.50
03/02/23	Michael P. Ridulfo	Work on further redline of Bid Procedures and communicate with creditors and debtors' counsel regarding same(1.8); Prepare Limited Objection to Bid Procedures(.7).	2.50	1,512.50
03/02/23	Joseph M. Coleman	Examine debtors' proposed changes to the Cash Management Order in light of the Committee's objections(.8); Negotiations with debtors' counsel regarding same(.4); Redline Cash Management Motion(1.10).	2.30	1,782.50
03/03/23	Joseph M. Coleman	Work on comments to proposed Cash Management Order and e-mail same to V. Flores(1.1).	1.10	852.50
03/03/23	Michael P. Ridulfo	Final review and revision to Limited Objection to Bid Procedures Motion(.5); Revisions to redline exhibit in connection with same(.5); Communications with counsel regarding same(.4); Prepare W&E list(.2).	1.60	968.00
03/07/23	Michael P. Ridulfo	Analyze issues for upcoming Bid Procedures Hearing(.6); Review and analyze additional issues relating to redline from debtors' counsel(.7).; Communications with other creditors' and debtors' counsel regarding same(1.0).	2.30	1,391.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/08/23	Michael P. Ridulfo	Teleconference with debtors' counsel regarding Bid Procedures(.3); Communications with creditors' counsel regarding same(.7); Revise and file W&E List(.2); Review further redline from debtors' counsel(.4); Global review of new Bid Procedures and Objection to Final DIP to determine any lingering issues between same(.5).	2.10	1,270.50
03/09/23	Michael P. Ridulfo	Continued work on Bid Procedures including discussions, e-mails and communications with debtors' counsel and other creditors' counsel and evaluation of numerous changes requested by DIP Lender.	3.80	2,299.00
03/09/23	Joseph M. Coleman	Examine changes to Cash management Order made by the Debtor(.3); Telephone conference with V. Flores regarding details of order(.3); Revise and comment upon Cash management Order and e-mail to V. Flores(.9); E-mail M. Hulteen regarding same(.2).	1.70	1,317.50
03/10/23	Joseph M. Coleman	Examine comments and open issues on cash management motion and prep for call with Committee Chair(.5); Go through Cash management Motion with Committee Chair(.6); Telephone conference with V. Flores regarding open issues and Committee issues(.2).	1.30	1,007.50
03/10/23	Michael P. Ridulfo	Continued negotiations regarding Bid Procedures and discussions with counsel regarding same(.8); Attend Bid Procedures Hearing(1.0).	1.80	1,089.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/12/23	Joseph M. Coleman	Examine e-mails from V. Polnick regarding confidential issues with banking matters and respond(.2); Confer with M. Ridulfo regarding same(.2); Telephone conference with V. Polnick regarding motions under seal, issues pertaining to same and confidentiality(.3); Search and research banking issue(.7); Communicate with M. Diaz regarding same(.2); Exchange e-mails with V. Polnick(.1).	1.70	1,317.50
03/13/23	Joseph M. Coleman	Review pleadings filed under seal regarding cash issues(.3); Review orders entered regarding same(.2); Numerous e-mails and telephone conferences with V. Polnick regarding same(.6); Telephone conference with M. Diaz and examine of information generated by FTI(.5); Status e-mail with Committee(.4); Continued follow ups with V. Polnick(.1); Final status report to Committee(.2).	2.30	1,782.50
03/14/23	Joseph M. Coleman	E-mail V. Flores regarding Cash management Motion and examine response(.1); Examine Interim Compensation Motion and Order and e-mail comments to debtors' counsel(.7); Examine responsive e-mail(.1).	0.90	697.50
03/15/23	Joseph M. Coleman	Telephone conference with V. Flores regarding Cash management Motion, voiding checks at petition date and case issues in general(.3).	0.30	232.50
03/17/23	Joseph M. Coleman	Examine e-mail from V. Flores regarding Cash management Motion(.1).	0.10	77.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/17/23	Joseph M. Coleman	Review changes to Cash management Order and make additional changes, e-mail to V. Flores (1.3); Telephone conference with V. Flores regarding same;(.2) Exchange e-mails regarding Interim Comp Order(.1); Follow up regarding Portage's application and Interim Comp Order comments(.1).	1.70	1,317.50
03/20/23	Joseph M. Coleman	Extended telephone conference with M. Duffy to go through in detail the Cash Management Motion(.7); Communicate with V. Flores regarding Cash Management Motion(.1).	0.80	620.00
03/21/23	Joseph M. Coleman	Prep for and participate in conference call with debtor and Pep Boys' counsel(.5).	0.50	387.50
03/22/23	Joseph M. Coleman	Examine revised Cash management Motion(.1); Exchange e-mails with Pep Boys and Debtors' counsel(.1); E-mail Committee regarding same(.1).	0.30	232.50
03/23/23	Joseph M. Coleman	Examine emails from debtors and Pep Boys' counsel regarding Cash management Motion(.1); Examine proposed final version of same(.2); E-mail to M. Duffy, Committee representative(.1); Go through changes and key provisions with M. Duffy(.3); E-mail Pep Boys and debtors counsel regarding finalization of Cash management Order(.1).	0.80	620.00
03/28/23	S. Kyle Woodard	Correspondence with debtors' counsel regarding ordinary course professionals motion.	0.10	44.00
03/29/23	Olivia Salvatierra	Creating electronic internal file folder and organizing pleadings received for B. Clark.	0.20	45.00
Total			31.50	\$21,651.00

Business Operations

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/06/23	Joseph M. Coleman	Investigation of admin insolvency concerns(1.5); Begin outlining letter to the board(.4).	1.90	1,472.50
03/12/23	Michael P. Ridulfo	Attention to issues regarding closing of Signature Bank, including e-mails to and from and teleconferences with debtors' counsel regardomg same.	1.00	605.00
03/16/23	Joseph M. Coleman	Review budget to actual variance, e-mail questions to M. Diaz(.2).	0.20	155.00
03/21/23	Joseph M. Coleman	Examine updated AP listing by the debtor; E-mail same to J. Kane with comments(.1); Strategize on DIP(.1); E-mail M. Diaz regarding budget(.1); Examine e-mails regarding dip Hearing prep(.1); Work on DIP hearing prep(3.6); Exchanges with M. Diaz regarding DIP prep(.1).	4.10	3,177.50
03/29/23	Joseph M. Coleman	Examine updated budget to actual.	0.60	465.00
Total			7.80	\$5,875.00

Financing/Cash Collateral

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	John J. Kane	Prepare for and attend DIP call with debtors' counsel.	0.70	406.00
03/01/23	John J. Kane	Work with FTI on revisions to DIP hearing demonstrative and work with team on witness and exhibits for hearing(.8); Follow up work with FTI and KRCL team on administrative insolvency matters(.6).	1.40	812.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	Joseph M. Coleman	Review DIP motion and objection and begin cross exams(2.10); Prep for call with debtors and participate in same(1.1); Examination of DIP Motion, DIP Term Sheet and Committee Objection(1.2); Continue DIP Hearing prep(1.5).	5.90	4,572.50
03/01/23	JaKayla DaBera	Search for form letters or pleadings regarding administrative insolvency.	1.80	693.00
03/02/23	JaKayla DaBera	Draft notice of deposition of Portage Point Representative; Prepare and file same.	3.10	1,193.50
03/02/23	John J. Kane	Calls with C. Bankler(.5) and J. Coleman(.8) regarding DIP negotiations, hearing matters; Review correspondence from V. Polnick regarding hearing(.1); Review correspondence from M. Diaz regarding budget issues(.3); Work on M. Berger deposition outline(.9); Finalize and serve Notice of Deposition(.4); Follow up with O. Salvatierra on deposition logistics, reporting(.2).	3.20	1,856.00
03/02/23	John J. Kane	Work on DIP hearing matters, strategic considerations.	0.80	464.00
03/02/23	Joseph M. Coleman	Examine Budget in detail(.4); E-mail to M. Diaz regarding admin insolvency(.1); DIP hearing prep(2.1).	2.60	2,015.00
03/02/23	Joseph M. Coleman	Exchange e-mails with M. Diaz regarding strategy and status regarding DIP financing(.2); Telephone conferences with Committee Member and J. Kane regarding admin insolvency and roll up(.4); Outline negotiations parameters and strategize regarding same(.5).	1.10	852.50
03/02/23	S. Kyle Woodard	Review credit agreements and related docs as pertaining to DIP motion.	1.00	440.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/23	Olivia Salvatierra	Update and organize trial binder for J. Coleman.	1.30	292.50
03/03/23	Joseph M. Coleman	Strategize regarding DIP negotiations(.3); Telephone conference with M. Diaz regarding DIP, inventory and related issues(.2); Review updated budget with M. Diaz(.3); Work on preparations for the March 9, 2023 DIP Hearing(3.1); Telephone conference with debtors' counsel regarding intention to continue the final DIP Hearing(.5); Follow up communications regarding same(.2).	4.60	3,565.00
03/03/23	John J. Kane	Obtain and review March 2 cash flow variance report and AP report(.7); Prepare for and participate on call with M. Diaz and FTI team addressing same in preparation for Berger deposition(1.1); Coordinate with C. Bankler regarding Berger deposition logistics(.2).	2.00	1,160.00
03/03/23	John J. Kane	Continue to prepare for Berger deposition and DIP hearing evidentiary presentation.	1.90	1,102.00
03/04/23	John J. Kane	Review Berger deposition topics and points of interest from FTI and continue to prepare for Berger and debtors' counsel conference.	1.30	754.00
03/04/23	Joseph M. Coleman	Exchange e-mails and texts with M. Cavanaugh and telephone conference with M. Cavanaugh regarding continuance of Final DIP Hearing and related issues(.7); Confer with J. Kane regarding same(.2).	0.90	697.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/05/23	John J. Kane	Continue to prepare for Berger interview and prepare questioning to address administrative insolvency concerns, rolling AP accrual, post-sale budget matters.	1.90	1,102.00
03/06/23	John J. Kane	Prepare for meeting with Mark Berger and JW team regarding budget, administrative insolvency concerns(1.6); Host discussion(1.7); Follow up discussions with M. Diaz and J. Coleman(.3).	3.60	2,088.00
03/06/23	John J. Kane	Work with J. Coleman on letter addressing administrative insolvency concerns.	0.30	174.00
03/06/23	S. Kyle Woodard	Work with J. DaBera on research related to debtors' DIP financing.	0.30	132.00
03/07/23	Charles E. Aster	Reviewing loan documents for lien positions.	1.50	945.00
03/07/23	John J. Kane	Continue to draft letter to independent director and officers regarding administrative insolvency and Committee's deep seated concerns regarding course of case, potential adverse outcome, fiduciary obligations of D&O post-petition.	4.10	2,378.00
03/07/23	Joseph M. Coleman	Work on letter to debtors' board of directors regarding admin insolvency caused by DIP Loan(.7).	0.70	542.50
03/08/23	Joseph M. Coleman	Examine rescheduled DIP hearing, e-mail appropriate parties and docket(.2).	0.20	155.00
03/08/23	John J. Kane	Continue to work on and revise investor letter, incorporate certain comments, obtain and circulate redline of revised draft and coordinate with J. Coleman regarding same.	1.90	1,102.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/08/23	John J. Kane	Work with FTI on supplement to D&O letter, provide feedback on revisions to form and structure.	0.90	522.00
03/09/23	John J. Kane	Update, revise, and finalize letter to directors and coordinate delivery and service of same.	2.10	1,218.00
03/09/23	Joseph M. Coleman	Work on letter to debtors' board regarding admin insolvency, including telephone conferences and comments from various committee members(2.1); Telephone conference with M. Diaz regarding same(.2); Finalize letter(.8).	3.10	2,402.50
03/09/23	Charles E. Aster	Reviewing amendments and other loan documents, send explanation to J. Coleman and K. Woodward.	3.00	1,890.00
03/10/23	Charles E. Aster	Reviewing UCCs.	0.50	315.00
03/10/23	John J. Kane	Review correspondence regarding DIP financing considerations and ancillary matters.	0.40	232.00
03/13/23	Charles E. Aster	Reviewing pledge and security agreement, send issues email to J. Coleman and K. Woodard and telephone conversations with both.	1.80	1,134.00
03/14/23	Joseph M. Coleman	Telephone conference with M. Diaz regarding new budget and admin insolvency(.4); Begin revised notice of deposition of Berger for DIP Hearing(.1).	0.50	387.50
03/14/23	Joseph M. Coleman	Work on DIP and Budget issues, including Administrative insolvency(1.70).	1.70	1,317.50
03/14/23	Olivia Salvatierra	Researching docket for critical dates and deadlines.	0.20	45.00
03/14/23	Olivia Salvatierra	Locating and providing J. Coleman the transcript of the 3-10-23 hearing.	0.20	45.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/15/23	Joseph M. Coleman	Prep for DIP Hearing, review key case law (.7).	0.70	542.50
03/15/23	Charles E. Aster	Reviewing materials for Joe Coleman.	0.80	504.00
03/16/23	JaKayla DaBera	File notice of deposition of Portage Point.	0.20	77.00
03/16/23	Joseph M. Coleman	Work on notice of deposition for DIP Hearing(.8); Telephone conference with M. Diaz regarding same and regarding sale process(.3); DIP Hearing prep(.4); Finalize and service Notice of Deposition(.2).	1.70	1,317.50
03/17/23	Joseph M. Coleman	Examine e-mail from M. Diaz regarding P-Card default(.1); DIP Hearing Prep(4.2).	4.30	3,332.50
03/18/23	Joseph M. Coleman	DIP hearing prep (2.70).	2.70	2,092.50
03/19/23	Joseph M. Coleman	Work on and send e-mails regarding additional DIP hearing exhibits(.2); Prep DIP Hearing(2.6).	2.80	2,170.00
03/20/23	John J. Kane	Review FTI correspondence on financial performance and notes(.8); Review logistics and subpoena duces tecum for Berger deposition and briefly coordinate with J. Coleman regarding same(.4); Work on Berger deposition prep and review applicable budgets and variance reporting and additional correspondence from FTI on sale process and effects on DIP(1.6).	2.80	1,624.00
03/20/23	Charles E. Aster	Review documents for J. Coleman and K. Woodward.	0.50	315.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/20/23	Joseph M. Coleman	DIP Hearing Prep(1); Meet with J. Kane regarding status issues and strategy(.9); Work on Cross issues(.9); E-mail M. Diaz regarding budget(.1); Examine key loan documents(.7); Examine budgets and variances(.5).	4.10	3,177.50
03/21/23	John J. Kane	Work on Berger deposition preparation and coordinate with FTI regarding follow up call to assist with same(1.6); Review e-mails and other correspondence from JW team and litigation team regarding DIP related matters, timing considerations, production in advance of hearing(.4); Conference calls with JW team and J. Coleman addressing DIP disputes, timing matters, DIP Lender considerations(1.3).	3.30	1,914.00
03/21/23	John J. Kane	Correspondence to JW team driving for pre-hearing negotiations with DIP Lender's counsel, feedback on efforts(.2); Brief strategy conference with J. Coleman regarding DIP hearing(.2).	0.40	232.00
03/21/23	JaKayla DaBera	Work on supplemental exhibit for final DIP hearing.	0.40	154.00
03/22/23	John J. Kane	Correspondence from DIP Lender's counsel, coordinate with J. Coleman, and DIP counsel re meeting to discuss outstanding dispute.	0.30	174.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/22/23	John J. Kane	Continue preparation for Berger deposition and review budgets, variance reports, AP rolls(.9); Berger deposition prep call with FTI(1.0); Calls and meetings with team and debtors' counsel regarding continuance of DIP hearing, potential mediation, related dates, discovery matters(1.4); Follow up calls with C. Bankler regarding Berger deposition reschedule, 2004 Exam answers, Subpoena Duces Tecum production(.4).	3.70	2,146.00
03/22/23	Joseph M. Coleman	Work on DIP Prep(2.9); E-mail exchanges with debtors' counsel regarding depositions, document production and continuance of DIP Hearing(.3).	3.20	2,480.00
03/23/23	Joseph M. Coleman	Exchange e-mails with Committee members, Debtors counsel and FTI regarding moving DIP hearing(.2); Review key DIP objections(.1).	0.30	232.50
03/23/23	John J. Kane	Work on DIP hearing logistics and continuance matters.	0.70	406.00
03/23/23	John J. Kane	Conference call with Debtor and DIP Lender counsel and push regarding production items, outlook for mediation(.8); Follow up correspondence with C. Bankler regarding discovery, meeting on standing discussions(.3); Work with J. Coleman on DIP matters, and work on budget outlook, FTI insights, Berger Subpoena Duces Tecum production review follow up(.9); Review FTI updates(.3); Follow up with J. Coleman regarding hearing timing, mediation timing(.2).	2.50	1,450.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/24/23	John J. Kane	Mediation planning conferences with debtor, DIP Lender, Team and follow up regarding same(1.9); Work on mediation scheduling issues(.4); Additional work on discovery items and follow up production intake and review of additional materials produced by debtor(.6); Follow up DIP and Strategy call with FTI(1.2); Work with J. Coleman on mediation matters(.4).	4.50	2,610.00
03/24/23	Joseph M. Coleman	Examine and e-mails regarding recent DIP Orders(.5).	0.50	387.50
03/25/23	John J. Kane	Work on pre-mediation diligence and memorandum.	2.30	1,334.00
03/26/23	John J. Kane	Complete memo addressing mediation and DIP matters and circulate to team(1.4); Review proposed revisions and additions and prepare for review, strategy meeting(.6).	2.00	1,160.00
03/27/23	John J. Kane	Work on mediation plan, to do lists, development of pre-mediation discovery management systems.	2.70	1,566.00
03/27/23	Joseph M. Coleman	Telephone conference with V. Polnick regarding DIP hearing postponement and related issues(.3).	0.30	232.50
03/28/23	John J. Kane	Work on document production intake, coding, review logistics matters for Pep Boys' production(1.0); Review debtor production and note missing categories and information relevant to mediation(.9); Prepare for independent director investigation meeting with C. Bankler(.8); Attend meeting(1.9); Follow up debrief with J. Coleman (.8).	5.40	3,132.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/30/23	John J. Kane	Conference with FTI on mediation matters, litigation and financial review updates, sales process, and updated budgets, variance analysis.	1.00	580.00
03/31/23	John J. Kane	Prepare for and attend conference call addressing mediation, mediation dates and issues.	0.60	348.00
Total			117.20	\$74,693.50

Real Estate

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/29/23	S. Kyle Woodard	Call with debtors' counsel, B. Butler, regarding production of real estate documents.	0.20	88.00
03/31/23	Stephen L. Kirschner	Review two Lease Agreements (for Philadelphia, PA and North Wales, PA)(2.0); Preparation of draft email to Joe Coleman providing a summary of the issues in the Lease Agreements(.8).	2.80	1,162.00
Total			3.00	\$1,250.00

Board of Directors Matters

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/06/23	S. Kyle Woodard	Review and consider SMP's comments to Committee Bylaws and prepare redline comments on the same.	1.10	484.00
03/06/23	S. Kyle Woodard	Conference regarding Committee Bylaws.	0.20	88.00
03/08/23	Olivia Salvatierra	Researching for Board of Directors for J. Coleman.	0.30	67.50
03/09/23	Michael P. Ridulfo	Review redline of Insolvency Letter.	0.20	121.00
Total			1.80	\$760.50

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Claims Administration and Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/05/23	S. Kyle Woodard	Review debtors' motion to establish bar dates.	0.50	220.00
03/06/23	S. Kyle Woodard	Conference regarding bar date motion and other recently filed motions.	0.30	132.00
03/06/23	S. Kyle Woodard	Follow up on issues related to bar date motion.	0.20	88.00
03/06/23	S. Kyle Woodard	Consider objections to debtors' motion to establish bar dates(.3); Prepare correspondence to Committee regarding the same(.2).	0.50	220.00
03/06/23	Joseph M. Coleman	Examine emergency motion regarding bar date and K. Woodard's comments thereto(.3); E-mail Debtor regarding questions(.1); Examine debtors' rationale for bar date and related issues(.1).	0.50	387.50
Total			2.00	\$1,047.50

Litigation

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/01/23	Michael P. Ridulfo	Revise letter agreement with debtors' counsel regarding 2004 production and e-mails to and from counsel regarding same(.3); Work on Confidentiality Agreement(2.5).	2.80	1,694.00
03/02/23	Michael P. Ridulfo	Review and assimilate additional comments to Confidentiality Agreement, revise redline and communications with creditors' counsel regarding same(2.2).	2.20	1,331.00
03/03/23	Michael P. Ridulfo	Further revisions to redline of Confidentiality Agreement with debtors(1.2).	1.20	726.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/06/23	Michael P. Ridulfo	Work on issues regarding 2004 Exams including document production and non-debtor 2004 notices(1.2); Review and analyze debtors' revised redline of Confidentiality Agreement(1.0).	2.20	1,331.00
03/07/23	Michael P. Ridulfo	Continued work on non-debtor 2004 notices, revisions and attention to discovery scope issues(1.0); Continued revisions to Confidentiality Agreement(1.6).	2.60	1,573.00
03/08/23	Michael P. Ridulfo	Continued work on non-debtor 2004's(.6).	0.60	363.00
03/09/23	Michael P. Ridulfo	Work on, review and compare final draft of Confidentiality Agreement from debtors' counsel(.5); E-mail to debtors' counsel regarding same(.1); Final revision of non-debtor 2004 Notices(.4).	1.00	605.00
03/10/23	Michael P. Ridulfo	Teleconference with debtors' counsel regarding 2004 Notice and Confidentiality Agreement(.2); Final review, revision and redline of Confidentiality Agreement(.8); E-mails to/from counsel for Pep Boys regarding 2004 Notice(.2).	1.20	726.00
03/11/23	Michael P. Ridulfo	E-mails to and from counsel for Ichan parties and American Entertainment regarding 2004 Notices.	0.20	121.00
03/13/23	Michael P. Ridulfo	Meet and confer with counsel for Icahn and American Entertainment(.3); Follow up on action items follow discussion(.3).	0.60	363.00
03/14/23	Michael P. Ridulfo	Revision of Icahn and American Entertainment 2004s prior to filing.	0.30	181.50
03/14/23	Michael P. Ridulfo	Review Motion for Standing.	0.30	181.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/15/23	Michael P. Ridulfo	Meet and confer with Pep Boys' counsel regarding 2004 Notice and follow up issues regarding same(.5); E-mails to and from FTI regarding same(.2); Final review and revision of Pep Boys 2004 Notice before filing(.3).	1.00	605.00
03/16/23	Michael P. Ridulfo	E-mails to and from counsel regarding 2004 Notices.	0.40	242.00
03/19/23	Michael P. Ridulfo	Analyze potential litigation claims against DIP Lender.	0.30	181.50
03/20/23	Michael P. Ridulfo	Attention to issues regarding litigation claims of Committee and evidence supporting same.	2.70	1,633.50
03/20/23	John J. Kane	Strategic planning and work on insider investigations, discovery status, next steps for case progression (non-DIP lender assessments).	1.00	580.00
03/21/23	Michael P. Ridulfo	Attention to discovery issues and communications with counsel regarding same(1.2); Prepare Notice of Reset debtors' 2004 Notice(.3); Review and make notes with respect to AEPC response to 2004 Notice(.5).	2.00	1,210.00
03/22/23	Michael P. Ridulfo	Review and make notes with respect to debtors' response to 2004 Notice(.4); Continued work on litigation issues and investigation and communications with counsel regarding same and FTI regarding same(3.0).	3.40	2,057.00
03/23/23	Michael P. Ridulfo	Review redline comments regarding Confidentiality Agreement(.3); Continued work on and communications with counsel regarding discovery and litigation investigation(2.8).	3.10	1,875.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/23/23	John J. Kane	Coordinate with B. Clark and C. Bankler on document production and document management matters.	0.60	348.00
03/24/23	Michael P. Ridulfo	Zoom meeting with counsel regarding mediation and discovery(.5); Work on discovery plan and litigation investigation issue(.8).	1.30	786.50
03/26/23	Michael P. Ridulfo	Work on pre-mediation issues and discovery(1.5).	1.50	907.50
03/27/23	Michael P. Ridulfo	Continued work on pre-mediation issues and discovery and communications with counsel regarding same(4.2); Redline non-debtor confidentiality agreement and e-mail to counsel regarding same(.4).	4.60	2,783.00
03/27/23	John J. Kane	Follow up correspondence on pre-mediation document production and review, Pep Boys' production timeline(.2); Prepare for meeting with debtors' counsel to discuss insider and affiliate investigations, role of independent director (.9).	1.10	638.00
03/28/23	Michael P. Ridulfo	Continued work on pre-mediation issues and discovery and communications with counsel regarding same.	3.50	2,117.50
03/29/23	Michael P. Ridulfo	Continued work on pre-mediation issues and discovery and communications with counsel regarding same(2.5).	2.50	1,512.50
03/29/23	John J. Kane	Work on document review memorandum and prepare for meeting with review team, outline to bring group up to speed on matters pertaining to Pep Boys, IAG affiliates.	1.20	696.00
03/30/23	John J. Kane	Follow up work on insider investigation and Debtor claim analysis memo.	1.00	580.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/30/23	John J. Kane	Document review team meeting, address key case considerations, work through timing and distribution of review, work with team on Pep Boys insider litigation analysis and claim preparation.	1.60	928.00
03/30/23	Michael P. Ridulfo	Zoom meeting with Committee(1.3); Continued work on pre-mediation and litigation issues and communications with FTI and counsel regarding same(2.7).	4.00	2,420.00
03/31/23	Michael P. Ridulfo	Attention to pre-mediation investigation and discovery(2.8); Discussions with and e-mails to/from outside counsel re same(.6); Revise third party confidentiality agreement(.2).	3.60	2,178.00
03/31/23	John J. Kane	Coordinate with litigation team on production of documents, status of review.	0.40	232.00
03/31/23	Joseph M. Coleman	Begin to work on mediation and PowerPoint(1.60).	1.60	1,240.00
Total			57.60	\$34,947.50
Total Professional Charges			646.20	\$371,352.00

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Joseph M. Coleman	Director	171.50 hrs at \$ 775 / hr 132,912.50
Brian N. Hail	Director	70.70 hrs at \$ 745 / hr 52,671.50
Charles E. Aster	Director	8.10 hrs at \$ 630 / hr 5,103.00
Michael P. Ridulfo	Director	71.10 hrs at \$ 605 / hr 43,015.50
John J. Kane	Director	70.60 hrs at \$ 580 / hr 40,948.00
Brian W. Clark	Director	62.00 hrs at \$ 535 / hr 33,170.00
Bruce "Chip" Morris	Director	1.80 hrs at \$ 0 / hr 0.00

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Invoice No.: 493787

File No: 74089.00002.000

<u>Timekeeper</u>	<u>Title</u>				<u>Total</u>
S. Kyle Woodard	Associate	28.40	hrs at	\$ 440 / hr	12,496.00
Andrew Robertson	Associate	7.30	hrs at	\$ 435 / hr	3,175.50
Stephen L. Kirschner	Associate	2.80	hrs at	\$ 415 / hr	1,162.00
Collin Delano	Associate	9.20	hrs at	\$ 395 / hr	3,634.00
JaKayla DaBera	Associate	50.20	hrs at	\$ 385 / hr	19,327.00
Miles Emery	Associate	2.80	hrs at	\$ 385 / hr	1,078.00
Brandon Keaton	Associate	29.60	hrs at	\$ 345 / hr	10,212.00
Reuel Coles	Paralegal	.60	hrs at	\$ 275 / hr	165.00
Carlos Velazquez	Paralegal	1.50	hrs at	\$ 265 / hr	397.50
Connie Nims	Paralegal	2.70	hrs at	\$ 235 / hr	634.50
Olivia Salvatierra	Paralegal	50.00	hrs at	\$ 225 / hr	11,250.00
Olivia Salvatierra	Paralegal	5.30	hrs at	\$ 0 / hr	0.00
Total Professional Charges					\$371,352.00

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/31/23	Photocopies	2,355.90
03/31/23	Color Copies	121.25
03/31/23	On-Line Services	1,414.47
03/31/23	Secretarial Overtime	252.00
03/31/23	Courier Expense	154.76
03/31/23	Postage	749.52
03/31/23	Word Processing	250.00
Total		\$5,297.90

Invoice Date: 04/27/23

Invoice No.: 493787

File No: 74089.00002.000

INVOICE SUMMARY

Professional Charges \$ 371,352.00

Disbursements \$ 5,297.90

CURRENT INVOICE DUE \$ 376,649.90

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	0.00	\$ 200,640.30

TOTAL AMOUNT DUE \$ 577,290.20

Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 04/27/23

Invoice No.: 493787

File No.: 74089.00002.000

Matt Hulteen, matt.hulteen@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through March 31, 2023:

Total Professional Charges	\$ 371,352.00
Disbursements	\$ 5,297.90
Current Invoice Due	\$ <u>376,649.90</u>
Previous Balance Due	\$ 200,640.30
TOTAL AMOUNT DUE	\$ <u>577,290.20</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.

**KANE RUSSELL
COLEMAN LOGAN**

Invoice Date: **04/27/23**

Invoice No.: **493788**

File No.: **74089.00003.000**

Matt Hulteen

The Unsecured Creditors Committee of IEH
Auto Parts
, TX

File Description: Lien Investigation of American Entertainment

PROFESSIONAL CHARGES

Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/23	JaKayla DaBera	Research regarding standing issues.	1.50	577.50
03/05/23	JaKayla DaBera	Continue research related to AEP challenge.	4.20	1,617.00
03/06/23	JaKayla DaBera	Continue researching standing and issues and incorporate findings into a memo.	6.20	2,387.00
03/07/23	JaKayla DaBera	Research related to AEP challenge.	1.00	385.00
03/08/23	JaKayla DaBera	Begin drafting shell motion for derivative standing.	0.80	308.00
03/09/23	JaKayla DaBera	Research regarding claims against AEP.	1.80	693.00
03/13/23	JaKayla DaBera	Continue researching claims against AEP.	0.50	192.50
03/13/23	S. Kyle Woodard	Draft motion for standing to challenge prepetition liens and conducting research related thereto.	4.10	1,804.00
03/13/23	S. Kyle Woodard	Prepare list of document requests to debtors as pertaining to motion for standing to challenge prepetition liens.	1.00	440.00

Invoice Date: 04/27/23

Invoice No.: 493788

File No: 74089.00003.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/13/23	S. Kyle Woodard	Review loan docs as pertaining to motion for standing.	0.30	132.00
03/13/23	S. Kyle Woodard	Review of prepetition loan documents as pertaining to prepetition lien challenge(1.0); Continue drafting motion for standing to challenge prepetition liens(3.7).	4.70	2,068.00
03/14/23	Joseph M. Coleman	Examine e-mail regarding documents not yet received(.1); Follow up regarding standing issues and claims against AEP(.4).	0.50	387.50
03/14/23	S. Kyle Woodard	Analyze potential causes of action against prepetition lenders as pertaining to challenges under DIP order.	1.10	484.00
03/14/23	S. Kyle Woodard	Researching issues related to standing to challenge prepetition liens(3.2); Continue drafting motion for standing(3.0).	6.20	2,728.00
03/14/23	S. Kyle Woodard	Work on drafting Committee's complaint challenging prepetition liens and claims of secured lender.	1.50	660.00
03/14/23	JaKayla DaBera	Work on Complaint against AEP.	4.50	1,732.50
03/15/23	Joseph M. Coleman	Work on standing motion and elements of equitable subordination(.4); Work on Motion for Standing(.9); Strategize regarding same(.2)	1.50	1,162.50
03/15/23	S. Kyle Woodard	Continue work drafting lien challenge complaint.	2.60	1,144.00
03/15/23	S. Kyle Woodard	Conduct research regarding numerous causes of action in complaint against prepetition lender.	3.70	1,628.00
03/15/23	S. Kyle Woodard	Continue drafting motion for standing.	0.80	352.00

Invoice Date: 04/27/23

Invoice No.: 493788

File No: 74089.00003.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/15/23	S. Kyle Woodard	Review debtors' UCC filings as pertaining to prepetition liens(.8); Continue drafting complaint against prepetition lender(3.4).	4.20	1,848.00
03/15/23	JaKayla DaBera	Continue research on equitable subordination issue(2.6); Work on equitable subordination insert to Complaint(2.0).	4.60	1,771.00
03/16/23	JaKayla DaBera	Research issues pertaining to derivative standing; Research credit bid issue; Continue to work on equitable subordination insert.	8.80	3,388.00
03/16/23	JaKayla DaBera	Work on AEP complaint.	1.40	539.00
03/16/23	S. Kyle Woodard	Analyze lien challenge claims and consider next steps on DIP issues and motion for standing.	0.70	308.00
03/16/23	Joseph M. Coleman	Work on complaint(.5); E-mail V. Polnick regarding extension of time(.1).	0.60	465.00
03/16/23	S. Kyle Woodard	Continue drafting lien challenge complaint.	3.80	1,672.00
03/17/23	JaKayla DaBera	Continue researching allowed claims for credit bidding.	3.40	1,309.00
03/17/23	JaKayla DaBera	Continue working on equitable subordination section of AEP complaint.	3.40	1,309.00
03/18/23	Joseph M. Coleman	E-mail regarding additional potential causes of action to investigate.	0.10	77.50
03/18/23	JaKayla DaBera	Work on equitable subordination section of AEP complaint.	2.80	1,078.00
03/19/23	S. Kyle Woodard	Conduct research related to equitable subordination and other lien challenge actions.	4.40	1,936.00
03/19/23	S. Kyle Woodard	Work on Committee's motion for standing(4.2); Work on drafting lien challenge complaint(1.0).	5.20	2,288.00
03/20/23	Joseph M. Coleman	Work on motion for standing(.6); Work on causes of action to be included in AEP complaint(.9).	1.50	1,162.50

Invoice Date: 04/27/23

Invoice No.: 493788

File No: 74089.00003.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/20/23	S. Kyle Woodard	Continue drafting sections of motion for standing addressing individual challenge claims (3.7); Work on drafting additional counts of lien challenge complaint(.5).	4.20	1,848.00
03/20/23	S. Kyle Woodard	Analyze and consider issues related to lien challenge claims.	1.10	484.00
03/20/23	JaKayla DaBera	Research regarding various lien challenge issues.	2.70	1,039.50
03/20/23	JaKayla DaBera	Research on credit bidding rights.	2.40	924.00
03/20/23	JaKayla DaBera	Research on derivative standing.	2.10	808.50
03/20/23	JaKayla DaBera	Attention to motion for derivative standing including support with drafting causes of action.	1.00	385.00
03/21/23	JaKayla DaBera	Research derivative standing issue.	2.30	885.50
03/22/23	JaKayla DaBera	Continue researching credit bid issue.	1.00	385.00
03/22/23	S. Kyle Woodard	Work on revising and continue drafting motion for standing and lien challenge complaint.	1.90	836.00
03/23/23	S. Kyle Woodard	Conduct research on numerous issues related to lien challenge complaint.	4.40	1,936.00
03/24/23	S. Kyle Woodard	Research issues related to credit bid and update motion for standing with briefing on the same.	2.30	1,012.00
03/24/23	S. Kyle Woodard	Research regarding claims for recharacterization of debt.	2.20	968.00
03/24/23	Joseph M. Coleman	Review case law related to AEP's claim.	0.50	387.50
03/25/23	S. Kyle Woodard	Research regarding potential lien challenge causes of action.	3.10	1,364.00
03/26/23	Joseph M. Coleman	Begin review of complaint.	0.20	155.00
03/27/23	S. Kyle Woodard	Continue working on lien challenge complaint.	0.80	352.00

Invoice Date: 04/27/23

Invoice No.: 493788

File No: 74089.00003.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/27/23	Joseph M. Coleman	Work on standing motion(.9).	0.90	697.50
03/28/23	S. Kyle Woodard	Work on researching lien challenge issues and reviewing relevant docs(2.4); Work on complaint(.4).	2.80	1,232.00
03/28/23	Joseph M. Coleman	Analysis of potential causes of action and standing issues applicable to AEP(.7).	0.70	542.50
03/29/23	JaKayla DaBera	Review equitable subordination cases(2.2); Draft equitable subordination memo(1.6).	3.80	1,463.00
03/30/23	S. Kyle Woodard	Conduct research regarding equitable subordination and other lien prepetition loan challenges(5.5); Continue drafting motion for standing and lien challenge complaint(1.7).	7.20	3,168.00
03/31/23	Joseph M. Coleman	Work on AEP complaint.	0.60	465.00
03/31/23	S. Kyle Woodard	Work on lien challenge complaint.	0.60	264.00
Total			142.20	\$61,635.50
Total Professional Charges			142.20	\$61,635.50

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Joseph M. Coleman	Director	7.10 hrs at \$ 775 / hr 5,502.50
S. Kyle Woodard	Associate	74.90 hrs at \$ 440 / hr 32,956.00
JaKayla DaBera	Associate	60.20 hrs at \$ 385 / hr 23,177.00
Total Professional Charges		\$61,635.50

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/31/23	Photocopies	32.10

Invoice Date: 04/27/23

Invoice No.: 493788

File No: 74089.00003.000

<u>Date</u>	<u>Description</u>	<u>Amount</u>
Total		\$32.10

INVOICE SUMMARY

Professional Charges \$ 61,635.50

Disbursements \$ 32.10

CURRENT INVOICE DUE \$ 61,667.60

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492462	03/21/23	1,602.50	0.00	\$ 1,602.50

TOTAL AMOUNT DUE \$ 63,270.10

Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 04/27/23

Invoice No.: 493788

File No.: 74089.00003.000

Matt Hulteen

The Unsecured Creditors Committee of IEH
Auto Parts
, TX

For Professional Services Rendered Through March 31, 2023:

Total Professional Charges	\$	61,635.50
Disbursements	\$	32.10
Current Invoice Due	\$	61,667.60
Previous Balance Due	\$	1,602.50
TOTAL AMOUNT DUE	\$	<u>63,270.10</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

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Exhibit A-3

Third Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) IEH AUTO PARTS HOLDING LLC, <i>et al.</i> , ¹) Debtors.)	Chapter 11 Case No. 23-90054 (CML) (Jointly Administered)
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**THIRD MONTHLY FEE STATEMENT OF KANE RUSSELL COLEMAN LOGAN PC,
AS COUNSEL FOR THE OFFICIAL UNSECURED CREDITORS' COMMITTEE,
FOR THE PERIOD FROM APRIL 1, 2023 THROUGH APRIL 30, 2023**

Name of Professional:	Kane Russell Coleman Logan PC	
Professional's Role in Case:	Counsel for the Official Unsecured Creditors' Committee	
Date of Retention Order:	April 27, 2023 [Dkt. #427]	
Effective Date of Retention:	February 15, 2023	
Time Period Covered by this Statement:	<u><i>Beginning of Period:</i></u> April 1, 2023	<u><i>End of Period:</i></u> April 30, 2023
Total Fees incurred during this Period:	\$755,535.50	
Total Expenses during this Period:	\$18,762.50	
Total Fees and Expenses for the Period:	\$774,298.00	
Summary of Monthly Fee Statement		
Fees sought in this Statement (80%):	\$604,428.40	
Expenses sought in this Statement (100%):	\$18,762.50	
Monthly Fee Statement Total:	\$623,190.90	
20% Holdback for Professional Fees:	\$151,107.10	

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

Kane Russell Coleman Logan PC ("**KRCL**"), counsel for the Official Unsecured Creditors' Committee (the "**Committee**"), submits this Monthly Fee Statement for the above-stated time period (the "**Statement Period**") pursuant to the *Court's Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. #264] (the "**Interim Compensation Order**")² as follows:

PROFESSIONAL FEES

1. KRCL's invoices for the Statement Period is attached hereto (the "**Invoices**"). The Invoices provides: (i) a description of the services rendered; (ii) the time spent; (iii) the hourly rates charged; and (iv) the name of the attorney or paraprofessional performing the work. Time entries on the Invoices are organized by project category.

2. KRCL's fees incurred during the Statement Period are summarized as follows:

Summary by Professional

Name	Position	Hourly Rate	Hours	Fees
Joseph M. Coleman	Director	\$775	265.80	\$205,995.00
Brian N. Hail	Director	\$745	146.70	\$109,291.50
Charles E. Aster	Director	\$630	6.00	\$3,780.00
Michael P. Ridulfo	Director	\$605	113.80	\$68,849.00
John J. Kane	Director	\$580	156.10	\$90,538.00
Don Waltz	Director	\$550	2.30	\$1,265.00
Brian W. Clark	Director	\$535	64.90	\$34,721.50
S. Kyle Woodard	Associate	\$440	146.90	\$64,636.00
Andrew Robertson	Associate	\$435	49.20	\$21,402.00
Collin Delano	Associate	\$395	69.00	\$27,255.00
JaKayla DaBera	Associate	\$385	143.10	\$55,093.50
Brandon Keaton	Associate	\$345	118.60	\$40,917.00
Reuel Coles	Paralegal	\$275	11.40	\$3,135.00
Carlos Velazquez	Paralegal	\$265	44.30	\$11,739.50
Connie Nims	Paralegal	\$235	29.00	\$6,815.00
Olivia Salvatierra	Paralegal	\$225	42.10	\$9,472.50
Bree Kimball	Paralegal	\$210	3.00	\$630.00
TOTAL:			1,412.20	\$755,535.50

² Undefined capitalized terms have the meanings provided in the Interim Compensation Order unless otherwise noted.

Summary by Project Category

Task Code	Hours	Fees
B100 - Bankruptcy	0.00	\$0.00
B110 - Case Administration	135.00	\$68,207.00
B120 - Asset Analysis and Recovery	1,147.30	\$605,402.50
B130 - Asset Disposition	10.00	\$7,137.00
B140 - Relief from Stay/Adequate Protection Proceedings	3.90	\$1,881.00
B150 - Meetings of and Communications with Creditors	26.10	\$17,298.50
B160 - Fee/Employment Applications	17.90	\$8,402.00
B170 - Fee/Employment Objections	0.30	\$132.00
B180 - Avoidance Action Analysis	0.00	\$0.00
B185 - Assumption/Rejection of Leases and Contracts	1.80	\$693.00
B190 - Other Contested Matters	0.30	\$132.00
B195 - Non-Working Travel	19.50	\$14,887.50
B200 - Operations	0.00	\$0.00
B210 - Business Operations	2.30	\$1,782.50
B220 - Employee Benefits/Pensions	0.00	\$0.00
B230 - Financing/Cash Collections	32.10	\$21,009.00
B240 - Tax Issues	0.00	\$0.00
B250 - Real Estate	0.00	\$0.00
B260 - Board of Directors Matters	0.00	\$0.00
B300 - Claims and Plan	0.00	\$0.00
B310 - Claims Administration and Objections	0.00	\$0.00
B320 - Plan and Disclosure Statement	15.70	\$8,571.50
B400 - Bankruptcy-Related Advice	0.00	\$0.00
B410 - General Bankruptcy Advice/Opinions	0.00	\$0.00
B420 - Restructurings	0.00	\$0.00
L100 - Litigation	0.00	\$0.00
TOTAL:	1,412.20	\$755,535.50

DISBURSEMENTS

3. KRCL's actual and necessary expenses incurred during the Statement Period are described as follows:

Date	Description	Amount
4/30/2023	Photocopies	\$770.55
4/30/2023	Color Copies	\$2,973.35
4/30/2023	On-Line Services	\$10,252.94
4/30/2023	Outside Photocopies	\$1,957.10
4/30/2023	Courier Expense	\$80.27

4/30/2023	Postage	\$272.94
4/30/2023	In House Litigation Support	\$164.37
4/30/2023	Travel Expense	\$1,432.98
4/30/2023	Filing Fee - Cogency Global Inc.	\$858.00
TOTAL:		\$18,762.50

NOTICE AND OPPORTUNITY TO OBJECT

4. Any party that objects to the fees or expenses sought in this Monthly Fee Statement must serve written notice of such objection upon KRCL and each of the Application Recipients³ by no later than **May 25, 2023 at 4:00 p.m. CDT**. The notice must set forth the precise nature and basis of the objection and the amount at issue, and must otherwise comply with the terms of the Interim Compensation Order. Copies of the Interim Compensation Order may be requested in writing from KRCL, Attn: Olivia Salvatierra (osalvatierra@krcl.com).

RESERVATION

5. The Committee and KRCL have been diligent in attempting to redact any and all privileged or otherwise confidential information from the Invoice. Notwithstanding, however, the Committee and KRCL expressly reserve, and do not waive under any circumstances whatsoever, any privileges, protections, or rights to confidentiality of any kind or character for any purpose.

6. While KRCL has made every effort to include all fees and expenses incurred during the Statement Period, some fees and expenses may not be included in this Monthly Fee Statement due to, *inter alia*, accounting and processing delays during the Statement Period. KRCL reserves

³ As defined in the Interim Compensation Order, the Application Recipients include the following parties: (a) the Debtors, 112 Townpark Drive NW, Suite 300, Kennesaw, Georgia 30144, Attn: Michael Neyrey; (b) Jackson Walker LLP (via email), 1401 McKinney Street, Suite 1900, Houston, Texas 77010, Attn: Veronica A. Polnick (vpolnick@jw.com) and Vienna Anaya (vanaya@jw.com); (c) the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov); (d) counsel for the Prepetition Lender, Sidley Austin LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Stephen Hessler (shessler@sidley.com) and Anthony Grossi (agrossi@sidley.com); and (e) counsel to any statutory committee appointed in these cases.

the right to seek allowance and payment of any such fees or expenses in accordance with the orders of this Court and the applicable provisions of the Bankruptcy Code and Bankruptcy Rules.

7. KRCL further reserves the right to supplement and/or amend this Monthly Fee Statement for any reason in accordance with the Interim Compensation Order.

DATED: May 11, 2023.

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Kyle Woodard

Joseph M. Coleman

State Bar No. 0456610

SDTX No. 16936

Michael P. Ridulfo

State Bar No. 16902020

SDTX No. 27086

John J. Kane

State Bar No. 24066794

SDTX No. 1069650

Kyle Woodard

State Bar No. 24102661

SDTX No. 3596595

Bank of America Plaza

901 Main Street, Suite 5200

Dallas, Texas 75202

Telephone: (214) 777-4200

Telecopier: (214) 777-4299

Email: jcoleman@krcl.com;

Email: mridulfo@krcl.com

Email: jkane@krcl.com

Email: kwoodard@krcl.com

**ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

CERTIFICATE OF SERVICE

This is to certify that on May 11, 2023, a true and correct copy of this Monthly Fee Statement was filed with the Court and served (i) via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case, and (ii) via e-mail or regular U.S. mail, postage prepaid, upon the following parties:

Debtor:

IEH Auto Parts Holding, LLC, *et al.*
Attn: Michael Neyrey
112 Townpark Drive NW, Suite 300
Kennesaw, GA 30144

Debtors' Counsel:

Jackson Walker LLP
Attn: Veronica A. Polnick (vpolnick@jw.com)
Attn: Vienna Anaya (vanaya@jw.com)

U.S. Trustee:

Office of the US Trustee
Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov)
Attn: Andrew Jimenez (Andrew.Jimenez@usdoj.gov)

Prepetition Lender's Counsel:

Sidley Austin LLP
Attn: Stephen Hessler (shessler@sidley.com)
Attn: Anthony Grossi (agrossi@sidley.com)

/s/ Kyle Woodard

Kyle Woodard

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **05/09/23**Invoice No.: **494094**File No.: **74089.00002.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors**PROFESSIONAL CHARGES****Case Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/23	JaKayla DaBera	Review SOFA and Schedules and work on summarizing information.	2.20	847.00
04/02/23	JaKayla DaBera	Continue summarizing SOFAs and Schedules.	1.30	500.50
04/03/23	Joseph M. Coleman	Examine recent pleading(.1); Divide and conquer memo(.4); E-mail V. Polink regarding timing and issues with mediation(.2); Telephone conferences and e-mail exchanges regarding resignation of Chair of the Committee(.3).	1.00	775.00
04/03/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/03/23	Olivia Salvatierra	Prepare electronic and physical files SOFAs and schedules.	0.40	90.00
04/04/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/04/23	S. Kyle Woodard	Work on prelitigation discovery matters(.3); Follow up on status of challenge deadline(.2).	0.50	220.00
04/04/23	JaKayla DaBera	Continue summarizing SOFAs and Schedules.	5.60	2,156.00
04/05/23	JaKayla DaBera	Attention to summary of schedules and SOFAs.	0.10	38.50

Invoice Date: 05/09/23

Invoice No.: 494094

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/05/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/06/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
04/06/23	S. Kyle Woodard	Correspondence with V. Anaya regarding proposed orders.	0.10	44.00
04/06/23	JaKayla DaBera	Assist in Neyrey deposition preparation.	0.50	192.50
04/06/23	Joseph M. Coleman	Review recent ECF flings(.2); Develop to do list and prioritize same(.2).	0.40	310.00
04/10/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/10/23	Olivia Salvatierra	Docket new and updated Court deadlines.	0.30	67.50
04/11/23	Olivia Salvatierra	Review docket for case activity and saved pertinent pleadings to internal firm electronic case file.	0.20	45.00
04/11/23	JaKayla DaBera	Attention to key plan provisions for mediation.	0.40	154.00
04/12/23	Olivia Salvatierra	Docket Court updates.	0.20	45.00
04/13/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/14/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/17/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
04/18/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/18/23	JaKayla DaBera	Review declaration of disinterestedness.	0.30	115.50
04/19/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/20/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/20/23	Joseph M. Coleman	Examine recent pleadings and orders filed via ECF.	0.20	155.00
04/21/23	Joseph M. Coleman	Review recent filings.	0.10	77.50
04/21/23	Michael P. Ridulfo	Attention to issues regarding potential amended to bidding procedures and e-mails to/from counsel regarding same.	1.00	605.00
04/21/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/24/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/24/23	Joseph M. Coleman	Review recently filed pleadings(.1); E-mail Cavanaugh regarding open issues(.1).	0.20	155.00
04/24/23	JaKayla DaBera	Prepare witness and exhibit list.	3.80	1,463.00
04/25/23	JaKayla DaBera	Update critical dates and deadlines memo.	0.80	308.00
04/25/23	JaKayla DaBera	Attention to pro hac motion.	0.50	192.50
04/25/23	Olivia Salvatierra	Review docket for case activity and saving pertinent pleadings to internal firm electronic files.	0.30	67.50
04/25/23	Olivia Salvatierra	Prepare and e-file form to appear Pro Hac Vice for J. DaBera.	0.20	45.00
04/25/23	S. Kyle Woodard	Update critical dates and deadlines memo.	0.40	176.00
04/25/23	S. Kyle Woodard	Update critical dates and deadlines.	0.10	44.00
04/26/23	S. Kyle Woodard	Follow up on mediation issues and discuss next steps.	0.50	220.00
04/26/23	S. Kyle Woodard	Update critical dates and deadlines.	0.40	176.00
04/26/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
04/26/23	Joseph M. Coleman	Examine new pleadings filed via ECF(.1); Follow up regarding insurance and lift stay set for tomorrow(.3); Examine adjournment of DIP hearing(.1); Examine updates regarding lift stay and related issues(.2).	0.70	542.50
04/27/23	JaKayla DaBera	Edit witness and exhibit list.	0.70	269.50
04/27/23	Olivia Salvatierra	Review docket for case activity and save pertinent pleadings to internal firm case file.	0.30	67.50
04/27/23	Olivia Salvatierra	Update Critical Dates and Deadlines and docket same.	0.20	45.00
04/27/23	Joseph M. Coleman	Review recent pleadings(.2).	0.20	155.00
04/27/23	S. Kyle Woodard	Update critical dates and deadlines.	0.20	88.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/28/23	Joseph M. Coleman	Examine recently filed pleadings(.1); Examine briefly motion to, inter alia, abandon inventory to Pep Boys and e-mail objection thoughts(.2).	0.30	232.50
04/28/23	Olivia Salvatierra	Review docket for case activity and save pertinent pleadings to internal firm electronic file.	0.30	67.50
04/28/23	JaKayla DaBera	File witness and exhibit list(.4); Prepare file transfer link for service(.5).	0.90	346.50
Total			28.40	\$11,684.00

Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/23	JaKayla DaBera	Review document production.	3.80	1,463.00
04/01/23	John J. Kane	Correspondence with J. Coleman and B. Clark regarding document intake, review, to-do's for mediation, discovery needs, deposition planning.	0.40	232.00
04/01/23	Joseph M. Coleman	Work on claims and causes of action against Non-Debtor affiliates(1.6)	1.60	1,240.00
04/01/23	Carlos Velazquez	Export requested Financial documents from Reveal to be sent to FTI.	0.60	159.00
04/01/23	Carlos Velazquez	Upload AEP/Icahn Holdings document production to Reveal for review by legal team.	1.90	503.50
04/01/23	Carlos Velazquez	Create review batches of AEP/Icahn Holdings document production for all reviewers.	0.70	185.50
04/01/23	Carlos Velazquez	Upload Debtor's Informal document production to Reveal for review by legal team.	2.40	636.00
04/01/23	Carlos Velazquez	Create review batches from Debtor's Informal document production for all reviewers.	0.70	185.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/23	Brian W. Clark	Attention to document production issues and preparation for depositions(2).	2.00	1,070.00
04/01/23	Andrew Robertson	Work on pre-mediation discovery matters.	1.20	522.00
04/01/23	Brandon Keaton	Work on pre-mediation discovery matters.	0.40	138.00
04/01/23	Brandon Keaton	Review document production.	1.70	586.50
04/01/23	Brian N. Hail	Analyze documents and potential claims on causes of action.	6.00	4,470.00
04/01/23	Michael P. Ridulfo	Attention to pre-mediation issues including document production and discovery issues.	1.80	1,089.00
04/01/23	Collin Delano	Pre-mediation discovery matters.	0.20	79.00
04/02/23	Collin Delano	Review of document production.	7.20	2,844.00
04/02/23	Michael P. Ridulfo	Continued work on pre-mediation discovery issues.	1.50	907.50
04/02/23	Olivia Salvatierra	Update chart analysis of all research of written consents and approval forms received 3/17/23.	1.30	292.50
04/02/23	Brian N. Hail	Analyze documents and potential claims on causes of action.	4.00	2,980.00
04/02/23	Brandon Keaton	Review document production.	2.50	862.50
04/02/23	Andrew Robertson	Work on pre-mediation discovery matters.	1.10	478.50
04/02/23	Joseph M. Coleman	Work on claims against Non-Debtor insiders(3.3).	3.30	2,557.50
04/02/23	John J. Kane	Follow up correspondence with IEH team regarding schedule and SOFA review, organizational chart issues, document review status.	0.30	174.00
04/02/23	JaKayla DaBera	Review document production.	4.00	1,540.00
04/03/23	JaKayla DaBera	Review document production.	6.50	2,502.50
04/03/23	JaKayla DaBera	Summarize document review findings and e-mail same to D. Robertson.	0.30	115.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/03/23	John J. Kane	Mediation logistics and discovery planning and to-do list meeting(1.6); Work on JW document review(1.8); Coordinate with J. Coleman regarding Complaint status, discovery matters, mediation presentation and timeline to accomplish goals(.6).	4.00	2,320.00
04/03/23	John J. Kane	Continue document review and coordinate with associate review team regarding daily meetings for Hot doc discussion, review updates and strategic considerations.	0.80	464.00
04/03/23	Joseph M. Coleman	Work on causes of action Non-Debtor Affiliates(2.60); Telephone conference with M. Diaz regarding FTI's analysis(.3); Review selected written consents(.8); Telephone conference with V. Polnick regarding mediation, DIP Hearing and related matters(.2).	3.90	3,022.50
04/03/23	Joseph M. Coleman	Work on causes of action against American Entertainment(.7).	0.70	542.50
04/03/23	Andrew Robertson	Work on pre-mediation discovery matters(1.1); Document review of documents produced by IEH and Pep Boys(4.2).	5.30	2,305.50
04/03/23	Brian N. Hail	Draft status on potential claims on causes of action.	7.00	5,215.00
04/03/23	Brandon Keaton	Continue reviewing document production.	8.10	2,794.50
04/03/23	Brian W. Clark	Continue working on document review(.7); Prepare for depositions(1.3); Coordinate with FTI(.1).	2.10	1,123.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/03/23	Michael P. Ridulfo	Review third party documents(1.6); Work on pre-mediation issues and strategy(3.5); Communications with counsel regarding 2004 scheduling(.3).	5.40	3,267.00
04/03/23	Collin Delano	Pre-mediation discovery matters.	0.80	316.00
04/03/23	Collin Delano	Review of document production.	1.90	750.50
04/03/23	Collin Delano	Research regarding unsecured creditors' potential claims.	1.80	711.00
04/04/23	Collin Delano	Pre-mediation discovery matters.	0.50	197.50
04/04/23	Collin Delano	Research regarding unsecured creditors' potential claims.	1.10	434.50
04/04/23	Michael P. Ridulfo	Work on scheduling 2004 exams and teleconferences with and e-mails to/from 2004 Examinees regarding same(1.4); Review and analyze issues regarding mediation(2.8); Review various debtor and third party document productions and create notes regarding same(5.2).	9.40	5,687.00
04/04/23	S. Kyle Woodard	Prepare motion for extension of challenge period.	3.80	1,672.00
04/04/23	Olivia Salvatierra	Analysis of lawsuits and background research regarding Debtors.	1.00	225.00
04/04/23	Brian W. Clark	Continue review and analysis of document production(2); Coordinate with FTI(.7); Prepare for depositions(2.5).	5.20	2,782.00
04/04/23	Connie Nims	Draft PowerPoint presentation to be used during settlement discussions.	1.00	235.00
04/04/23	Carlos Velazquez	Upload Pep Boy's document production to Reveal for review by legal team.	2.60	689.00
04/04/23	Carlos Velazquez	Create review batches in Reveal from Pep Boy's document production for all reviewers.	0.70	185.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/04/23	Carlos Velazquez	Upload IAG's document production to Reveal for review by legal team.	2.30	609.50
04/04/23	Carlos Velazquez	Create review batches from IAG document production for all reviewers.	0.70	185.50
04/04/23	Carlos Velazquez	Export requested Grant Thornton documents from Reveal to be sent to FTI.	0.80	212.00
04/04/23	Carlos Velazquez	Export all documents designated as Hot as of 04/04/2023 in Reveal to be sent to FTI for review.	0.80	212.00
04/04/23	Brandon Keaton	Work on pre-mediation discovery matters.	0.50	172.50
04/04/23	Brandon Keaton	Review document production.	7.50	2,587.50
04/04/23	Brian N. Hail	Review status on potential claims and causes of action.	6.20	4,619.00
04/04/23	Andrew Robertson	Work on pre-mediation discovery matters(1.1); Document review of documents produced by IEH and Pep Boys(2.5).	3.60	1,566.00
04/04/23	Joseph M. Coleman	Exchange e-mails with B. Clark regarding investigation(.1); E-mail J. Kane regarding investigation(.1); Work on develop of claims and review of documents(2.10); Review documents and work on investigation(.7); Confer with M. Diaz(.3); Work on deposition issues(.3).	3.60	2,790.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/04/23	John J. Kane	Calls and e-mails regarding mediation, mediation location, mediation-related discovery, availability of witnesses for depositions, locations of depositions, location of mediation, related logistical and discovery related issues(2.1); Hot document review(2.3); Review meeting with review team(.8); Follow up work on key documents for themes, preparation of Hot doc folders, mediation document support and prep(.8).	6.00	3,480.00
04/04/23	JaKayla DaBera	Review document production.	3.70	1,424.50
04/05/23	John J. Kane	Continue Hot document review(2.6); Document review team meeting, direct focus, work on review logistics(.7); Follow up review of supplements from review team(.4); Coordinate with deposing attorneys regarding key documents and themes from review(.6); Calls and discussions with J. Coleman, mediation team members regarding strategic considerations(.8).	5.10	2,958.00
04/05/23	Joseph M. Coleman	Examine e-mail from A. Grossi regarding deposition schedule(.1); Document review and continue with development of causes of action(.5).	0.60	465.00
04/05/23	Joseph M. Coleman	Attend to numerous e-mails regarding discovery, mediation, Creditors' meeting, and respond as appropriate(.4); Begin reviewing documents key documents for insider litigation(4.9); Review legal research and begin analysis(2.1).	7.40	5,735.00
04/05/23	Brian N. Hail	Analyze newly produced documents in connection with investigation of claims on causes of actions.	6.20	4,619.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/05/23	Brian N. Hail	Coordinate 2004 deposition issues.	1.00	745.00
04/05/23	Brandon Keaton	Work on pre-mediation discovery matters.	0.80	276.00
04/05/23	Brandon Keaton	Continue reviewing document production.	6.80	2,346.00
04/05/23	Carlos Velazquez	Upload Pep Boy's Informal Production to Reveal for review by legal team.	2.60	689.00
04/05/23	Carlos Velazquez	Create review batches from Pep Boy's Informal Production for all reviewers.	0.70	185.50
04/05/23	JaKayla DaBera	Review document production including attention to analysis of causes of action.	9.10	3,503.50
04/05/23	Carlos Velazquez	Upload supplemental AEP/Icahn Holdings document production to Reveal for review by legal team.	2.90	768.50
04/05/23	Carlos Velazquez	Create review batches from AEP-Icahn Holding's document production for all reviewers.	0.70	185.50
04/05/23	Carlos Velazquez	Create review batches from Pep Boy's supplemental Production to for all reviewers.	0.70	185.50
04/05/23	Carlos Velazquez	Upload Pep Boy's supplemental Production to Reveal for review by legal team.	2.40	636.00
04/05/23	Connie Nims	Draft PowerPoint to be used to present Unsecured Creditor's case during mediation.	3.20	752.00
04/05/23	Carlos Velazquez	Export all documents designated as Hot as of 04/05/2023 in Reveal to be sent to FTI for review.	0.70	185.50
04/05/23	Carlos Velazquez	Export all documents designated as Financial as of 04/04/2023 in Reveal to be sent to FTI for review.	0.80	212.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/05/23	Carlos Velazquez	Export all documents from Reveal designated Hot documents as of 04/05/2023 with a Neyrey hit for review by legal team.	0.60	159.00
04/05/23	Brian W. Clark	Continue review of documents with focus on key documents(3.7); Prepare for depositions(.8); Prepare for mediation(.8); E-mails with other counsel regarding document production(.2); Analysis of possible causes of action(.5).	6.00	3,210.00
04/05/23	Olivia Salvatierra	Prepare document production and research files in preparation for 04/07/23 deposition.	8.70	1,957.50
04/05/23	S. Kyle Woodard	Begin working on mediation PowerPoint.	0.50	220.00
04/05/23	Reuel Coles	Travel to and from Southern District Bankruptcy Court to review procedures for presenting hearing exhibits in Judge Lopez's courtroom.	1.30	357.50
04/05/23	Michael P. Ridulfo	Work on issues relating to 2004 examinations and communications with counsel regarding same(1.3); Revise 2004 notices(.4); Review documents produced by no-debtors and debtors(1.7); Prepare for non-party 2004 exams(2.5).	5.90	3,569.50
04/05/23	Michael P. Ridulfo	Review summary of schedules and SOFA(1.0); Review documents regarding and prepare for creditor meeting(2.5).	3.50	2,117.50
04/05/23	Collin Delano	Research regarding unsecured creditors' potential claims.	3.60	1,422.00
04/05/23	Collin Delano	Pre-mediation discovery matters.	0.80	316.00
04/05/23	Collin Delano	Review of document production.	3.40	1,343.00
04/06/23	Collin Delano	Review of document production.	6.00	2,370.00
04/06/23	Collin Delano	Pre-mediation discovery matters.	1.50	592.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/06/23	Collin Delano	Research regarding unsecured creditors' potential claims.	0.90	355.50
04/06/23	Michael P. Ridulfo	Communications with counsel regarding upcoming 2004 exams(.6); Finalize amended 2004 notices(.5); Revise outline of Neyrey questions(.4); Review Hot documents from various non-debtor document productions(6.0); Prepare initial outline for Pep Boys/IAG 2004(.8).	8.30	5,021.50
04/06/23	Reuel Coles	Coordinate scheduling of Rule 2004 Examinations(1.0).	1.00	275.00
04/06/23	Reuel Coles	Review and organization of documents for Rule 2004 Examinations.	3.50	962.50
04/06/23	S. Kyle Woodard	Review changes to agreed order extending challenge period.	0.20	88.00
04/06/23	Olivia Salvatierra	Prepare and update research and document production files for 04/07/23 deposition.	9.20	2,070.00
04/06/23	S. Kyle Woodard	Review proposed mediation order and challenge order revisions.	0.20	88.00
04/06/23	Brian W. Clark	Continue review of documents(3); Prepare for depositions(1.5); Prepare for mediation(.7); Coordinate with FTI(.1); Phone with IAG/PB counsel regarding deposition topics(.2); Phone with Debtors' counsel regarding e-mail production(.1).	5.60	2,996.00
04/06/23	Carlos Velazquez	Upload AEP-Incahn Holdings' supplemental Production to Reveal for review by legal team.	2.90	768.50
04/06/23	Carlos Velazquez	Export all transition services agreement from Reveal for review by legal team.	0.80	212.00
04/06/23	Carlos Velazquez	Create review batches from Debtor's supplemental production for all reviewers.	0.70	185.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/06/23	Carlos Velazquez	Upload Debtor's supplemental production to Reveal for review by legal team.	1.80	477.00
04/06/23	Carlos Velazquez	Create review batches from AEP-Incahn Holdings' supplemental Production for all reviewers.	0.70	185.50
04/06/23	Carlos Velazquez	Export all documents designated as financial as of 04/06/2023 in Reveal to be sent to FTI for review.	0.60	159.00
04/06/23	Carlos Velazquez	Export all documents designated as Hot as of 04/06/2023 in Reveal to be sent to FTI for review.	0.70	185.50
04/06/23	Carlos Velazquez	Export all documents from Reveal designated Hot documents as of 04/06/2023 with a Neyrey hit for review by legal team.	0.90	238.50
04/06/23	Connie Nims	Draft PowerPoint to be used to present Unsecured Creditor's case during mediation.	1.90	446.50
04/06/23	Carlos Velazquez	Export all Pep Boys Store Leases from Reveal to be sent to FTI for review.	0.60	159.00
04/06/23	Brian N. Hail	Analyze documents produced in connection with investigation of claims and causes of action against non-debtor affiliates.	7.00	5,215.00
04/06/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	2.80	1,218.00
04/06/23	Brandon Keaton	Review document production.	4.00	1,380.00
04/06/23	Brandon Keaton	Work on pre-mediation discovery matters.	0.50	172.50
04/06/23	Joseph M. Coleman	Review documents produced(2.9); Communications regarding review team, document production and related issues(.7); Work on mediation prep(.9); Begin deposition prep for Neyrey deposition(1.50).	6.00	4,650.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/06/23	John J. Kane	Additional Hot doc review.	0.80	464.00
04/06/23	John J. Kane	Document review update meeting.	0.50	290.00
04/06/23	JaKayla DaBera	Review document production including attention to analysis of causes of action.	6.80	2,618.00
04/07/23	JaKayla DaBera	Analysis of claims and causes of action; Continue reviewing document production.	8.10	3,118.50
04/07/23	John J. Kane	Hot Doc document review in support of mediation preparation(3.8); Review team meeting(.8); Follow up status call with deposition and discovery team leaders(.6); Follow up work with J. Coleman on mediation strategy, deposition preparation and logistical considerations(.3).	5.50	3,190.00
04/07/23	Joseph M. Coleman	Call with IEH team(1.1); Work on Neyrey deposition prep and review of documents(4.4); FTI call(.6); Work on development of causes of action(.9); Continue review of documents(.5).	7.50	5,812.50
04/07/23	Brandon Keaton	Work on pre-mediation discovery matters.	0.60	207.00
04/07/23	Brandon Keaton	Review document production.	5.50	1,897.50
04/07/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	3.10	1,348.50
04/07/23	Brian N. Hail	Analyze key claims on causes of action against non-debtor affiliates.	6.00	4,470.00
04/07/23	Brian W. Clark	Continue review and analysis of Hot documents(5.7); Prepare for mediation(.8); Prepare for depositions(1.4); Coordinate with FTI(.4).	8.30	4,440.50
04/07/23	S. Kyle Woodard	Work on prelitigation discovery issues.	0.50	220.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/07/23	S. Kyle Woodard	Follow up with J. Kane regarding discovery issues.	0.20	88.00
04/07/23	S. Kyle Woodard	Work on mediation PowerPoint.	2.30	1,012.00
04/07/23	S. Kyle Woodard	Research regarding mediation PowerPoint and continue working on the same.	3.20	1,408.00
04/07/23	Reuel Coles	Continue coordinating scheduling of Rule 2004 Examinations.	1.00	275.00
04/07/23	Michael P. Ridulfo	Review documents productions and prepare for upcoming 2004 Exams.	8.50	5,142.50
04/07/23	Collin Delano	Pre-mediation discovery matters.	0.50	197.50
04/07/23	Collin Delano	Review of document production.	2.00	790.00
04/08/23	Collin Delano	Review of document production.	1.00	395.00
04/08/23	Michael P. Ridulfo	Review documents and preparing for upcoming 2004's.	4.00	2,420.00
04/08/23	Brian W. Clark	Continue review and analysis of potentially key documents(.8); Prepare for depositions(.4); Prepare for mediation(.5).	1.70	909.50
04/08/23	Connie Nims	Draft PowerPoint to be used to present Unsecured Creditor's case during mediation.	1.30	305.50
04/08/23	Brian N. Hail	Draft PowerPoint presentation for mediation.	4.00	2,980.00
04/08/23	Brian N. Hail	Analyze issues in connection with upcoming 2004 deposition.	4.00	2,980.00
04/08/23	Brandon Keaton	Review document production.	2.50	862.50
04/08/23	Joseph M. Coleman	Review documents, work on Neyrey deposition prep and mediation PowerPoint(12.6).	12.60	9,765.00
04/08/23	JaKayla DaBera	Analysis of claims and causes of action; Continue reviewing document production.	9.10	3,503.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/09/23	Joseph M. Coleman	Work on Neyrey deposition(3.5); Review documents(2.4); Conference call with FTI and review documents regarding same(1.1).	7.00	5,425.00
04/09/23	Brandon Keaton	Review document production.	7.80	2,691.00
04/09/23	Brian W. Clark	Teams call with FIT(1.3).	1.30	695.50
04/09/23	Michael P. Ridulfo	Review document productions and prepare for upcoming 2004's.	8.50	5,142.50
04/10/23	Michael P. Ridulfo	Review document productions and prepare for upcoming 2004's.	8.20	4,961.00
04/10/23	Collin Delano	Pre-mediation discovery matters.	0.60	237.00
04/10/23	Collin Delano	Review of document production.	5.30	2,093.50
04/10/23	S. Kyle Woodard	Work on equitable subordination portion of mediation PowerPoint.	1.80	792.00
04/10/23	S. Kyle Woodard	Work on issue-proof outline for mediation, specifically related to recharacterization of debt claim.	5.30	2,332.00
04/10/23	S. Kyle Woodard	Continue work on mediation PowerPoint.	3.20	1,408.00
04/10/23	S. Kyle Woodard	Work on mediation PowerPoint.	4.00	1,760.00
04/10/23	Olivia Salvatierra	Assist with preparation of production of documents for 4/12/23 deposition.	3.00	675.00
04/10/23	Brian W. Clark	Prepare for depositions(.5); Work on overall case analysis in preparation for mediation(3.5); Continue review and analysis of document production(3.8).	7.80	4,173.00
04/10/23	Connie Nims	Draft PowerPoint to be used to present Unsecured Creditor's case during mediation.	4.90	1,151.50
04/10/23	JaKayla DaBera	Review document production.	7.00	2,695.00
04/10/23	Carlos Velazquez	Upload Pep Boy's Informal Production to Reveal for review by legal team.	1.50	397.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/10/23	Carlos Velazquez	Create review batches from Pep Boy's Informal Production for all reviewers.	0.70	185.50
04/10/23	Brandon Keaton	Review document production.	4.10	1,414.50
04/10/23	Brandon Keaton	Work on pre-mediation discovery matters.	0.60	207.00
04/10/23	Brandon Keaton	Review document production.	0.70	241.50
04/10/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	4.90	2,131.50
04/10/23	Brian N. Hail	Confer with FTI regarding 2004 examination issues on potential damages.	1.50	1,117.50
04/10/23	Brian N. Hail	Draft PowerPoint for mediation.	2.00	1,490.00
04/10/23	Joseph M. Coleman	Go through voluminous documents and prep for Neyrey's deposition(8.5); Analysis of potential claims and causes of action(.8).	9.30	7,207.50
04/11/23	Joseph M. Coleman	Prep for Neyrey deposition(8.2); Work on mediation preparation(3.8).	12.00	9,300.00
04/11/23	John J. Kane	Work on mediation presentation PowerPoint in support of plan proposal, distribution to unsecured creditors.	2.90	1,682.00
04/11/23	John J. Kane	Review documents and coordinate with review team regarding key issues and hot documents in support of mediation position for potential case resolution through development of Plan.	0.90	522.00
04/11/23	Bree Kimball	Prepare timeline binder.	1.30	273.00
04/11/23	Brian W. Clark	Continue review and analysis of key documents (3.3); Work on timeline of key events (.5); Prepare for depositions (.8); Prepare for mediation (1.8).	6.40	3,424.00
04/11/23	Brandon Keaton	Review document production.	6.10	2,104.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/11/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	3.00	1,305.00
04/11/23	Carlos Velazquez	Export all documents designated as financial as of 04/11/2023 in Reveal to be sent to FTI for review.	0.90	238.50
04/11/23	Carlos Velazquez	Search for all documents with a 80-100 AI score line for any financial tags.	0.50	132.50
04/11/23	JaKayla DaBera	Review document production.	7.00	2,695.00
04/11/23	Connie Nims	Draft PowerPoint to be used to present Unsecured Creditor's case during mediation.	5.20	1,222.00
04/11/23	Collin Delano	Pre-mediation discovery matters.	0.50	197.50
04/11/23	Collin Delano	Review of document production.	5.10	2,014.50
04/11/23	Michael P. Ridulfo	Attention to issues for Neyrey 2004(1.3); Continue review of produced documents(2.0); Prepare for Nevin 2004(5.5).	8.80	5,324.00
04/11/23	S. Kyle Woodard	Continue researching issues related to litigation claims, including recharacterization and equitable subordination(4.7); Work on issue-proof outline for mediation(3.2).	7.90	3,476.00
04/11/23	S. Kyle Woodard	Work on numerous aspects of mediation PowerPoint(4.5); Research and support on draft of litigation Complaint(2.3).	6.80	2,992.00
04/12/23	S. Kyle Woodard	Work on mediation PowerPoint and exhibits to be included therein.	3.80	1,672.00
04/12/23	S. Kyle Woodard	Continue working on mediation outline and presentation.	1.90	836.00
04/12/23	Michael P. Ridulfo	Listen in on 2004 Exam of Michael Neyrey(5.5); Prepare for Nevin 2004(6.0).	11.50	6,957.50
04/12/23	Collin Delano	Pre-mediation discovery matters.	0.70	276.50
04/12/23	Collin Delano	Review of document production.	5.50	2,172.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/12/23	Reuel Coles	Continue review and organization of documents for Rule 2004 Examinations(2.1).	2.10	577.50
04/12/23	Olivia Salvatierra	Assisted with research of documents received regarding Debtors for 4/19/23 and 4/20/23 depositions.	0.20	45.00
04/12/23	Connie Nims	Review and compile documents to be used during Willetts' deposition.	0.60	141.00
04/12/23	Connie Nims	Draft PowerPoint to be used to present Unsecured Creditor's case during mediation.	0.80	188.00
04/12/23	Brian W. Clark	Prepare for mediation including working on PowerPoint presentation(.8); Prepare for remaining depositions(.7); Attend portions of Neyrey deposition via Zoom(.4); Continue review and analysis of key documents(.7); E-mails with N. Rose regarding IAG/Pep Boys topics(.1).	2.70	1,444.50
04/12/23	JaKayla DaBera	Review document production.	9.30	3,580.50
04/12/23	JaKayla DaBera	Review chart of plan provisions in preparation for call with M. Warner; Call with M. Warner regarding same.	0.60	231.00
04/12/23	JaKayla DaBera	E-mail to J. Coleman with summary of call; Review provisions for mediation strategy.	0.60	231.00
04/12/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	5.00	2,175.00
04/12/23	Brandon Keaton	Review document production.	5.30	1,828.50
04/12/23	Brandon Keaton	Work on pre-mediation discovery matters.	0.50	172.50
04/12/23	Bree Kimball	Organize timeline binder with all information as requested by attorney.	1.70	357.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/12/23	Brian N. Hail	Analyze documents on issues in connection with preparation for IEH 2004 deposition.	2.30	1,713.50
04/12/23	Brian N. Hail	Analyze claims against non-debtor affiliates.	1.20	894.00
04/12/23	Brian N. Hail	Prepare PowerPoint for mediation.	1.30	968.50
04/12/23	Joseph M. Coleman	Prep for and take Neyrey's deposition(11.5); Multiple telephone conferences with M. Cavanaugh regarding mediation and related issues(.9); Outline mediation to do's, strategies and e-mail to IEH team(.9); Telephone conferences and e-mail communications with M. Diaz, M. Ridulfo, Vienna Flores, J. Kane, B. Hail and M. Warner in prep for mediation(1.8); Organize deposition exhibits(.8).	15.90	12,322.50
04/13/23	John J. Kane	Mediation strategy work, mediation proposal development, plan outline work.	2.30	1,334.00
04/13/23	John J. Kane	Review meeting and assess hot documents in preparation for mediation, preparation of plan proposal for Judge Jones' review(.5); Follow up with C. Bankler(.1).	0.60	348.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/13/23	Joseph M. Coleman	IEH Team meeting regarding key documents and items from depositions(1.1); Work on submission to Judge Jones(5.2); E-mails to mediation team(.4); Draft memo regarding mediation issues, dynamics and related issues(2.6); Telephone conferences with A. Grossi regarding mediation(.3); Telephone conference with M. Cavanaugh regarding same(.3); E-mail Committee Members attending mediation(.2); E-mail Committee Member's counsel regarding submission to Judge Jones(.2).	10.30	7,982.50
04/13/23	John J. Kane	Assist with preparation of mediation proposal for Judge Jones.	0.40	232.00
04/13/23	Brian N. Hail	Preparation for Willets 2004 depositions.	8.00	5,960.00
04/13/23	Brian N. Hail	Prepare for mediation.	2.00	1,490.00
04/13/23	Brian W. Clark	Analyze issues relating to potential litigation and mediation(1.4); Review transcript of Neyrey deposition (1.8); Work on presentation for Mediator(.5); Review key documents(.3).	4.00	2,140.00
04/13/23	Brandon Keaton	Review document production.	5.50	1,897.50
04/13/23	Brandon Keaton	Attention to pre-mediation discovery matters.	0.60	207.00
04/13/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	0.80	348.00
04/13/23	JaKayla DaBera	Review document production.	7.00	2,695.00
04/13/23	JaKayla DaBera	Draft memo regarding mediation strategy.	1.70	654.50
04/13/23	Connie Nims	Review and compile exhibits to be used during Willets' deposition.	4.90	1,151.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/13/23	Olivia Salvatierra	Locating and sending copies of requested documents for J. Coleman's review.	0.20	45.00
04/13/23	Reuel Coles	Attend and assist counsel at Rule 2004 Examination of The Pep Boys and Icahn Automotive Group, LLC(2.5).	2.50	687.50
04/13/23	Collin Delano	Pre-mediation discovery matters.	0.50	197.50
04/13/23	Michael P. Ridulfo	Prepare for and take 2004 exam of M. Nevin.	12.50	7,562.50
04/13/23	S. Kyle Woodard	Meet with KRCL team and work on mediation preparation(2.0); Work on preparation of mediation submission materials(.9).	2.90	1,276.00
04/13/23	S. Kyle Woodard	Work on mediation PowerPoint.	6.80	2,992.00
04/14/23	S. Kyle Woodard	Continue working on mediation PowerPoint(6.7); Review documents related to causes of action(2.0).	8.70	3,828.00
04/14/23	Collin Delano	Review of document production.	7.50	2,962.50
04/14/23	Collin Delano	Pre-mediation discovery matters.	0.80	316.00
04/14/23	Michael P. Ridulfo	Attention to pre-mediation issues(1.2); Attention to issues regarding Complaint(.8); Follow up issues raised in yesterday's Nevin 2004(1.5).	3.50	2,117.50
04/14/23	Olivia Salvatierra	Prepare depositions and exhibits notebooks for mediation.	4.00	900.00
04/14/23	Olivia Salvatierra	Prepare paper and electronic pleadings files for mediation.	0.20	45.00
04/14/23	Connie Nims	Review and compile documents to be used as exhibits during Willetts' deposition, confirm deposition will be video recorded, and discuss logistics of shipping witness exhibits to Miami.	2.20	517.00
04/14/23	Brian W. Clark	Continue review and analysis of key documents.	0.30	160.50
04/14/23	JaKayla DaBera	Attention to causes of action and review document production.	3.30	1,270.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/14/23	Carlos Velazquez	Upload Pep Boy's supplemental production to Reveal for review by legal team.	2.30	609.50
04/14/23	Carlos Velazquez	Create review batches from Pep Boy's new supplemental production for all reviewers.	0.70	185.50
04/14/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	1.40	609.00
04/14/23	Brandon Keaton	Review document production.	6.10	2,104.50
04/14/23	Brandon Keaton	Attention to pre-mediation discovery matters.	0.80	276.00
04/14/23	Brian N. Hail	Preparation for Willets' 2004 Depositions, including review and preparation of Deposition Exhibits.	10.00	7,450.00
04/14/23	Brian N. Hail	Coordinate logistics of 2004 Depositions.	1.00	745.00
04/14/23	John J. Kane	Conference calls with C. Bankler regarding pre-mediation matters, plan outlook issues(.7); Coordinate with J. Coleman regarding same(.4); Work with B. Hail on logistics and deposition points in support of plan, mediation(.4); Work on mediation logistics and follow up with K. Woodard on plan and mediation PowerPoint(.4).	1.90	1,102.00
04/14/23	Joseph M. Coleman	Telephone conference with Committee Chair regarding mediation(.3); Exchange e-mails with counsel for Committee Member regarding mediation(.1); Review Neyrey deposition(4.3); Aid preparation of Willette's deposition(2.3); Work on submission to Judge Jones for mediation(1.7); Review, comment and conference call with FTI regarding exhibits for Mediation submission and PowerPoint(2.1).	10.80	8,370.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/15/23	Joseph M. Coleman	Prep for Willet's deposition(2.0); Examine key documents(2.9); Numerous conference calls and revisions of GUC Recovery Model with FTI(3.3); Work on PowerPoint regarding causes of action(2.8); Work on key document notebook for mediation(.6).	11.60	8,990.00
04/15/23	John J. Kane	Work on plan proposals, support documents, and mediation materials(2.9); Assist B. Hail with deposition prep in support of mediation(1.8).	4.70	2,726.00
04/15/23	Brian N. Hail	Preparation for Willetts' 2004 Depositions, including review of any claims and causes of action.	10.50	7,822.50
04/15/23	Brandon Keaton	Review document production.	4.50	1,552.50
04/15/23	JaKayla DaBera	Assist in mediation preparation.	4.70	1,809.50
04/15/23	JaKayla DaBera	Draft memo summarizing Neyrey deposition.	5.40	2,079.00
04/15/23	Connie Nims	Review and compile documents to be offered during Willetts' deposition.	2.70	634.50
04/15/23	Collin Delano	Review of document production.	3.00	1,185.00
04/15/23	Michael P. Ridulfo	Follow up issues regarding recent depositions and upcoming Willett deposition.	0.80	484.00
04/15/23	S. Kyle Woodard	Work on mediation PowerPoint.	6.80	2,992.00
04/15/23	S. Kyle Woodard	Continue working on mediation PowerPoint.	4.00	1,760.00
04/16/23	Michael P. Ridulfo	Review Nevin 2004 transcript(2.8); Review issued regarding substantive consolidation(1.0).	3.80	2,299.00
04/16/23	S. Kyle Woodard	Work on mediation PowerPoint and preparation of other mediation materials.	6.30	2,772.00
04/16/23	JaKayla DaBera	Review document production.	3.90	1,501.50
04/16/23	Brandon Keaton	Review document production.	6.80	2,346.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/16/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	4.60	2,001.00
04/16/23	Brian N. Hail	Travel to and prepare for Willets' 2004 Deposition.	12.00	8,940.00
04/16/23	Brian W. Clark	Review transcript of Nevin deposition(1.5).	1.50	802.50
04/16/23	Joseph M. Coleman	11:45 examine research issues(7.1); Telephone conference with IEH team members(.3); E-mail Debtors' counsel regarding mediation(.1).	7.50	5,812.50
04/16/23	John J. Kane	Work on mediation presentation(1.0); Review FTI contributions to plan and mediation proposals(.4); Correspondence with C. Bankler regarding plan proposals and mediation(.3); Correspondence with M. Diaz regarding plan modeling, supporting documentation(.4); Work with J. Coleman on strategic matters for plan presentation(.3).	2.40	1,392.00
04/17/23	John J. Kane	Mediation strategy session(1.4); Work on slide deck(1.2); Follow up with review team on documents supporting slide deck and mediation presentation(.8); Work with FTI on mediation slides, reconciliation of numbers(.9); Continue to work with J. Coleman on mediation negotiation outlook, plan elements, review mediation proposal(1.1).	5.40	3,132.00
04/17/23	JaKayla DaBera	Review document production.	0.70	269.50
04/17/23	JaKayla DaBera	Review schedules for mediation preparation.	1.00	385.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/17/23	Joseph M. Coleman	Work on Complaint, key document notebook, mediation submission, PowerPoint and otherwise prepare for mediation(12.0).	12.00	9,300.00
04/17/23	Brian W. Clark	Work on Complaint against Icahn entities(3.6); Work on mediation statement(.5); Work on mediation presentation and preparation(1.7); Continue review of key documents(.6).	6.40	3,424.00
04/17/23	Brian N. Hail	Prepare for and attend Willets' 2004 Deposition.	9.00	6,705.00
04/17/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	8.50	3,697.50
04/17/23	Brandon Keaton	Review document production.	12.90	4,450.50
04/17/23	Connie Nims	Attention to service of Willets' deposition exhibits on opposing counsel.	0.10	23.50
04/17/23	Carlos Velazquez	Perform requested key word text searches in Reveal over all loaded data.	1.20	318.00
04/17/23	Carlos Velazquez	Create work folders in Reveal from all hits identified in key word search.	0.50	132.50
04/17/23	S. Kyle Woodard	Conference with FTI regarding mediation.	1.00	440.00
04/17/23	S. Kyle Woodard	Strategize regarding mediation(.7); Continue working on mediation presentation(1.3).	2.00	880.00
04/17/23	S. Kyle Woodard	Work on mediation PowerPoint.	4.70	2,068.00
04/17/23	Olivia Salvatierra	Located and provided pleading copies in both electronic form and hard copy form in preparation for upcoming mediation to J. Coleman for review.	1.40	315.00
04/17/23	Collin Delano	Review of document production.	1.30	513.50
04/17/23	Collin Delano	Pre-mediation discovery matters.	1.50	592.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/17/23	Michael P. Ridulfo	Review and analyze law re substantive consolidation of non-debtors(1.6); Review second half of draft Nevin 2004(1.2).	2.80	1,694.00
04/17/23	S. Kyle Woodard	Work on mediation PowerPoint and coordinate with J. Gruber regarding FTI slides.	1.60	704.00
04/18/23	S. Kyle Woodard	Revise PowerPoint and add updated FTI slides.	1.40	616.00
04/18/23	S. Kyle Woodard	Strategize regarding mediation and continue preparing materials.	3.00	1,320.00
04/18/23	Michael P. Ridulfo	Review and redline Committee Complaint(1.6).	1.60	968.00
04/18/23	Olivia Salvatierra	Prepare mediation binders.	1.30	292.50
04/18/23	Andrew Robertson	Work on pre-mediation discovery matters.	0.50	217.50
04/18/23	Brandon Keaton	Review document production.	4.50	1,552.50
04/18/23	Brian N. Hail	Incorporate Willets' deposition into Complaint and PowerPoint and otherwise in preparation for mediation.	11.00	8,195.00
04/18/23	Brian W. Clark	Prepare for mediation(.4); Continue review of key documents(.6); Work on complaint against Icahn Holdings and AEP(1.2).	2.20	1,177.00
04/18/23	Joseph M. Coleman	Finalize draft Complaint, PowerPoint and prep for mediation(3.8); Follow up regarding open issues regarding tax allocation, \$124 mm interco, Dark Rent and related issues(.9); Examination of key documents(1.1); Telephone conference with M. Daiz regarding FTI's slides and open issues(.3); E-mail to A. Grossi (.2); Mediation prep(4.9); Meeting with Committee Members attending mediation in preparation for same(1.1).	12.30	9,532.50

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04/18/23	JaKayla DaBera	Review document production.	3.00	1,155.00
04/18/23	John J. Kane	Mediation travel (5.0); Work on mediation presentation, walk through slide deck, prepare key points for session with J. Jones(1.4).	6.40	3,712.00
04/18/23	John J. Kane	Conference with C. Bankler re mediation issues(.8).	0.80	464.00
04/19/23	John J. Kane	Premediation strategy meeting(1.0); Mediation(10.0).	11.00	6,380.00
04/19/23	JaKayla DaBera	Review document production.	3.40	1,309.00
04/19/23	Joseph M. Coleman	Prepare for, meet with the Committee, attend mediation with Judge Jones, finalize term sheet(16.0).	16.00	12,400.00
04/19/23	Brian W. Clark	Review portions of Willett deposition(.6); Attention to key document review(.3).	0.90	481.50
04/19/23	Brian N. Hail	Confer with clients regarding mediation.	1.00	745.00
04/19/23	Brian N. Hail	Attend mediation.	15.00	11,175.00
04/19/23	Brandon Keaton	Final review of document production.	10.40	3,588.00
04/19/23	Andrew Robertson	Document review of additional documents produced by Debtors, Pep Boys, and Ichan entities.	3.40	1,479.00
04/19/23	Collin Delano	Review of document production.	2.20	869.00
04/20/23	Connie Nims	Attention to request from Willetts' stenographer for a digital copy of all proposed exhibits, and forward same.	0.20	47.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/20/23	Joseph M. Coleman	Numerous post-mediation e-mail exchanges in an effort to obtain final signoff from Icahn, including with Judge Jones, A. Grossi, J. Garvey, A. Vandramana, Committee members, FTI, Debtors' counsel(1.10); Exchange e-mails with V. Polnick regarding no sign off from A. Grossi(.1); Telephone conference with M. Cavanaugh(.3); E-mail A. Grossi re finalizing deal and numerous internal discussions(.5); conference call with A. Grossi, Liz Freeman and V. Polnick regarding finalizing deal(.3); Examination of drafts of term sheet, redlines and related review(.6).	2.90	2,247.50
04/20/23	John J. Kane	Work on release language proposed by Sidley team, review DRiV counsel comments, follow up with J. Coleman regarding same(1.3).	1.30	754.00
04/20/23	John J. Kane	Review revisions to term sheet and correspondence regarding same(.4); Follow up with J. Coleman regarding term sheet, Icahn approval timeline(.3).	0.70	406.00
04/21/23	John J. Kane	Work on releases to Term Sheet.	1.60	928.00
04/21/23	Joseph M. Coleman	Work on drafts of terms sheet, release and deal points, including telephone conferences, emails and drafting(1.2).	1.20	930.00
04/22/23	Joseph M. Coleman	Exchange e-mails with A. Grosse regarding 9019, Challenge Period and related issues(.2); Work on exhibit book for 9019(.6).	0.80	620.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/23/23	Joseph M. Coleman	Work on issues in the term sheet settlement with Icahn entities regarding releases(.8); E-mail regarding settlement, 9019 Motion, plan and releases to sidley and JW(.3); Telephone conferences with e-mail exchanges with M. Cavanaugh regarding settlement and 9019(.5); Examine 9019 and begin commenting upon same (.7).	2.30	1,782.50
04/23/23	John J. Kane	Review drafts of release language(1.4); Review comments from Sidley, DRiV, others(.2); Work on draft revised language and supplement releases and release definitions(.7); Follow up with J. Coleman regarding same(.1).	2.40	1,392.00
04/24/23	John J. Kane	Review correspondence regarding term sheet and 9019 negotiations(.4); Conference with J. Coleman regarding releases(.3); Conference call with counsel for AEP, Pep Boys, Debtors regarding release revisions, final release language, KRCL redline and negotiate revised language(.4); Review final revised releases and circulate same to J. Coleman with status update email(.3).	1.40	812.00

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Invoice No.: 494094

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/24/23	Joseph M. Coleman	Telephone conference with M. Diaz regarding 9019 hearing and preparation therefor(.3); Work on comments to 9019 Motion(1.9); Telephone conference with D. Keene regarding status and strategy(.3); E-mail Committee reps who attended mediation with status regarding port(.3); Follow up regarding release portion of term sheet(.2); Telephone conference with M. Cavanaugh regarding 9019 Motion(.3); Examine e-mail from J. Garvey regarding release(.1); Telephone conference with Committee Chair regarding next steps(.3); Telephone conference with M. Diaz regarding same, quantification of admins and related issues(.3); Telephone conference with DRiV's counsel(.2); Exchange e-mails with M. Cavanaugh regarding 9019 Motion(.2); Telephone conference with M. Diaz regarding estimation of secured claim and admin and priority and examine chart regarding same(.4); Telephone conference with A. Grossi regarding settlement related issues(.2).	5.00	3,875.00
04/24/23	Brian W. Clark	Draft summary of discovery and research work done by Committee(.5).	0.50	267.50
04/24/23	Olivia Salvatierra	Prepare copies of original and amended Bankruptcy Rule 2004 Examinations pleadings for J. Coleman for Bankruptcy Rule 9019 hearing.	0.10	22.50

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File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/25/23	Joseph M. Coleman	Work on finalizing release, Term Sheet and 9019 Motion, including telephone conferences with Debtors, AEP and reviewing and commenting upon same and numerous exchanges of e-mails(6.7).	6.70	5,192.50
04/25/23	John J. Kane	Follow up work on releases, conferences with SMP and Interstate Batteries, follow up with DRiV counsel and further revise and supplement release language(3.1); Circulate to Sidley and JW teams and follow up with same and obtain final approval(.4); Coordinate with J. Coleman regarding same(.2).	3.70	2,146.00
04/26/23	Joseph M. Coleman	Comment upon 9019 and revise same(1.1); Review JW's comments and telephone conference with C. Bankler regarding same(.4); Examine e-mails regarding finalizing 9019 Motion and respond as appropriate(.2); Telephone conference with A. Grossi regarding same(.2); Telephone conference with J. Garvey regarding 9019(.2); Review final comments and review and finalize 9019 Motion(.6); Work on witness and exhibit list(.1).	2.80	2,170.00
04/27/23	John J. Kane	Coordinate with J. Coleman regarding 9019 timing and logistical issues, alternative strategy considerations in light of Icahn's failure of execution.	0.60	348.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/27/23	Joseph M. Coleman	E-mails and telephone conferences regarding finalizing Committee Members signing off on term sheets(.9); E-mail regarding same to JW and Sidley(.1); Work on W&E List and e-mail draft to Debtors and Sidley(.4); Several telephone conferences and e-mail exchanges regarding finalizing 9019, obtaining AEP's signature and related issues(.9); Telephone conference with V. Polnick regarding 9019 and finalizing settlement(.2).	2.50	1,937.50
04/28/23	Joseph M. Coleman	Telephone conferences and e-mail exchanges with V. Polnick, M. Cavanaugh, A. Grossi, J. Kane and others regarding Finalizing term sheet, DIP Hearing, settlement, contingencies, witness and exhibit list, and related matters due to delay in AEP signing the term sheet(1.2); Exchange e-mails with Icahn's counsel regarding finalizing the settlement(.3); Exchange e-mails regarding Pep Boys request to extend the Bar Date(.2).	1.70	1,317.50
04/28/23	Joseph M. Coleman	Review several e-mails from Sidley and JW, confirm latest version of 9019 Motion, e-mail regarding same and regarding Committee's signature pages to Term Sheet supporting settlement(.6).	0.60	465.00
04/28/23	John J. Kane	Work with J. Coleman on strategy considerations in light of Icahn's lack of sign-off on term sheet and settlement.	0.40	232.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/29/23	Joseph M. Coleman	Examine e-mails from J. Garvey, P. Boland, V. Polnick, J. Kane, M. Diaz and respond as appropriate(.4); E-mail to Debtors authorizing the release of the Committee's signature pages(.1); Exchange e-mails with J. Kane and begin to prep for 9019 approval hearing(.2).	0.70	542.50
Total			1,147.30	\$605,402.50

Asset Disposition

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/13/23	Collin Delano	Review of document production.	1.30	513.50
04/21/23	Joseph M. Coleman	Examine e-mail with issues on bidding procedures, telephone conferences regarding same and finalize Committee's position on the issue(.4).	0.40	310.00
04/24/23	Joseph M. Coleman	Examine e-mail from M. Diaz regarding auction(.1); Extended telephone conference with M. Diaz regarding same(.5); Examine bidding procedures regarding same(.7); Telephone conferences with M. Ridulfo and M. Diaz regarding demands by Lincoln and examine emails regarding same, respond to e-mails(.8).	2.10	1,627.50
04/24/23	Michael P. Ridulfo	Review proposal from Lender regarding change to Bid Procedures(.2); Review Bid Procedures and e-mail regarding issues regarding same(.5).	0.70	423.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/25/23	Joseph M. Coleman	Telephone conference with M. Cavanaugh regarding issues with sale(.2); Review e-mails, discuss with M. Diaz and draft response(.8); Obtain input from M. Ridulfo, M. Daiz and finalize and send responsive e-mail(.6); Examine numerous objections and related pleadings regarding cure costs, sale and related matters(.3).	1.90	1,472.50
04/26/23	Joseph M. Coleman	Telephone conference with Bidder's counsel and report to V. Polinick (.5); Exchange e-mails regarding same(.2); Telephone conference with FTI regarding same(.3); Telephone conference with V. Flores regarding abandonment issues and liquidation value(.3); Review issues with a Bidder, telephone conference with JS and with Bidder's counsel, exchange e-mails and follow up(.9).	2.20	1,705.00
04/27/23	Joseph M. Coleman	Telephone conference with Bidder regarding issues(.2); Telephone conference with M. Diaz regarding bidding, Auction and related issues(.3); Exchange e-mails with M. Duffy, Committtee Chair, regarding Auction(.1); Examine e-mail from Bidder and e-mail Debtor regarding same(.2); Telephone conference with M. Diaz regarding Auction(.2); E-mail exchange with Committee Chair regarding Auction(.1); Follow up telephone conference with M. Diaz regarding auction, bidding and related issues(.3).	1.40	1,085.00
Total			10.00	\$7,137.00

Relief from Stay/Adequate Protection Proceedings

Invoice Date: 05/09/23

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File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/25/23	JaKayla DaBera	Review motion to lift stay pleadings including the insurance policy at issue.	1.10	423.50
04/25/23	JaKayla DaBera	Talk with L. Freeman regarding motion to lift stay.	0.20	77.00
04/25/23	Don Waltz	Review e-mail from J. Debera regarding analysis necessary as to policy and begin review of policy.	1.00	550.00
04/26/23	Don Waltz	Analyze Chubb policy to determine whether fronted policy with the deductible at limits would result in Debtor having to satisfy any third-party claims filed by personal injury auto plaintiff.	1.30	715.00
04/26/23	JaKayla DaBera	Follow up with E. Meraia on motion to lift stay.	0.10	38.50
04/26/23	JaKayla DaBera	Attention to D. Waltz email regarding insurance policy.	0.20	77.00
Total			3.90	\$1,881.00

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/03/23	Joseph M. Coleman	Extended telephone conference with M. Hulteen, Chair of Committee(.5); Examine e-mail from DRiV's in-house counsel, review bylaws and respond(.3); Telephone conference with M. Duffy, DRiV regarding [REDACTED] (.3); Status report to Committee(.6).	1.70	1,317.50
04/04/23	Joseph M. Coleman	Exchange e-mails with Committee Members about [REDACTED] (.4).	0.40	310.00
04/04/23	Joseph M. Coleman	Exchange e-mails with creditors(.1); Prepare Agenda for Committee call(.7).	0.80	620.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/06/23	Joseph M. Coleman	Prepare for and conduct Committee Meeting(1.7); Follow up call with M. Duffy, the new Chair(.3); Exchange e-mails with Creditor's counsel(.1).	2.10	1,627.50
04/06/23	John J. Kane	Committee Meeting(1.0); Post-meeting follow up with J. Coleman(.2).	1.20	696.00
04/06/23	Michael P. Ridulfo	Attend creditor meeting.	1.00	605.00
04/06/23	Michael P. Ridulfo	Attend Committee Meeting Zoom(.8).	0.80	484.00
04/06/23	Olivia Salvatierra	Attend and take minutes of weekly Committee meeting; Prepare Minutes for J. Coleman.	1.40	315.00
04/10/23	Olivia Salvatierra	Update 04/06/23 Committee Meeting Minutes memo.	0.20	45.00
04/13/23	Joseph M. Coleman	Exchange e-mails with attorney for creditor.	0.10	77.50
04/14/23	Joseph M. Coleman	Prepare for and conduct conference call with committee members who are attending mediation(1.8); Follow up telephone conference with Committee Chair(.2).	2.00	1,550.00
04/15/23	Joseph M. Coleman	Status report to Committee(.3).	0.30	232.50
04/18/23	Joseph M. Coleman	Substantive status report to Committee(.7); Telephone conference with M. Duffy, Committee Chair, regarding meditation(.3).	1.00	775.00
04/20/23	Joseph M. Coleman	Numerous calls and e-mails with Committee Members [REDACTED] [REDACTED] [REDACTED](1.1).	1.10	852.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/21/23	Joseph M. Coleman	Detailed e-mail to Committee regarding status of mediated settlement and next steps and issues(.6); Examine Committee Members' comments to release and respond to each comment(.8); Telephone conference with key creditors regarding status and next steps(.3).	1.70	1,317.50
04/24/23	Joseph M. Coleman	Telephone conference with creditors regarding settlement(.3); Detailed e-mail to Committee regarding settlement(.6); Telephone conference with DRiV's counsel regarding settlement and next steps(.2).	1.10	852.50
04/25/23	Joseph M. Coleman	Draft agenda for Committee Meeting, including exhibits related to same(1.10); Telephone conference with attorney for Gates, large unsecured creditor regarding mediation, settlement and related issues(.3).	1.40	1,085.00
04/25/23	Olivia Salvatierra	Update agenda for 04/26/23 Committee Meeting.	0.10	22.50
04/26/23	Olivia Salvatierra	Attend and take minutes of Committee Meeting 04/26/23; prepare Minutes memo.	1.40	315.00
04/26/23	Olivia Salvatierra	Track and save signed Term Sheets from Committee Members.	0.20	45.00
04/26/23	S. Kyle Woodard	Follow up on proof of claim issues for Committee Meeting.	0.20	88.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/26/23	Joseph M. Coleman	Prepare for and participate in Committee Meeting(1.6); Follow up calls with counsel for Committee Members(.3); Examine e-mail from M. Diaz regarding same(.1); Answer follow up questions from Committee Members regarding [REDACTED](.5); E-mail Committee Members regarding term sheet execution(.1); Follow up with Committee Chair regarding 9019 Motion and term sheet execution(.2).	2.80	2,170.00
04/26/23	John J. Kane	Prepare for and attend Committee Meeting addressing 9019, settlement releases and term sheet.	1.30	754.00
04/27/23	Olivia Salvatierra	Compiled all signed Term Sheets/Releases by Committee members and provided to J. Coleman.	0.10	22.50
04/27/23	Olivia Salvatierra	Update internal [REDACTED].	0.10	22.50
04/27/23	Olivia Salvatierra	Start preparation of Committee expenses reimbursement fee app.	0.20	45.00
04/28/23	Joseph M. Coleman	Status report to the Committee; Exchange e-mails with Committee Member(.6).	0.60	465.00
04/28/23	S. Kyle Woodard	Phone call with creditor regarding claims.	0.10	44.00
04/30/23	Joseph M. Coleman	Detailed status report to the Committee.	0.70	542.50
Total			26.10	\$17,298.50

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/03/23	Olivia Salvatierra	Prepare KRCL monthly fee statement spreadsheet.	0.40	90.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/03/23	S. Kyle Woodard	Update declaration in support of KRCL employment application.	2.50	1,100.00
04/03/23	S. Kyle Woodard	Work on issues related to supplemental employment declaration.	1.00	440.00
04/03/23	Joseph M. Coleman	Additional due diligence and work on Amended Declaration in support of KRCL fee application(.5).	0.50	387.50
04/04/23	Joseph M. Coleman	Examine and finalize supplemental Declaration(.3); Briefly examine Portage's monthly fee application(.1); Examine e-mail exchange with UST regarding amended Declaration(.1).	0.50	387.50
04/04/23	S. Kyle Woodard	Follow up on issues related to KRCL fee app(.2); Correspondence with UST regarding amended declaration(.2).	0.40	176.00
04/04/23	Olivia Salvatierra	Work on KRCL monthly fee statement spreadsheet.	0.30	67.50
04/04/23	Olivia Salvatierra	Prepare two certificates of no objection.	0.50	112.50
04/05/23	S. Kyle Woodard	Prepare certificates of counsel related to employment applications(.4); Incorporate UST comments into FTI proposed employment order and follow up with UST regarding the same(.5).	0.90	396.00
04/05/23	S. Kyle Woodard	File certificates of counsel and orders on KRCL and FTI fee apps.	0.20	88.00
04/05/23	S. Kyle Woodard	File amended declaration in support of KRCL employment application.	0.30	132.00
04/05/23	Joseph M. Coleman	Finalize and file amended Declaration in support of the employment of KRCL(.3).	0.30	232.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/05/23	JaKayla DaBera	Attention to proposed order approving retention of FTI including isolating same into a separate document.	0.20	77.00
04/06/23	S. Kyle Woodard	Follow up on KRCL fees and employment matters.	0.10	44.00
04/06/23	S. Kyle Woodard	Prepare monthly fee statement.	1.00	440.00
04/12/23	S. Kyle Woodard	Correspondence with Court regarding proposed order on KRCL employment application(.1); Revise and reupload proposed order(.2).	0.30	132.00
04/20/23	Joseph M. Coleman	Work on fee statements for February and March time.	0.20	155.00
04/21/23	Joseph M. Coleman	Work on fee application issues(.5).	0.50	387.50
04/21/23	S. Kyle Woodard	Finalize and file first monthly fee statement.	0.40	176.00
04/24/23	Joseph M. Coleman	Work on monthly fee application(.4); E-mail regarding estimated fees per portage's request(.2).	0.60	465.00
04/27/23	S. Kyle Woodard	Prepare KRCL monthly fee statements and exhibits for the same.	3.10	1,364.00
04/27/23	S. Kyle Woodard	Phone call with FTI(.2); Review and finalize FTI fee statement for filing(.7); Exchange correspondence with FTI regarding the same(.2); Correspondence with courtroom deputy regarding employment orders(.2).	1.30	572.00
04/27/23	Joseph M. Coleman	Work on FTI and KRCL fee statements for March time/April Invoice(.6); Examine several e-mails and requests for reimbursements from Committee Members attending mediation(.2).	0.80	620.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/27/23	Olivia Salvatierra	E-file FTI's first monthly fee statement and KRCL's second monthly fee statement and serve same.	0.30	67.50
04/28/23	Olivia Salvatierra	Prepare Committee Expense Fee App and exhibits for J. Coleman	1.30	292.50
Total			17.90	\$8,402.00

Fee/Employment Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/05/23	S. Kyle Woodard	Follow up on issues related to OCP motion(.2); Phone call with M. Diaz(.1).	0.30	132.00
Total			0.30	\$132.00

Assumption/Rejection of Leases and Contracts

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/25/23	JaKayla DaBera	Summarize and track all cure objections.	1.60	616.00
04/26/23	JaKayla DaBera	Attention to objections to cure amounts.	0.20	77.00
Total			1.80	\$693.00

Other Contested Matters (excl. assumption/rejection motions)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/04/23	S. Kyle Woodard	Phone calls with E. Meraia at JW regarding ordinary course professionals motion.	0.30	132.00
Total			0.30	\$132.00

Non-Working Travel

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/11/23	Joseph M. Coleman	Travel to Atlanta, GA for Neyrey deposition.	4.00	3,100.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/12/23	Joseph M. Coleman	Non-working travel back from Neyrey deposition	2.00	1,550.00
04/18/23	Joseph M. Coleman	Travel to NY for mediation (non-working).	2.00	1,550.00
04/20/23	Joseph M. Coleman	Non-work travel.	4.00	3,100.00
04/20/23	Brian N. Hail	Travel to Dallas from mediation.	7.50	5,587.50
Total			19.50	\$14,887.50

Business Operations

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/23	Joseph M. Coleman	Examine SOFA and Bankruptcy Schedules and e-mail key points(2.3).	2.30	1,782.50
Total			2.30	\$1,782.50

Financing/Cash Collateral

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/03/23	Joseph M. Coleman	Telephone conference with V. Polnick regarding DIP Hearing and mediation(.2).	0.20	155.00
04/04/23	Joseph M. Coleman	Work on Credit bid/Challenge issues, including e-mails to Pre-Petition Lender, Debtors and regarding view of DIP Financing Term Sheet(1.7); Work on emergency motion to extend the challenge period(.3); Telephone conference with A. Grossi regarding challenge period(.3); Examine e-mail regarding same and e-mail regarding same to the Debtors(.2); Exchange numerous e-mails regarding challenge period and mediation(.4); Draft emergency motion to extend challenge period(4.6).	7.50	5,812.50
04/05/23	Joseph M. Coleman	Finalize motion to extend challenge deadline(.4).	0.40	310.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/05/23	S. Kyle Woodard	Prepare agreed order extending Committee's challenge deadline under the DIP Order.	1.50	660.00
04/06/23	Joseph M. Coleman	Review Sidley's redline to stipulation to extend Challenge Period and comment thereon(.2); Numerous telephone conferences and e-mail exchanges with M. Cavanaugh and V. Flores regarding Stipulation to extend Challenge Period(1.1); Continue to monitor, review changes, and review Mediation Stipulation(.9); Telephone conference with J. Garvey regarding same(.3); Exchange e-mails with A. Grossi regarding same(.1); Follow up telephone conference with V. Flores(.3); E-mail M. Cavanaugh(.1).	3.00	2,325.00
04/06/23	John J. Kane	Document review for mediation(.4).	0.40	232.00
04/08/23	John J. Kane	Review documents, assist with Neyrey deposition prep, and coordinate with J. Coleman regarding DIP issues and mediation strategy.	2.60	1,508.00
04/09/23	John J. Kane	IEH Neyrey depo preparation support(1.2).	1.20	696.00
04/10/23	John J. Kane	Review documents(.6); Attend document review status meeting and work with review team on key issues(.8); Work on mediation presentation for DIP and Case mediation(3.3); Work on Neyrey deposition prep(.4).	5.10	2,958.00
04/10/23	John J. Kane	Work with C. Aster on slides for comparison of certain credit facilities in preparation for mediation(.5); Additional document review in support of mediation preparation(.4).	0.90	522.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/10/23	Charles E. Aster	Reviewing new Sun Trust loan documents and creating PowerPoint comparing it to Icahn loan terms.	6.00	3,780.00
04/11/23	John J. Kane	Work with M. Diaz on Portage Point update on budget and financials for DIP financing and business operations considerations.	0.40	232.00
04/12/23	John J. Kane	Mediation strategy prep, neyrey deposition download, and discovery review meetings in support of mediation.	1.80	1,044.00
04/28/23	Joseph M. Coleman	Review Debtors' witness and exhibit list for DIP Hearing(.1); Begin to outline issues and to do's for Tuesday, May 2 DIP hearing(.3).	0.40	310.00
04/30/23	Joseph M. Coleman	Briefly review proposed final DIP Order and e-mail regarding same(.3).	0.30	232.50
04/30/23	John J. Kane	Review proposed DIP final order, provide preliminary comments to same.	0.40	232.00
Total			32.10	\$21,009.00

Plan and Disclosure Statement (including Business Plan)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/14/23	John J. Kane	Prepare for and participate in pre-mediation Committee call.	1.20	696.00
04/21/23	Joseph M. Coleman	Begin work on Plan of liquidation(.5).	0.50	387.50
04/23/23	Joseph M. Coleman	Telephone conference with L. Freeman regarding Plan issues(.3); Examine Christian Care and Spherature Plans and e-mail language to L. Freeman(.6).	0.90	697.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/25/23	S. Kyle Woodard	Review Debtors' proposed plan and disclosure statement and provide comments and edits for the same.	3.20	1,408.00
04/26/23	S. Kyle Woodard	Review term sheet and 9019 motion as pertaining to plan(.5); Redline edits to Debtors' proposed plan draft(3.4); Call with Debtors' counsel regarding the same(.2).	4.10	1,804.00
04/26/23	Joseph M. Coleman	Begin to work on plan issues(.2); Conference call with V. Polnick regarding same(.3).	0.50	387.50
04/26/23	John J. Kane	Review follow up correspondence and proposed revisions to 9019 from Sidley and JW teams and coordinate with J. Coleman regarding same, status of execution of term sheet by Icahn.	0.80	464.00
04/27/23	John J. Kane	Work on review and markup of Plan and Disclosure Statement.	1.20	696.00
04/28/23	John J. Kane	Work on review and markup of liquidation plan and disclosure statement (1.3).	1.30	754.00
04/28/23	John J. Kane	Review correspondence regarding 9019 Meeting and Icahn delays.	0.40	232.00
04/28/23	Joseph M. Coleman	Briefly review Plan just filed; E-mail Committee regarding same.	0.30	232.50
04/29/23	John J. Kane	Review correspondence regarding finalization of term sheet and submission of 9019; Correspondence with C. Bankler regarding signature pages, follow up with J. Coleman and review docket for filing.	1.00	580.00
04/30/23	Joseph M. Coleman	Begin reviewing the Plan.	0.30	232.50
Total			15.70	\$8,571.50
Total Professional Charges			305.60	\$699,012.50

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File No: 74089.00002.000

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>				<u>Total</u>
Joseph M. Coleman	Director	260.00	hrs at	\$ 775 / hr	201,500.00
Brian N. Hail	Director	146.70	hrs at	\$ 745 / hr	109,291.50
Charles E. Aster	Director	6.00	hrs at	\$ 630 / hr	3,780.00
Michael P. Ridulfo	Director	113.80	hrs at	\$ 605 / hr	68,849.00
John J. Kane	Director	96.40	hrs at	\$ 580 / hr	55,912.00
Don Waltz	Director	2.30	hrs at	\$ 550 / hr	1,265.00
Brian W. Clark	Director	64.90	hrs at	\$ 535 / hr	34,721.50
S. Kyle Woodard	Associate	118.20	hrs at	\$ 440 / hr	52,008.00
Andrew Robertson	Associate	49.20	hrs at	\$ 435 / hr	21,402.00
Collin Delano	Associate	69.00	hrs at	\$ 395 / hr	27,255.00
JaKayla DaBera	Associate	130.70	hrs at	\$ 385 / hr	50,319.50
Brandon Keaton	Associate	118.60	hrs at	\$ 345 / hr	40,917.00
Reuel Coles	Paralegal	11.40	hrs at	\$ 275 / hr	3,135.00
Carlos Velazquez	Paralegal	44.30	hrs at	\$ 265 / hr	11,739.50
Connie Nims	Paralegal	29.00	hrs at	\$ 235 / hr	6,815.00
Olivia Salvatierra	Paralegal	42.10	hrs at	\$ 225 / hr	9,472.50
Bree Kimball	Paralegal	3.00	hrs at	\$ 210 / hr	630.00
Total Professional Charges					\$699,012.50

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/30/23	Photocopies	770.55
04/30/23	Color Copies	2,973.35
04/30/23	On-Line Services	10,211.69
04/30/23	Outside Photocopies	1,957.10
04/30/23	Courier Expense	80.27
04/30/23	Postage	272.94
04/30/23	In House Litigation Support	164.37

Invoice Date: 05/09/23

Invoice No.: 494094

File No: 74089.00002.000

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/30/23	Travel Expense	1,432.98
03/17/23	Filing Fee - Cogency Global Inc.	858.00
Total		\$18,721.25

INVOICE SUMMARY

Professional Charges	\$ 699,012.50
Disbursements	\$ 18,721.25
CURRENT INVOICE DUE	\$ <u>717,733.75</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	0.00	\$ 200,640.30
493787	04/27/23	376,649.90	0.00	\$ 376,649.90

TOTAL AMOUNT DUE	\$ <u>1,295,023.95</u>
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Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 05/09/23

Invoice No.: 494094

File No.: 74089.00002.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through April 30, 2023:

Total Professional Charges	\$ 699,012.50
Disbursements	\$ 18,721.25
Current Invoice Due	\$ 717,733.75
Previous Balance Due	\$ 577,290.20
TOTAL AMOUNT DUE	\$ <u>1,295,023.95</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.

**KANE RUSSELL
COLEMAN LOGAN**

Invoice Date: **05/09/23**

Invoice No.: **494095**

File No.: **74089.00003.000**

Michael Duffy, michael.duffy@driv.com

The Unsecured Creditors Committee of IEH
Auto Parts

**File Description: Lien Investigation of American Entertainment
PROFESSIONAL CHARGES**

Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/23	Joseph M. Coleman	Lien investigation American Entertainment(1.0).	1.00	775.00
04/02/23	Joseph M. Coleman	Work on Complaint(3.2).	3.20	2,480.00
04/02/23	John J. Kane	Coordinate with J. Coleman on review, supplement, draft of Complaint and review current progress of same.	0.80	464.00
04/02/23	S. Kyle Woodard	Conduct research related to recharacterization of debt and equitable subordination.	4.40	1,936.00
04/03/23	S. Kyle Woodard	Work on motion for standing.	0.50	220.00
04/03/23	S. Kyle Woodard	Continue researching lien challenge causes of action(3.8); Continue drafting motion for standing(2.7).	6.50	2,860.00
04/03/23	JaKayla DaBera	Research issue related to certain causes of action in Complaint.	3.10	1,193.50
04/04/23	S. Kyle Woodard	Work on lien challenge Complaint.	1.00	440.00
04/05/23	John J. Kane	AEP deposition prep, work on supplemental outline, tailor document review to address pre-Icahn loan matters.	3.20	1,856.00

Invoice Date: 05/09/23

Invoice No.: 494095

File No: 74089.00003.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/06/23	S. Kyle Woodard	Work on mediation PowerPoint.	2.00	880.00
04/06/23	Joseph M. Coleman	Work on Complaint against AEP(.7).	0.70	542.50
04/06/23	S. Kyle Woodard	Work on mediation PowerPoint(1.0); Research regarding litigation claims and lien challenge Complaint(2.2); Work on motion for standing(.6).	3.80	1,672.00
04/06/23	John J. Kane	Work on AEP Complaint and review documents related to prior prepetition lender.	0.90	522.00
04/06/23	John J. Kane	Work on Complaint against AEP, continue to outline factual background, restructure presentation of facts, work on supporting graphics and timeline.	3.30	1,914.00
04/07/23	John J. Kane	Work on Complaint against AEP, outline themes, work on restructure of draft Complaint, identify key areas of document review focus on bolstering Complaint's factual background.	3.90	2,262.00
04/07/23	S. Kyle Woodard	Work on motion for standing to bring lien challenges.	1.60	704.00
04/08/23	John J. Kane	Work on development of litigation claims against DIP lender and prior prepetition lender and review documents related to same.	0.90	522.00
04/09/23	JaKayla DaBera	Continue researching issues related to causes of action.	1.20	462.00
04/10/23	John J. Kane	Work on Complaint against AEP and IEP Holdings.	2.10	1,218.00
04/10/23	JaKayla DaBera	Continue researching issues related to causes of action.	3.10	1,193.50
04/10/23	JaKayla DaBera	Edit motion for standing.	1.60	616.00
04/10/23	JaKayla DaBera	Attention to analysis of causes of action.	1.30	500.50

Invoice Date: 05/09/23

Invoice No.: 494095

File No: 74089.00003.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/11/23	John J. Kane	Continue to review documents and work on Complaint against AEP and IEP Holdings.	6.20	3,596.00
04/12/23	S. Kyle Woodard	Work on motion for standing to challenge liens(3.3); Conduct related research(1.3).	4.60	2,024.00
04/12/23	John J. Kane	Work on AEP Complaint.	6.70	3,886.00
04/13/23	Joseph M. Coleman	Work on Complaint against American Entertainment properties.	0.90	697.50
04/13/23	John J. Kane	Work on Complaint.	1.90	1,102.00
04/14/23	John J. Kane	Work on Complaint.	1.20	696.00
04/14/23	John J. Kane	Work on AEP and IEP Holdings Complaint.	5.60	3,248.00
04/14/23	JaKayla DaBera	Attention to preparing documents for upcoming mediation.	0.30	115.50
04/15/23	John J. Kane	Draft Complaint against AEP and IEP Holdings.	12.70	7,366.00
04/16/23	John J. Kane	Work on Complaint against AEP and IEP Holdings.	6.40	3,712.00
04/17/23	S. Kyle Woodard	Work on and update draft motion for standing.	3.00	1,320.00
04/17/23	John J. Kane	Continue to work on Complaint, revise, finalize same.	3.90	2,262.00
04/17/23	JaKayla DaBera	Review Complaint.	1.80	693.00
04/19/23	S. Kyle Woodard	Work on revising and drafting motion for standing.	1.30	572.00
Total			106.60	\$56,523.00
Total Professional Charges			106.60	\$56,523.00

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Joseph M. Coleman	Director	5.80 hrs at \$ 775 / hr 4,495.00
John J. Kane	Director	59.70 hrs at \$ 580 / hr 34,626.00

Invoice Date: 05/09/23

Invoice No.: 494095

File No: 74089.00003.000

<u>Timekeeper</u>	<u>Title</u>				<u>Total</u>
S. Kyle Woodard	Associate	28.70	hrs at	\$ 440 / hr	12,628.00
JaKayla DaBera	Associate	12.40	hrs at	\$ 385 / hr	4,774.00
Total Professional Charges					\$56,523.00

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/30/23	On-Line Services	41.25
Total		\$41.25

INVOICE SUMMARY

Professional Charges	\$ 56,523.00
Disbursements	\$ 41.25

CURRENT INVOICE DUE **\$ 56,564.25**

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492462	03/21/23	1,602.50	0.00	\$ 1,602.50
493788	04/27/23	61,667.60	0.00	\$ 61,667.60

TOTAL AMOUNT DUE **\$ 119,834.35**

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KANE RUSSELL COLEMAN LOGAN

Invoice Date: 05/09/23

Invoice No.: 494095

File No.: 74089.00003.000

Michael Duffy, michael.duffy@driv.com

The Unsecured Creditors Committee of IEH
Auto Parts
, TX

For Professional Services Rendered Through April 30, 2023:

Total Professional Charges	\$	56,523.00
Disbursements	\$	41.25
Current Invoice Due	\$	56,564.25
Previous Balance Due	\$	63,270.10
TOTAL AMOUNT DUE	\$	<u>119,834.35</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

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Exhibit A-4

Fourth Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
IEH AUTO PARTS HOLDING LLC, <i>et al.</i> , ¹)	Case No. 23-90054 (CML)
)	
Debtors.)	(Jointly Administered)

**FOURTH MONTHLY FEE STATEMENT OF KANE RUSSELL COLEMAN LOGAN
PC, AS COUNSEL FOR THE OFFICIAL UNSECURED CREDITORS' COMMITTEE,
FOR THE PERIOD FROM MAY 1, 2023 THROUGH MAY 31, 2023**

Name of Professional:	Kane Russell Coleman Logan PC	
Professional's Role in Case:	Counsel for the Official Unsecured Creditors' Committee	
Date of Retention Order:	April 27, 2023 [Dkt. #427]	
Effective Date of Retention:	February 15, 2023	
Time Period Covered by this Statement:	<u><i>Beginning of Period:</i></u> May 1, 2023	<u><i>End of Period:</i></u> May 31, 2023
Total Fees incurred during this Period:	\$174,451.50	
Total Expenses during this Period:	\$16,020.39	
Total Fees and Expenses for the Period:	\$190,471.89	
Summary of Monthly Fee Statement		
Fees sought in this Statement (80%):	\$139,561.20	
Expenses sought in this Statement (100%):	\$16,020.39	
Monthly Fee Statement Total:	\$155,581.59	
20% Holdback for Professional Fees:	\$34,890.30	

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

Kane Russell Coleman Logan PC ("**KRCL**"), counsel for the Official Unsecured Creditors' Committee (the "**Committee**"), submits this Monthly Fee Statement for the above-stated time period (the "**Statement Period**") pursuant to the *Court's Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. #264] (the "**Interim Compensation Order**")² as follows:

PROFESSIONAL FEES

1. KRCL's invoices for the Statement Period is attached hereto (the "**Invoices**"). The Invoices provides: (i) a description of the services rendered; (ii) the time spent; (iii) the hourly rates charged; and (iv) the name of the attorney or paraprofessional performing the work. Time entries on the Invoices are organized by project category.

2. KRCL's fees incurred during the Statement Period are summarized as follows:

Summary by Professional

Name	Position	Hourly Rate	Hours	Fees
Joseph M. Coleman	Director	\$775	128.00	\$99,200.00
John J. Kane	Director	\$580	64.90	\$37,642.00
S. Kyle Woodard	Associate	\$440	13.30	\$5,852.00
JaKayla DaBera	Associate	\$385	71.50	\$27,527.50
Reuel Coles	Paralegal	\$275	7.20	\$1,980.00
Olivia Salvatierra	Paralegal	\$225	10.00	\$2,250.00
TOTAL:			294.90	\$174,451.50

² Undefined capitalized terms have the meanings provided in the Interim Compensation Order unless otherwise noted.

Summary by Project Category

Task Code	Hours	Fees
B100 - Bankruptcy	0.00	\$0.00
B110 - Case Administration	8.80	\$4,228.00
B120 - Asset Analysis and Recovery	1.80	\$1,063.50
B130 - Asset Disposition	101.70	\$64,004.00
B140 - Relief from Stay/Adequate Protection Proceedings	0.00	\$0.00
B150 - Meetings of and Communications with Creditors	19.20	\$12,583.00
B160 - Fee/Employment Applications	8.90	\$4,825.50
B170 - Fee/Employment Objections	0.30	\$115.50
B180 - Avoidance Action Analysis	0.00	\$0.00
B185 - Assumption/Rejection of Leases and Contracts	15.10	\$6,348.00
B190 - Other Contested Matters	1.60	\$953.00
B195 - Non-Working Travel	12.50	\$7,737.50
B200 - Operations	0.00	\$0.00
B210 - Business Operations	0.50	\$222.50
B220 - Employee Benefits/Pensions	2.10	\$1,627.50
B230 - Financing/Cash Collections	2.70	\$1,585.50
B240 - Tax Issues	0.00	\$0.00
B250 - Real Estate	0.00	\$0.00
B260 - Board of Directors Matters	0.00	\$0.00
B300 - Claims and Plan	0.00	\$0.00
B310 - Claims Administration and Objections	20.20	\$9,069.00
B320 - Plan and Disclosure Statement	92.30	\$58,109.00
B400 - Bankruptcy-Related Advice	0.00	\$0.00
B410 - General Bankruptcy Advice/Opinions	0.00	\$0.00
B420 - Restructurings	0.00	\$0.00
L100 - Litigation	7.20	\$1,980.00
TOTAL:	294.90	\$174,451.50

DISBURSEMENTS

3. KRCL's actual and necessary expenses incurred during the Statement Period are described as follows:

Date	Description	Amount
5/31/2023	Photocopies	\$160.50
5/31/2023	Color Copies	\$7.50
5/31/2023	Meals	\$136.44
5/31/2023	On-Line Services	\$1,765.05
5/31/2023	Secretarial Overtime	\$53.55
5/31/2023	Outside Photocopies	\$3,183.09
5/31/2023	Parking	\$259.80
5/31/2023	Postage	\$4.44
5/31/2023	In House Litigation Support	\$1,126.06
5/31/2023	Travel Expense	\$9,242.71
5/31/2023	Word Processing	\$81.25
TOTAL:		\$16,020.39

NOTICE AND OPPORTUNITY TO OBJECT

4. Any party that objects to the fees or expenses sought in this Monthly Fee Statement must serve written notice of such objection upon KRCL and each of the Application Recipients³ by no later than **July 4, 2023 at 4:00 p.m. CDT**. The notice must set forth the precise nature and basis of the objection and the amount at issue, and must otherwise comply with the terms of the Interim Compensation Order. Copies of the Interim Compensation Order may be requested in writing from KRCL, Attn: Olivia Salvatierra (osalvatierra@krcl.com).

RESERVATION

5. The Committee and KRCL have been diligent in attempting to redact any and all privileged or otherwise confidential information from the Invoice. Notwithstanding, however, the Committee and KRCL expressly reserve, and do not waive under any circumstances whatsoever,

³ As defined in the Interim Compensation Order, the Application Recipients include the following parties: (a) the Debtors, 112 Townpark Drive NW, Suite 300, Kennesaw, Georgia 30144, Attn: Michael Neyrey; (b) Jackson Walker LLP (via email), 1401 McKinney Street, Suite 1900, Houston, Texas 77010, Attn: Veronica A. Polnick (vpolnick@jw.com) and Vienna Anaya (vanaya@jw.com); (c) the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov); (d) counsel for the Prepetition Lender, Sidley Austin LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Stephen Hessler (shessler@sidley.com) and Anthony Grossi (agrossi@sidley.com); and (e) counsel to any statutory committee appointed in these cases.

any privileges, protections, or rights to confidentiality of any kind or character for any purpose.

6. While KRCL has made every effort to include all fees and expenses incurred during the Statement Period, some fees and expenses may not be included in this Monthly Fee Statement due to, *inter alia*, accounting and processing delays during the Statement Period. KRCL reserves the right to seek allowance and payment of any such fees or expenses in accordance with the orders of this Court and the applicable provisions of the Bankruptcy Code and Bankruptcy Rules.

7. KRCL further reserves the right to supplement and/or amend this Monthly Fee Statement for any reason in accordance with the Interim Compensation Order.

DATED: June 20, 2023

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Kyle Woodard

Joseph M. Coleman

State Bar No. 0456610

SDTX No. 16936

Michael P. Ridulfo

State Bar No. 16902020

SDTX No. 27086

John J. Kane

State Bar No. 24066794

SDTX No. 1069650

Kyle Woodard

State Bar No. 24102661

SDTX No. 3596595

Bank of America Plaza
901 Main Street, Suite 5200
Dallas, Texas 75202

Telephone: (214) 777-4200

Telecopier: (214) 777-4299

Email: jcoleman@krcl.com;

Email: mridulfo@krcl.com

Email: jkane@krcl.com

Email: kwoodard@krcl.com

**ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

CERTIFICATE OF SERVICE

This is to certify that on June 20, 2023, a true and correct copy of this Monthly Fee Statement was filed with the Court and served (i) via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case, and (ii) via e-mail or regular U.S. mail, postage prepaid, upon the following parties:

Debtor:

IEH Auto Parts Holding, LLC, *et al.*
Attn: Michael Neyrey
112 Townpark Drive NW, Suite 300
Kennesaw, GA 30144

Debtors' Counsel:

Jackson Walker LLP
Attn: Veronica A. Polnick (vpolnick@jw.com)
Attn: Vienna Anaya (vanaya@jw.com)

U.S. Trustee:

Office of the US Trustee
Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov)
Attn: Andrew Jimenez (Andrew.Jimenez@usdoj.gov)

Prepetition Lender's Counsel:

Sidley Austin LLP
Attn: Stephen Hessler (shessler@sidley.com)
Attn: Anthony Grossi (agrossi@sidley.com)

/s/ Kyle Woodard
Kyle Woodard

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **06/14/23**Invoice No.: **495552**File No.: **74089.00002.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors**PROFESSIONAL CHARGES****Case Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	Joseph M. Coleman	Review numerous pleadings(.3).	0.30	232.50
05/01/23	Olivia Salvatierra	Review docket for case activity and save pertinent pleadings to internal firm electronic case file.	0.30	67.50
05/01/23	Olivia Salvatierra	Research Pacer and Claims Agent sites for confirmation of a filed claim.	0.10	22.50
05/02/23	Olivia Salvatierra	Review docket for case activity and specific pleadings for J. Coleman.	0.30	67.50
05/02/23	Olivia Salvatierra	Docket court deadlines and/or hearings on internal firm calendar and update Critical Dates & Deadlines internal firm memo.	0.30	67.50
05/03/23	Olivia Salvatierra	Docket court deadlines on internal firm calendar.	0.20	45.00
05/03/23	Joseph M. Coleman	Examine recent pleadings and miscellaneous e-mails.	0.20	155.00
05/04/23	Joseph M. Coleman	Review recent ECF filings(.1).	0.10	77.50
05/04/23	Joseph M. Coleman	Review ECF filings, including pleadings, orders, minute entries and related entries.	0.10	77.50

Invoice Date: 06/14/23

Invoice No.: 495552

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/04/23	Olivia Salvatierra	Review docket for case activity and save pertinent pleadings to internal case file.	0.20	45.00
05/05/23	Olivia Salvatierra	Review docket for case activity and saved pertinent pleadings to internal firm case file.	0.20	45.00
05/05/23	Joseph M. Coleman	Review several pleadings filed via ECF(.2).	0.20	155.00
05/08/23	Joseph M. Coleman	Examine recent pleadings filed via ECF(.1).	0.10	77.50
05/08/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
05/09/23	JaKayla DaBera	Review docket for updates.	0.20	77.00
05/09/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
05/09/23	Olivia Salvatierra	Update Critical Dates & Deadlines internal firm memo.	0.20	45.00
05/09/23	Joseph M. Coleman	Update to do list and prioritization of same(.3); Examine recent pleadings(.1); Prepare for and attend IEH Team meeting regarding divide and conquer, prevent duplication and go over critical dates and deadlines(.6).	1.00	775.00
05/10/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
05/11/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
05/12/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
05/12/23	Joseph M. Coleman	Examine recent pleadings filed via ECF.	0.10	77.50
05/15/23	Joseph M. Coleman	Examine recent pleadings via ECF.	0.10	77.50
05/15/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
05/15/23	JaKayla DaBera	Review bankruptcy docket.	0.10	38.50
05/16/23	Olivia Salvatierra	Review docket for case activity.	0.20	45.00
05/16/23	Joseph M. Coleman	Examine recent ECF pleadings(.1).	0.10	77.50
05/17/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50

Invoice Date: 06/14/23

Invoice No.: 495552

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/18/23	Olivia Salvatierra	Review docket for case activity and docketed internal firm calendar of reset hearing.	0.20	45.00
05/18/23	Joseph M. Coleman	Examine recent ECF pleadings(.1).	0.10	77.50
05/19/23	Olivia Salvatierra	Review docket for case activity; Save pertinent pleadings to internal firm case file.	0.30	67.50
05/20/23	Joseph M. Coleman	Finalize minutes from Committee meeting(.3); Follow up regarding open questions(.1); To do list and prioritize same(.1).	0.50	387.50
05/22/23	Joseph M. Coleman	Work through to do list and prioritize items(.3).	0.30	232.50
05/22/23	Olivia Salvatierra	Review docket for case activity; Save pertinent pleadings to internal case file.	0.20	45.00
05/23/23	Olivia Salvatierra	Review docket for case activity; Save pertinent pleadings to internal case file.	0.20	45.00
05/23/23	Joseph M. Coleman	Examine recent pleadings filed via ECF.	0.10	77.50
05/24/23	Joseph M. Coleman	Examine numerous pleadings recently filed.	0.10	77.50
05/24/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
05/25/23	Olivia Salvatierra	Review docket for case activity.	0.10	22.50
05/25/23	Joseph M. Coleman	Examine recent filings; Examine various e-mails(.2).	0.20	155.00
05/26/23	Joseph M. Coleman	Review recent pleadings.	0.10	77.50
05/30/23	Joseph M. Coleman	Examine recent filings(.1); Update critical dates and deadlines(.1).	0.20	155.00
05/30/23	Olivia Salvatierra	Review docket for case activity and saved pertinent pleadings to internal case file.	0.20	45.00
05/30/23	Olivia Salvatierra	Update Critical Dates & Deadlines internal firm memo for J. Coleman.	0.20	45.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/31/23	Olivia Salvatierra	Review docket for case activity; Save pertinent pleadings to internal firm case file.	0.20	45.00
05/31/23	Joseph M. Coleman	Review recent ECF pleadings.	0.10	77.50
Total			8.80	\$4,228.00

Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/03/23	John J. Kane	Coordinate with G. Graham and V. Anaya regarding ancillary issue resolutions and settlements.	0.30	174.00
05/15/23	John J. Kane	Auction debrief, bid review, update on Fisher issues, and review outstanding sale issues.	1.40	812.00
05/31/23	Joseph M. Coleman	Examine emergency motion to sell miscellaneous assets and confirm it includes the Committee's comments to the draft emergency motion.	0.10	77.50
Total			1.80	\$1,063.50

Asset Disposition

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	Joseph M. Coleman	Telephone conference with M. Diaz regarding sale process and claims objection(.3); Telephone conference with M. Duffy regarding same(.3).	0.60	465.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/04/23	Joseph M. Coleman	Examine e-mails regarding status of auction and bids(.1); Telephone conference with FTI regarding issues for Auction, dynamics regarding same; Preparation for auction(.5); Examine e-mail from bidder and forward to JW(.1); Begin prep for auction(.1); Examine e-mails from bidder and JW's proposed solution and weigh in(.2); Begin auction prep(.3); Exchange e-mails with C. Zucker regarding Auction issues(.1); Exchange follow up e-mails with C. Zucker regarding additional news and analysis of bids(.1); Exchange e-mails with the Debtor regarding Auction attendance and related issues(.1); Examine e-mails from and between G. Graham and J. Kane regarding Auction issues(.1).	1.70	1,317.50
05/04/23	JaKayla DaBera	Prepare Auction notebook.	0.40	154.00
05/04/23	JaKayla DaBera	Review bid procedures.	0.60	231.00
05/05/23	Joseph M. Coleman	Prep for auction(.3); Examine initial bids(.1); Exchange e-mails with FTI regarding bids(.1); Telephone conference with M. Duffy regarding Auction prep(.2); Report to the Committee regarding Auction, bids and related issues(.2); Provide JW info from the Committee regarding Auction(.1); Examine Auction Notice and related materials(.1); E-mails from/to FTI regarding Auction issues(.2).	1.30	1,007.50
05/05/23	John J. Kane	Review bids, sale outlook, correspondence from FTI regarding same.	0.40	232.00
05/06/23	Joseph M. Coleman	Examine e-mail from bidder(.1); Examine e-mails with JW regarding Auction, issues and general items(.1).	0.20	155.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/08/23	Joseph M. Coleman	Examine e-mail regarding auction and bids from Committee Member(.1); E-mail C. Zucker at FTI(.1); Examine e-mail from JW regarding auction(.1); E-mail G. Graham regarding auction(.1); Telephone conference with C. Zucker regarding Auction(.3); Telephone conference with Committee Member regarding questions and issues(.3); E-mail JW regarding same(.1); Telephone conference with potential bidder, sending same to B. Murphy(.1); Examine bid profile(.3); E-mail JW regarding auction prep(.1); Communicate with bidder(.1).	1.70	1,317.50
05/08/23	John J. Kane	Review sale update, spreadsheet addressing bids, correspondence from C. Zucker, and briefly coordinate with J. Coleman regarding sale outlook, auction issues, feasibility of \$205MM recovery.	0.60	348.00
05/08/23	JaKayla DaBera	Prepare for Auction.	0.70	269.50
05/09/23	JaKayla DaBera	Prepare for auction including preparing Auction notebooks; Discuss auction expectations with Committee Chair and J. Coleman.	2.10	808.50
05/09/23	JaKayla DaBera	Attend Auction status teams meeting.	0.50	192.50
05/09/23	John J. Kane	Sale status update discussions.	0.40	232.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/09/23	Joseph M. Coleman	Auction prep(.2); Telephone conference with a bidder(.3); Multiple calls with bidder, FTI and JW regarding issues for the Auction(.8); Examine Fisher/Auto Parts APA, changes and related issues and examine XL Auto Parts APA(2.2); Numerous telephone conferences and e-mail exchanges regarding Debtors' counsel, FTI, and bidders regarding open issues(.9); Attend meeting with Committee Chair in prep for Auction(1.5).	5.90	4,572.50
05/10/23	Joseph M. Coleman	Exchange e-mails with G. Graham regarding issues with the auction(.1); Meet with various parties, including the Debtor and AEP regarding issues with the Auction(2.5); Attend Auction(14.4).	17.00	13,175.00
05/10/23	JaKayla DaBera	Attend Auction.	14.40	5,544.00
05/11/23	JaKayla DaBera	Prepare for second day of Auction.	1.00	385.00
05/11/23	JaKayla DaBera	Attend second day of Auction.	10.00	3,850.00
05/11/23	Joseph M. Coleman	Meeting with Committee Chair and FTI to prep for issues with the Auction(1); Meeting with Debtor and AEP reps regarding issues with the Auction(.7); Attend Auction(10).	11.70	9,067.50
05/11/23	John J. Kane	Coordinate with team, creditors, regarding status of Auction, sale.	0.60	348.00
05/12/23	Joseph M. Coleman	Several telephone conferences, e-mail exchanges and related issues with Debtors' counsel regarding individual location extended auction, Notice of Winning Bidders, assumption and assignments and related matters(2.7); Examine e-mail from J. Garvey regarding IP and IT terms(.1).	2.80	2,170.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/12/23	JaKayla DaBera	Summarize and send Auction results for Committee update to J. Coleman.	0.30	115.50
05/13/23	Joseph M. Coleman	Examine several e-mails from Debtors regarding notice of winning bids, instructions for bidders of individual locations not assumed at Auction, and related matters(.2); Examine e-mail notice to contract parties regarding adequate assurance of future performance(.1).	0.30	232.50
05/15/23	Joseph M. Coleman	Examine notice of winning bids(.2); Examine e-mail regarding same from creditors and respond(.1); E-mail regarding communications with Debtors' counsel regarding notice of winning bids(.1); Telephone conference with C. Zucker with Sale issues(.2); Examine several e-mails from Debtor regarding sale issues(.2).	0.80	620.00
05/15/23	JaKayla DaBera	Review witness and exhibit list for sale hearing.	0.10	38.50
05/15/23	Olivia Salvatierra	Prepared W&E list draft for Sale hearing 05.19.23.	0.20	45.00
05/16/23	JaKayla DaBera	Review witness and exhibit list for sale hearing.	0.10	38.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/16/23	Joseph M. Coleman	Examine several e-mails regarding Sale process and problems with a bidder and respond accordingly(.2); Telephone conference with E. Pawlish regarding inventory valuation in lot sales(.2); Telephone conference with C. Zucker regarding same(.2); Follow up regarding open issues with Sale process(.2); Telephone conference with C. Zucker regarding issues raised by the Committee regarding the Auction(.1); Telephone conference with C. Zucker and E. Pawlin regarding same(.2); Communicate with Debtors regarding problematic bidder(.2); Continue to examine e-mails between Fisher and the Debtor(.1).	1.40	1,085.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/17/23	Joseph M. Coleman	Telephone conference with Liz Freeman regarding sale and related issues(.2); Examine cease and desist relating to the sale process(.1); Finalize W&E List and file same(.1); Exchange e-mails with Debtors' counsel regarding same(.1); Begin prep for sale hearing(.6); Examine exhibits(.2); Telephone conference with G. Graham regarding 363 Sale status of outstanding issues(.2); Examine sale order(1.2); Telephone conference with G. Graham regarding sale order and related issues(.3); Review witness and exhibit lists for hearing(.1); Follow up regarding sale order(.2); E-mail JW regarding additional comments to the Sale Order(.1); Examine Fisher's comments and changes to latest APA draft(.2); Exchange e-mails with Emily at JW regarding Sale Order(.1); Examine e-mail from D. Hayes and G. Graham regarding Sale Order and e-mail regarding same and briefly look at Fisher's proposed order(.3); Examine e-mail from M. Cavanaugh regarding sale(.1); Conference call with M. Cavanaugh and L. Freeman regarding issues with the sale process(.4); Examine transcript from sale and exchange e-mails regarding Fisher(.1).	4.60	3,565.00
05/17/23	John J. Kane	Review draft sale order, conference with J. Coleman regarding sale update, and review correspondence to Committee regarding sale matters and related issues.	0.70	406.00
05/17/23	JaKayla DaBera	Prepare for sale hearing.	0.50	192.50
05/17/23	JaKayla DaBera	Revise witness and exhibit list.	0.10	38.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/17/23	Olivia Salvatierra	Prepare outline memo, pleading copies, and W&E lists copies for 05.19.23 Sale hearing notebook for J. Coleman.	0.20	45.00
05/17/23	Olivia Salvatierra	E-filed Committee's W&E list for J. Coleman.	0.10	22.50
05/18/23	Olivia Salvatierra	Prepare hearing notebook for 05.19.23 Sale hearing for J Coleman.	0.40	90.00
05/18/23	JaKayla DaBera	Review objections to sale motion and supplemental cure notice.	1.00	385.00
05/18/23	JaKayla DaBera	Review Auction transcript.	0.20	77.00
05/18/23	John J. Kane	Correspondence with Debtors' counsel and J. Coleman regarding sale matters, Fisher issues.	0.80	464.00
05/18/23	Joseph M. Coleman	Telephone conference with L. Freeman regarding issues with top bidder(.3); Telephone conference with Committee Chair and in-house counsel regarding same(.3); Examine e-mails by and between Fisher's counsel and JW(.1); Prep for hearing and work through issues raised late last night(.7); Telephone conference with A. Grossi regarding new highest bidder(.3); Telephone conference with Debtors' counsel regarding notice on highest and best bidder(.3); Examine notice regarding same(.1); Detailed e-mail to Committee(.9); Telephone conference with Committee Member regarding same(.3).	3.30	2,557.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/19/23	Joseph M. Coleman	Telephone conference with M. Duffy regarding status of Debtors' change in highest/best bid(.3); Examine e-mails with Committee Member regarding same(.1); Examine updated exhibits list, revised notice of winner bidder and prep for hearing(.3); Telephone conference with C. Zucker regarding revised winning bidder(.2); Review updated exhibits filed by the Debtor(.4); Prepare for and attend Sale Hearing(2.0); Telephone conferences with Committee Members about Sale Hearing(.2); Telephone conference with Debtors' counsel(.3); Telephone conference with Debtors' lawyers regarding sale and related matters(.3); Briefly review sale orders(.2).	4.30	3,332.50
05/19/23	JaKayla DaBera	Attend sale hearing.	1.80	693.00
05/19/23	JaKayla DaBera	Review sale declaration.	0.10	38.50
05/19/23	JaKayla DaBera	Review redline of sale order.	0.20	77.00
05/19/23	Olivia Salvatierra	Update 05.19.23 Sale hearing notebook with additional filed exhibits for J. Coleman.	0.40	90.00
05/20/23	Joseph M. Coleman	Examine Debtors' report on bids applicable to ad hoc locations and e-mail C. Zucker regarding same(.2).	0.20	155.00
05/22/23	Joseph M. Coleman	Examine results of Lot 9(d) Auction, locations not bid on in the primary Auction, ask questions of the debtor, communicate with C. Zucker regarding same and e-mail Committee with status(.6); Telephone conference with A. Kochenderfer regarding sale transaction(.2); Examine Lincoln's response to inquiry(.1).	0.90	697.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/23/23	Joseph M. Coleman	Review terms of Lot 9(d) proposed order and e-mail Debtors' counsel regarding same(.4).	0.40	310.00
05/23/23	Joseph M. Coleman	Examine notice of hearing, notice of winning bids and related pleadings for tomorrow's Lot 9(d) hearing(.3).	0.30	232.50
05/24/23	Joseph M. Coleman	Review Neyrey and Stone Declarations in support of lot 9(d) sale(.2); E-mail Committee regarding status and related issues regarding today's hearing on Lot 9(d) (.1); Examine supplemental notices of assumption and assignment(.1); Prepare for (briefly) and attend hearing regarding Lot 19(d) (.5); Telephone conference with Debtors' counsel regarding closing sales, issues with disqualified bidders, additional potential lots and related issues(.3); Examine demand from FMP; Examine e-mail from G. Graham and telephone conference with G. Graham regarding same(.3).	1.50	1,162.50
05/24/23	JaKayla DaBera	Review declarations and notice of winning bid regarding the Lot 9(d) sale.	0.30	115.50
05/29/23	Joseph M. Coleman	Review motion for sale of miscellaneous assets and comment upon same and e-mail to Debtors(.7); E-mails to Committee and J. Kane regarding same(.3); Exchange e-mails with JW regarding miscellaneous asset sale(.1).	1.10	852.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/30/23	Joseph M. Coleman	Exchange e-mails regarding misc. asset sale motion with JW(.1); Telephone conference with G. Graham regarding status of closings, misc. asset sales, transition services agreements and related matters(.3); Review chart of closings status(.1).	0.50	387.50
Total			101.70	\$64,004.00

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/03/23	Joseph M. Coleman	Detailed status to the Committee including attachments, Approval of 9019 Motion, Plan, DIP Order and Auction.	1.30	1,007.50
05/03/23	Joseph M. Coleman	Exchange communications with Committee Chair.	0.10	77.50
05/09/23	John J. Kane	Coordinate with J. Coleman regarding Committee Meeting, agenda items, timing of call.	0.20	116.00
05/09/23	Joseph M. Coleman	E-mail Committee regarding Auction, Plan and related issues(.5); Exchange e-mails with Committee Member regarding Plan(.1); Exchange e-mails with Committee Member regarding next call(.1); E-mail Committee setting next call(.1); Telephone conference with M. Duffy regarding Auction schedule and related issues(.2).	1.00	775.00
05/11/23	Joseph M. Coleman	Exchange e-mails with creditors regarding status issues and follow up regarding same(.2); Brief response to Committee Member's inquiry(.1).	0.30	232.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/12/23	Joseph M. Coleman	Telephone conference with DRiV representatives regarding issues going forward, Auction and confirmation(.5); Numerous e-mails exchanges with Committee Members regarding Auction results(.2); E-mail Committee with status report of Auction Results(.8).	1.50	1,162.50
05/13/23	Joseph M. Coleman	Examine e-mail from L. Smith, counsel for Gates, regarding Auction.	0.10	77.50
05/15/23	Joseph M. Coleman	Examine e-mails from creditors regarding Plan, Auction and related matters and respond(.2); Prepare detailed Agenda with attachments for Committee Meeting tomorrow(1.2); Telephone conference with J. Wenger, counsel for creditor, regarding Credit Bid, 503(b)(9), Plan, Auction and related issues(.4); Telephone conference with another creditor regarding Auction, winning bids and related issues(.3); Exchange e-mails with Debtor and Lincoln regarding Auction issues(.1); Answer Creditors' questions regarding same(.1); Follow up calls with Gates and Mann-Hummel's counsel(.1); Finalize Committee Agenda and e-mail same(.4); Exchange e-mails with Committee Member(.1).	2.90	2,247.50
05/15/23	Olivia Salvatierra	Updated Critical Dates and Deadlines memo for agenda for upcoming 5-16-23 Committee Meeting.	0.20	45.00
05/16/23	Olivia Salvatierra	Attend Committee Meeting and prepare minutes memo for J. Coleman.	1.40	315.00
05/16/23	John J. Kane	Prepare for and attend Committee call.	1.10	638.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/16/23	Joseph M. Coleman	Prepare for and conduct Committee Meeting(1.6); Handle follow up matters(.2).	1.80	1,395.00
05/19/23	Joseph M. Coleman	Status report on Sale Hearing to Committee(.2).	0.20	155.00
05/22/23	Joseph M. Coleman	Telephone conference with E. Pawlish regarding inventory issues and related matters(.2).	0.20	155.00
05/25/23	Joseph M. Coleman	Telephone conference with creditor regarding sale, 503(b)(9) and related issues(.3); Status report to Committee(.2).	0.50	387.50
05/30/23	Joseph M. Coleman	Examine e-mail from M. Duffy, Committee Chair, regarding sale process(.1); Work on Committee communication regarding Plan confirmation(.1); Work on Agenda for Committee meeting with several attachments(.9); Continue to work on Agenda for tomorrow's Committee Meeting, including excerpts from the Plan and motion to extend confirmation(.3); Update and finalize critical dates and deadlines for Committee Members(.1); E-mail Committee regarding IEH Committee Meeting(.1).	1.60	1,240.00
05/30/23	John J. Kane	Work on prep and agenda for Committee call and update on Plan process, progress, negotiations, Trust.	0.70	406.00
05/31/23	John J. Kane	Prepare for and attend Committee Meeting regarding Plan issues, next steps(1.2); Work on Committee Meeting minutes, finalize same for circulation(.4).	1.60	928.00
05/31/23	Joseph M. Coleman	Prep for and participate in Auto Plus Conference call, including review of sales, review of confidentiality agreement(1.2).	1.20	930.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/31/23	Olivia Salvatierra	Attend Committee Meeting and prepare minutes memo of said meeting for J. Coleman.	1.30	292.50
Total			19.20	\$12,583.00

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/23	S. Kyle Woodard	Prepare application for reimbursement of Committee Member expenses(1.7); Prepare fee application cover sheet(.4); Prepare proposed order(.4).	2.50	1,100.00
05/03/23	Joseph M. Coleman	Work on monthly fee application for April time.	0.10	77.50
05/04/23	Joseph M. Coleman	Fee application April time/May bill(1.10).	1.10	852.50
05/08/23	Joseph M. Coleman	Work on fee application(.3); E-mail Committee regarding April time, May fees(.1).	0.40	310.00
05/09/23	Joseph M. Coleman	Review Portage Point 3/23/2023 Fee App.	0.10	77.50
05/09/23	Joseph M. Coleman	Review Portage Point's February Fee App.	0.10	77.50
05/09/23	S. Kyle Woodard	Prepare KRCL third monthly fee statement.	1.60	704.00
05/11/23	S. Kyle Woodard	File and serve notice of KRCL monthly fee statement.	0.20	88.00
05/15/23	S. Kyle Woodard	Review FTI's second monthly fee statement and finalize for filing; Correspondence with FTI regarding the same.	0.40	176.00
05/15/23	Joseph M. Coleman	Follow up regarding Committee reimbursements and e-mail regarding same(.3); Exchange e-mails with Debtors' FA regarding estimation of fees(.1).	0.40	310.00
05/16/23	S. Kyle Woodard	Correspondence with FTI.	0.10	44.00
05/16/23	Olivia Salvatierra	E-file FTI's monthly fee statement and serve out for J. Coleman.	0.30	67.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/18/23	Olivia Salvatierra	Update Committee Reimbursement drafts with additional expenses.	0.30	67.50
05/19/23	S. Kyle Woodard	Work on Committee Member expense reimbursement application.	0.40	176.00
05/22/23	Joseph M. Coleman	Finalize and file Committee Expense reimbursement(.2); Review 5 e-mails confirming expenses are accurate(.3); Follow up e-mail to M. Berger regarding fees due and owing, e-mail JW regarding same(.2).	0.70	542.50
05/26/23	Joseph M. Coleman	E-mail M. Berger regarding third monthly fee application.	0.10	77.50
05/31/23	Joseph M. Coleman	Exchange e-mails with M. Berger and C. Bacon regarding issues with Fee application(.1).	0.10	77.50
Total			8.90	\$4,825.50

Fee/Employment Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/31/23	JaKayla DaBera	Review portage point fee application.	0.30	115.50
Total			0.30	\$115.50

Assumption/Rejection of Leases and Contracts

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/03/23	JaKayla DaBera	Attention to limited objection to motion to abandon.	0.20	77.00
05/03/23	S. Kyle Woodard	Work on limited objection to Debtors' second omnibus motion to reject leases.	0.50	220.00
05/04/23	JaKayla DaBera	Attention to cure amount objections including updating summary.	0.40	154.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/04/23	Joseph M. Coleman	Examine proposed agreement to terminate lease at the 201 W Hunting Park Avenue, Philadelphia, PA location, e-mail M. Duffy and V. Flores regarding same(.3).	0.30	232.50
05/05/23	JaKayla DaBera	Begin drafting limited objection to motion to reject leases and abandon property.	0.40	154.00
05/05/23	JaKayla DaBera	Attention to cure objections summary.	0.60	231.00
05/08/23	JaKayla DaBera	Work on summary of cure objections.	1.10	423.50
05/08/23	Joseph M. Coleman	Examine element objection to assumption and cure(.1).	0.10	77.50
05/12/23	JaKayla DaBera	Review objections to first supplemental cure notice.	0.40	154.00
05/13/23	JaKayla DaBera	Compare list of assumed leases to cure objection summary.	0.80	308.00
05/15/23	JaKayla DaBera	Work on limited objection to motion to abandon.	0.70	269.50
05/15/23	JaKayla DaBera	Review notices of assumption and assignment	0.50	192.50
05/15/23	JaKayla DaBera	Review objection to first supplemental cure notice(.2); Update summary of cure objections(.1).	0.30	115.50
05/15/23	Joseph M. Coleman	Examine numerous motions to assume and assign executory contracts and unexpired leases and e-mails regarding same(.2).	0.20	155.00
05/16/23	Joseph M. Coleman	Review briefly pleadings regarding cure objections and objections to assumption and assignment.	0.20	155.00
05/16/23	JaKayla DaBera	Review objection to first supplemental cure notice.	0.40	154.00
05/16/23	JaKayla DaBera	Continue working on limited objection to motion to abandon.	3.10	1,193.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/17/23	JaKayla DaBera	File limited objection to motion to abandon.	0.20	77.00
05/17/23	JaKayla DaBera	Review cure objections.	0.60	231.00
05/17/23	JaKayla DaBera	Finish drafting limited objection to motion to abandon.	2.90	1,116.50
05/17/23	Joseph M. Coleman	Review emergency motion and e-mail V. Flores regarding Committee having no objection(.1).	0.10	77.50
05/25/23	JaKayla DaBera	Review objection to cure notice.	0.20	77.00
05/31/23	JaKayla DaBera	Attention to lease rejection motion.	0.50	192.50
05/31/23	Joseph M. Coleman	Briefly examine rejection motion filed today and e-mail regarding same.	0.10	77.50
05/31/23	Joseph M. Coleman	Telephone conference with A. Flores regarding Motion to abandon, supplemental assumptions and assignments, Fisher investigation and related issues(.3).	0.30	232.50
Total			15.10	\$6,348.00

Other Contested Matters (excl. assumption/rejection motions)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	S. Kyle Woodard	Assist with preparation for 9019 hearing.	0.20	88.00
05/01/23	Olivia Salvatierra	Prepare Hearing and W&E List Notebooks in preparation of 05.02.23 hearing.	0.40	90.00
05/03/23	Joseph M. Coleman	Follow up regarding cure objections and issues with assumption of executory contracts(.1); Work on objection to abandonment of inventory at Pep Boy's locations(.1).	0.20	155.00

Invoice Date: 06/14/23

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File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/16/23	Joseph M. Coleman	Work on limited objection to abandonment(.2); Review redline to lease termination and surrender for which Debtor is paid \$182,000 and e-mail V. Flores regarding same(.2).	0.40	310.00
05/17/23	Joseph M. Coleman	Finalize motion to abandon objection(.3).	0.30	232.50
05/25/23	Joseph M. Coleman	Examine report required by Cash Management Order regarding transactions between Pep Boys and Auto Plus.	0.10	77.50
Total			1.60	\$953.00

Non-Working Travel

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	Joseph M. Coleman	Travel to Houston for DIP Financing, 9019 and conditional approval of Disclosure Statement hearings.	2.00	1,550.00
05/02/23	Joseph M. Coleman	Return to Dallas after hearings.	2.50	1,937.50
05/09/23	JaKayla DaBera	Travel to Houston for Auction.	2.00	770.00
05/11/23	JaKayla DaBera	Travel back to Dallas.	3.00	1,155.00
05/11/23	Joseph M. Coleman	Return to Dallas.	3.00	2,325.00
Total			12.50	\$7,737.50

Business Operations

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/08/23	Olivia Salvatierra	Prepare 05.10.23 auction notebooks for J. Coleman and J. DaBera.	0.30	67.50
05/31/23	Joseph M. Coleman	Briefly review MORs.	0.20	155.00
Total			0.50	\$222.50

Employee Benefits/Pensions

Invoice Date: 06/14/23

Invoice No.: 495552

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	Joseph M. Coleman	Review DIP Financing Order(1.1); Telephone call with J. Garvey regarding same(.2); E-mails to Sidley regarding issues with form of DIP Financing Final Order(.3); Work on comments to the Order(.3); Confer with J. Kane regarding same(.2).	2.10	1,627.50
Total			2.10	\$1,627.50

Financing/Cash Collateral

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	John J. Kane	Review and comment on the Final DIP order and circulate comments to Icahn and Debtor groups for incorporation into order(1.9); Follow up with J. Coleman regarding same and address inquiries(.2); Review revised DIP Order and comment on same(.3); Review Debtor further revised redline and provide comment regarding same(.2).	2.60	1,508.00
05/04/23	Joseph M. Coleman	Review redline submitted to court of Final DIP Order.	0.10	77.50
Total			2.70	\$1,585.50

Claims Administration and Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	S. Kyle Woodard	Attention to Committee Member's claim and assistance with filing.	0.40	176.00
05/04/23	Joseph M. Coleman	Examine KCC claims analysis(.1); Telephone conference with M. Diaz regarding claim reconciliation(.3); E-mail JW team regarding need for access to a controller and software for claims reconciliation(.2).	0.60	465.00

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File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/16/23	Joseph M. Coleman	Follow up regarding claim to schedule reconciliation with D. Diaz(.1).	0.10	77.50
05/16/23	Joseph M. Coleman	Briefly review claim reconciliation chart and e-mail M. Warner.	0.10	77.50
05/17/23	Joseph M. Coleman	Work on claims objections, communicate with M. Diaz regarding same(.2); Begin to work on Omnibus Claim objections related duplicates and amendments(.3).	0.50	387.50
05/17/23	S. Kyle Woodard	Work on claim objections.	0.40	176.00
05/17/23	JaKayla DaBera	Work on omnibus claim objection.	0.60	231.00
05/17/23	JaKayla DaBera	Call with M. Diaz and J. Coleman regarding omnibus claim objections.	0.30	115.50
05/18/23	JaKayla DaBera	Work on omnibus claim objections.	3.50	1,347.50
05/19/23	JaKayla DaBera	Review southern district omnibus claim objection requirements.	0.20	77.00
05/19/23	JaKayla DaBera	Work on omnibus claim objections.	0.80	308.00
05/22/23	JaKayla DaBera	Finish drafting first and second omnibus objections	7.90	3,041.50
05/22/23	JaKayla DaBera	Call with E. Meraia regarding omnibus objections.	0.10	38.50
05/22/23	Joseph M. Coleman	Work on omnibus objections to claims(.3); E-mail M. Diaz regarding claims issues(.1); Revise objections(.1).	0.50	387.50
05/23/23	Joseph M. Coleman	Examine e-mails and otherwise follow up regarding Omnibus Claim objection(.2); Follow up with J. DaBera regarding claims issues and examine emails regarding same from FTI and J. DaBera(.2).	0.40	310.00
05/23/23	JaKayla DaBera	Finalize and send first draft of first and second omnibus claim objections.	0.70	269.50

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File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/23/23	JaKayla DaBera	Calls with J. Gruber regarding treatment of duplicate claims.	0.20	77.00
05/25/23	JaKayla DaBera	Draft notice of hearing for omnibus objections(1.7); E-mails to Debtor's counsel regarding omnibus objection(.1).	1.80	693.00
05/25/23	Joseph M. Coleman	Exchange e-mails with M. Berger and M. Diaz regarding omnibus claim objections(.1); Examine comments regarding same(.1); Follow up with filing same(.1); E-mail M. Warner regarding claims objections(.1); Begin working on additional claims objections(.1); Examine follow up e-mails regarding claims objections and respond as appropriate(.1); Examine e-mail from M. Warner and respond(.1).	0.70	542.50
05/26/23	JaKayla DaBera	E-mails to E. Meraia regarding filing the omnibus claim objections.	0.10	38.50
05/30/23	Joseph M. Coleman	Examine POCs and e-mail regarding claim objections(.1).	0.10	77.50
05/31/23	Joseph M. Coleman	Telephone conference with M. Diaz regarding next omnibus claim objection(.2).	0.20	155.00
Total			20.20	\$9,069.00

Plan and Disclosure Statement (including Business Plan)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	John J. Kane	Work through Plan and Disclosure Statement and prepare substantive comments responsive to same, coordinate redlines, further revise plan and circulate to Debtor's counsel and Icahn entities for review, comment in advance of hearing.	3.90	2,262.00

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File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	Joseph M. Coleman	Review 9019 Motion and prep for hearing(4.1); Review objection from taxing authority(.2).	4.30	3,332.50
05/01/23	Joseph M. Coleman	Examine Plan and Disclosure Statement(1.8); Telephone conference with V. Polnick regarding Plan, DIP Financing and tomorrow's hearing(.2); Telephone conference with potential Plan administrator(.2).	2.20	1,705.00
05/02/23	John J. Kane	Hearing preparation for DIP and Plan/Disclosure Statement conditional approval(.6); Work on Plan revisions(5.2); Attend hearing on 9019, Plan/Disc conditional approval, and 9019(1.0); Travel(3.0).	9.80	5,684.00
05/02/23	Joseph M. Coleman	Prepare for and attend hearing regarding Motion to approve 9019, Motion to Conditionally approve Disclosure Statement, and Motion to approve final DIP Order(6.5).	6.50	5,037.50
05/02/23	Joseph M. Coleman	Work with JW and go through and make Plan and Disclosure Statement changes(3.2).	3.20	2,480.00
05/03/23	Joseph M. Coleman	Review plan, comment upon same and examine e-mails and return same regarding Plan(1.1).	1.10	852.50
05/03/23	John J. Kane	Review additional Debtor comments to Plan and Disclosure Statement, review insurance provisions, confer with J. Coleman regarding same.	1.10	638.00
05/03/23	John J. Kane	Follow up with Debtor regarding Plan revisions.	0.20	116.00
05/04/23	John J. Kane	Review Plan and Disclosure statement, note lack of plan consolidation, follow up with Debtors' counsel regarding same(.4); Prepare supplemental Plan language addressing Plan consolidation mechanics(1.2).	1.60	928.00

Invoice Date: 06/14/23

Invoice No.: 49552

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/04/23	John J. Kane	Follow up with E. Meraia regarding Committee plan revisions.	0.20	116.00
05/04/23	John J. Kane	Strategy discussion regarding finalization of Plan language.	0.20	116.00
05/04/23	Joseph M. Coleman	Examine e-mails regarding Plan comments and respond as appropriate(.1); E-mail regarding substantive consolidation for distribution purposes only(.1); Follow up regarding Plan administrators(.1); Exchange e-mails with M. Cavanaugh regarding same(.1); Work on substantive consolidation for distribution purposes only language for plan(.7).	1.10	852.50
05/05/23	Joseph M. Coleman	Exchange e-mails with M. Diaz regarding Plan issues(.1).	0.10	77.50
05/09/23	Joseph M. Coleman	Examine Notice of Combined Hearings, Plan Non-Voting Opt-Out Form and Non-Voting Deemed to Reject Notice(.3).	0.30	232.50
05/09/23	S. Kyle Woodard	Conference regarding divide and conquer on sale and Plan issues.	0.50	220.00
05/10/23	JaKayla DaBera	Begin drafting plan administrator agreement.	1.00	385.00
05/10/23	John J. Kane	Review Plan issues and address same with J. Coleman in support of Auction inquiries(.8); Follow up correspondence with J. Coleman regarding plan provisions and GUC Administrator issues, Committee role post-effective date(.2).	1.00	580.00
05/11/23	John J. Kane	Work to schedule conference call with major creditors regarding inquiries about Plan, Disclosure Statement, and circulate current working draft Plan.	0.30	174.00
05/11/23	JaKayla DaBera	Work on Plan Administrator Agreement.	1.00	385.00

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Invoice No.: 495552

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/12/23	John J. Kane	Prepare for and host Plan revision conference call with key creditors(.4); Review proposed revised release language for Plan(.4); Review results of Auction and correspondence from Debtor's counsel regarding same(.3).	1.10	638.00
05/15/23	John J. Kane	Work with Norton Rose an OMM regarding proposed Plan revisions and circulate correspondence raising concerns regarding Plan proposals(1.1); Review responsive correspondence and coordinate with J. Coleman regarding same(.4); Conference with M. Warner regarding Plan, Plan supplement considerations(1.5); Follow up with J. Coleman regarding costs of reconciliation and administration(.2); Follow up with M. Warner(.1); Note to Debtor lack of certain books and records preservation language and prepare language for sale order to effectuate same concern(.8).	4.10	2,378.00
05/15/23	Joseph M. Coleman	Telephone conference with candidates for Plan Administrator and obtain information for Committee Call Agenda packet(.9); Telephone conference with creditors regarding Plan and related issues(.2); Provide comments to Plan(.2); Follow up regarding GUC Administrator choices and recommendations(.2); Confer with J. Kane regarding Plan issues(.2); Examine several e-mails regarding same(.1); Telephone conference with M. Warner regarding variety of Plan issues(.3).	2.10	1,627.50

Invoice Date: 06/14/23

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/15/23	S. Kyle Woodard	Research and draft GUC Administrator Agreement.	5.80	2,552.00
05/16/23	Joseph M. Coleman	Examine e-mails regarding Plan and respond as appropriate(.2); Telephone conference with GUC Administrator regarding Plan and related issues(.3); Work through issues with releases in the Plan(.3).	0.80	620.00
05/16/23	John J. Kane	Review Plan comments from certain creditors, note concerns regarding proposed language and attend call regarding same(.8); Follow up strategy conference with J. Coleman regarding comments(.3); Prepare Plan comment update and key issue list and coordinate with JW team regarding same(.9); Follow up call to K. Gluck(.1); Work on additional Plan language(.6).	2.70	1,566.00
05/17/23	John J. Kane	Prepare for and attend call with JW team regarding Plan, walk through comments and key issues, related GUC administrator matters.	1.20	696.00
05/17/23	Joseph M. Coleman	Examine e-mail from Committee Member regarding need Plan solicitation materials and e-mail J. Kane regarding same(.1); Communicate with M. Warner regarding Plan issues(.2); Examine e-mails from Emily and L. Freeman regarding Plan issues(.1); Work on Plan issues(1.5); Telephone conference with M. Warner regarding Plan issues(.5).	2.40	1,860.00
05/18/23	Joseph M. Coleman	Telephone conference with J. Rae regarding selection of GUC Administrator(.2).	0.20	155.00
05/19/23	John J. Kane	Work on GUC Trust Agreement document.	2.40	1,392.00

Invoice Date: 06/14/23

Invoice No.: 495552

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/19/23	John J. Kane	Complete revisions to Second Amended Plan and circulate to Debtors' counsel with redline and request for feedback, comments.	2.10	1,218.00
05/22/23	John J. Kane	Review supplemental comments and inquiries from M. Warner regarding Plan, Plan implementation, form of GUC Trust Agreement and address same.	1.40	812.00
05/22/23	John J. Kane	Work on additional revisions to Plan and Plan Supplement and engage with M. Warner, JW team regarding same.	2.60	1,508.00
05/22/23	Joseph M. Coleman	Exchange e-mails with Committee Member regarding receipt of Plan and voting, follow up with J. Kane(.1); Go through Plan issues with J. Kane and related to do items(.2).	0.30	232.50
05/22/23	Joseph M. Coleman	Examine comments to the Plan, confer with J. Kane regarding same.	0.20	155.00
05/23/23	Joseph M. Coleman	Examine e-mails regarding Plan amendments and confer with J. Kane regarding same(.2); Examine continued e-mails regarding finalizing Plan and Plan supplement(.1).	0.30	232.50
05/23/23	John J. Kane	Review M. Warner proposed revisions to Plan and incorporate same(.9); Work on additional revisions to Plan to address M. Warner comments(1.2); Work on GUC Trust Agreement, coordinate with M. Warner regarding same(2.3).	4.40	2,552.00
05/23/23	John J. Kane	Work on potential mutual release language for Plan and circulate draft of proposed language to interested creditors(.4); Work with JW team to schedule walk through, page turn for Plan, GUC Trust Agreement(.2).	0.60	348.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/24/23	John J. Kane	Correspondence with M. Warner, JW Plan team regarding status of Plan, Plan supplement deadlines, big picture Plan items(.4); Work with JW team to schedule calls regarding Plan and Plan supplement(.2); Call to M. Duffy regarding extension(.2); Follow up correspondence to Committee regarding Plan extensions(.3); Briefly correspond with J. Coleman regarding status of reconciliation process and effects on Plan(.2).	1.30	754.00
05/24/23	John J. Kane	Work on Plan and GUC Trust documents.	1.20	696.00
05/24/23	Joseph M. Coleman	Telephone conference with M. Warner regarding Plan issues(.1); Confer with J. Kane and examine e-mail from Debtors' counsel regarding pushing out confirmation timetable(.3); Telephone conference with M. Duffy regarding same(.1).	0.50	387.50
05/25/23	Joseph M. Coleman	Review order amending confirmation dates(.1); Exchange e-mails regarding ballot deadline and issues with ballot and respond(.2); Examine multiple creditors issue with returning ballots and problems with KCC and deal with same(.4); Confer with J. Kane regarding Plan issues(.4).	1.10	852.50
05/25/23	John J. Kane	Prepare for and attend conference call with M. Warner and JW team regarding Plan revisions, GUC Trust structure, Plan Agent considerations, releases(1.7); Follow up correspondence to Committee Members with update, Plan issues, balloting notification, troubleshooting guidance and support for Plan(.9).	2.60	1,508.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/25/23	John J. Kane	Continue to work on Plan and balloting issues with updates to Committee Members regarding status of Plan revisions, negotiations.	1.20	696.00
05/26/23	Joseph M. Coleman	Examine numerous objections to confirmation(.8); Follow up regarding help Committee Members with ballot(.2).	1.00	775.00
05/26/23	John J. Kane	Attend to voting inquiries and trouble shooting(.6); Briefly coordinate with K. Woodard regarding same, KCC submission information(.2); Follow up with creditors regarding ballot and voting issues(.3).	1.10	638.00
05/26/23	John J. Kane	Review objections to Plan confirmation.	0.60	348.00
05/26/23	S. Kyle Woodard	Assist with ballot and Plan voting issues.	0.30	132.00
05/29/23	John J. Kane	Review Plan Agent inquiries from M. Warner and correspondence with J. Coleman, Debtor regarding Plan, ballots, related issues.	0.80	464.00
05/29/23	Joseph M. Coleman	Exchange e-mails regarding Plan Agent(.1); E-mail regarding Ballot Summary(.1).	0.20	155.00
05/30/23	Joseph M. Coleman	Work on confirmation issues, GUC Trust, examine preliminary ballot tabulation, and related issues(.9); Briefly review Plan changes by Debtors(.1); Follow up regarding Icahn's refusal to allow certain mutual release(.1); Telephone conference with L. Freeman, M. Warner and A. Grossi regarding plan and winddown after confirmation(.9).	2.00	1,550.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/30/23	John J. Kane	Review revised Trust agreement(.8); Plan and prepare for conference with M. Warner regarding Plan implementation, GUC Trustee, Plan Agent considerations and logistical concerns(.9); Conference with M. Warner regarding same(1.0).	2.70	1,566.00
05/30/23	John J. Kane	Correspondence with Debtor's counsel regarding balloting, obtain summary of results, provide follow up inquiry regarding vote-no creditors(.4); Update to J. Coleman regarding same and coordinate regarding Plan confirmation strategy(.2).	0.60	348.00
05/31/23	Joseph M. Coleman	Follow up on voting(.1); E-mails to V. Flores, M. Diaz and M. Warner regarding need to a part time employee with knowledge of accounting system to be available to be retained by GUC Admin and Plan Admin(.2).	0.30	232.50
05/31/23	John J. Kane	Plan confirmation hearing strategy discussion(.2); Follow up with K. Gluck regarding Mann Hummell Plan vote(.2); Review BBB representation(.1).	0.50	290.00
Total			92.30	\$58,109.00
Litigation				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/11/23	Reuel Coles	Complete scheduling of Rule 2004 Examinations(.4).	0.40	110.00
04/11/23	Reuel Coles	Continue review and organization of documents for Rule 2004 Examinations(6.8).	6.80	1,870.00
Total			7.20	\$1,980.00
Total Professional Charges			294.90	\$174,451.50

Invoice Date: 06/14/23

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File No: 74089.00002.000

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>			<u>Total</u>
Joseph M. Coleman	Director	128.00	hrs at \$ 775 / hr	99,200.00
John J. Kane	Director	64.90	hrs at \$ 580 / hr	37,642.00
S. Kyle Woodard	Associate	13.30	hrs at \$ 440 / hr	5,852.00
JaKayla DaBera	Associate	71.50	hrs at \$ 385 / hr	27,527.50
Reuel Coles	Paralegal	7.20	hrs at \$ 275 / hr	1,980.00
Olivia Salvatierra	Paralegal	10.00	hrs at \$ 225 / hr	2,250.00
Total Professional Charges				\$174,451.50

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/31/23	Photocopies	160.50
05/31/23	Color Copies	7.50
05/31/23	Meals	136.44
05/31/23	On-Line Services	1,765.05
05/31/23	Secretarial Overtime	53.55
05/31/23	Outside Photocopies	3,183.09
05/31/23	Parking	259.80
05/31/23	Postage	4.44
05/31/23	In House Litigation Support	1,126.06
05/31/23	Travel Expense	9,242.71
05/31/23	Word Processing	81.25
Total		\$16,020.39

Invoice Date: 06/14/23

Invoice No.: 49552

File No: 74089.00002.000

INVOICE SUMMARY

Professional Charges	\$ 174,451.50
Disbursements	\$ 16,020.39
CURRENT INVOICE DUE	\$ <u>190,471.89</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	160,523.10	\$ 40,117.20
493787	04/27/23	376,649.90	302,379.50	\$ 74,270.40
494094	05/09/23	717,733.75	623,190.90	\$ 94,542.85
TOTAL AMOUNT DUE				\$ <u>399,402.34</u>

PAYMENT SUMMARY

Balance Due Per Prior Invoice	\$ 1,134,500.85		
<u>Date</u>	<u>Check/Pmt #</u>	<u>Payor</u>	
05/24/23	wire	IEH Auto Parts LLC	- 302,379.50
06/01/23	wire	IEH Auto Parts	- 623,190.90
Previous Balance Due			\$ <u>208,930.45</u>

Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 06/14/23

Invoice No.: 495552

File No.: 74089.00002.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through May 31, 2023:

Total Professional Charges	\$	174,451.50
Disbursements	\$	16,020.39
Current Invoice Due	\$	190,471.89
Previous Balance Due	\$	208,930.45
TOTAL AMOUNT DUE	\$	<u>399,402.34</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.

Exhibit A-5

Fifth Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) IEH AUTO PARTS HOLDING LLC, <i>et al.</i> , ¹) Debtors.)	Chapter 11 Case No. 23-90054 (CML) (Jointly Administered)
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**FIFTH MONTHLY FEE STATEMENT OF KANE RUSSELL COLEMAN LOGAN PC,
AS COUNSEL FOR THE OFFICIAL UNSECURED CREDITORS' COMMITTEE,
FOR THE PERIOD FROM JUNE 1, 2023 THROUGH JUNE 16, 2023**

Name of Professional:	Kane Russell Coleman Logan PC	
Professional's Role in Case:	Counsel for the Official Unsecured Creditors' Committee	
Date of Retention Order:	April 27, 2023 [Dkt. #427]	
Effective Date of Retention:	February 15, 2023	
Time Period Covered by this Statement:	<u><i>Beginning of Period:</i></u> June 1, 2023	<u><i>End of Period:</i></u> June 16, 2023
Total Fees incurred during this Period:	\$46,752.50	
Total Expenses during this Period:	\$22,035.91	
Total Fees and Expenses for the Period:	\$68,788.41	
Summary of Monthly Fee Statement		
Fees sought in this Statement (80%):	\$37,402.00	
Expenses sought in this Statement (100%):	\$22,035.91	
Monthly Fee Statement Total:	\$59,437.91	
20% Holdback for Professional Fees:	\$9,350.50	

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

Kane Russell Coleman Logan PC ("**KRCL**"), counsel for the Official Unsecured Creditors' Committee (the "**Committee**"), submits this Monthly Fee Statement for the above-stated time period (the "**Statement Period**") pursuant to the *Court's Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. #264] (the "**Interim Compensation Order**")² as follows:

PROFESSIONAL FEES

1. KRCL's invoices for the Statement Period is attached hereto (the "**Invoices**"). The Invoices provides: (i) a description of the services rendered; (ii) the time spent; (iii) the hourly rates charged; and (iv) the name of the attorney or paraprofessional performing the work. Time entries on the Invoices are organized by project category.

2. KRCL's fees incurred during the Statement Period are summarized as follows:

Summary by Professional

Name	Position	Hourly Rate	Hours	Fees
Joseph M. Coleman	Director	\$775	21.40	\$16,585.00
John J. Kane	Director	\$580	40.50	\$23,490.00
S. Kyle Woodard	Associate	\$440	1.00	\$440.00
JaKayla DaBera	Associate	\$385	15.50	\$5,967.50
Olivia Salvatierra	Paralegal	\$225	1.20	\$270.00
TOTAL:			79.60	\$46,752.50

² Undefined capitalized terms have the meanings provided in the Interim Compensation Order unless otherwise noted.

Summary by Project Category

Task Code	Hours	Fees
B100 - Bankruptcy	0.00	\$0.00
B110 - Case Administration	2.50	\$1,600.50
B120 - Asset Analysis and Recovery	0.00	\$0.00
B130 - Asset Disposition	2.20	\$1,705.00
B140 - Relief from Stay/Adequate Protection Proceedings	0.30	\$115.50
B150 - Meetings of and Communications with Creditors	2.90	\$2,169.50
B160 - Fee/Employment Applications	3.00	\$1,669.00
B170 - Fee/Employment Objections	0.50	\$270.50
B180 - Avoidance Action Analysis	0.00	\$0.00
B185 - Assumption/Rejection of Leases and Contracts	3.70	\$1,541.50
B190 - Other Contested Matters	0.00	\$0.00
B195 - Non-Working Travel	0.00	\$0.00
B200 - Operations	0.00	\$0.00
B210 - Business Operations	0.00	\$0.00
B220 - Employee Benefits/Pensions	0.00	\$0.00
B230 - Financing/Cash Collections	0.00	\$0.00
B240 - Tax Issues	0.00	\$0.00
B250 - Real Estate	0.30	\$232.50
B260 - Board of Directors Matters	0.00	\$0.00
B300 - Claims and Plan	0.00	\$0.00
B310 - Claims Administration and Objections	16.60	\$8,009.50
B320 - Plan and Disclosure Statement	47.60	\$29,439.00
B400 - Bankruptcy-Related Advice	0.00	\$0.00
B410 - General Bankruptcy Advice/Opinions	0.00	\$0.00
B420 - Restructurings	0.00	\$0.00
L100 - Litigation	0.00	\$0.00
TOTAL:	79.60	\$46,752.50

DISBURSEMENTS

3. KRCL's actual and necessary expenses incurred during the Statement Period are described as follows:

Date	Description	Amount
3/27/2023	Professional Services - Elite Deposition Technologies	\$485.00
4/28/2023	Court Reporter Fees - Veritext Corporate Services, Inc.	\$3,842.80
5/5/2023	Court Reporter Fees - Veritext Corporate Services, Inc.	\$4,744.80
5/8/2023	Professional Services - The Video Department	\$1,475.00
5/9/2023	Court Reporter Fees - Veritext Corporate Services, Inc.	\$2,994.00
5/9/2023	Professional Services - Eversheds Sutherland (US) LLP	\$585.22
5/9/2023	Professional Services - Eversheds Sutherland (US) LLP	\$54.00
5/15/2023	Court Reporter Fees - Judicial Transcribers of Texas, LLC	\$50.40
5/23/2023	Court Reporter Fees - Veritext Corporate Services, Inc.	\$2,788.00
6/28/2023	Photocopies	\$49.05
6/28/2023	Color Copies	\$3.75
6/28/2023	On-Line Services	\$245.32
6/28/2023	Parking	\$27.00
6/28/2023	Postage	\$3.06
6/28/2023	In House Litigation Support	\$1,928.38
6/28/2023	Travel Expense	\$2,760.13
TOTAL:		\$22,035.91

NOTICE AND OPPORTUNITY TO OBJECT

4. Any party that objects to the fees or expenses sought in this Monthly Fee Statement must serve written notice of such objection upon KRCL and each of the Application Recipients³ by no later than **July 14, 2023 at 4:00 p.m. CDT**. The notice must set forth the precise nature and basis of the objection and the amount at issue, and must otherwise comply with the terms of the

³ As defined in the Interim Compensation Order, the Application Recipients include the following parties: (a) the Debtors, 112 Townpark Drive NW, Suite 300, Kennesaw, Georgia 30144, Attn: Michael Neyrey; (b) Jackson Walker LLP (via email), 1401 McKinney Street, Suite 1900, Houston, Texas 77010, Attn: Veronica A. Polnick (vpolnick@jw.com) and Vienna Anaya (vanaya@jw.com); (c) the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov); (d) counsel for the Prepetition Lender, Sidley Austin LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Stephen Hessler (shessler@sidley.com) and Anthony Grossi (agrossi@sidley.com); and (e) counsel to any statutory committee appointed in these cases.

Interim Compensation Order. Copies of the Interim Compensation Order may be requested in writing from KRCL, Attn: Olivia Salvatierra (osalvatierra@krcl.com).

RESERVATION

5. The Committee and KRCL have been diligent in attempting to redact any and all privileged or otherwise confidential information from the Invoice. Notwithstanding, however, the Committee and KRCL expressly reserve, and do not waive under any circumstances whatsoever, any privileges, protections, or rights to confidentiality of any kind or character for any purpose.

6. While KRCL has made every effort to include all fees and expenses incurred during the Statement Period, some fees and expenses may not be included in this Monthly Fee Statement due to, *inter alia*, accounting and processing delays during the Statement Period. KRCL reserves the right to seek allowance and payment of any such fees or expenses in accordance with the orders of this Court and the applicable provisions of the Bankruptcy Code and Bankruptcy Rules.

7. KRCL further reserves the right to supplement and/or amend this Monthly Fee Statement for any reason in accordance with the Interim Compensation Order.

DATED: June 30, 2023

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Kyle Woodard

Joseph M. Coleman

State Bar No. 0456610

SDTX No. 16936

Michael P. Ridulfo

State Bar No. 16902020

SDTX No. 27086

John J. Kane

State Bar No. 24066794

SDTX No. 1069650

Kyle Woodard

State Bar No. 24102661

SDTX No. 3596595

Bank of America Plaza

901 Main Street, Suite 5200

Dallas, Texas 75202

Telephone: (214) 777-4200

Telecopier: (214) 777-4299

Email: jcoleman@krcl.com;

Email: mridulfo@krcl.com

Email: jkane@krcl.com

Email: kwoodard@krcl.com

**ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

CERTIFICATE OF SERVICE

This is to certify that on June 30, 2023, a true and correct copy of this Monthly Fee Statement was filed with the Court and served (i) via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case, and (ii) via e-mail or regular U.S. mail, postage prepaid, upon the following parties:

Debtor:

IEH Auto Parts Holding, LLC, *et al.*
Attn: Michael Neyrey
112 Townpark Drive NW, Suite 300
Kennesaw, GA 30144

Debtors' Counsel:

Jackson Walker LLP
Attn: Veronica A. Polnick (vpolnick@jw.com)
Attn: Vienna Anaya (vanaya@jw.com)

U.S. Trustee:

Office of the US Trustee
Attn: Jayson Ruff (Jayson.B.Ruff@usdoj.gov)
Attn: Andrew Jimenez (Andrew.Jimenez@usdoj.gov)

Prepetition Lender's Counsel:

Sidley Austin LLP
Attn: Stephen Hessler (shessler@sidley.com)
Attn: Anthony Grossi (agrossi@sidley.com)

/s/ Kyle Woodard

Kyle Woodard

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **06/30/23**Invoice No.: **496504**File No.: **74089.00002.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors**PROFESSIONAL CHARGES****Case Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	Joseph M. Coleman	Examine recent ECF filings.	0.10	77.50
06/01/23	JaKayla DaBera	Review docket for updates.	0.20	77.00
06/05/23	Olivia Salvatierra	Review docket for case activity; Save pertinent pleadings to internal firm case file.	0.20	45.00
06/06/23	Joseph M. Coleman	Examine recent ECF filings; Examine miscellaneous e-mails.	0.20	155.00
06/07/23	Joseph M. Coleman	Examine recent pleadings; Examine various e-mails and respond as appropriate.	0.20	155.00
06/07/23	Olivia Salvatierra	Review docket for activity; Save pertinent pleadings to internal firm case file.	0.20	45.00
06/08/23	JaKayla DaBera	Attention to updating internal calendar for Kemp motion to lift stay.	0.10	38.50
06/08/23	Joseph M. Coleman	Examine recent pleadings filed via ECF.	0.20	155.00
06/09/23	Joseph M. Coleman	Examine recent ECF filings.	0.10	77.50
06/12/23	Joseph M. Coleman	Review recent pleadings and various e-mails from Debtor(.2).	0.20	155.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/13/23	Joseph M. Coleman	Review recent pleadings; Examine recent e-mails and respond as appropriate.	0.20	155.00
06/15/23	Joseph M. Coleman	Review pleadings filed via ECF, various e-mails and confer with J. Kane regarding wide array of issues.	0.40	310.00
06/16/23	Joseph M. Coleman	Examine e-mails and pleadings.	0.20	155.00
Total			2.50	\$1,600.50

Asset Disposition

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/02/23	Joseph M. Coleman	Follow up regarding closings, supplemental assumptions and rejections, including telephone conference with V. Flores(.4).	0.40	310.00
06/08/23	Joseph M. Coleman	Follow up regarding closings from 363 sales, miscellaneous sales and Fisher investigation.	0.80	620.00
06/09/23	Joseph M. Coleman	Examine miscellaneous asset sales order and two miscellaneous asset sales(.4).	0.40	310.00
06/10/23	Joseph M. Coleman	Examine several Notices of Closings(.2).	0.20	155.00
06/16/23	Joseph M. Coleman	Examine and follow up regarding numerous notices of sale closing, including FMP, notices of miscellaneous asset sales and follow up regarding Fisher investigation.	0.40	310.00
Total			2.20	\$1,705.00

Relief from Stay/Adequate Protection Proceedings

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/05/23	JaKayla DaBera	Review docket for updates regarding Kemp motion to lift stay.	0.20	77.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/07/23	JaKayla DaBera	E-mail to E. Meraia requesting update on Kemp Motion to Lift Stay hearing.	0.10	38.50
Total			0.30	\$115.50

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	Joseph M. Coleman	Follow up regarding voting/balloting(.2).	0.20	155.00
06/06/23	Joseph M. Coleman	Telephone conference with Committee Member.	0.30	232.50
06/09/23	Joseph M. Coleman	Telephone conference with creditor with numerous questions about case.	0.30	232.50
06/09/23	Joseph M. Coleman	Follow up regarding status report to Committee.	0.10	77.50
06/09/23	John J. Kane	Committee status update on Plan, Plan confirmation matters, Plan supplement filing, updated GUC Trust Agreement.	0.40	232.00
06/12/23	Joseph M. Coleman	Receive e-mails from various creditors regarding Plan, confirmation, closings and related matters and respond as appropriate(.2).	0.20	155.00
06/15/23	Joseph M. Coleman	Communications and status with Committee.	0.30	232.50
06/15/23	Joseph M. Coleman	Telephone conference with M. Duffy, Committee Chair, regarding Asset Sales, Confirmation issues, Plan Agent and related issues(.3); Examine e-mails from Committee Members regarding issues and respond(.1).	0.40	310.00
06/16/23	Joseph M. Coleman	Final status report to the Committee.	0.40	310.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/16/23	Joseph M. Coleman	Follow up regarding Committee Reimbursements, examine Order regarding same; E-mails to Committee and to M. Berger at Portage(.3).	0.30	232.50
Total			2.90	\$2,169.50

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	Joseph M. Coleman	Examine e-mail from C. Bacon regarding fee questions and wind down budget and raise questions via return e-mail(.1); Research and answer questions and e-mail C. Bacon per his request(.3); Finalize and e-mail estimate of fees through confirmation date(.3); E-mail regarding same to C. Bacon(.1).	0.80	620.00
06/07/23	John J. Kane	Work on bills and redactions for fee statement and fee submissions.	0.80	464.00
06/12/23	S. Kyle Woodard	Follow up on FTI's monthly fee statement.	0.20	88.00
06/12/23	Joseph M. Coleman	Work on KRCL fee application for May time(.1).	0.10	77.50
06/12/23	Olivia Salvatierra	E-filed Fee App pleading and served out to required parties for K. Woodard.	0.30	67.50
06/16/23	S. Kyle Woodard	Prepare KRCL May monthly fee statement.	0.80	352.00
Total			3.00	\$1,669.00

Fee/Employment Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	JaKayla DaBera	Finish reviewing Portage fee application for a summary e-mail to J. Coleman.	0.30	115.50

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/16/23	Joseph M. Coleman	Finalize May time/June Invoice Interim Fee application.	0.20	155.00
Total			0.50	\$270.50

Assumption/Rejection of Leases and Contracts

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	JaKayla DaBera	E-mail to debtor's counsel to schedule a conference regarding Committee objection to motion to abandon personal property.	0.10	38.50
06/01/23	JaKayla DaBera	Review third omnibus motion to reject leases and abandon property(.2); Compare third omnibus motion to second omnibus motion(.2).	0.40	154.00
06/01/23	JaKayla DaBera	Attention to hearing date on cure objections.	0.40	154.00
06/01/23	JaKayla DaBera	Attention to Committee objection to motion to abandon, including providing status update.	0.10	38.50
06/05/23	JaKayla DaBera	Prepare for and attend call with V. Anaya regarding objection to motion to abandon.	0.30	115.50
06/06/23	JaKayla DaBera	E-mail M. Diaz regarding claim objections.	0.10	38.50
06/06/23	Joseph M. Coleman	Work on outstanding issues with abandonment to Pep Boys and several rejection and updated assumption and cure motions as they impact insiders and affiliates(.3).	0.30	232.50
06/09/23	JaKayla DaBera	E-mails to V. Anaya regarding status of property abandonment issue.	0.30	115.50
06/09/23	JaKayla DaBera	Review notices of assumption to determine whether AEP assumed pepboys subleases subject to abandonment issue.	0.60	231.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/13/23	JaKayla DaBera	Review redline of order on motion to abandon; Review AEP sale order and notices of assumption and assignment to determine if AEP purchased PB subleases.	0.90	346.50
06/14/23	JaKayla DaBera	Review liquidation analysis related to third omnibus rejection and abandonment motion.	0.20	77.00
Total			3.70	\$1,541.50

Real Estate

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	Joseph M. Coleman	Briefly examine supplemental motions and additional pleadings regarding assumption and assignment, abandonment and rejection and [REDACTED] (.3).	0.30	232.50
Total			0.30	\$232.50

Claims Administration and Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/05/23	Joseph M. Coleman	Examine e-mails and strategize regarding personal injury claimant's motion to lift stay(.3); E-mail M. Diaz and others regarding claims objections(.2).	0.50	387.50
06/05/23	Joseph M. Coleman	Communicate with M. Diaz regarding claims and objections; Examine two late filed claims; Follow up with J. DaBera regarding claim objections; Examine e-mail regarding same(.3).	0.30	232.50

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/05/23	John J. Kane	Work with JW team to address pending motions for relief from stay related to personal injury claims by reviewing claims(.5), analyzing Plan provisions(.6), and working with JW counsel regarding insurance policies, collateral, potential ramifications of PI litigation(.8); Follow up with J. Coleman regarding same(.1); Correspondence with personal injury claimant on stay relief hearing(.2).	2.20	1,276.00
06/05/23	JaKayla DaBera	Draft and send e-mail to FTI team regarding status of next omnibus claim objections.	0.10	38.50
06/06/23	JaKayla DaBera	Discuss progress of omnibus claim objections with J. Coleman.	0.10	38.50
06/06/23	JaKayla DaBera	Call with D. Sveen regarding omnibus claim objections.	0.30	115.50
06/06/23	JaKayla DaBera	Review claim analysis spreadsheet.	0.30	115.50
06/06/23	Joseph M. Coleman	Examine e-mails and otherwise work on claim objections, including late filed claims, \$0 claims and claims without documentation.	0.30	232.50
06/07/23	Joseph M. Coleman	Work on claim objections regarding \$0, lack of documentation and late filed claims.	0.20	155.00
06/07/23	Joseph M. Coleman	Work on claim objection and reconciliation issues.	0.90	697.50
06/08/23	John J. Kane	Review and approve IAP stipulation and confirm same with L. Freeman(.3).	0.30	174.00
06/08/23	JaKayla DaBera	Attention to inquiry regarding remaining claim of Brown Rudnick(.2); Call with E. Meraia regarding same(.1).	0.30	115.50
06/08/23	JaKayla DaBera	E-mails to D. Sveen regarding omnibus objections.	0.10	38.50

Invoice Date: 06/30/23

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File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/09/23	JaKayla DaBera	Call with D. Sveen regarding proofs of claims subject to objection.	0.10	38.50
06/09/23	JaKayla DaBera	Call with J. Gruber regarding Brown Rudnick claim(.1); Draft and send update e-mail to J. Coleman regarding same(.2).	0.30	115.50
06/09/23	JaKayla DaBera	Prepare for call with D. Sveen regarding omnibus claim objections including review exhibits for proposed objections.	0.90	346.50
06/09/23	JaKayla DaBera	Call with D. Sveen regarding omnibus claim objections.	0.30	115.50
06/12/23	JaKayla DaBera	Work on third and fourth omnibus claim objections.	2.50	962.50
06/13/23	JaKayla DaBera	Call with Brown Rudnick regarding duplicate claim objection; E-mails to E. Meraia regarding Brown Rudnick inquiry.	0.20	77.00
06/13/23	JaKayla DaBera	Work on omnibus objections.	1.90	731.50
06/14/23	JaKayla DaBera	Calls and e-mails with D. Sveen regarding omnibus objections(.2); Finish drafting omnibus objections(2.7).	2.90	1,116.50
06/14/23	Joseph M. Coleman	Work on claims objections, procedures for omnibus, preservation of accounting system and related issues.	0.70	542.50
06/15/23	JaKayla DaBera	E-mail E. Meraia about Peoples Natural Gas claim objection inquiry.	0.10	38.50
06/15/23	JaKayla DaBera	Review proofs of claim listed on insufficient documentation schedule(.4); E-mail D. Sveen regarding updates to same (.1).	0.50	192.50
06/15/23	JaKayla DaBera	E-mail E. Meraia regarding hearing date on additional claims objections and send drafts for review.	0.20	77.00

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/15/23	JaKayla DaBera	E-mail S. Hall regarding withdrawal of objection to Peoples Natural Gas.	0.10	38.50
Total			16.60	\$8,009.50

Plan and Disclosure Statement (including Business Plan)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	John J. Kane	Conference with K. Gluck regarding Plan vote, follow up with Debtors regarding same.	0.40	232.00
06/01/23	John J. Kane	Review and comment on M. Warner enforcement provisions for Plan supplement documents.	0.40	232.00
06/02/23	Joseph M. Coleman	Work on confirmation issues, including voting issues, Plan Administrator, GUC Trustee, objections and related matters.	0.90	697.50
06/05/23	Joseph M. Coleman	Follow up regarding Open Confirmation issues(.2).	0.20	155.00
06/05/23	Joseph M. Coleman	Examine e-mail from M. Warner regarding Plan Agent Agreement(.1).	0.10	77.50
06/05/23	John J. Kane	Review comments to GUC Trust agreement from Committee Members(.5); Revise GUC Trust Agreement and circulate to M. Warner(.6).	1.10	638.00
06/06/23	John J. Kane	Work with Debtors' counsel on plan-related and claim administration related insurance matters, prepare for preliminary call, and attend call on same(1.6); Work with M. Warner on GUC Trust Agreement updates and minor revisions(.3).	1.90	1,102.00

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/06/23	Joseph M. Coleman	Examine e-mail from M. Warner regarding Plan Agent issues(.1); Examine e-mail regarding Plan objection and related issues and respond as appropriate(.2); Work on GUC admin issues, distribution agent matters and related matters(.3).	0.60	465.00
06/07/23	John J. Kane	Review Stretto proposal for post-confirmation claims agent work.	0.20	116.00
06/07/23	Joseph M. Coleman	Examine e-mails; Follow up regarding open confirmation issues; Telephone conference with M. Warner.	0.40	310.00
06/07/23	John J. Kane	Review Plan provisions and objections regarding insurance in preparation for call(.8); Review insurance and personal injury claims in case in preparation for call(.9); Conference call with Debtors' counsel regarding Plan objections and insurance related matters(.6); Coordinate with J. Coleman on insurance matters, effects of same on administration of GUC claims and estate(.4).	2.70	1,566.00
06/08/23	John J. Kane	Coordinate with M. Warner and J. Coleman regarding Plan agent and GUC Trust Agreement, Debtor's designation of Plan Agent, related issues.	0.60	348.00
06/09/23	John J. Kane	Calls and e-mails with V. Polnick and E. Meraia regarding Plan Agent, GUC Trust, and revised Plan filings(.5); Review revised Plan and redline and compare to prior form, note issues, correspond with V. Polnick regarding same(1.1); Review GUC Trust Agreement as revised, run redline, revise form, prepare redline, and resubmit to V. Polnick with commentary(1.0).	2.60	1,508.00

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/09/23	Joseph M. Coleman	Examine e-mails and address open issues regarding Plan supplement, Plan agent and confirmation issues(.4).	0.40	310.00
06/10/23	Joseph M. Coleman	Work on open issues regarding Plan confirmation(.2); Briefly begin reviewing redline of Plan(.1).	0.30	232.50
06/12/23	Joseph M. Coleman	Telephone conference with M. Warner(.3); Work on various Plan confirmation issues(1.1).	1.40	1,085.00
06/12/23	John J. Kane	Call and e-mails to JW team regarding Plan Agent/GUC Trustee issues, synergies, next steps for resolving same(.9); Work with E. Meraia on insurance-related Plan language(.5); Correspondence with creditors regarding Plan Agent/GUC Trustee roles and responsibilities(.2); Review revisions to proposed Plan Agent agreement, plan, GUC Trustee Agreement(.6); Coordinate with J. Coleman regarding Plan, confirmation, and GUC claim reconciliation issues(.4).	2.60	1,508.00
06/12/23	Olivia Salvatierra	Prepared Witness & Exhibit List draft for combined hearing 06.16.23 for J. Kane.	0.30	67.50
06/13/23	John J. Kane	Work through Plan insurance and related matters(.5); Begin review and mark up of confirmation order(1.3); Correspondence with BBB regarding Plan vote(.2); Review outstanding Plan objections(.4).	2.40	1,392.00
06/13/23	Joseph M. Coleman	Work on confirmation matters.	0.90	697.50
06/14/23	Joseph M. Coleman	Work on myriad of confirmation issues.	1.30	1,007.50

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/14/23	Joseph M. Coleman	Review amended Plan supplement, with particular attention to the GUC Trust Agreement(1.1).	1.10	852.50
06/14/23	John J. Kane	Work on confirmation order(.4); Review and work through Plan objection related to insurance matters, propose language for confirmation order resolving same, and correspond with Debtor's counsel(.6); Correspondence with Icahn team regarding Plan language(.2); Follow up call regarding same(.4); Prepare and submit witness and exhibit list for hearing(.3); Update with J. Coleman on Plan confirmation, related matters(.4); Correspondence with Debtors' counsel regarding Plan Agent, GUC Trustee considerations(.2); Call with BBB Industries regarding Plan vote matters(.3); Follow up with J. Coleman regarding same(.1); Work through gatekeep and exculpation consideration from UST objection, propose language resolving same(.7); Schedule follow up update call with Debtors' counsel(.2).	3.80	2,204.00
06/14/23	John J. Kane	Work on Plan confirmation issues, GUC Trust matters and coordinate with Debtors' counsel regarding same(1.4); Correspondence with J. Hall regarding BBB claim and vote for Plan(.4).; Call with J. Garvey regarding Plan Agent and cost allocation for GUC Trust formation(.4); Update to J. Coleman on Plan issues(.2); Work with L. Freeman on plan-related insurance issues(.2).	2.60	1,508.00

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/14/23	Olivia Salvatierra	E-filed Witness & Exhibit List for 06.16.23 hearing for J. Kane	0.20	45.00
06/15/23	John J. Kane	Work on BBB Industries vote resolution matters, draft proposed language for confirmation order, coordinate with JW team regarding same, resolution of balloting for plan confirmation hearing(1.0); Work on revisions to confirmation order and coordinate with M. Warner, E. Meraia, regarding same(.4); Further review and revise updated confirmation order(.8); Work on plan revisions with J. Garvey, prepare revised language, further negotiate terms and coordinate with JW team for insertion of agreed revised language in amended Plan(1.2); Correspondence with J. Coleman regarding Plan confirmation issues, release language, Plan balloting, resolution of outstanding issues(.4); Follow up correspondence with JW team regarding insurance issues and Plan objections, resolution of same(.9).	4.70	2,726.00
06/15/23	John J. Kane	Additional follow up correspondence to Sidley team regarding definitions in Plan, language, potential Plan objection related to fee shifting dispute, propose revised language addressing issue.	1.10	638.00
06/15/23	Joseph M. Coleman	Work on myriad of confirmation issues.	1.40	1,085.00
06/16/23	Joseph M. Coleman	Numerous telephone conferences, emails working with issues regarding confirmation(1.1); Follow up regarding Effective Date v. Confirmation Date and impact of each(.2).	1.30	1,007.50

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/16/23	John J. Kane	Work on revisions to draft confirmation order and work with M. Warner regarding same(2.4); Travel to Houston for hearing(2.0); Prepare for Plan confirmation hearing(1.2); Work with JW team on insurance disputes, Plan revisions, redlines, related Plan matters(1.0); Attend Plan confirmation hearing(.8); Debrief with J. Coleman(.3); Travel to Dallas(2.0).	9.70	5,626.00
Total			47.60	\$29,439.00
Total Professional Charges			79.60	\$46,752.50

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Joseph M. Coleman	Director	21.40 hrs at \$ 775 / hr 16,585.00
John J. Kane	Director	40.50 hrs at \$ 580 / hr 23,490.00
S. Kyle Woodard	Associate	1.00 hrs at \$ 440 / hr 440.00
JaKayla DaBera	Associate	15.50 hrs at \$ 385 / hr 5,967.50
Olivia Salvatierra	Paralegal	1.20 hrs at \$ 225 / hr 270.00
Total Professional Charges		\$46,752.50

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/28/23	Photocopies	49.05
06/28/23	Color Copies	3.75
06/28/23	On-Line Services	245.32
06/28/23	Parking	27.00
06/28/23	Postage	3.06
06/28/23	In House Litigation Support	1,928.38
06/28/23	Travel Expense	2,760.13

Invoice Date: 06/30/23

Invoice No.: 496504

File No: 74089.00002.000

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/27/23	Professional Services - Elite Deposition Technologies	485.00
04/28/23	Court Reporter Fees - Veritext Corporate Services, Inc.	3,842.80
05/05/23	Court Reporter Fees - Veritext Corporate Services, Inc.	4,744.80
05/08/23	Professional Services - The Video Department	1,475.00
05/09/23	Court Reporter Fees - Veritext Corporate Services, Inc.	2,994.00
05/09/23	Professional Services - Eversheds Sutherland (US) LLP	585.22
05/09/23	Professional Services - Eversheds Sutherland (US) LLP	54.00
05/15/23	Court Reporter Fees - Judicial Transcribers of Texas, LLC	50.40
05/23/23	Court Reporter Fees - Veritext Corporate Services, Inc.	2,788.00
Total		\$22,035.91

INVOICE SUMMARY

Professional Charges	\$ 46,752.50
Disbursements	\$ 22,035.91
CURRENT INVOICE DUE	\$ <u>68,788.41</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	160,523.10	\$ 40,117.20
493787	04/27/23	376,649.90	302,379.50	\$ 74,270.40
494094	05/09/23	717,733.75	623,190.90	\$ 94,542.85
495552	06/14/23	190,471.89	0.00	\$ 190,471.89
TOTAL AMOUNT DUE				\$ <u>468,190.75</u>

Privacy Notice

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KANE RUSSELL COLEMAN LOGAN

Invoice Date: 06/30/23

Invoice No.: 496504

File No.: 74089.00002.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through June 28, 2023:

Total Professional Charges	\$	46,752.50
Disbursements	\$	22,035.91
Current Invoice Due	\$	68,788.41
Previous Balance Due	\$	399,402.34
TOTAL AMOUNT DUE	\$	<u>468,190.75</u>

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Exhibit A-6

Unbilled February 2023 Invoice

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **03/21/23**Invoice No.: **492462**File No.: **74089.00003.000****Matt Hulteen**

The Unsecured Creditors Committee of IEH
Auto Parts
, TX

File Description: Lien Investigation of American Entertainment**PROFESSIONAL CHARGES****Asset Analysis and Recovery**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/27/23	Joseph M. Coleman	Begin work on lien perfection issues.	0.40	310.00
Total			0.40	\$310.00

Other Contested Matters (excl. assumption/rejection motions)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/27/23	S. Kyle Woodard	Brief research regarding standing issues.	0.40	176.00
02/27/23	JaKayla DaBera	Research on whether derivative standing must be requested prior to a lien challenge.	2.90	1,116.50
Total			3.30	\$1,292.50
Total Professional Charges			3.70	\$1,602.50

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>		<u>Total</u>
Joseph M. Coleman	Director	.40 hrs at \$ 775 / hr	310.00
S. Kyle Woodard	Associate	.40 hrs at \$ 440 / hr	176.00
JaKayla DaBera	Associate	2.90 hrs at \$ 385 / hr	1,116.50

Invoice Date: 03/21/23

Invoice No.: 492462

File No: 74089.00003.000

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Total Professional Charges		\$1,602.50

INVOICE SUMMARY

Professional Charges	\$ 1,602.50
CURRENT INVOICE DUE	\$ <u>1,602.50</u>
TOTAL AMOUNT DUE	\$ <u>1,602.50</u>

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KANE RUSSELL
COLEMAN LOGAN

Invoice Date: 03/21/23

Invoice No.: 492462

File No.: 74089.00003.000

Matt Hulteen

The Unsecured Creditors Committee of IEH
Auto Parts
, TX

For Professional Services Rendered Through March 16, 2023:

Total Professional Charges	\$	1,602.50
Current Invoice Due	\$	<u>1,602.50</u>
TOTAL AMOUNT DUE	\$	<u>1,602.50</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

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Exhibit A-7

June 2023 Invoices

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **07/13/23**Invoice No.: **496992**File No.: **74089.00002.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors**PROFESSIONAL CHARGES****Plan and Disclosure Statement (including Business Plan)**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/15/23	Olivia Salvatierra	Prepared notebook of Debtor's W&E List in preparation of combined hearing 06.16.23 for J. Kane.	0.40	90.00
Total			0.40	\$90.00
Total Professional Charges			0.40	\$90.00

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Olivia Salvatierra	Paralegal .40 hrs at \$ 225 / hr	90.00
Total Professional Charges		\$90.00

INVOICE SUMMARY

Professional Charges	\$	90.00
CURRENT INVOICE DUE	\$	<u>90.00</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	160,523.10	\$ 40,117.20

Invoice Date: 07/13/23

Invoice No.: 496992

File No: 74089.00002.000

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>		<u>Balance</u>
493787	04/27/23	376,649.90	302,379.50	\$	74,270.40
494094	05/09/23	717,733.75	623,190.90	\$	94,542.85
495552	06/14/23	190,471.89	155,581.59	\$	34,890.30
496504	06/30/23	68,788.41	0.00	\$	68,788.41
TOTAL AMOUNT DUE				\$	<u>312,699.16</u>

PAYMENT SUMMARY

Balance Due Per Prior Invoice	\$	468,190.75
<u>Date</u>	<u>Check/Pmt #</u>	<u>Payor</u>
07/11/23	wire	leh Auto Parts
		- 155,581.59
Previous Balance Due	\$	<u>312,609.16</u>

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KANE RUSSELL
COLEMAN LOGAN

Invoice Date: 07/13/23

Invoice No.: 496992

File No.: 74089.00002.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through June 30, 2023:

Total Professional Charges	\$	90.00
Current Invoice Due	\$	90.00
Previous Balance Due	\$	312,609.16
TOTAL AMOUNT DUE	\$	<u>312,699.16</u>

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**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **07/13/23**Invoice No.: **496988**File No.: **74089.00005.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH - Post-Confirmation**PROFESSIONAL CHARGES****Case Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/29/23	Joseph M. Coleman	Examine several pleadings filed over the last 10 days(.5); Answer Debtors' e-mails about effective date, Plan Administrator, insurance matters, TSA's and related matters(.3); Telephone conference with Debtors' counsel regarding Plan Agent, wind up and effective date(.3); Communicate with A. Grossi(.1).	1.20	930.00
06/30/23	Joseph M. Coleman	Work on issues pertaining to Effective Date, including personnel, data preservation and related issues.	0.50	387.50
Total			1.70	\$1,317.50

Asset Disposition

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/20/23	Joseph M. Coleman	Follow up regarding investigation of Fisher(.5).	0.50	387.50
Total			0.50	\$387.50

Fee/Employment Applications

Invoice Date: 07/13/23

Invoice No.: 496988

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/29/23	John J. Kane	Work on fee application, invoice redactions, and coordinate with J. Coleman regarding same and Plan.	1.40	812.00
06/30/23	Joseph M. Coleman	Finalize fee application for June pre-confirmation time.	0.20	155.00
06/30/23	Olivia Salvatierra	E-filed 5th Monthly Fee Statement and served out per COS for K. Woodard.	0.30	67.50
06/30/23	John J. Kane	Follow up regarding fee statement and application and confirm redactions on relevant invoices.	0.20	116.00
06/30/23	John J. Kane	Work with J. Coleman on Plan and fee related matters.	0.40	232.00
Total			2.50	\$1,382.50

Plan and Disclosure Statement (including Business Plan)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/26/23	John J. Kane	Review Debtors' responses to list of information requests to Debtors related to Plan, effective date, preparation of GUC Trust.	0.40	232.00
Total			0.40	\$232.00
Total Professional Charges			5.10	\$3,319.50

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>		<u>Total</u>
Joseph M. Coleman	Director	2.40 hrs at \$ 775 / hr	1,860.00
John J. Kane	Director	2.40 hrs at \$ 580 / hr	1,392.00
Olivia Salvatierra	Paralegal	.30 hrs at \$ 225 / hr	67.50
Total Professional Charges			\$3,319.50

INVOICE SUMMARY

Professional Charges	\$	3,319.50
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Invoice Date: 07/13/23

Invoice No.: 496988

File No: 74089.00005.000

CURRENT INVOICE DUE \$ **3,319.50**

TOTAL AMOUNT DUE \$ **3,319.50**

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KANE RUSSELL COLEMAN LOGAN

Invoice Date: 07/13/23

Invoice No.: 496988

File No.: 74089.00005.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through July 13, 2023:

Total Professional Charges	\$	3,319.50
Current Invoice Due	\$	<u>3,319.50</u>
TOTAL AMOUNT DUE	\$	<u>3,319.50</u>

REMITTANCE

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Exhibit A-8

July 2023 Invoices

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **08/21/23**Invoice No.: **498837**File No.: **74089.00002.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors**PROFESSIONAL CHARGES****Fee/Employment Applications**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/05/23	Joseph M. Coleman	Docket dates for monthly fee apps(.1); Ascertain deadline to file final fee app and begin outlining fee app(.2); Answer Committee Member's question and provide status report(.3).	0.60	465.00
07/07/23	Joseph M. Coleman	Follow up regarding monthly fee apps and begin final fee application(.2).	0.20	155.00
07/21/23	Joseph M. Coleman	Exchange e-mail with M. Berger regarding monthly fee statements.	0.10	77.50
07/26/23	JaKayla DaBera	Review and revise IEH first and final fee application.	0.80	308.00
Total			1.70	\$1,005.50
Total Professional Charges			1.70	\$1,005.50

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>		<u>Total</u>
Joseph M. Coleman	Director	.90 hrs at \$ 775 / hr	697.50
JaKayla DaBera	Associate	.80 hrs at \$ 385 / hr	308.00

Invoice Date: 08/21/23

Invoice No.: 498837

File No: 74089.00002.000

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Total Professional Charges		\$1,005.50

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/31/23	Meals	21.67
07/31/23	Travel Expense	2,967.73
05/25/23	Professional Services - Orbital Data Consulting Group	6,242.19
06/30/23	Court Reporter Fees - Judicial Transcribers of Texas, LLC	36.00
Total		\$9,267.59

INVOICE SUMMARY

Professional Charges	\$ 1,005.50
Disbursements	\$ 9,267.59
CURRENT INVOICE DUE	\$ <u>10,273.09</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	160,523.10	\$ 40,117.20
493787	04/27/23	376,649.90	302,379.50	\$ 74,270.40
494094	05/09/23	717,733.75	623,190.90	\$ 94,542.85
495552	06/14/23	190,471.89	155,581.59	\$ 34,890.30
496504	06/30/23	68,788.41	59,437.91	\$ 9,350.50
496992	07/13/23	90.00	0.00	\$ 90.00
TOTAL AMOUNT DUE				\$ <u>263,534.34</u>

PAYMENT SUMMARY

Balance Due Per Prior Invoice	\$ 312,699.16		
<u>Date</u>	<u>Check/Pmt #</u>	<u>Payor</u>	
07/21/23	wire	IEH Auto Parts LLC	- 59,437.91
Previous Balance Due			\$ <u>253,261.25</u>

[Privacy Notice](#)

Invoice Date: 08/21/23

Invoice No.: 498837

File No: 74089.00002.000

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KANE RUSSELL COLEMAN LOGAN

Invoice Date: 08/21/23

Invoice No.: 498837

File No.: 74089.00002.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through July 31, 2023:

Total Professional Charges	\$	1,005.50
Disbursements	\$	9,267.59
Current Invoice Due	\$	<u>10,273.09</u>
Previous Balance Due	\$	253,261.25
TOTAL AMOUNT DUE	\$	<u>263,534.34</u>

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**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **08/21/23**Invoice No.: **498838**File No.: **74089.00005.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH - Post-Confirmation**PROFESSIONAL CHARGES****Case Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/03/23	John J. Kane	Confer with J. Coleman on Plan provisions related to GUC Trust, professional fee compensation, conditions precedent to effective date.	0.30	174.00
07/05/23	John J. Kane	Confer with Debtors' counsel with insurance-related issues, stipulation discussions and stay relief hearing settings, resolution of same.	0.90	522.00
07/05/23	Joseph M. Coleman	Answer question from creditor about the case(.1); Examine e-mail from Committee Member and respond(.1); Examine set offs between Pep Boys and Auto Plus per Cash Management Order(.1); Work on status report to the Committee(.1).	0.40	310.00

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/06/23	Joseph M. Coleman	Examine Plan regarding Effective Date and need to cause Effective Date to arrive(.3); Examine recent pleadings filed with the Court(.1); Prep regarding all outstanding issues for meeting with V. Flores(.2); Meeting with V. Flores regarding effective date, Plan Administrator, sale closings and transitions, Fisher investigation, remaining Debtor personnel and related matters(1.0).	1.60	1,240.00
07/07/23	Joseph M. Coleman	Follow up regarding asset sale closings, TSA issues, and all the issues and obstacles to Effective Date(.3); Status report to Committee Members(.2).	0.70	542.50
07/07/23	John J. Kane	Correspondence with Debtors regarding GUC claim treatment pre-effective date and coordinate with J. Coleman regarding same.	0.20	116.00
07/07/23	John J. Kane	Advise regarding Plan language, fee and cost shifting during post-confirmation period.	0.30	174.00
07/10/23	Joseph M. Coleman	Examine recent filings via ECF(.1); Exchange e-mails with M. Cavanaugh regarding Plan and wind down issues(.1); Telephone conference with A. Grossi regarding wind down issues(.2); E-mail A. Grossi regarding same(.1).	0.50	387.50
07/11/23	Joseph M. Coleman	Telephone conference with M. Cavanaugh regarding Effective Date, Fisher and TSA's and related issues(.3); Follow up regarding lift stay regarding insurance issue(.1); E-mail M. Cavanaugh regarding Fisher investigation(.1); Communications with C. Bankler regarding Fisher investigation(.2); Provide C. Bankler with my information about Fisher(.3).	1.00	775.00

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/11/23	Olivia Salvatierra	Review docket for case activity and saved pertinent pleadings to internal case file.	0.40	90.00
07/11/23	John J. Kane	Review correspondence and comments to Goodman stipulation for effects on Trust(.6); Confer with Debtor's counsel and opposing counsel regarding lift stay hearing dates, continuance of same(.4); Work with M. Warner on to-do items and confer regarding call to address Goodman stipulation, claims administration matters(.3); Brief correspondence with J. Coleman regarding post-confirmation obligations(.2).	1.50	870.00
07/11/23	JaKayla DaBera	Review and revise notices.	0.40	154.00
07/12/23	Joseph M. Coleman	Examine stipulation regarding personal injury claim, insurance issues and related matters filed with the Court.	0.10	77.50
07/14/23	Joseph M. Coleman	Exchange e-mails with Committee Chair regarding sale process; Examine recent ECF filings; Examine e-mail from Committee Members(.3).	0.30	232.50
07/17/23	Joseph M. Coleman	Examine numerous e-mails from V. Flores, E. Meraia, and others regarding wide array of matters and respond as appropriate(.2).	0.20	155.00
07/17/23	S. Kyle Woodard	Correspondence with counsel for workers comp. claimant.	0.10	44.00
07/18/23	Joseph M. Coleman	Examine e-mails from P. Bartels, V. Flores and others regarding Plan administrator(.1); Examine recent pleadings(.1).	0.20	155.00
07/18/23	John J. Kane	Prepare agenda items for call with Plan Agent(.4); Correspondence with Plan Agent rescheduling call(.2).	0.60	348.00

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/23	Olivia Salvatierra	Review docket for case activity and saved pertinent pleadings to internal firm case file.	0.20	45.00
07/19/23	Joseph M. Coleman	Research P. Bartels, Plan Administrator(.2).	0.20	155.00
07/19/23	John J. Kane	Prepare for and attend conference call with Plan Agent, Debtors' counsel regarding reconciliation logistics and procedures, outstanding pre-effective date matters, related issues.	1.20	696.00
07/20/23	Joseph M. Coleman	Examine recent pleadings; Examine miscellaneous asset sale; Examine e-mail from Debtors' counsel.	0.20	155.00
07/21/23	S. Kyle Woodard	Follow up on worker's comp claim issue.	0.20	88.00
07/24/23	Joseph M. Coleman	Communications with M. Neyrey and V. Flores regarding Effective Date; Examine e-mail from M. Neyrey regarding Effective Date and respond(.2).	0.20	155.00
07/26/23	Joseph M. Coleman	Briefly review MORs filed by the debtor.	0.10	77.50
07/28/23	Joseph M. Coleman	Review recent pleadings; Follow up regarding Effective Date.	0.10	77.50
07/28/23	S. Kyle Woodard	Review bar date order as pertaining to creditor issues.	0.20	88.00
07/31/23	Olivia Salvatierra	Reviewed docket for case activity and saved pertinent docket items to internal case file.	0.30	67.50
07/31/23	Joseph M. Coleman	Review recent motion to abandon with particular attention to if it went to an insider(.1); Examine e-mail from Committee Member and respond(.1).	0.20	155.00
Total			12.80	\$8,126.50

Asset Disposition

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/14/23	John J. Kane	Advise Committee Members regarding asset sale final terms.	0.40	232.00
07/17/23	Joseph M. Coleman	Examine miscellaneous sale outside the ordinary course of business to an insider and approve same.	0.20	155.00
07/21/23	Joseph M. Coleman	Communicate with C. Bankler regarding Fisher dispute and mediation.	0.10	77.50
07/24/23	Joseph M. Coleman	Follow up regarding Fisher mediation and next steps related thereto.	0.40	310.00
Total			1.10	\$774.50

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/05/23	John J. Kane	Additional correspondence with Committee Members regarding post-confirmation logistics, claim reconciliation considerations(.3); Confer with J. Coleman regarding same and related issues(.4).	0.70	406.00
07/05/23	John J. Kane	Review creditor correspondence, review additional correspondence from Debtors' counsel regarding status of post-confirmation work necessary for effective date, and prepare status update to the Committee regarding case issues.	1.40	812.00
07/10/23	Joseph M. Coleman	Examine e-mail from Committee Chair and follow up regarding post-effective date creditor/Committee involvement(.1).	0.10	77.50

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/12/23	Joseph M. Coleman	Detailed status report to the Committee(.6); Examine e-mail from Committee Member with a variety of questions regarding Fisher's disqualification and status related thereto and respond(.2); Exchange e-mails with Committee Member regarding additional questions and request for updates(.1).	0.90	697.50
07/13/23	S. Kyle Woodard	Phone call regarding workers' compensation issue.	0.10	44.00
07/13/23	S. Kyle Woodard	Review Plan and confirmation as pertaining to alleged workers comp claim against AutoPlus; Follow up with counsel for Claimant.	0.60	264.00
07/17/23	Joseph M. Coleman	Examine e-mail from Committee Chair.	0.10	77.50
07/20/23	Joseph M. Coleman	Examine status report; E-mail Committee Members regarding expense reimbursement; Examine responses(.2).	0.20	155.00
07/25/23	Joseph M. Coleman	Telephone conference with Committee Chair regarding status, Effective Date and related issues(.1).	0.10	77.50
07/25/23	Joseph M. Coleman	Telephone conference with Committee Member E. Pawlish regarding variety of questions about Effective Date, 503(b)(9), Fisher, role of subset of Committee Members being available to GUC Trustee and related matters.	0.30	232.50
07/26/23	Joseph M. Coleman	Telephone conference with Committee Chair, M. Duffy, regarding status issues, particularly Fisher and Effective Date.	0.30	232.50
07/27/23	Joseph M. Coleman	Status report to IEH Committee, including responses to inquiries.	0.30	232.50

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Total			5.10	\$3,308.50

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/05/23	Olivia Salvatierra	Prepare First and Final Fee App.	2.50	0.00
07/10/23	Joseph M. Coleman	Examine Fourth Monthly Fee Statement and objection deadline; E-mail M. Berger regarding same(.2); Exchange e-mails with M. Berger and determine objection deadline for Fifth Monthly Fee Statement(.1).	0.30	232.50
07/11/23	Joseph M. Coleman	E-mail A. Grossi regarding fees for Plan issues(.1); Examine FTI monthly fee application readying same for filing(.1).	0.20	155.00
07/11/23	Olivia Salvatierra	E-filed FTI's Fourth Monthly Fee Statement for K. Woodard.	0.20	45.00
07/18/23	Joseph M. Coleman	Confirm no objections to Fifth monthly fee statement; E-mail M. Berger regarding same.	0.20	155.00
07/19/23	JaKayla DaBera	Draft proposed order to authorize payment of pre-effective day fees and expenses.	0.70	269.50
Total			4.10	\$857.00

Assumption/Rejection of Leases and Contracts

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/11/23	Joseph M. Coleman	Examine reject Motion and exhibit thereto(.1).	0.10	77.50
Total			0.10	\$77.50

Other Contested Matters (excl. assumption/rejection motions)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/07/23	John J. Kane	Work to continue hearings on motion for relief from stay filed by personal injury claimants.	0.30	174.00

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Total			0.30	\$174.00

Claims Administration and Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/07/23	John J. Kane	Coordinate with Debtors counsel and M. Warner regarding PI claims, Goodman stipulation, related issues and concerns.	0.60	348.00
07/10/23	John J. Kane	Work with Debtors' counsel and Claimant counsel on resetting motion for relief from stay hearing, timing for same, means of obtaining new hearing from Court.	0.50	290.00
07/11/23	JaKayla DaBera	Review schedule of untimely claim objections(.2); Call with E. Meraia to discuss omnibus objection to untimely claims(.1).	0.30	115.50
07/12/23	JaKayla DaBera	Email V. Anaya regarding omnibus objection to landlord claims(.2); Call with V. Anaya regarding same(.2).	0.40	154.00
Total			1.80	\$907.50

Plan and Disclosure Statement (including Business Plan)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/13/23	Olivia Salvatierra	Prepare Plan notebook for K. Woodard.	0.50	0.00
Total			0.50	\$0.00
Total Professional Charges			25.80	\$14,225.50

Invoice Date: 08/21/23

Invoice No.: 498838

File No: 74089.00005.000

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>			<u>Total</u>
Joseph M. Coleman	Director	9.80	hrs at \$ 775 / hr	7,595.00
John J. Kane	Director	8.90	hrs at \$ 580 / hr	5,162.00
S. Kyle Woodard	Associate	1.20	hrs at \$ 440 / hr	528.00
JaKayla DaBera	Associate	1.80	hrs at \$ 385 / hr	693.00
Olivia Salvatierra	Paralegal	1.10	hrs at \$ 225 / hr	247.50
Olivia Salvatierra	Paralegal	3.00	hrs at \$ 0 / hr	0.00
Total Professional Charges				\$14,225.50

INVOICE SUMMARY

Professional Charges \$ 14,225.50

CURRENT INVOICE DUE **\$ 14,225.50**

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
496988	07/13/23	3,319.50	0.00	\$ 3,319.50

TOTAL AMOUNT DUE **\$ 17,545.00**

Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL
COLEMAN LOGAN

Invoice Date: 08/21/23

Invoice No.: 498838

File No.: 74089.00005.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through July 31, 2023:

Total Professional Charges	\$	14,225.50
Current Invoice Due	\$	14,225.50
Previous Balance Due	\$	3,319.50
TOTAL AMOUNT DUE	\$	<u>17,545.00</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

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Exhibit A-9

August 2023 Invoices¹

¹ KRCL does not seek reimbursement for the In House Litigation Support charges listed on Invoice No. 500086; such amounts are excluded from the expense totals listed in **Exhibit D**.

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **09/22/23**Invoice No.: **500086**File No.: **74089.00002.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors**DISBURSEMENTS**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/31/23	Photocopies	0.90
08/31/23	Color Copies	2.50
08/31/23	In House Litigation Support (no charge)	964.19
Total		\$967.59

INVOICE SUMMARY

Disbursements	\$	967.59
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CURRENT INVOICE DUE	\$	<u>967.59</u>
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Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	160,523.10	\$ 40,117.20
493787	04/27/23	376,649.90	302,379.50	\$ 74,270.40
494094	05/09/23	717,733.75	623,190.90	\$ 94,542.85
495552	06/14/23	190,471.89	155,581.59	\$ 34,890.30
496504	06/30/23	68,788.41	59,437.91	\$ 9,350.50
496992	07/13/23	90.00	0.00	\$ 90.00
498837	08/21/23	10,273.09	0.00	\$ 10,273.09

TOTAL AMOUNT DUE	\$	<u>264,501.93</u>
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Invoice Date: 09/22/23

Invoice No.: 500086

File No: 74089.00002.000

access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 09/22/23

Invoice No.: 500086

File No.: 74089.00002.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through August 31, 2023:

Disbursements	\$	967.59
Current Invoice Due	\$	967.59
Previous Balance Due	\$	263,534.34
TOTAL AMOUNT DUE	\$	<u>264,501.93</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

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**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **09/22/23**Invoice No.: **500087**File No.: **74089.00005.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH - Post-Confirmation**PROFESSIONAL CHARGES****Bankruptcy**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/09/23	S. Kyle Woodard	Correspondence with FTI regarding plan.	0.10	44.00
Total			0.10	\$44.00

Case Administration

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/02/23	Joseph M. Coleman	E-mail regarding status of effective date and timing of Section 503(b)(9) claims.	0.10	77.50
08/03/23	Joseph M. Coleman	Follow up regarding effective date and 503(b)(9) status; Examine recent pleadings filed and orders entered.	0.10	77.50
08/07/23	Joseph M. Coleman	Examine recent bankruptcy filings.	0.10	77.50
08/09/23	Joseph M. Coleman	E-mail Debtors regarding effective Date and related status issues; Examine response; Examine latest rejection and abandonment order.	0.20	155.00

Invoice Date: 09/22/23

Invoice No.: 500087

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/10/23	Joseph M. Coleman	Examine e-mails from M. Neyrey, Emily and M. Warner; Respond as appropriate regarding status of Effective Date and related issues(.1); Work on issues regarding objection party and how to proceed(.1).	0.20	155.00
08/10/23	John J. Kane	Coordinate status update conference with Debtors' counsel and address logistics issues.	0.20	116.00
08/14/23	Joseph M. Coleman	Examine stipulation with landlord and approve same; Examine recent filings; E-mail Debtor regarding response to questions.	0.30	232.50
08/15/23	Joseph M. Coleman	E-mail regarding 1:00 hearing status(.1); Follow up with C. Bankler regarding Fisher controversy(.1).	0.20	155.00
08/15/23	Joseph M. Coleman	Conference call with Debtors' representatives regarding status of effective date, Fisher negotiations, 503(b)(9) status, open issues and related matters(.5); Examine recent pleadings and orders(.1).	0.60	465.00
08/15/23	John J. Kane	Status update call with Debtor's counsel and M. Neyrey and follow up with J. Coleman on Committee reporting, to do list for effective date and next steps.	1.10	638.00
08/16/23	Joseph M. Coleman	Examine recent filings via ECF(.1).	0.10	77.50
08/17/23	Joseph M. Coleman	Examine e-mail from Emily of JW regarding proposal to resolve dispute, consider same, obtain authority and confirm agreement(.2); Examine Motion to Lift stay filed today(.1).	0.30	232.50
08/21/23	Joseph M. Coleman	Examine proposed stipulation and approve same.	0.10	77.50

Invoice Date: 09/22/23

Invoice No.: 500087

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/22/23	Joseph M. Coleman	Call with Committee Chair for authority on settlement of a dispute(.1); Examine e-mail from Debtors' counsel and respond confirming Committee's approval(.1).	0.20	155.00
08/25/23	Joseph M. Coleman	Examine recent pleadings(.1); Examine e-mail from creditor owing funds to the Debtor and provide M. Neyrey contact information(.1); E-mail following up regarding September 1 Effective Date(.1).	0.30	232.50
08/25/23	John J. Kane	Review case correspondence regarding effective date, follow up items.	0.30	174.00
08/28/23	John J. Kane	Follow up correspondence with Debtors' counsel regarding effective date issues and review responsive correspondence (.2); Coordinate with J. Coleman regarding strategy and effective date matters (.2).	0.40	232.00
08/30/23	Joseph M. Coleman	Review notice of insider sale(.2); Telephone conference with V. Flores regarding Effective Date and related issues(.2); Examine most recent ECF filings(.1).	0.50	387.50
08/31/23	Joseph M. Coleman	E-mail V. Flores regarding rejection issue; Exchange e-mails with V. Polinick regarding Effective date issues(.3).	0.30	232.50
Total			5.60	\$3,950.00

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/15/23	Joseph M. Coleman	Status report to the Committee.	0.30	232.50
08/16/23	Joseph M. Coleman	Examine e-mails from Committee Members following up on status report(.1).	0.10	77.50

Invoice Date: 09/22/23

Invoice No.: 500087

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/18/23	Joseph M. Coleman	Exchange e-mails with Committee Member answering questions.	0.10	77.50
08/21/23	Joseph M. Coleman	Examine e-mail from Committee Member and extended telephone conference with Committee Member regarding status, concerns about asset purchase agreement, and timeline for the foreseeable future(.3); Follow up e-mail regarding same(.1).	0.40	310.00
Total			0.90	\$697.50

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/31/23	Joseph M. Coleman	Examine invoices, confirm redactions and e-mail to V. Polnick and V. Flores in response to their request.	0.20	155.00
Total			0.20	\$155.00

Assumption/Rejection of Leases and Contracts

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/17/23	Joseph M. Coleman	Examine Debtors' stipulation with AMG and determine no to oppose(.1).	0.10	77.50
Total			0.10	\$77.50

Plan and Disclosure Statement (including Business Plan)

Invoice Date: 09/22/23

Invoice No.: 500087

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/28/23	Joseph M. Coleman	Telephone conference with M. Warner regarding Effective Date, 503(b)(9) issues and related matters(.2); Confirm Confirmation Date, review prior e-mail and e-mail Debtors' counsel regarding Effective Date and telephone conference with V. Flores regarding same(.2); Examine e-mail regarding Effective Date and respond and confer with J. Kane(.2); Second follow up e-mail(.1).	0.70	542.50
08/29/23	Joseph M. Coleman	Exchange e-mails regarding escrowing \$17.5 million pending Effective Date; E-mail Committee representative regarding same(.3).	0.30	232.50
Total			1.00	\$775.00
Total Professional Charges			7.90	\$5,699.00

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>	<u>Total</u>
Joseph M. Coleman	Director	5.80 hrs at \$ 775 / hr 4,495.00
John J. Kane	Director	2.00 hrs at \$ 580 / hr 1,160.00
S. Kyle Woodard	Associate	.10 hrs at \$ 440 / hr 44.00
Total Professional Charges		\$5,699.00

INVOICE SUMMARY

Professional Charges	\$ 5,699.00
CURRENT INVOICE DUE	\$ <u>5,699.00</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
496988	07/13/23	3,319.50	0.00	\$ 3,319.50
498838	08/21/23	14,225.50	0.00	\$ 14,225.50

Invoice Date: 09/22/23

Invoice No.: 500087

File No: 74089.00005.000

TOTAL AMOUNT DUE

\$ 23,244.00

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KANE RUSSELL COLEMAN LOGAN

Invoice Date: 09/22/23

Invoice No.: 500087

File No.: 74089.00005.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through August 31, 2023:

Total Professional Charges	\$	5,699.00
Current Invoice Due	\$	5,699.00
Previous Balance Due	\$	17,545.00
TOTAL AMOUNT DUE	\$	<u>23,244.00</u>

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Exhibit A-10

September 2023 Invoices¹

¹ KRCL does not seek reimbursement for the In House Litigation Support charges listed on Invoice No. 501380; such amounts are excluded from the expense totals listed in **Exhibit D**.

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **10/16/23**Invoice No.: **501380**File No.: **74089.00002.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH Auto Parts Holding LLC et al - Debtors**DISBURSEMENTS**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/30/23	On-Line Services	72.50
09/30/23	In House Litigation Support (no charge)	3,054.91
Total		\$3,127.41

INVOICE SUMMARY

Disbursements	\$	3,127.41
CURRENT INVOICE DUE	\$	<u>3,127.41</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
492465	03/23/23	200,640.30	160,523.10	\$ 40,117.20
493787	04/27/23	376,649.90	302,379.50	\$ 74,270.40
494094	05/09/23	717,733.75	623,190.90	\$ 94,542.85
495552	06/14/23	190,471.89	155,581.59	\$ 34,890.30
496504	06/30/23	68,788.41	59,437.91	\$ 9,350.50
496992	07/13/23	90.00	0.00	\$ 90.00
498837	08/21/23	10,273.09	0.00	\$ 10,273.09
500086	09/22/23	967.59	0.00	\$ 967.59
TOTAL AMOUNT DUE				\$ <u>267,629.34</u>

Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts

Invoice Date: 10/16/23

Invoice No.: 501380

File No: 74089.00002.000

access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 10/16/23

Invoice No.: 501380

File No.: 74089.00002.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through September 30, 2023:

Disbursements	\$	3,127.41
Current Invoice Due	\$	3,127.41
Previous Balance Due	\$	264,501.93
TOTAL AMOUNT DUE	\$	<u>267,629.34</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **10/16/23**Invoice No.: **501381**File No.: **74089.00005.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH - Post-Confirmation**PROFESSIONAL CHARGES****Case Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/01/23	Joseph M. Coleman	Examine recent filings; Examine Proof of Claim just filed regarding late or rejection(.1); Examine e-mail from V. Polinick regarding Effective date(.1).	0.20	155.00
09/01/23	John J. Kane	Confer with Debtors' counsel regarding effective date outlook and coordinate internally with team.	0.40	232.00
09/05/23	Joseph M. Coleman	Follow up regarding Effective Date(.1); Examine recent pleadings(.1).	0.20	155.00
09/06/23	Joseph M. Coleman	Examine several e-mails regarding admin claims and related issues; E-mail V. Flores regarding same and inquiry from creditor(.1).	0.10	77.50

Invoice Date: 10/16/23

Invoice No.: 501381

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/07/23	Joseph M. Coleman	Telephone conference with JW regarding Effective Date, status of Section 503(b)(9) reconciliation, sale closings and related issues(.4); Telephone conference with M. Warner regarding Effective Date and initial game plan(.1); Follow up regarding \$17.5 million in settlement proceeds, 503(b)(9) issues and related matters(.3); Numerous e-mail exchanges with the Debtors(.1).	0.90	697.50
09/08/23	Joseph M. Coleman	Exchange e-mails with Debtors' counsel; Set up meeting with Debtors in preparation for Effective Date(.2).	0.20	155.00
09/08/23	John J. Kane	Correspondence regarding pre-effective date status update from Debtors and confer with J. Coleman regarding same.	0.40	232.00
09/11/23	Joseph M. Coleman	Review recent pleadings(.1); Prep for call with Debtors and JW regarding Effective Date, sale status, Bidder Disqualification settlement, and wide array of other issues(.1).	0.20	155.00
09/11/23	John J. Kane	Conference with V. Polnick regarding outstanding post-confirmation pre-effective date issues(.4); Follow up with J. Coleman(.1).	0.50	290.00
09/12/23	Joseph M. Coleman	Prep for and attend conference call with Debtors and counsel regarding numerous issues, including Effective Date, staffing, Disqualified Bidder Settlement and related matters(1.6); E-mail JW regarding wind down budget(.1); Examine e-mail from Z. Casa regarding stipulation(.1).	1.80	1,395.00

Invoice Date: 10/16/23

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/23	John J. Kane	Prepare for and participate in follow up call regarding pre-effective date claims administration, Effective Date outlook, and related issues pertaining to outstanding claim matters.	0.90	522.00
09/14/23	Joseph M. Coleman	Examine pleadings filed recently.	0.10	77.50
09/14/23	Joseph M. Coleman	E-mail JW regarding transition issues upon Effective Date.	0.20	155.00
09/18/23	Joseph M. Coleman	Review recently filed Motion to Lift stay(.1); Follow up with the Debtor regarding Effective date(.1).	0.20	155.00
09/19/23	Joseph M. Coleman	Examine notice of regarding-set hearing(.1); Do detailed To Do List(.1); Strategize regarding Motion to Lift Stay to go after insurance proceeds and related issues(.4).	0.60	465.00
09/20/23	Joseph M. Coleman	Exchange e-mails with Debtor regarding Effective Date(.1); Examine numerous e-mails regarding motion to lift stay, defenses, continuances and insurance policy attributes(.1); Work on insurance issues and personal injury claims(.2); work on insurance issue(1.1).	1.50	1,162.50
09/21/23	Joseph M. Coleman	Review settlement agreement, motion to approve same; E-mail J. Kane regarding insurance issue(.3); Examine e-mail from Debtor's counsel regarding continued hearing(.1); Continue to work on insurance motion to lift stay matters(.6); Telephone conference with V. Flores regarding stipulation, JW's fees, Effective Date and related matters(.3); Examine recent filings(.1).	1.40	1,085.00

Invoice Date: 10/16/23

Invoice No.: 501381

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/22/23	Joseph M. Coleman	Telephone conference with M. Duffy, Committee Chair regarding Effective date issue(.1); E-mail Committee regarding same(.3); Examine responsive e-mails from numerous Committee Members(.2); Telephone conference with A. Grossi regarding insurance and Effective Date(.4); Telephone conference with M. Cavanaugh regarding same(.3); Follow up telephone conference with M. Duffy, Committee Chair regarding need to file Motion for status conference regarding Effective Date(.3).	1.60	1,240.00
09/22/23	JaKayla DaBera	Attention to motion to set status conference including correspondence with case manager regarding how to appropriately file same(.4); Draft proposed order on motion to set hearing(1.0); Prepare and file motion to set status conference and effectuate service of same(.5).	1.90	731.50
09/22/23	Joseph M. Coleman	Communications with M. Cavanaugh regarding effective date(.2); Telephone conference with M. Warner regarding same(.2); Extended telephone conference with V. Flores regarding stipulation on rent claim, Effective Date, insurance and related issues(.4).	0.80	620.00
09/25/23	Joseph M. Coleman	Examine recent pleadings.	0.10	77.50
09/26/23	Joseph M. Coleman	Exchange e-mails with American Entertainment Properties' counsel(.1); Examine recent pleadings(.2).	0.30	232.50

Invoice Date: 10/16/23

Invoice No.: 501381

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/27/23	Joseph M. Coleman	Prep for conversation with A. Grossi regarding insurance issue, including review of plan, insurance company POC's, Stipulations with personal injury claimants and related issues(1.1); Attend conference call with Sidley(.5); Follow up telephone conferences with J. Kane and then M. Warner(.3).	1.90	1,472.50
Total			16.40	\$11,540.00

Asset Disposition

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/13/23	Joseph M. Coleman	Examine recent pleadings related to settlement with disqualified bidder.	0.20	155.00
Total			0.20	\$155.00

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/07/23	Joseph M. Coleman	Detailed status report(.7); Follow up e-mail exchanges with Committee Members(.1); Exchange e-mails with various Committee Members regarding status of Section 503(b)(9) claims(.3); Telephone conference with E. Meraia regarding rejection issues, Effective Date and logistics(.2)	1.30	1,007.50
09/19/23	Joseph M. Coleman	Status report to Committee and e-mail exchanges thereafter(.4).	0.40	310.00
09/25/23	Joseph M. Coleman	Status report and update to Committee regarding Effective Date(.2); Exchange e-mails with Committee Members regarding follow up matters(.2).	0.40	310.00
Total			2.10	\$1,627.50

Invoice Date: 10/16/23

Invoice No.: 501381

File No: 74089.00005.000

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/01/23	Joseph M. Coleman	Begin review of Triple P RTS LLC fee app(.1).	0.10	77.50
09/11/23	Joseph M. Coleman	Briefly review JW monthly fee apps for over \$1.5 million.	0.30	232.50
09/11/23	S. Kyle Woodard	Correspondence to JW regarding fourth and fifth monthly fee statements.	0.50	220.00
Total			0.90	\$530.00

Fee/Employment Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/23	Joseph M. Coleman	Telephone conference with V. Polinick regarding JW monthly fee application issues.	0.10	77.50
Total			0.10	\$77.50

Claims Administration and Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/01/23	John J. Kane	Work with M. Warner on insurance/GUC claim matters, effective date outlook, Tamayo matter.	0.90	522.00
09/13/23	John J. Kane	Correspondence with JW team regarding objection deadline for motion for relief from stay and coordinate strategy for response to same, insurance and related issues.	1.40	812.00
09/14/23	John J. Kane	Follow up with Debtors' team regarding claim administration issues, effective date timing, and pending stay relief hearing, related pleadings(.8); Work with claimants on potential stipulations, hearing-related issues, timing concerns tied to effective date delays(.5).	1.30	754.00

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Invoice No.: 501381

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/15/23	John J. Kane	Review stipulation proposal from K. Lewinski regarding personal injury claim matters, and review correspondence regarding timing of hearing, effective date issues(.5).	0.50	290.00
09/18/23	John J. Kane	Work with claimants' counsel and debtors' counsel regarding personal injury claims, stay hearings, continuances, stipulations resolving claims and related effective date issues.	1.70	986.00
09/19/23	John J. Kane	Prepare for and participate in conference call with Debtors and Icahn counsel regarding insurance claims resolution, Kemp claim, motions for relief from stay, and effective date(1.0); Follow up with M. Warner and J. Coleman regarding same(.6); Work with D. Waltz on insurance policy analysis(.5).	2.10	1,218.00
09/20/23	John J. Kane	Continue assessment of insurance issues, plan provisions, applicable precedent(1.2); Confer with M. Warner(.3); Conference call with Debtors and Icahn regarding insurance claims and administration(.9); Confer with J. Coleman regarding same(.8).	3.20	1,856.00
09/20/23	John J. Kane	Correspondence with claimants regarding lift stay hearing dates and continuances.	0.40	232.00
09/21/23	John J. Kane	Prepare for and attend conference call with M. Cavanaugh regarding insurance issues(.4); Follow up with J. Coleman regarding same(.3); Continue to review pertinent legal authority and contract provisions related to same(.8).	1.50	870.00

Invoice Date: 10/16/23

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File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/22/23	John J. Kane	Work on insurance matters, engage in calls with J. Coleman and Icahn representatives, review key provisions of plan, insurance policy, and further work on insurance claim matters.	2.40	1,392.00
09/26/23	John J. Kane	Confer with J. Coleman regarding insurance matters(.4); Work with J. DaBera on preparation of materials to support assessment and resolution of insurance issues(1.5); Follow up with J. Coleman regarding availability for call with Icahn counsel regarding insurance(.2).	2.10	1,218.00
09/27/23	John J. Kane	Prepare for and attend conference call with Icahn counsel regarding insurance issues(.5); Coordinate with J. Coleman regarding insurance matters, related issues(.7).	1.20	696.00
09/28/23	John J. Kane	Review correspondence from Chubb regarding order language request.	0.20	116.00
09/29/23	John J. Kane	Review I Heart Radio pleadings related to insurance matters.	1.00	580.00
Total			19.90	\$11,542.00

Plan and Disclosure Statement (including Business Plan)

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/22/23	John J. Kane	Draft, revise, and coordinate filing of motion to set status conference on effective date.	1.50	870.00
09/22/23	Joseph M. Coleman	Work on Motion for Status Conference because of Effective Date(.3); Telephone conference with A. Grossi(.1); Strategize with J. Kane(.3); Finalize same(.1).	0.80	620.00

Invoice Date: 10/16/23

Invoice No.: 501381

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/25/23	Joseph M. Coleman	E-mail M. Warner regarding Effective Date struggles and what is needed related to GUC Trust becoming operative.	0.20	155.00
Total			2.50	\$1,645.00

Litigation

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/20/23	Don Waltz	Analyze Ace policy (400+ pages) regarding defense provisions and reimbursement rates of Ace.	2.30	1,345.50
09/20/23	Don Waltz	Draft e-mail to J. Kane regarding defense provisions and right of reimbursement under Ace Policy.	0.50	292.50
Total			2.80	\$1,638.00
Total Professional Charges			44.90	\$28,755.00

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>			<u>Total</u>
Joseph M. Coleman	Director	16.10	hrs at \$ 775 / hr	12,477.50
Don Waltz	Director	2.80	hrs at \$ 585 / hr	1,638.00
John J. Kane	Director	23.60	hrs at \$ 580 / hr	13,688.00
S. Kyle Woodard	Associate	.50	hrs at \$ 440 / hr	220.00
JaKayla DaBera	Associate	1.90	hrs at \$ 385 / hr	731.50
Total Professional Charges				\$28,755.00

INVOICE SUMMARY

Professional Charges	\$	28,755.00
CURRENT INVOICE DUE	\$	<u>28,755.00</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
496988	07/13/23	3,319.50	0.00	\$ 3,319.50

Invoice Date: 10/16/23

Invoice No.: 501381

File No: 74089.00005.000

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>		<u>Balance</u>
498838	08/21/23	14,225.50	0.00	\$	14,225.50
500087	09/22/23	5,699.00	0.00	\$	5,699.00
TOTAL AMOUNT DUE				\$	<u>51,999.00</u>

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KANE RUSSELL
COLEMAN LOGAN

Invoice Date: 10/16/23

Invoice No.: 501381

File No.: 74089.00005.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through September 30, 2023:

Total Professional Charges	\$	28,755.00
Current Invoice Due	\$	28,755.00
Previous Balance Due	\$	23,244.00
TOTAL AMOUNT DUE	\$	<u>51,999.00</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

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Exhibit A-11

October 2023 Invoices

**KANE RUSSELL
COLEMAN LOGAN**Invoice Date: **11/10/23**Invoice No.: **502391**File No.: **74089.00005.000****Michael Duffy, michael.duffy@driv.com**

These invoices will have to be approved by the
Bankruptcy
Court for Payment

File Description: IEH - Post-Confirmation**PROFESSIONAL CHARGES****Case Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/02/23	John J. Kane	Follow up with J. DaBera on court correspondence regarding status conference to address failure of Effective Date, follow up with J. Coleman regarding same.	0.30	174.00
10/03/23	John J. Kane	Work with Debtors and Icahn's counsel on insurance claim issues and hearings and coordinate with J. Coleman regarding same, legal issues.	1.20	696.00
10/04/23	Joseph M. Coleman	Review recent pleadings(.1); Follow up regarding Effective Date(.1).	0.20	155.00
10/04/23	John J. Kane	Work with McRary counsel regarding hearing dates for motion for relief; Coordinate with Icahn counsel, Debtors' counsel, court regarding hearing dates, desires of McRary counsel in advance of hearing.	0.50	290.00
10/05/23	John J. Kane	Correspondence with J. Coleman and Committee Members regarding status of effective date, status conference, court interaction.	0.40	232.00
Total			2.60	\$1,547.00

Invoice Date: 11/10/23

Invoice No.: 502391

File No: 74089.00005.000

Meetings of and Communications with Creditors

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/05/23	Joseph M. Coleman	Status report to Committee Members regarding Effective Date(.1); Telephone conference with Committee representative regarding status issues and problems with Effective Date(.3).	0.40	310.00
10/06/23	Joseph M. Coleman	Communicate with Committee regarding Effective Date and impact upon Committee Members, next steps and related issues.	0.60	465.00
Total			1.00	\$775.00

Fee/Employment Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/04/23	Joseph M. Coleman	Examine JW Fee application(.2).	0.20	155.00
10/06/23	Joseph M. Coleman	Review of JW fee application.	0.20	155.00
Total			0.40	\$310.00

Claims Administration and Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/02/23	John J. Kane	Correspondence with Icahn and Debtors' counsel regarding personal injury claim and insurance considerations and conference call to discuss same(.3); Call with J. Coleman regarding same, detailing issues(.8); Review case authority regarding plan injunction relief and related issues(.6).	1.70	986.00
Total			1.70	\$986.00

Plan and Disclosure Statement (including Business Plan)

Invoice Date: 11/10/23

Invoice No.: 502391

File No: 74089.00005.000

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/06/23	Joseph M. Coleman	Monitor announcement of Effective Date and communicate with M. Cavanaugh regarding same(.3); Confer with J. Kane(.2); Examine plan regarding impact upon Committee Members(.5).	1.00	775.00
Total			1.00	\$775.00
Total Professional Charges			6.70	\$4,393.00

PROFESSIONAL CHARGES SUMMARY

<u>Timekeeper</u>	<u>Title</u>		<u>Total</u>
Joseph M. Coleman	Director	2.60 hrs at \$ 775 / hr	2,015.00
John J. Kane	Director	4.10 hrs at \$ 580 / hr	2,378.00
Total Professional Charges			\$4,393.00

DISBURSEMENTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/31/23	Color Copies	25.00
Total		\$25.00

INVOICE SUMMARY

Professional Charges	\$	4,393.00
Disbursements	\$	25.00
CURRENT INVOICE DUE	\$	<u>4,418.00</u>

Outstanding Prior Balance

<u>Invoice No.</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments</u>	<u>Balance</u>
496988	07/13/23	3,319.50	0.00	\$ 3,319.50
498838	08/21/23	14,225.50	0.00	\$ 14,225.50
500087	09/22/23	5,699.00	0.00	\$ 5,699.00
501381	10/16/23	28,755.00	0.00	\$ 28,755.00

Invoice Date: 11/10/23

Invoice No.: 502391

File No: 74089.00005.000

TOTAL AMOUNT DUE

\$ 56,417.00

Privacy Notice

Kane Russell Coleman Logan PC may acquire and collect nonpublic personal information about clients and former clients in the course of providing legal services. Such information may be obtained from the client; may be generated as a result of the services provided; or may be received from third parties involved in, or affiliated with, the services provided. Kane Russell Coleman Logan PC does not disclose, nor does Kane Russell Coleman Logan PC reserve the right to disclose, any nonpublic personal information about clients or former clients, except as permitted by law. Kane Russell Coleman Logan PC restricts access to nonpublic personal information to those employees who need to know that information to provide the applicable services. Kane Russell Coleman Logan PC maintains physical, electronic and procedural safeguards to prevent the dissemination of nonpublic personal information of clients and former clients.

KANE RUSSELL COLEMAN LOGAN

Invoice Date: 11/10/23

Invoice No.: 502391

File No.: 74089.00005.000

Michael Duffy, michael.duffy@driv.com

These invoices will have to be approved by
the Bankruptcy
Court for Payment

For Professional Services Rendered Through October 31, 2023:

Total Professional Charges	\$	4,393.00
Disbursements	\$	25.00
Current Invoice Due	\$	<u>4,418.00</u>
Previous Balance Due	\$	51,999.00
TOTAL AMOUNT DUE	\$	<u>56,417.00</u>

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Exhibit B**Summary of Fees by Professional During Application Period**

Name	Position	Hourly Rate	Year Licensed	Total Hours	Total Fees
Joseph M. Coleman	Director	\$775	1985	726.6	\$563,115.00
Brian N. Hail	Director	\$745	1990	233.7	\$174,106.50
Charles E. Aster	Director	\$630	1982	21.9	\$13,797.00
Michael P. Ridulfo	Director	\$605	1987	209.6	\$126,808.00
Don Waltz ¹	Director	\$585	1988	2.8	\$1,638.00
John J. Kane	Director	\$580	2009	452.7	\$262,566.00
Don Waltz ¹	Director	\$550	1988	2.3	\$1,265.00
Brian W. Clark	Director	\$535	2001	158.3	\$84,690.50
Kyle Woodard	Associate	\$440	2016	303.9	\$133,716.00
Andrew Robertson	Associate	\$435	2015	56.5	\$24,577.50
Stephen L. Kirschner	Associate	\$415	2014	2.8	\$1,162.00
Collin Delano	Associate	\$395	2018	84.3	\$33,298.50
JaKayla DaBera	Associate	\$385	2021	363.3	\$139,870.50
Miles Emery	Associate	\$385	2021	2.8	\$1,078.00
Brandon Keaton	Associate	\$345	2022	157.9	\$54,475.50
Reuel Coles	Paralegal	\$275	N/A	19.2	\$5,280.00
Carlos Velazquez	Paralegal	\$265	N/A	45.8	\$12,137.00
Connie Nims	Paralegal	\$235	N/A	31.7	\$7,449.50
Olivia Salvatierra	Paralegal	\$225	N/A	123.3	\$27,742.50
Bree Kimball	Paralegal	\$210	N/A	3.0	\$630.00
Joseph M. Coleman	Director	\$0	1985	1.6	\$0.00
Bruce "Chip" Morris	Director	\$0	1991	1.8	\$0.00
JaKayla DaBera	Associate	\$0	2021	1.8	\$0.00
Olivia Salvatierra	Paralegal	\$0	N/A	9.6	\$0.00
TOTAL:				3,017.2	\$1,669,403.00

¹ Mr. Waltz's standard hourly rate for 2023 is \$585 per hour; however, due to an error in the billing process, a portion of Mr. Waltz's time on this matter was inadvertently billed at \$550 per hour.

Exhibit C**Summary of Fees by Project Category During Application Period**

Task Code	Total Hours	Total Fees
B100 - Bankruptcy	0.1	\$44.00
B110 - Case Administration	275.5	\$143,151.00
B120 - Asset Analysis and Recovery	1,681.9	\$883,880.00
B130 - Asset Disposition	147.1	\$93,762.00
B140 - Relief from Stay/Adequate Protection Proceedings	4.2	\$1,996.50
B150 - Meetings of and Communications with Creditors	115.6	\$76,059.00
B160 - Fee/Employment Applications	69.5	\$34,711.00
B170 - Fee/Employment Objections	15.7	\$6,227.00
B180 - Avoidance Action Analysis	0.0	\$0.00
B185 - Assumption/Rejection of Leases and Contracts	20.8	\$8,737.50
B190 - Other Contested Matters	59.1	\$35,379.00
B195 - Non-Working Travel	32.0	\$22,625.00
B200 - Operations	0.0	\$0.00
B210 - Business Operations	10.8	\$8,035.00
B220 - Employee Benefits/Pensions	2.1	\$1,627.50
B230 - Financing/Cash Collections	280.5	\$177,142.00
B240 - Tax Issues	0.0	\$0.00
B250 - Real Estate	3.3	\$1,482.50
B260 - Board of Directors Matters	1.8	\$760.50
B300 - Claims and Plan	0.0	\$0.00
B310 - Claims Administration and Objections	62.2	\$31,561.50
B320 - Plan and Disclosure Statement	161.4	\$99,636.50
B400 - Bankruptcy-Related Advice	0.0	\$0.00
B410 - General Bankruptcy Advice/Opinions	0.0	\$0.00
B420 - Restructurings	0.0	\$0.00
L100 - Litigation	73.6	\$42,585.50
TOTAL:	3,017.2	\$1,669,403.00

Exhibit D**Summary of Expenses During Application Period**

Description	Total
Photocopies	\$3,423.30
Color Copies	\$3,133.35
Meals	\$158.11
On-Line Services	\$13,750.28
Secretarial Overtime	\$305.55
Outside Photocopies	\$5,140.19
Courier Expense	\$235.03
Parking	\$286.80
Postage	\$1,029.96
Word Processing	no charge
In House Litigation Support	\$3,218.81
Travel Expense	\$16,403.55
Court Reporter Fees - Judicial Transcribers of Texas, LLC	\$86.40
Court Reporter Fees - Veritext Corporate Services, Inc.	\$2,788.00
Court Reporter Fees - Veritext Corporate Services, Inc.	\$8,587.60
Court Reporter Fees - Veritext Corporate Services, Inc.	\$2,994.00
Filing Fee - Cogency Global Inc.	\$858.00
Professional Services - Elite Deposition Technologies	\$485.00
Professional Services - Eversheds Sutherland (US) LLP	\$585.22
Professional Services - Eversheds Sutherland (US) LLP	\$54.00
Professional Services - Orbital Data Consulting Group	\$6,242.19
Professional Services - The Video Department	\$1,475.00
TOTAL:	\$71,240.34

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:)	Chapter 11
IEH AUTO PARTS HOLDING LLC, <i>et al.</i> , ¹)	Case No. 23-90054 (CML)
Debtors.)	(Jointly Administered)

FINAL ORDER GRANTING FIRST AND FINAL APPLICATION OF
KANE RUSSELL COLEMAN LOGAN PC FOR ALLOWANCE AND PAYMENT OF
FEES AND EXPENSES AS COUNSEL FOR THE OFFICIAL UNSECURED
CREDITORS' COMMITTEE FOR THE PERIOD FROM
FEBRUARY 15, 2023 THROUGH OCTOBER 6, 2023

The Court has considered the *First and Final Fee Application for Allowance and Payment of Fees and Expenses as Counsel to the Official Unsecured Creditors' Committee for the Period from February 15, 2023, through October 6, 2023* [Dkt. No. ____] (the "**Application**") filed by Kane Russell Coleman Logan PC (the "**Applicant**"). The Court finds and orders as follows:

A. In making the following findings, the Court has considered the novelty and difficulty of the questions, issues, and problems addressed by the Applicant's services through its representation of the Official Unsecured Creditors' Committee during these bankruptcy cases.

B. The time spent by the Applicant on services provided under the Application was reasonable and necessary based on the complexity, importance, and nature of the bankruptcy cases.

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

C. The billing rates charged by the Applicant are comparable to and reasonable based on rates charged by other professionals with similar experience and expertise in the Southern District of Texas.

D. The services provided by the Applicant were necessary to the administration of these bankruptcy cases.

IT IS THEREFORE ORDERED THAT:

1. The Applicant is allowed compensation and reimbursement of expenses in the total amount of \$1,748,143.34 for the period set forth in the Application.

2. The compensation and reimbursement of expenses allowed in this Order and all previous interim allowances of compensation and reimbursement of expenses are approved on a final basis.

3. The Wind-Down Debtors are authorized and directed to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

Signed:

Christopher Lopez
United States Bankruptcy Judge