

1 SAMUEL R. MAIZEL (SBN 189301)
2 samuel.maizel@dentons.com
3 TANIA M. MOYRON (SBN 235736)
4 tania.moyron@dentons.com
5 REBECCA M. WICKS (SBN 313608)
6 rebecca.wicks@dentons.com
7 Dentons US LLP
8 601 South Figueroa Street, Suite 2500
9 Los Angeles, CA 90017-5704
10 Telephone: 213 623 9300
11 Facsimile: 213 623 9924

12 Attorneys for Chapter 11 Debtor and Debtor
13 In Possession

14 **UNITED STATES BANKRUPTCY COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 In re:
17 BORREGO COMMUNITY
18 HEALTH FOUNDATION,
19 Debtor and Debtor In Possession.

20 Case No. 22-02384
21 Chapter 11 Case
22 (Voluntary Petition Filed September 12,
23 2022)
24 **DENTONS US LLP'S SIXTEENTH
25 MONTHLY FEE APPLICATION FOR
26 ALLOWANCE AND PAYMENT OF
27 INTERIM COMPENSATION AND
28 REIMBURSEMENT OF EXPENSES
FOR THE PERIOD DECEMBER 1,
2023 THROUGH DECEMBER 31, 2023**

Judge: Hon. Laura S. Taylor

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



1 CSD 1143 (04/28/96)

2 **UNITED STATES BANKRUPTCY COURT**
 3 **SOUTHERN DISTRICT OF CALIFORNIA**

4 DEBTOR: Borrego Community PETITION DATE: September 12, 2022
 5 Health Foundation
 6 CASE NO.: 22-02384

7 **MONTHLY FEE APPLICATION SUMMARY**

8 APPLICANT: Dentons US LLP REPRESENTING: Debtor

9 **ORDER APPROVING EMPLOYMENT:** Docket No. 292

CATEGORIES	December 1, 2023 –December 31, 2023 (APPLICATION PERIOD)	
	HOURS	AMOUNT REQUESTED
Case Administration	7.00	\$5,233.90
Meetings of and Communications with Creditors	0.50	\$315.00
Fee / Employment Applications	18.20	\$9,360.80
Assumption / Rejection of Leases and Contracts	1.30	\$904.00
Other Contested Matters (excl. assumption/rejection motions)	10.20	\$7,310.00
Business Operations	0.90	\$567.00
Financing/Cash Collections	3.40	\$2,720.00
Claims Administration and Objections	32.50	\$21,973.40
Plan and Disclosure Statement (incl. Business Plan)	62.90	\$41,420.50
DHCS Litigation	0.60	\$480.00
Reporting	0.80	\$273.60
TOTALS:	138.30	\$90,558.20

DENTONS US LLP
 601 SOUTH FIGUEROA STREET, SUITE 2500
 LOS ANGELES, CALIFORNIA 90017-5704
 (213) 623-9300

MONTHLY FEE APPLICATION

Dentons US LLP (the “Firm”) submits its *Sixteenth Monthly Fee Application for Allowance and Payment of Interim Compensation and Reimbursement of Expenses for the Period December 1, 2023 – December 31, 2023* for services rendered during the chapter 11 case (this “Case”) of the above-captioned debtor (the “Debtor”) for the Debtor. In support of the foregoing application (the “Application”), the Firm respectfully represents as follows:

1. The Firm is bankruptcy counsel to the Debtor. The Firm hereby applies to the Court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the period of December 1, 2023 – December 31, 2023 (the “Application Period”).

2. The Firm billed a total of \$90,558.20 in fees and \$447.90 expenses during the Application Period. The total fees represent 138.30 hours expended during the period covered by this Application. These fees and expenses break down as follows:

Application Period	Fees	Expenses	Total
December 1, 2023 – December 31, 2023	\$90,558.20	\$447.90	\$91,006.10

3. Accordingly, the Firm seeks allowance of interim compensation in the amount of a total of \$72,894.46 at this time. This total is comprised as follows: \$72,446.56 (80% of the fees for services rendered), plus \$447.90 (100% of the expenses incurred).

4. Attached as **Exhibit “1”** hereto is the name of each professional who performed services in connection with these cases during the period covered by this Application and the hourly rate for each such professional. Attached hereto as **Exhibit “2”** are the detailed time and expense statements for the Application Period.

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1 5. The Firm has served a copy of this Application on the Office of the
2 United States Trustee (the “U.S. Trustee”), the Debtor, counsel to the Debtor, counsel
3 to the Patient Care Ombudsman, and counsel to the Official Committee of Unsecured
4 Creditors appointed in this Case. The Application was mailed by first class mail,
5 postage prepaid, on or about March 14, 2024. Notice of the filing of this Application
6 was served on the foregoing parties as well as any party who has requested special
7 notice in this Case as of the date of the Notice. The Notice was mailed by first class
8 mail, postage prepaid, on or about March 14, 2024.

9 6. Pursuant to this Court’s *Order On Debtor’s Notice Of Motion And*
10 *Motion for Entry Of An Order Establishing Procedures For Monthly Payment Of*
11 *Fees And Expense Reimbursement* entered on December 15, 2022 (the “Order
12 Establishing Monthly Fee Procedures”) [Docket No. 299], the Debtor is authorized
13 to make the payment requested herein without a further hearing or order of this Court
14 unless an objection to this Application is filed with the Court and served upon the
15 Notice Parties within ten (10) calendar days after the date of mailing of the Notice of
16 this Application. If such an objection is filed, the Debtor is authorized to pay 80%
17 of the uncontested fees and 100% of the uncontested expenses without further order
18 of the Court. If no objection is filed, the Debtor is authorized to pay 80% of all fees
19 requested in the Application and 100% of the uncontested expenses without further
20 order of the Court.

21 7. The interim compensation and reimbursement of expenses sought in this
22 Application is not final. Upon the conclusion of this Case, the Firm will seek fees
23 and reimbursement of the expenses incurred for the totality of the services rendered
24 in this Case. Any interim fees or reimbursement of expenses approved by this Court
25 and received by the Firm (along with any retainer) will be credited against such final
26 fees and expenses as may be allowed by this Court.

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

EXHIBIT “1”

**(Summary of Hours by Professional for
Application Period December 1, 2023 – December 31, 2023)**

Name of Professional	Title	Hours	Rate	Total Billed
Samuel R. Maizel	Partner	18.40	\$800.00	\$14,720.00
Tania M. Moyron	Partner	22.00	\$800.00	\$17,600.00
Robert Richards	Partner	4.10	\$800.00	\$3,280.00
Geoffrey M. Miller	Partner	1.90	\$729.00	\$1,385.10
Lauren Macksoud	Partner	2.80	\$729.00	\$2,041.20
Rebecca M. Wicks	Senior Managing Associate	71.80	\$630.00	\$45,234.00
Elysa Chew	Associate	1.10	\$660.00	\$726.00
Samantha Ruben	Associate	.20	\$499.50	\$99.90
George L. Medina	Senior Paralegal	16.00	\$342.00	\$2,291.40
Totals:		138.30		\$90,558.20

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “2”

**(Detailed Time and Expense Statements for
Application Period December 1, 2023 – December 31, 2023)**

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300



SNR Denton US LLP
601 S. Figueroa Street
Suite 2500
Los Angeles, California 90017-5704

dentons.com

Borrego Community Health Foundation
Douglas B. Habig
587 PALM CANYON DR, SUITE 208
BORREGO SPRINGS CA 92005
United States

January 31, 2024

Invoice No. 2722918

Client: 15810746

Payment Due Upon Receipt

Total This Invoice	\$ 91,006.10
Amounts Received, Available to Apply Against Current or Future Invoices	100,000.00
Amount Due	\$ 91,006.10

Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP
8000 Sears Tower
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP
Attention: Accounting
233 South Wacker Drive
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank
227 W Monroe, Chicago, IL 60606
ABA Transit # 271070801
Account # 0801051693
Account Name: Dentons US LLP
Swift Code: CITIUS33
Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel
at 1 213 623 9300

Borrego Community Health Foundation
Douglas B. Habig
587 PALM CANYON DR, SUITE 208
BORREGO SPRINGS CA 92005
United States

January 31, 2024

Invoice No. 2722918

For Professional Services Rendered through December 31, 2023:

Matter: 15810746-000002
Postpetition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
12/01/23	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
12/04/23	R. Wicks	0.50	315.00	B110	Call with T. Moyron and S. Maizel regarding reply, opposition to Premier status conference, and other outstanding issues.
12/04/23	T. Moyron	0.30	240.00	B110	Correspond with CJ Pease re July MOR (.1); analyze MOR and attention to coordination of filing thereof (.2).
12/05/23	S. Maizel	1.30	1,040.00	B110	Zoom conference with J. Pomerantz re Vitamin D claim (.2); review and respond to emails re same (.5); drafting email to S. Hansberger re same (.6).
12/05/23	S. Maizel	0.50	400.00	B110	Participate in regularly scheduled call re pending legal issues with I. Lee, etc.
12/06/23	S. Maizel	0.50	400.00	B110	Review pending legal issues from weekly call with R. MacIsaac, I. Lee, etc.
12/06/23	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
12/07/23	S. Maizel	0.50	400.00	B110	Teams meeting with Ankura re pending issues.
12/13/23	T. Moyron	0.80	640.00	B110	Correspondence and attend to various pending matters including MOR, monthly fee applications, and objections.
12/14/23	R. Wicks	0.10	63.00	B110	Analyze correspondence from CJ Pease regarding November bank statements.
12/19/23	R. Wicks	0.20	126.00	B110	Review October monthly operating report.
12/19/23	R. Wicks	0.10	63.00	B110	Analyze correspondence from T. Cazares regarding monthly operating report.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/19/23	R. Wicks	0.10	63.00	B110	Correspond with T. Moyron regarding filing monthly operating report.
12/19/23	R. Wicks	0.20	126.00	B110	Analyze correspondence from A. Guerra regarding service of filed documents and hearing notice.
12/20/23	T. Moyron	0.20	160.00	B110	Correspond regarding MOR and filing thereof.
12/20/23	R. Wicks	0.20	126.00	B110	Finalize and file monthly operating report.
12/20/23	R. Wicks	0.10	63.00	B110	Analyze correspondence with A. Guerra regarding service of filed documents.
12/26/23	S. Maizel	0.10	80.00	B110	Telephone conference with T. Moyron re pending issues.
12/26/23	S. Maizel	0.10	80.00	B110	Review and respond to emails re weekly legal issues call.
12/26/23	R. Wicks	0.20	126.00	B110	Review notice of inability to process from Riverside County Sheriff.
12/26/23	T. Moyron	0.70	560.00	B110	Correspondence and attend to various pending matters, including stipulation, Travelers, LEDES files, and other matters.
12/28/23	R. Wicks	0.10	63.00	B110	Analyze correspondence from A. Guerra regarding service of recently filed documents.
	Subtotal	7.00	5,233.90		

B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
12/04/23	R. Wicks	0.10	63.00	B150	Analyze correspondence from creditor regarding timing for payment of claims.
12/15/23	R. Wicks	0.10	63.00	B150	Call with creditor regarding confirmation hearing.
12/26/23	R. Wicks	0.10	63.00	B150	Call with S. Toma regarding claim and anticipated payment timing.
12/29/23	R. Wicks	0.20	126.00	B150	Correspond with T. Moyron and G. Medina regarding creditor questions about plan.
	Subtotal	0.50	315.00		

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

B160 - Fee/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
12/01/23	T. Moyron	0.20	160.00	B160	Analyze and provide comment on HLB monthly fee application.
12/01/23	R. Wicks	0.30	189.00	B160	Finalize and file Hooper Lundy fee applications.
12/01/23	R. Wicks	1.10	693.00	B160	Prepare fourteenth monthly fee application and notice.
12/01/23	G. Medina	1.50	513.00	B160	Correspond with R. Wicks regarding Hooper Lundy's twelfth and thirteenth monthly fee applications (0.1); review, assemble and file the twelfth monthly fee application for August 2023 (0.5); review and file the notice of the twelfth monthly application (0.2); review, assemble, and file the thirteenth monthly fee application for September 2023 (0.5); review and file the notice of the thirteenth monthly application (0.2).
12/04/23	R. Wicks	0.10	63.00	B160	Analyze correspondence with CJ Pease and T. Moyron regarding fee applications.
12/04/23	R. Wicks	0.20	126.00	B160	Finalize and file fourteenth monthly fee application.
12/04/23	R. Wicks	0.20	126.00	B160	Finalize and file Ankura compensation report.
12/04/23	G. Medina	0.70	239.40	B160	Correspond with R. Wicks and coordinate with C. Arias LEDES filed for August, September and October monthlies filed (0.4); received, reviewed and send to R. Wicks monthlies filed per the request of the UST (0.3).
12/04/23	G. Medina	1.30	444.60	B160	Correspond with R. Wicks, prepare, assemble and file Ankura compensation report (0.6); correspond with R. Wicks, prepare, assemble and file DUS fourteenth monthly fee application (0.4); review and file notice of DUS fourteenth monthly fee application (0.3).
12/05/23	R. Wicks	0.10	63.00	B160	Correspond with T. Reid regarding Hooper Lundy fee applications.

Borrego Community Health Foundation
 Matter: 15810746-000002
 Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/06/23	R. Wicks	0.30	189.00	B160	Review Ankura October staffing report exhibits.
12/07/23	R. Wicks	0.70	441.00	B160	Prepare shell of fifteenth monthly fee application.
12/12/23	R. Wicks	0.10	63.00	B160	Review correspondence with T. Reid regarding monthly fee application.
12/13/23	R. Wicks	0.10	63.00	B160	Analyze correspondence with T. Cazares regarding September monthly operating report.
12/14/23	R. Wicks	0.40	252.00	B160	Prepare Hooper Lundy monthly fee application.
12/14/23	R. Wicks	0.80	504.00	B160	Prepare fifteenth monthly fee application.
12/14/23	R. Wicks	0.90	567.00	B160	Prepare Ankura October compensation report.
12/14/23	R. Wicks	0.10	63.00	B160	Correspond with J. Kearney regarding Hooper monthly fee application.
12/14/23	T. Moyron	0.10	80.00	B160	Analyze emails from R. Wicks, et al., re staffing report re Ankura.
12/14/23	G. Medina	0.90	307.80	B160	Correspond with C. Arias regarding November invoice (0.1); review and draft Fifteenth monthly fee application for Dentons with notice (0.8).
12/15/23	R. Wicks	0.70	441.00	B160	Prepare fifteenth monthly fee application and file same.
12/15/23	R. Wicks	0.10	63.00	B160	Correspond with T. Moyron and S. Maizel regarding Ankura October compensation report.
12/15/23	R. Wicks	0.20	126.00	B160	Correspond with T. Moyron and S. Maizel regarding Hooper Lundy monthly fee applications.
12/15/23	R. Wicks	0.10	63.00	B160	Analyze correspondence from A. Guerra regarding service of monthly fee applications.
12/15/23	G. Medina	1.00	342.00	B160	Edit and send fifteenth Monthly Fee Application for Dentons to T. Moyron, S. Maizel and R. Wicks (0.5); file Monthly Fee Application for Dentons with notice (0.5).
12/15/23	T. Moyron	0.10	80.00	B160	Analyze email from Evdnetworks re claim.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/15/23	T. Moyron	0.10	80.00	B160	Attention to Dentons' monthly fee application.
12/18/23	T. Moyron	0.40	320.00	B160	Analyze Ankura staffing report (.2); correspond with T. Cazares re same (.2).
12/18/23	R. Wicks	0.20	126.00	B160	Correspond with T. Moyron and S. Maizel regarding Hooper Lundy fee applications.
12/18/23	R. Wicks	0.20	126.00	B160	Finalize and file Ankura monthly compensation report.
12/18/23	R. Wicks	0.10	63.00	B160	Correspond with H. Hong regarding Ankura LEDES files.
12/18/23	R. Wicks	0.10	63.00	B160	Correspond with G. Medina regarding Dentons LEDES files.
12/19/23	R. Wicks	0.20	126.00	B160	Correspond with T. Reid regarding Hooper monthly fee application and rate increases.
12/19/23	R. Wicks	0.30	189.00	B160	Finalize and file Hooper monthly fee application.
12/19/23	R. Wicks	0.10	63.00	B160	Correspond with H. Hong regarding LEDES files for Hooper monthly fee application.
12/19/23	G. Medina	0.80	273.60	B160	Correspond with C. Arias and request LEDES file to send to the UST (0.1); received review and send November 2023 LEDES file to R. Wicks (0.2); correspond with R. Wicks regarding HLB October 2023 fee application (0.1); review, prepare assemble and file HLB 14th monthly fee application (0.4).
12/20/23	G. Medina	1.70	581.40	B160	Correspond with R. Wicks regarding October MOR (0.1); prepare assemble and file HLB 15th monthly fee application (0.4); draft Ankura November compensation report and send to R. Wicks and T. Moyron for review (0.6); file Ankura compensation report (0.3); file October monthly operating report (0.3).
12/20/23	R. Wicks	0.30	189.00	B160	Analyze correspondence from I. Lee regarding Ankura November compensation report.
12/20/23	T. Moyron	0.10	80.00	B160	Attention to Hooper's monthly fee application and filing thereof.

Borrego Community Health Foundation
 Matter: 15810746-000002
 Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/20/23	R. Wicks	0.40	252.00	B160	Prepare Hooper November monthly fee application.
12/20/23	R. Wicks	0.10	63.00	B160	Finalize and file Hooper November monthly fee application.
12/20/23	R. Wicks	0.20	126.00	B160	Review Ankura November compensation and staffing report.
12/26/23	R. Wicks	0.10	63.00	B160	Correspond with H. Hong regarding Ankura LEDES files.
12/26/23	R. Wicks	0.10	63.00	B160	Analyze correspondence with I. Lee and T. Moyron regarding Ankura LEDES files.
12/27/23	R. Wicks	0.10	63.00	B160	Review correspondence from T. Reid regarding Hooper Lundy's notice of annual rate increases.
12/28/23	R. Wicks	0.30	189.00	B160	Review Hooper Lundy notice of annual rate increase.
	Subtotal	18.20	9,360.80		

B185 - Assumption/Rejection of Leases and Contracts

Date	Timekeeper	Hours	Amount	Task	Narrative
12/04/23	S. Maizel	0.50	400.00	B185	Review and respond to emails re possible settlement of Vitamin D claim.
12/18/23	R. Wicks	0.10	63.00	B185	Call with CJ Pease regarding El Cajon lease.
12/18/23	R. Wicks	0.50	315.00	B185	Analyze rejection of Promenade Square lease, deadlines, and related issues.
12/18/23	R. Wicks	0.20	126.00	B185	Correspond with T. Moyron and S. Maizel regarding rejection of Promenade Square lease.
	Subtotal	1.30	904.00		

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

B190 - Other Contested Matters (excl. assumption/rejection motions)

Date	Timekeeper	Hours	Amount	Task	Narrative
12/04/23	S. Maizel	1.90	1,520.00	B190	Review and revise opposition to Premier request for status conference (.7); telephone conference with T. Moyron re same (.3); review and respond to emails re same (.3); zoom conference with J. Pomerantz and T. Moyron re same (.6).
12/05/23	T. Moyron	0.60	480.00	B190	Analyze issues related to Premier creditors and filed claims, including motion to estimate and objection and potential resolution.
12/05/23	T. Moyron	0.10	80.00	B190	Analyze email from counsel for Premier.
12/07/23	T. Moyron	0.80	640.00	B190	Correspondence from S. Golden, KCC, et al., re order, timing and related matters (.4); call with R. Wicks regarding same (.1); attention to final changes in documents to be attached to order (.3).
12/11/23	T. Moyron	1.50	1,200.00	B190	Review and comment on notice of plan supplement and related exhibits (.8); correspond with Committee, Ankura, G. Medina, et al., regarding same (.7).
12/19/23	T. Moyron	0.20	160.00	B190	Correspond regarding Traveler's proposal.
12/19/23	R. Wicks	2.10	1,323.00	B190	Prepare 9019 motion for Travelers settlement.
12/19/23	R. Wicks	0.10	63.00	B190	Correspond with T. Moyron regarding Travelers 9019 motion.
12/20/23	T. Moyron	0.10	80.00	B190	Correspond with R. Wicks regarding Traveler's 9019 motion and hearing.
12/20/23	R. Wicks	0.10	63.00	B190	Call with R. Paluso regarding hearing date for Travelers 9019 settlement motion.
12/20/23	R. Wicks	0.10	63.00	B190	Correspond with T. Moyron regarding 9019 motion and hearing date.
12/20/23	R. Wicks	0.10	63.00	B190	Analyze correspondence with T. Moyron and J. Sokol regarding Travelers 9019 motion.
12/21/23	R. Wicks	1.80	1,134.00	B190	Prepare Travelers 9019 motion.
12/26/23	R. Wicks	0.10	63.00	B190	Correspond with T. Moyron and S. Maizel regarding 9019 motion.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/26/23	R. Wicks	0.60	378.00	B190	Prepare 9019 motion for Travelers settlement.
	Subtotal	10.20	7,310.00		

B210 - Business Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
12/04/23	R. Wicks	0.30	189.00	B210	Analyze correspondence with T. Moyron, CJ Pease, et. al regarding monthly operating reports.
12/06/23	R. Wicks	0.10	63.00	B210	Call with CJ Pease regarding monthly operating reports.
12/06/23	R. Wicks	0.10	63.00	B210	Analyze correspondence with UST regarding monthly operating reports.
12/08/23	R. Wicks	0.30	189.00	B210	Finalize and file August monthly operating report.
12/14/23	R. Wicks	0.10	63.00	B210	Correspond with T. Moyron regarding filing September monthly operating report.
	Subtotal	0.90	567.00		

B230 - Financing/Cash Collections

Date	Timekeeper	Hours	Amount	Task	Narrative
12/06/23	S. Maizel	0.60	480.00	B230	Emails to S. Hansberger, etc. re Vitamin D claim objection and settlement.
12/06/23	S. Maizel	0.50	400.00	B230	Review and respond to emails re claims objections.
12/13/23	S. Maizel	0.20	160.00	B230	Review and respond to emails re resolving claims protocols.
12/13/23	S. Maizel	0.20	160.00	B230	Review and respond to emails re Vitamin D objection.
12/14/23	T. Moyron	0.20	160.00	B230	Analyze emails from CJ Pease, et al., re bank statements and MORs.
12/15/23	S. Maizel	0.30	240.00	B230	Zoom conference with J. Pomerantz, etc. re claims administration.
12/15/23	S. Maizel	0.30	240.00	B230	Review and respond to emails with T. Moyron, J. Pomerantz, etc. re claims review and administration.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/18/23	S. Maizel	0.50	400.00	B230	Review materials re Priest proof of claim in preparation for call with Priest's counsel.
12/18/23	S. Maizel	0.60	480.00	B230	Review materials re claim against Hemet Hospital for contract damages.
	Subtotal	3.40	2,720.00		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
12/01/23	R. Wicks	0.10	63.00	B310	Analyze amended tentative ruling on IRS claim objection.
12/01/23	R. Wicks	0.10	63.00	B310	Correspond with J. Pomerantz regarding amended tentative ruling.
12/03/23	R. Wicks	0.30	189.00	B310	Analyze correspondence with A. Mojdehi, T. Moyron, et. al regarding Premier claims.
12/04/23	R. Wicks	0.60	378.00	B310	Prepare omnibus objection to claims form.
12/04/23	R. Wicks	0.10	63.00	B310	Call with T. Moyron regarding Premier claims.
12/04/23	L. Macksoud	0.30	218.70	B310	Confer with T. Moyron re draft summary of proposed Vitamin D claim settlement.
12/04/23	T. Moyron	0.10	80.00	B310	Correspond with L. Macksoud re Vitamin D claim.
12/05/23	R. Wicks	0.60	378.00	B310	Prepare omnibus objection to late filed claims.
12/05/23	R. Wicks	1.70	1,071.00	B310	Research issues related to Premier claims, including issues related to motion to estimate or objection to claim.
12/05/23	R. Wicks	0.30	189.00	B310	Call with S. Maizel regarding Premier claims.
12/05/23	R. Wicks	0.30	189.00	B310	Call with B. Richards regarding Premier claims.
12/05/23	R. Wicks	0.30	189.00	B310	Call with CJ Pease, S. Maizel, I. Lee, et. al regarding Premier claims.
12/05/23	R. Wicks	0.30	189.00	B310	Analyze correspondence with L. Macksoud, S. Maizel, regarding Vitamin D settlement.
12/05/23	R. Wicks	0.20	126.00	B310	Correspond with T. Moyron, CJ Pease, and J. Kearney regarding Premier claims.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/05/23	R. Richards	0.20	160.00	B310	Call with Rebecca Wicks regarding background on Priest related claims.
12/05/23	R. Richards	0.30	240.00	B310	Review DRP claim number 232.
12/05/23	R. Richards	0.30	240.00	B310	Review Inland Valley claim number 231.
12/05/23	R. Richards	0.30	240.00	B310	Review Promenade Square claim number 230.
12/05/23	R. Richards	0.40	320.00	B310	Review Premier Healthcare Management claim number 228.
12/05/23	R. Richards	0.40	320.00	B310	Review 2022 state court complaint against Priest related parties.
12/05/23	R. Richards	0.10	80.00	B310	Review bar date notice.
12/05/23	R. Richards	0.40	320.00	B310	Review key claims related portions of combined plan and disclosure statement.
12/05/23	R. Richards	0.10	80.00	B310	Emails re preliminary feedback and strategy on claims objections.
12/05/23	S. Maizel	0.50	400.00	B310	Telephone conference with T. Moyron re Premier issues (.1); telephone conference with R. Wicks re same (.2); review and respond to correspondence re same (.2).
12/06/23	R. Wicks	0.70	441.00	B310	Analyze transfer of Cook Street claim.
12/06/23	R. Wicks	0.20	126.00	B310	Prepare omnibus objection to claim.
12/06/23	R. Wicks	0.10	63.00	B310	Analyze correspondence with L. Macksoud, S. Maizel, et al regarding Vitamin D claim settlement.
12/06/23	R. Wicks	0.30	189.00	B310	Analyze complaints against Premier claimants.
12/06/23	R. Wicks	0.10	63.00	B310	Correspond with L. Macksoud regarding preparing omnibus claim objection.
12/06/23	G. Medina	0.40	136.80	B310	Received request from R. Wicks and retrieve and send claims requested.
12/06/23	L. Macksoud	0.20	145.80	B310	Review draft settlement offer for Vitamin D claim and confer with S. Maizel re same.
12/06/23	L. Macksoud	1.30	947.70	B310	Review and comment on omnibus objection to late filed claims and declaration in support thereof (.8); review claims register (.3); and draft email to R. Wicks re same and re next steps (.2).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/07/23	R. Wicks	0.50	315.00	B310	Call with S. Maizel, I. Lee, et. al regarding IRS claims.
12/07/23	R. Wicks	0.20	126.00	B310	Call with B. Richards regarding claim objection and Rule 3018 motion process and related research.
12/07/23	R. Wicks	1.10	693.00	B310	Research regarding filing claim objections instead of Rule 3018 motions.
12/07/23	R. Wicks	0.50	315.00	B310	Correspond with B. Richards, T. Moyron, et al regarding filing claim objections instead of Rule 3018 motions.
12/07/23	R. Wicks	0.20	126.00	B310	Analyze CMS and HRS claims for voting purposes.
12/07/23	R. Richards	1.30	1,040.00	B310	Emails re Priest claims (0.2) discuss Priest Claim strategy with Wicks (0.1); review additional state court complaint (0.4); review estimation and related caselaw research from Wicks (0.6).
12/08/23	R. Wicks	0.40	252.00	B310	Prepare omnibus claim objection.
12/08/23	T. Moyron	0.30	240.00	B310	Call with J. Pomerantz regarding disputed claim schedule, upcoming call with KCC and claim matters.
12/08/23	R. Wicks	0.20	126.00	B310	Correspond with CJ Pease regarding US Bank claim withdrawal.
12/08/23	R. Wicks	0.10	63.00	B310	Analyze correspondence from H. Hammi regarding claim stipulation.
12/11/23	R. Wicks	0.20	126.00	B310	Correspond with T. Moyron, B. Richards regarding Premier claims.
12/13/23	R. Wicks	0.20	126.00	B310	Correspond with L. Macksoud regarding omnibus claim objection.
12/13/23	L. Macksoud	0.20	145.80	B310	Confer with R. Wicks redraft omnibus objection.
12/14/23	R. Wicks	0.20	126.00	B310	Analyze correspondence with T. Moyron, S. Maizel, S. golden, et al regarding Premier claims.
12/14/23	T. Moyron	0.70	560.00	B310	Conference calls with J. Pomerantz and R. Maclsaac regarding threshold and Vitamin D objection resolutions (.5); correspondence regarding same (.2).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/15/23	R. Wicks	0.10	63.00	B310	Correspond with T. Moyron regarding Enhanced Voice and Data claim.
12/15/23	R. Wicks	1.30	819.00	B310	Analyze Premier proofs of claim, including research into impact of surrender of leases.
12/15/23	R. Wicks	0.10	63.00	B310	Correspond with L. Macksoud regarding omnibus claim objection.
12/15/23	R. Wicks	0.50	315.00	B310	Prepare omnibus claim objection form.
12/15/23	R. Wicks	0.20	126.00	B310	Correspond with T. Moyron and S. Maizel regarding omnibus claim objection form.
12/15/23	R. Wicks	0.10	63.00	B310	Call with T. Moyron regarding Premier claims.
12/15/23	R. Wicks	0.40	252.00	B310	Call with T. Moyron, J. Pomerantz, et. al regarding Premier claims.
12/15/23	R. Richards	0.30	240.00	B310	Call regarding Priest claims with Dentons team and Committee counsel.
12/15/23	L. Macksoud	0.50	364.50	B310	Review and comment on draft omnibus objection for late filed claims (.3); update claims chart per same (.1); confer with R. Wicks re same (.1).
12/17/23	R. Wicks	0.20	126.00	B310	Analyze correspondence with T. Moyron, A. Mojdehi, J. Pomerantz, et. al regarding Premier claim discussion.
12/18/23	R. Wicks	0.40	252.00	B310	Analyze Enhanced Voice and Data Networks claim.
12/18/23	R. Wicks	0.20	126.00	B310	Correspond with CJ Pease, T. Moyron, et. al regarding Enhanced voice and Data Networks claim.
12/18/23	R. Wicks	0.20	126.00	B310	Correspond with G. Medina, CJ Pease, T. Moyron et al regarding Grigoryan proof of claim.
12/18/23	T. Moyron	0.70	560.00	B310	Analyze issues related to Priest claims and resolutions.
12/19/23	R. Wicks	0.20	126.00	B310	Correspond with S. Maizel and T. Moyron regarding Enhanced Voice and Data claim.
12/19/23	R. Wicks	0.10	63.00	B310	Analyze correspondence with T. Moyron, B. Richards, et al regarding Premier claims and proposed stipulation.

Borrego Community Health Foundation
 Matter: 15810746-000002
 Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/20/23	T. Moyron	1.10	880.00	B310	Analyze objections to claims and declarations in support thereof (.5); prepare emails to B. Dassa regarding same (.2); analyze stipulations resolving claims and related emails from CJ Pease, et al. (.4).
12/20/23	R. Wicks	0.10	63.00	B310	Call with B. Richards regarding Premier claim objections.
12/20/23	R. Wicks	0.20	126.00	B310	Correspond with T. Moyron, B. Richards, and S. Maizel regarding Premier claims.
12/20/23	R. Wicks	0.10	63.00	B310	Analyze correspondence from H. Hammi regarding Wermers settlement.
12/21/23	L. Macksoud	0.30	218.70	B310	Call with R. Wicks to discuss additional claims objections.
12/21/23	R. Wicks	0.30	189.00	B310	Call with T. Moyron, J. Pomerantz, J. Pomerantz regarding Premier claims.
12/21/23	R. Wicks	3.70	2,331.00	B310	Prepare objection to Premier claims for voting purposes.
12/21/23	R. Wicks	0.10	63.00	B310	Call with B. Richards regarding Premier claim objections.
12/21/23	R. Wicks	0.20	126.00	B310	Correspond with L. Macksoud regarding Premier claim objections.
12/21/23	R. Wicks	0.10	63.00	B310	Call with T. Moyron regarding Premier claim objections and potential settlement.
12/21/23	R. Wicks	0.10	63.00	B310	Analyze correspondence from S. Reitzel regarding insurance provider claim.
12/22/23	R. Wicks	0.30	189.00	B310	Analyze correspondence with A. Mojdehi, T. Moyron, J. Pomerantz, et al. regarding settlement with Premier creditors.
12/22/23	R. Wicks	0.20	126.00	B310	Review objections to claims filed by Committee.
12/22/23	R. Wicks	0.10	63.00	B310	Correspond with B. Richards regarding settlement with Premier creditors.
12/22/23	R. Wicks	0.10	63.00	B310	Correspond with T. Moyron and S. Maizel regarding stipulation regarding James Wermers rejection claim.
12/26/23	R. Wicks	0.10	63.00	B310	Correspond with T. Moyron regarding James Wermers stipulation.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/28/23	T. Moyron	0.30	240.00	B310	Analyze email from J. Pomerantz re Vitamin D claim (.1); analyze proposed stipulation re same (.1); and prepare email to J. Pomerantz regarding same (.1).
12/28/23	R. Wicks	0.10	63.00	B310	Analyze stipulation resolving claim of BRG.
12/28/23	R. Wicks	0.20	126.00	B310	Correspond with T. Moyron and S. Maizel regarding stipulation to resolve Wermers claim.
12/28/23	R. Wicks	0.10	63.00	B310	Correspond with H. Hammi regarding Wermers stipulation to resolve claim.
12/28/23	R. Wicks	0.60	378.00	B310	Prepare Wermers stipulation to resolve claim.
12/28/23	S. Maizel	0.40	320.00	B310	Review and revise stipulation with Wermers re claim.
12/28/23	G. Medina	0.20	68.40	B310	Address creditor call related to change of address.
12/29/23	R. Wicks	0.10	63.00	B310	Correspond with H. Hammi regarding revisions to stipulation to resolve James Wermers' claim.
	Subtotal	32.50	21,973.40		

B320 - Plan and Disclosure Statement (incl. Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
12/01/23	T. Moyron	0.60	480.00	B320	Analyze email from T. Cazares attaching wind-down budget and analyze same and related issues.
12/01/23	R. Wicks	3.80	2,394.00	B320	Prepare reply in support of solicitation procedures motion.
12/01/23	R. Wicks	0.10	63.00	B320	Call H. Hong from US Trustee regarding solicitation procedures motion.
12/01/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with T. Cazares and T. Moyron regarding wind-down budget.
12/03/23	R. Wicks	0.30	189.00	B320	Correspond with T. Moyron and S. Maizel regarding solicitation procedures and Premier claims.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/03/23	S. Maizel	0.50	400.00	B320	Review and respond to emails re Premier response re hearing on combined plan and disclosure statement.
12/03/23	T. Moyron	1.10	880.00	B320	Correspond with counsel for Premier regarding upcoming hearing, request for status conference and related matters (.4); correspond with Committee counsel regarding same (.2); correspond with S. Maizel regarding upcoming hearing (.1); correspond with S. Maizel and R. Wicks regarding plan and litigation (.2); analyze plan in connection therewith (.2).
12/04/23	S. Maizel	0.80	640.00	B320	Zoom conference with Ankura and R. Wicks re Premier treatment and liquidation analysis (.4); review and respond to emails re same (.4).
12/04/23	S. Maizel	1.20	960.00	B320	Zoom conference with T. Moyron and R. Wicks re hearing on solicitation motion and Premier response (.4); review and revise reply to objections to solicitation motion (.4); review and respond to emails re same (.4).
12/04/23	T. Moyron	5.10	4,080.00	B320	Conference call with S. Maizel regarding pending issues, including reply brief and Premier (.4); analyze premier claims and related issues including next steps (.8); zoom conference with T. Moyron and R. Wicks re hearing on solicitation motion and Premier response (.4); analyze and finalize reply to objections to solicitation motion (.4); review and respond to emails regarding reply (.3); analyze application for status conference (.1) and analyze opposition and prepare comments thereto (.6); prepare and finalize opposition (.4); phone calls with S. Maizel regarding upcoming hearing, Premier, plan and related matters (1.2); call with J. Pomerantz regarding Premier filing and related matters (.5).
12/04/23	R. Wicks	0.10	63.00	B320	Correspond with UST regarding LEDES files.
12/04/23	R. Wicks	0.30	189.00	B320	Analyze correspondence with T. Moyron, S. Golden, et. al regarding opposition to status conference request.

Borrego Community Health Foundation
 Matter: 15810746-000002
 Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/04/23	R. Wicks	0.10	63.00	B320	Call with CJ Pease regarding plan effective date.
12/04/23	R. Wicks	0.90	567.00	B320	Call with T. Moyron, J. Pomerantz, and S. Maizel regarding opposition to Premier creditors' request for status conference.
12/04/23	R. Wicks	0.70	441.00	B320	Prepare reply in support of solicitation procedures motion.
12/04/23	R. Wicks	0.10	63.00	B320	Call with S. Golden regarding solicitation procedures reply.
12/04/23	R. Wicks	2.40	1,512.00	B320	Prepare opposition to status conference request.
12/04/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with H. Hong regarding solicitation procedures.
12/04/23	R. Wicks	0.40	252.00	B320	Analyze Premier's request for status conference.
12/04/23	G. Medina	1.30	444.60	B320	Correspond with R. Wicks and prepare, assemble and file joint omnibus reply to objections to the motion granting interim approval of the adequacy of the disclosure statement (0.6); correspond with R. Wicks, review assemble and file joint opposition to status conference related to DRP, Inland and Premier Status conference request (0.3); correspond with R. Wicks, edit and filed combined disclosure statement (0.4).
12/05/23	R. Wicks	1.70	1,071.00	B320	Prepare disclosure statement order.
12/05/23	R. Wicks	0.80	504.00	B320	Prepare ballots, opt-out form, and notices.
12/05/23	R. Wicks	0.20	126.00	B320	Analyze amended tentative ruling vacating hearing on disclosure statement.
12/05/23	R. Wicks	0.10	63.00	B320	Correspond with R. Maclsaac, I. Lee, et. al regarding amended tentative ruling.
12/05/23	R. Wicks	0.30	189.00	B320	Analyze correspondence with S. Reitzel, et. al regarding solicitation.
12/05/23	T. Moyron	0.30	240.00	B320	Correspond with Committee counsel regarding communication from counsel for Premier and related matters.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/05/23	T. Moyron	0.30	240.00	B320	Analyze email from R. Wicks regarding disclosure statement order and updated ballots, notices, etc. (.1); correspondence with KCC regarding disclosure statement documents, timing and call (.2).
12/05/23	T. Moyron	0.20	160.00	B320	Call with S. Maizel regarding correspondence from S. Hansberger and response thereto (.1); correspond with S. Hansberger regarding same (.1).
12/05/23	S. Maizel	1.10	880.00	B320	Review materials in preparation for hearing on solicitation motion (1.0); review minute order re waiver of hearing (.1).
12/05/23	S. Maizel	0.50	400.00	B320	Telephone conference with T. Moyron re hearing on solicitation motion (.2); review and respond to emails from S. Hansberger re solicitation of plan approval (.3).
12/06/23	S. Maizel	0.80	640.00	B320	Review and respond to emails re post-confirmation expenses (.3); review proposed post-confirmation budget (.5).
12/06/23	S. Maizel	1.40	1,120.00	B320	Review plan re voting issues (.4); zoom conference with KCC, PSZJ, etc. re solicitation issues, etc. (1.0).
12/06/23	T. Moyron	1.80	1,440.00	B320	Zoom meeting with KCC, Ankura, Committee advisors, S. Maizel, et al., regarding claims, and issues related to ballots, service of solicitation packages, and related matters (1.1); conference call regarding wind-down budget with I. Lee, CJ Pease, S. Maizel, et al. (.7).
12/06/23	T. Moyron	0.40	320.00	B320	Attention to order approving adequacy of DS and exhibits (.2); analyze emails from KCC, R. Wicks, et al., regarding same (.2).
12/06/23	R. Wicks	1.10	693.00	B320	Call with T. Moyron, S. Golden, S. Reitzel, et. al regarding solicitation packages and procedures.
12/06/23	R. Wicks	0.70	441.00	B320	Call with CJ Pease, I. Lee, T. Moyron, et. al regarding wind down budget.
12/06/23	R. Wicks	0.40	252.00	B320	Prepare notices, ballots, and opt-out forms.
12/06/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron, G. Miller regarding order approving the disclosures.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/06/23	R. Wicks	0.60	378.00	B320	Prepare order approving disclosure statement order.
12/06/23	R. Wicks	0.30	189.00	B320	Analyze correspondence with S. Reitzel, T. Moyron, et. al regarding solicitation procedures and service.
12/06/23	R. Wicks	0.20	126.00	B320	Correspond with G. Medina regarding preparing and uploading disclosure approval order.
12/06/23	R. Wicks	1.00	630.00	B320	Prepare schedules for plan supplement.
12/06/23	R. Wicks	0.10	63.00	B320	Call R. Paluso regarding disclosure statement order.
12/06/23	R. Wicks	0.20	126.00	B320	Analyze minute order granting solicitation procedure motion.
12/06/23	R. Wicks	0.20	126.00	B320	Analyze correspondence with I. Lee, S. Golden, et. al regarding wind down budget.
12/06/23	G. Miller	0.70	510.30	B320	Review order approving disclosure statement.
12/06/23	G. Medina	0.70	239.40	B320	Correspond with R. Wicks regarding disclosure statement order (0.1); receive the proposed order with exhibits, assemble and send to R. Wicks for review and upload disclosure statement order (0.6).
12/07/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with S. Golden, T. Moyron, et. al regarding Plan Supplement.
12/07/23	R. Wicks	0.10	63.00	B320	Analyze correspondence from I. Lee regarding documents for Plan Supplement including administration costs.
12/07/23	R. Wicks	0.30	189.00	B320	Correspond with T. Moyron and S. Maizel regarding voting status of HRSA claim.
12/07/23	R. Wicks	1.80	1,134.00	B320	Prepare list of excluded parties for plan supplement.
12/07/23	R. Wicks	0.10	63.00	B320	Prepare schedule of retained causes of action for plan supplement.
12/07/23	R. Wicks	0.40	252.00	B320	Prepare notices and ballots and combined plan with disclosure statement order information.
12/07/23	R. Wicks	0.20	126.00	B320	Analyze order granting disclosure statement order.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/07/23	R. Wicks	0.50	315.00	B320	Analyze correspondence regarding disclosure statement order and solicitation procedures.
12/07/23	G. Medina	0.30	102.60	B320	Correspond with R. Wicks and D. Kalve and review status of the combined disclosure statement order (0.2); review ECFX notification received and forward the order entered to R. Wicks (0.1).
12/07/23	R. Wicks	0.10	63.00	B320	Call with J. Morrow regarding service of solicitation packages.
12/07/23	R. Wicks	0.10	63.00	B320	Call with R. Paluso regarding disclosure statement order.
12/07/23	R. Wicks	0.10	63.00	B320	Call with T. Moyron regarding disclosure statement order and solicitation packages.
12/07/23	R. Wicks	0.10	63.00	B320	Call with CJ Pease regarding plan supplement.
12/07/23	R. Wicks	0.10	63.00	B320	Correspond with T. Cazares regarding plan supplement.
12/08/23	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding Plan Supplement.
12/08/23	R. Wicks	0.30	189.00	B320	Correspond with R. MacIsaac regarding liquidating trust agreement.
12/08/23	R. Wicks	1.70	1,071.00	B320	Prepare notice of plan supplement.
12/08/23	R. Wicks	0.10	63.00	B320	Analyze FTI draft disputed claim schedule.
12/08/23	S. Maizel	0.50	400.00	B320	Review and respond to emails re plan supplement documents.
12/09/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with S. Rinaldi and T. Moyron regarding liquidating trust agreement.
12/10/23	R. Wicks	0.10	63.00	B320	Correspond with S. Ruben regarding Plan Supplement deadlines.
12/10/23	R. Wicks	0.10	63.00	B320	Correspond with J. Kearney, et. al regarding prepetition fraud parties for Plan Supplement.
12/10/23	R. Wicks	0.10	63.00	B320	Correspond with CJ Pease, I. Lee, et. al regarding prepetition fraud parties for Plan Supplement.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/10/23	R. Wicks	0.20	126.00	B320	Prepare list of excluded parties for Plan Supplement.
12/10/23	R. Wicks	0.20	126.00	B320	Prepare list of retained causes of action for Plan Supplement.
12/10/23	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron regarding Plan Supplement.
12/10/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron, G. Miller, et. al regarding liquidating trust agreement.
12/11/23	R. Wicks	0.10	63.00	B320	Call with S. Maizel regarding list of excluded parties.
12/11/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with T. Moyron, S. Rinaldi, et al regarding plan supplement.
12/11/23	R. Wicks	0.10	63.00	B320	Correspond with CJ Pease regarding list of excluded parties.
12/11/23	R. Wicks	0.70	441.00	B320	Analyze S. Rinaldi's proposed changes to liquidating trust agreement.
12/11/23	R. Wicks	0.80	504.00	B320	Analyze correspondence regarding preparing and finalizing plan supplement.
12/11/23	E. Chew	1.10	726.00	B320	Review Plan Supplement and prepare same for filing.
12/11/23	R. Wicks	1.50	945.00	B320	Prepare list of excluded parties for plan supplement.
12/11/23	R. Wicks	0.30	189.00	B320	Correspond with J. Kearney, et. al regarding prepetition fraud parties for Plan Supplement.
12/11/23	G. Miller	1.20	874.80	B320	Review and comment on draft LTA (1.0); call with T. Moyron re same (.1); email S. Golden re same (.1).
12/11/23	S. Maizel	0.50	400.00	B320	Review and respond to emails re supplemental filings for plan.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/11/23	G. Medina	2.90	991.80	B320	Correspond with R. Wicks regarding plan supplement (0.1); call T. Moyron and edit notice of supplement to incorporate exhibits into single notice (0.5); review and incorporate new language to list of excluded parties sent by E. Chew (0.3); send revised notice of plan supplement to E. Chew, T. Moyron, S. Maizel, and R. Wicks (0.2); review order approving DS motion related to language (0.2); send first amend plan to T. Moyron per her request (0.2); further updated the notice to include all schedules sent by Ankura (0.5); call with T. Moyron regarding Exhibit E and inserted word version sent by Ankura (0.2); further revised notice per T. Moyron's request (0.3); file Plan supplement (0.4).
12/12/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with CJ Pease, S. Reitzel, et. al regarding service of plan and plan supplement.
12/12/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with J. Morrow, T. Moyron, et. al regarding service of disputed claims schedule and plan supplement.
12/14/23	T. Moyron	0.30	240.00	B320	Analyze plan issues related to correspondence from Premier's counsel (.2); and prepare email to Committee counsel regarding call re same (.1).
12/15/23	T. Moyron	0.40	320.00	B320	Zoom meeting with Committee counsel, S. Maizel, et al., re Premier creditors.
12/18/23	G. Medina	0.40	136.80	B320	Call to and from Claimant Vahan Grigoryan DDS regarding schedule of disputed claims; correspond with R. Wicks regarding same.
12/19/23	R. Wicks	0.10	63.00	B320	Review notice of confirmation hearing issued by Court.
12/19/23	S. Maizel	0.30	240.00	B320	Zoom conference with J. Pomerantz, A. Mojdehi, etc. re Premier claims.
12/19/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with I. Lee and T. Moyron regarding reserves to pay disputed unsecured creditors.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
12/19/23	T. Moyron	0.80	640.00	B320	Zoom meeting with Committee counsel, counsel for Premier, S. Maizel, et al., regarding proposal and resolution and analyze related issues thereafter.
12/19/23	G. Medina	0.60	205.20	B320	Call with creditor related to Opt out form and send Amended Plan, Notice of hearing approving plan and plan supplement for his review.
12/20/23	R. Wicks	0.20	126.00	B320	Analyze proposed settlement from A. Mojdehi.
12/20/23	R. Wicks	0.20	126.00	B320	Analyze correspondence with T. Moyron, J. Pomerantz, et al. regarding A. Mojdehi's settlement proposal.
12/20/23	T. Moyron	0.30	240.00	B320	Analyze email from Premier's counsel re proposal (.1); analyze emails from R. Wicks and R. Richards regarding same (.1); prepare email to Committee counsel (.1).
12/21/23	S. Maizel	0.20	160.00	B320	Review and respond to emails re CMS issues.
12/21/23	T. Moyron	0.50	400.00	B320	Call with S. Maizel re Premier claim and plan confirmation.
12/22/23	S. Maizel	0.50	400.00	B320	Telephone conference with T. Moyron re Premier claim and plan confirmation.
12/26/23	R. Wicks	2.80	1,764.00	B320	Prepare outline for confirmation brief.
12/28/23	R. Wicks	0.20	126.00	B320	Correspond with S. Maizel and T. Moyron regarding stipulation with Premier claimants and plan confirmation order.
12/28/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with S. Maizel, S. Golden, et. al regarding stipulation with Premier claimants and plan confirmation order.
12/28/23	R. Wicks	0.20	126.00	B320	Prepare tabulation report outline.
12/28/23	S. Maizel	0.20	160.00	B320	Review and respond to emails re Amended Combined Plan issues.
12/29/23	G. Medina	0.50	171.00	B320	Address creditor calls related to the Plan and Opt out form (0.4); correspond with KCC regarding creditor calls (0.1).
12/29/23	R. Wicks	0.10	63.00	B320	Analyze correspondence from G. Medina and L. Do regarding voting information request from creditor.

Borrego Community Health Foundation
 Matter: 15810746-000002
 Invoice No.: 2722918

January 31, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
	Subtotal	62.90	41,420.50		

DHCS - DHCS Litigation

Date	Timekeeper	Hours	Amount	Task	Narrative
12/05/23	S. Maizel	0.40	320.00	DHCS	Review and respond to emails re reports for DHCS.
12/05/23	T. Moyron	0.20	160.00	DHCS	Analyze email from R. Maclsaac regarding DHCS reports (.1); analyze email from S. Maizel regarding same (.1).
	Subtotal	0.60	480.00		

REP - Reporting

Date	Timekeeper	Hours	Amount	Task	Narrative
12/04/23	G. Medina	0.40	136.80	REP	Correspond with T. Moyron and filed July monthly operating report.
12/14/23	G. Medina	0.40	136.80	REP	Review and file September monthly operating report.
	Subtotal	0.80	273.60		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Maizel	\$ 800.00	18.40	\$ 14,720.00
T. Moyron	\$ 800.00	22.00	\$ 17,600.00
G. Miller	\$ 729.00	1.90	\$ 1,385.10
L. Macksoud	\$ 729.00	2.80	\$ 2,041.20
R. Richards	\$ 800.00	4.10	\$ 3,280.00
R. Wicks	\$ 630.00	71.80	\$ 45,234.00
E. Chew	\$ 660.00	1.10	\$ 726.00
S. Ruben	\$ 499.50	0.20	\$ 99.90
G. Medina	\$ 342.00	<u>16.00</u>	<u>\$ 5,472.00</u>
Totals		138.30	\$ 90,558.20

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2722918

January 31, 2024

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	5,233.90
B150	Meetings of and Communications with Creditors	315.00
B160	Fee/Employment Applications	9,360.80
B185	Assumption/Rejection of Leases and Contracts	904.00
B190	Other Contested Matters (excl. assumption/rejection motions)	7,310.00
B210	Business Operations	567.00
B230	Financing/Cash Collections	2,720.00
B310	Claims Administration and Objections	21,973.40
B320	Plan and Disclosure Statement (incl. Business Plan)	41,420.50
DHCS	DHCS Litigation	480.00
REP	Reporting	273.60
	Total This Matter	\$90,558.20

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/31/2023	LITIGATION SUPPORT VENDORS PACER 2637538-Q42023	55.90
	SUBTOTAL	55.90
12/7/2023	WESTLAW WICKS\ REBECCA	150.00
12/26/2023	WESTLAW WICKS\REBECCA	242.00
	SUBTOTAL	392.00
	Total Disbursements	\$447.90

Borrego Community Health Foundation January 31, 2024
Invoice #: 2722918

COMBINED TOTALS

Total Hours		138.30
Fee Total, all Matters	\$	90,558.20
Disbursement Total, all Matters	\$	447.90
Invoice Total, all Matters	\$	<u>91,006.10</u>
Amounts Received, Available to Apply Against Current or Future Invoices		100,000.00
Amount Due	\$	91,006.10



of 34
 SNR Denton US LLP
 601 S. Figueroa Street
 Suite 2500
 Los Angeles, California 90017-5704

snrdenton.com

Borrego Community Health Foundation
 Douglas B. Habig
 587 PALM CANYON DR, SUITE 208
 BORREGO SPRINGS CA 92005
 United States

January 31, 2024

Client #: 15810746

Statement of Account

According to our records, as of January 31, 2024, the amounts shown below are outstanding.
 If your records are not in agreement with ours, please call us. Thank you.

<u>Date</u>	<u>Invoice No.</u>	<u>Invoice Amount</u>	<u>Payments/ Adjustments</u>	<u>Total</u>
09/30/23	2672266	\$ 98,005.95	(\$ 78,499.76)	\$ 19,506.19
10/31/23	2679858	\$ 129,875.45	(\$ 104,020.36)	\$ 25,855.09
11/30/23	2687822	\$ 135,695.10	(\$ 108,877.08)	\$ 26,818.02
12/14/23	2712257	\$ 115,857.35	(\$ 92,685.88)	\$ 23,171.47
01/31/24	2722918	\$ 91,006.10	\$ 0.00	\$ 91,006.10
Total Outstanding Invoices				<u>\$ 186,356.87</u>
Credits On Account				\$ 100,000.00

Questions should be directed to:
 S. Maizel
 at 1 213 623 9300
 Federal Tax I.D. Number 36-1796730