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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
20 Debtor and Debtor In Possession.

21 Case No. 22-02384
22 Chapter 11 Case
23 (Voluntary Petition Filed September 12,
24 2022)

25 **DENTONS US LLP'S SEVENTEENTH**
26 **MONTHLY FEE APPLICATION FOR**
27 **ALLOWANCE AND PAYMENT OF**
28 **INTERIM COMPENSATION AND**
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD JANUARY 1, 2024
THROUGH JANUARY 31, 2024

Judge: Hon. Laura S. Taylor

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
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1 CSD 1143 (04/28/96)

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

4 DEBTOR: Borrego Community
 5 Health Foundation

PETITION DATE: September 12, 2022

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	January 1, 2024 –January 31, 2024 (APPLICATION PERIOD)	
	HOURS	AMOUNT REQUESTED
Case Administration	12.80	\$9,582.30
Asset Disposition	0.50	\$315.00
Meetings of and Communications with Creditors	0.30	\$189.00
Fee / Employment Applications	0.70	\$526.00
Other Contested Matters (excl. assumption/rejection motions)	2.40	\$1,512.00
Financing/Cash Collections	0.40	\$320.00
Non-Working Travel	2.30	\$1,449.00
Board of Directors Matters	5.00	\$4,000.00
Claims Administration and Objections	13.50	\$9,560.80
Plan and Disclosure Statement (incl. Business Plan)	104.40	\$70,447.10
Employee Matters	0.10	\$63.00
Medicare/CMS Issues	0.80	\$640.00
SUB-TOTAL:	143.20	\$98,604.20
REDUCED FEES:		(\$1,449.00)
TOTAL:		\$97,155.20

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MONTHLY FEE APPLICATION

Dentons US LLP (the “Firm”) submits its *Seventeenth Monthly Fee Application for Allowance and Payment of Interim Compensation and Reimbursement of Expenses for the Period January 1, 2024 – January 31, 2024* 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 January 1, 2024 – January 31, 2024³ (the “Application Period”).

2. The Firm billed a total of \$97,155.20¹ in fees and \$326.79 expenses during the Application Period. The total fees represent 143.20 hours expended during the period covered by this Application. These fees and expenses break down as follows:

Application Period	Fees	Expenses	Total
January 1, 2024 – January 31, 2024	\$97,155.20	\$326.79	\$97,481.99

3. Accordingly, the Firm seeks allowance of interim compensation in the amount of a total of \$78,335.75 at this time. This total is comprised as follows: \$78,008.96 (80% of the fees for services rendered), plus \$326.79 (100% of the expenses incurred).

¹ In light of the Debtor’s nonprofit status and charitable mission, the Firm agreed to cap its hourly fees at \$800 per hour and reduce the hourly rate of professionals billing under \$800 per hour by 10%. Additionally, the Firm does not bill for non-working travel time. Inadvertently, the Firm billed \$1,449.00 in fees for 2.30 hours of non-working travel time. Accordingly, the Firm has reduced the fees sought during this Application Period by \$1,449.00.

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

5 5. The Firm has served a copy of this Application on the Office of the
6 United States Trustee (the “U.S. Trustee”), the Debtor, counsel to the Debtor, counsel
7 to the Patient Care Ombudsman, and counsel to the Official Committee of Unsecured
8 Creditors appointed in this Case. The Application was mailed by first class mail,
9 postage prepaid, on or about March 19, 2024. Notice of the filing of this Application
10 was served on the foregoing parties as well as any party who has requested special
11 notice in this Case as of the date of the Notice. The Notice was mailed by first class
12 mail, postage prepaid, on or about March 19, 2024.

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

25 7. The interim compensation and reimbursement of expenses sought in this
26 Application is not final. Upon the conclusion of this Case, the Firm will seek fees
27 and reimbursement of the expenses incurred for the totality of the services rendered
28 in this Case. Any interim fees or reimbursement of expenses approved by this Court

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1 and received by the Firm (along with any retainer) will be credited against such final
2 fees and expenses as may be allowed by this Court.

3 **WHEREFORE**, the Firm respectfully requests that the Debtor pay
4 compensation to the Firm as requested herein pursuant to and in accordance with the
5 terms of the Order Establishing Monthly Fee Procedures.

6 Dated: March 19, 2024

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

7
8
9 By /s/ Tania M. Moyron
Tania M. Moyron

10 Attorneys for the Chapter 11 Debtor and
11 Debtor In Possession

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EXHIBIT “1”

**(Summary of Hours by Professional for
Application Period January 1, 2024 – January 31, 2024)**

Name of Professional	Title	Hours	Rate	Total Billed
Samuel R. Maizel	Partner	26.00	\$800.00	\$20,800.00
Tania M. Moyron	Partner	25.20	\$800.00	\$20,160.00
Robert Richards	Partner	1.10	\$800.00	\$880.00
Sandra McCandless	Partner	3.30	\$800.00	\$2,640.00
Geoffrey M. Miller	Partner	2.50	\$729.00	\$1,822.50
Lauren Macksoud	Partner	3.60	\$729.00	\$2,624.40
Rebecca M. Wicks	Senior Managing Associate	75.50	\$630.00	\$47,565.00
Samantha Ruben	Associate	.60	\$499.50	\$299.70
George L. Medina	Senior Paralegal	3.50	\$342.00	\$1,197.00
Kathryn Howard	Senior Paralegal	1.90	\$324.00	\$615.60
Sub-totals:		143.20		\$98,604.20
Reduced Fees:				(\$1,449.00)
Total:				\$97,155.20

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EXHIBIT “2”

**(Detailed Time and Expense Statements for
Application Period January 1, 2024 – January 31, 2024)**

DENTONS US LLP
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dentons.com

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

February 29, 2024

Invoice No. 2729514

Client: 15810746

Payment Due Upon Receipt

Total This Invoice	\$ 98,930.99
Amounts Received, Available to Apply Against Current or Future Invoices	100,000.00
Amount Due	\$ 98,930.99

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

February 29, 2024

Invoice No. 2729514

For Professional Services Rendered through January 31, 2024:

Matter: 15810746-000002
Postpetition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
01/02/24	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
01/02/24	R. Wicks	0.80	504.00	B110	Call with S. Maizel, R. Maclsaac, I. Lee, et al regarding plan, state court litigation, reconstituted board, and IRS claim.
01/02/24	R. Wicks	0.10	63.00	B110	Analyze correspondence with S. Maizel and T. Moyron regarding call with R. Maclsaac, I. Lee, et al.
01/02/24	S. Maizel	0.50	400.00	B110	Zoom conference with R. Maclsaac, I. Lee and J. LaMagna, re pending legal issues.
01/03/24	S. Maizel	0.20	160.00	B110	Review and respond to emails re post-confirmation governance issues.
01/09/24	S. Maizel	0.70	560.00	B110	Zoom conference with R. Maclsaac, I. Lee, etc. regarding pending legal issues.
01/09/24	R. Wicks	0.10	63.00	B110	Analyze correspondence with CJ Pease and UST regarding bank statements.
01/12/24	R. Wicks	0.10	63.00	B110	Analyze correspondence from A. Guerra regarding service of documents.
01/16/24	T. Moyron	0.20	160.00	B110	Correspond with T. Cazares regarding MOR filing (.1); analyze MOR (.1).
01/16/24	R. Wicks	0.10	63.00	B110	Correspond with T. Cazares regarding November monthly operating report.
01/16/24	R. Wicks	0.30	189.00	B110	Finalize and file November monthly operating report.
01/16/24	G. Medina	0.30	102.60	B110	File November monthly operating report.

Borrego Community Health Foundation
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Date	Timekeeper	Hours	Amount	Task	Narrative
01/18/24	S. Maizel	1.10	880.00	B110	Zoom call with Ankura, etc. re Medicare cost reports (.6); telephone conference with S. Hull re same (.1); email to L. Gardner, USAO, re same (.4).
01/18/24	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
01/21/24	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
01/22/24	R. Wicks	0.10	63.00	B110	Call with R. Paluso regarding hearing dates.
01/22/24	S. Maizel	1.20	960.00	B110	Zoom call with I. Lee, etc. re wind-down plan for Liquidating Trust, etc. (1.1); review and respond to emails re same (.1).
01/22/24	S. Maizel	0.30	240.00	B110	Zoom call with D. Wesel, T. Moyron and J. Pomerantz re monitor responsibilities.
01/23/24	R. Wicks	0.10	63.00	B110	Analyze correspondence from S. Rinaldi regarding liquidating trust agreements, including KCC agreement.
01/23/24	T. Moyron	0.80	640.00	B110	Participate in legal status call with R. Maclsaac, I. Lee, S. Maizel, et al., re next steps to reach effective date, litigation, monitor, and other issues.
01/23/24	S. Maizel	1.10	880.00	B110	Zoom conference with R. Maclsaac, I. Lee, etc. re pending legal issues.
01/24/24	S. Maizel	0.30	240.00	B110	Zoom conference with Ankura re engagement issues.
01/24/24	R. Wicks	0.10	63.00	B110	Analyze correspondence with S. Rinaldi and T. Moyron regarding US trustee's fees on liquidating trust assets.
01/24/24	R. Wicks	0.10	63.00	B110	Correspond with T. Moyron and S. Maizel regarding outstanding work streams and post-effective date tasks required.
01/25/24	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
01/26/24	S. McCandless	2.60	2,080.00	B110	Review draft of independent contractor agreement and begin detailed revisions to same.
01/27/24	S. McCandless	0.70	560.00	B110	Further revise independent contractor agreement; forward same to Dentons team.

Borrego Community Health Foundation
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February 29, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
01/29/24	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
01/30/24	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
01/30/24	S. Maizel	0.20	160.00	B110	Telephone conference with T. Moyron re pending issues.
01/31/24	R. Wicks	0.10	63.00	B110	Correspond with G. Medina regarding stipulation with CMS.
	Subtotal	12.80	9,582.30		

B130 - Asset Disposition

Date	Timekeeper	Hours	Amount	Task	Narrative
01/16/24	R. Wicks	0.20	126.00	B130	Correspond with K. Martinez regarding release of Wells Fargo lien.
01/16/24	R. Wicks	0.10	63.00	B130	Call with CJ Pease regarding Wells Fargo lien release.
01/18/24	R. Wicks	0.10	63.00	B130	Call with CJ Pease regarding release of Wells Fargo lien on sold vehicle.
01/18/24	R. Wicks	0.10	63.00	B130	Correspond with K. Martinez regarding release of Wells Fargo lien on sold vehicle.
	Subtotal	0.50	315.00		

B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
01/04/24	R. Wicks	0.10	63.00	B150	Call with creditor D. Shelley regarding plan and committee counsel.
01/08/24	R. Wicks	0.20	126.00	B150	Analyze letter from non-voting creditor regarding vaccines.
	Subtotal	0.30	189.00		

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B160 - Fee/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
01/09/24	R. Wicks	0.20	126.00	B160	Correspond with T. Moyron and S. Maizel regarding fee applications.
01/25/24	S. Maizel	0.50	400.00	B160	Review and respond to emails re Ankura engagement letter issues.
	Subtotal	0.70	526.00		

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

Date	Timekeeper	Hours	Amount	Task	Narrative
01/02/24	R. Wicks	0.20	126.00	B190	Analyze correspondence regarding case management conference in state court litigation with T. Reid, T. Moyron, et. al.
01/02/24	R. Wicks	0.30	189.00	B190	Review removal deadlines and standards.
01/02/24	R. Wicks	0.20	126.00	B190	Correspond with S. Maizel regarding removal deadlines and procedure.
01/04/24	R. Wicks	0.60	378.00	B190	Prepare email to Hooper Lundy regarding plan summary in relation to Aldairi state court litigation, including plan injunctions, for case management conference.
01/04/24	R. Wicks	0.10	63.00	B190	Analyze correspondence from T. Reid regarding Aldairi state court litigation.
01/08/24	R. Wicks	0.20	126.00	B190	Prepare summary of plan and injunctions for HLB for Aldairi litigation.
01/10/24	R. Wicks	0.20	126.00	B190	Correspond with T. Reid, T. Moyron, et. al regarding Aldairi case management conference.
01/12/24	R. Wicks	0.20	126.00	B190	Prepare Travelers settlement 9019 motion.
01/16/24	R. Wicks	0.20	126.00	B190	Correspond with T. Moyron and S. Maizel regarding Travelers settlement.
01/16/24	R. Wicks	0.10	63.00	B190	Analyze correspondence from H. Hammi regarding Wermers stipulation resolving claim.
01/30/24	R. Wicks	0.10	63.00	B190	Analyze correspondence from J. Sokol regarding Travelers settlement.
	Subtotal	2.40	1,512.00		

Borrego Community Health Foundation
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B195 - Non-Working Travel

Date	Timekeeper	Hours	Amount	Task	Narrative
01/16/24	R. Wicks	2.30	1,449.00	B195	Drive to San Diego for confirmation hearing.
	Subtotal	2.30	1,449.00		

B230 - Financing/Cash Collections

Date	Timekeeper	Hours	Amount	Task	Narrative
01/03/24	S. Maizel	0.10	80.00	B230	Telephone conference with I. Lee re proposed resolution of creditors claim.
01/22/24	S. Maizel	0.10	80.00	B230	Review and respond to emails re Fair Harbor Capital claims resolutions.
01/22/24	S. Maizel	0.10	80.00	B230	Review and respond to email re resolution of Riverside County claim.
01/22/24	S. Maizel	0.10	80.00	B230	Review and respond to email from L. Gardner re Medicare claims issues related to cost reports.
	Subtotal	0.40	320.00		

B260 - Board of Directors Matters

Date	Timekeeper	Hours	Amount	Task	Narrative
01/11/24	S. Maizel	0.80	640.00	B260	Prepare notes in preparation for briefing board on plan (.5); review and respond to emails re board meeting (.3).
01/16/24	S. Maizel	2.20	1,760.00	B260	Zoom conference with Board re pending issues, including confirmation (2.0); telephone conference with S. Hansberger re same (.1); telephone conference with T. Moyron re same (.1).
01/16/24	T. Moyron	2.00	1,600.00	B260	Teams meeting with Board regarding 990s and plan of liquidation and next steps.
	Subtotal	5.00	4,000.00		

Borrego Community Health Foundation
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B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
01/03/24	R. Wicks	0.10	63.00	B310	Review transfer of claim of Beltmann Integrated Logistics.
01/03/24	T. Moyron	0.20	160.00	B310	Analyze correspondence from J. Pomerantz re claims and stipulation.
01/04/24	T. Moyron	0.50	400.00	B310	Correspond with L. Macksoud re Vitamin D (.2) and analyze stipulation and comment thereto (.3).
01/04/24	T. Moyron	0.10	80.00	B310	Analyze I. Lee email re IRS claim.
01/04/24	T. Moyron	0.40	320.00	B310	Correspond with R. Wicks re Aldairi claims (.2); analyze and correspond regarding status for state court (.2).
01/04/24	T. Moyron	0.10	80.00	B310	Correspond with J. Pomerantz, et al., re claims.
01/04/24	R. Wicks	0.20	126.00	B310	Correspond with L. Macksoud regarding 1542 waiver language for Vitamin D stipulation.
01/04/24	R. Wicks	0.20	126.00	B310	Review Aldairi claims.
01/04/24	R. Wicks	0.10	63.00	B310	Call with H. Hammi regarding stipulation to resolve James Wermers claim.
01/04/24	L. Macksoud	1.40	1,020.60	B310	Review and revise draft stipulation with Vitamin D (.9); confer with R. Wicks re addition of required language under CA Civil Code 1542 (.2); review statute (.1); incorporate same into draft (.2).
01/05/24	R. Wicks	0.10	63.00	B310	Analyze correspondence with L. Macksoud and T. Moyron regarding Vitamin D stipulation.
01/05/24	L. Macksoud	0.40	291.60	B310	Further review California Code section 1542 (.2); emails with T. Moyron re same (.1); draft email to J. Pomerantz with proposed revised stipulation (.1).
01/09/24	L. Macksoud	0.60	437.40	B310	Call with J. Pomerantz to discuss Vitamin D stipulation (.4); further revise same per comments received (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/09/24	S. Maizel	0.70	560.00	B310	Zoom conference with J. Pomerantz, T. Moyron, etc. re claims adjudication issues (.5); review and respond to emails re same (.2).
01/11/24	T. Moyron	0.20	160.00	B310	Analyze email from I. Lee, J. Pomerantz, et al., re disputed claims schedule.
01/11/24	T. Moyron	0.10	80.00	B310	Analyze email from S. Christianson re Oracle Cure Objection.
01/12/24	R. Richards	0.70	560.00	B310	Review and comment on new Ankura and KCC engagement letters.
01/16/24	R. Wicks	0.10	63.00	B310	Analyze correspondence with T. Moyron and S. Maizel regarding HHS claim.
01/16/24	R. Wicks	0.20	126.00	B310	Analyze correspondence with S. Maizel and L. Gardner regarding HHS claim.
01/16/24	R. Wicks	0.10	63.00	B310	Analyze correspondence with S. Maizel, I. Lee, et. al regarding HHS claim.
01/16/24	R. Wicks	0.20	126.00	B310	Analyze draft stipulation to resolve Hernandez claim.
01/16/24	R. Wicks	0.10	63.00	B310	Analyze correspondence from J. Pomerantz regarding Hernandez stipulation.
01/16/24	L. Macksoud	0.20	145.80	B310	Review and finalize stipulation for Vitamin D.
01/16/24	S. Maizel	0.70	560.00	B310	Review and respond to emails re HHS claims.
01/17/24	S. Maizel	0.50	400.00	B310	Review and respond to emails re settlement of claim of C. Hernandez.
01/17/24	R. Wicks	0.20	126.00	B310	Analyze correspondence with S. Hull, S. Maizel, et. al regarding HHS cost report discrepancies related to HHS claim.
01/17/24	R. Wicks	0.40	252.00	B310	Prepare amendments to Crystal Hernandez claim stipulation.
01/17/24	R. Wicks	0.20	126.00	B310	Analyze correspondence with I. Lee, J. Pomerantz, et al regarding Crystal Hernandez claim stipulation.
01/17/24	R. Wicks	0.20	126.00	B310	Analyze correspondence from S. Maizel, T. Moyron, et. al regarding Crystal Hernandez claim.

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February 29, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
01/17/24	R. Richards	0.20	160.00	B310	Call with Moyron and follow up re comments on Ankura Engagement Letter.
01/18/24	R. Wicks	0.20	126.00	B310	Analyze correspondence with L. Macksoud, S. Maizel, and T. Moyron regarding stipulation to resolve Crystal Hernandez claim.
01/18/24	S. Maizel	0.40	320.00	B310	Review and respond to emails re C. Hernandez claim.
01/18/24	L. Macksoud	0.30	218.70	B310	Review stipulation relating to C. Hernandez (.1); confer with S. Maizel re same (.2).
01/19/24	S. Maizel	0.30	240.00	B310	Review and respond to email from Fair Harbor Capital re assigned claims.
01/19/24	R. Wicks	0.30	189.00	B310	Finalize stipulation to resolve Wermers rejection claim.
01/19/24	R. Wicks	0.10	63.00	B310	Analyze correspondence from S. Maizel regarding traded claims.
01/20/24	R. Wicks	0.10	63.00	B310	Analyze correspondence from T. Cazares regarding traded claims.
01/22/24	R. Wicks	0.10	63.00	B310	Analyze correspondence with L. Macksoud, T. Moyron, et al regarding stipulation to resolve Crystal Hernandez claim.
01/22/24	R. Wicks	0.10	63.00	B310	Analyze correspondence with J. Pomerantz regarding stipulation to resolve Crystal Hernandez claim.
01/22/24	L. Macksoud	0.70	510.30	B310	Review and revise draft stipulation with C. Hernandez (.5); confer with client (.1) and counsel to committee (.1) re same.
01/23/24	G. Medina	0.70	239.40	B310	Call from former employee regarding withdrawal of claim and to be removed from service list (0.4); correspond with KCC regarding removal from service list and withdrawal of claim number 83 (0.2); follow-up with former employee related to email sent by claims agent to confirm request to be removed from service list and claim withdrawn (0.1).
01/23/24	R. Wicks	0.10	63.00	B310	Analyze correspondence from R. Maclsaac regarding Crystal Hernandez stipulation.
01/25/24	R. Wicks	0.10	63.00	B310	Review order granting Crystal Hernandez stipulation.

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01/25/24	R. Wicks	0.10	63.00	B310	Analyze correspondence with J. Pomerantz, L. Macksoud, et. al regarding order approving Crystal Hernandez stipulation.
01/26/24	R. Wicks	0.10	63.00	B310	Analyze correspondence with J. Pomerantz regarding order approving Vitamin D claims stipulation.
01/28/24	R. Richards	0.20	160.00	B310	Review updated Liquidating Trust Agreement.
01/29/24	R. Wicks	0.20	126.00	B310	Review orders sustaining claim objections.
	Subtotal	13.50	9,560.80		

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

Date	Timekeeper	Hours	Amount	Task	Narrative
01/02/24	G. Miller	0.30	218.70	B320	Review UST objection to confirmation.
01/02/24	R. Wicks	1.60	1,008.00	B320	Analyze US Trustee objection to plan confirmation.
01/02/24	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding US Trustee objection.
01/02/24	R. Wicks	0.30	189.00	B320	Correspond with S. Maizel regarding US Trustee objection to plan confirmation.
01/03/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from T. Moyron regarding discussions with Committee counsel regarding UST objection and plan issues.
01/03/24	S. Maizel	0.20	160.00	B320	Review and respond to emails re exclusivity motion.
01/03/24	S. Maizel	0.10	80.00	B320	Review and respond to emails re UST objection to plan confirmation.
01/03/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from S. Reitzel regarding current ballots.
01/03/24	R. Wicks	2.40	1,512.00	B320	Prepare fourth motion to extend exclusivity.
01/03/24	R. Wicks	0.20	126.00	B320	Correspond with S. Maizel and T. Moyron regarding motion to extend plan exclusivity.
01/03/24	T. Moyron	0.40	320.00	B320	Correspond with S. Golden re UST objection (.1); analyze UST objection (.3).
01/03/24	T. Moyron	0.10	80.00	B320	Correspond with R. Wicks re exclusivity.

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01/04/24	S. Maizel	0.50	400.00	B320	Zoom conference with J. Pomerantz, S. Golden, etc. re US Trustee objection to plan confirmation.
01/04/24	S. Maizel	0.20	160.00	B320	Multiple calls with creditors re plan solicitation issues.
01/04/24	S. Maizel	0.20	160.00	B320	Zoom call with Hooper Lundy attorneys re impact of plan confirmation on pending litigation.
01/04/24	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding opt-out language in the plan.
01/04/24	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding interest language in the Plan.
01/04/24	R. Wicks	1.30	819.00	B320	Prepare fourth motion to extend exclusivity.
01/04/24	R. Wicks	0.40	252.00	B320	Call with T. Moyron, S. Maizel, J. Pomerantz, S. Golden regarding UST plan objection.
01/05/24	G. Medina	0.70	239.40	B320	Correspond with R. Wicks regarding fourth motion and notice of hearing on exclusivity (0.1); coordinate with KCC regarding proof of service (0.2); review and send proof of service prepared by KCC to R. Wicks (0.1); correspond with KCC regarding timing and service (0.2); call R. Wicks regarding KCC service deadlines (0.1).
01/05/24	R. Wicks	0.20	126.00	B320	Correspond with G. Medina regarding certificate of service and filing of exclusivity motion.
01/05/24	R. Wicks	0.20	126.00	B320	Call with R. Paluso regarding hearing time for exclusivity motion.
01/05/24	R. Wicks	0.50	315.00	B320	Review plan provisions regarding interest payments.
01/05/24	R. Wicks	0.10	63.00	B320	Correspond with R. MacIsaac, I. Lee, et.al regarding exclusivity motion.
01/05/24	R. Wicks	0.10	63.00	B320	Correspond with S. Golden, J. Pomerantz, et. al regarding exclusivity motion.
01/05/24	R. Wicks	0.60	378.00	B320	Finalize and file exclusivity motion.
01/05/24	T. Moyron	0.90	720.00	B320	Analyze and provide comments to exclusivity motion (.6); correspond with R. Wicks re same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/07/24	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron regarding setting call with US Trustee to discuss plan objection.
01/08/24	T. Moyron	1.30	1,040.00	B320	Zoom meeting with S. Maizel and R. Wicks regarding pending issues, including tabulation of votes on plan, UST and Oracle objections and proposed joint plan in connection therewith, stipulation proposed by Premier creditors, and other matters.
01/08/24	T. Moyron	1.10	880.00	B320	Analyze emails from A. Mojdehi, counsel for Premier creditors and respond to same (.2); analyze proposed stipulation resolving plan matters (.3); analyze emails from counsel regarding extension while stipulation is finalized (.1); analyze stipulation prepared by counsel for Premier creditors re extension (.1) and prepare comments thereto and circulate same (.2); correspond with M. Turpin, et al., regarding finalization and filing of same (.2).
01/08/24	T. Moyron	0.20	160.00	B320	Calls with S. Maizel re plan matters.
01/08/24	T. Moyron	0.20	160.00	B320	Analyze and prepare comment to notice of errata re plan time.
01/08/24	R. Wicks	1.30	819.00	B320	Conference call with T. Moyron and S. Maizel regarding confirmation memo, reply to Oracle and US Trustee objections, Premier stipulation, and other issues.
01/08/24	R. Wicks	0.20	126.00	B320	Review Borrego ballot summary.
01/08/24	R. Wicks	0.30	189.00	B320	Correspond with S. Reitzel regarding voting declaration and ballot summary.
01/08/24	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding confirmation hearing.
01/08/24	R. Wicks	0.40	252.00	B320	Prepare notice of errata.
01/08/24	R. Wicks	0.40	252.00	B320	Finalize and file notice of errata.
01/08/24	R. Wicks	1.20	756.00	B320	Analyze and prepare comments to stipulation with Premier creditors.
01/08/24	R. Wicks	0.20	126.00	B320	Correspond with I. Lee regarding Oracle objection.
01/08/24	R. Wicks	0.20	126.00	B320	Correspond with S. Golden regarding Oracle objection.

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01/08/24	R. Wicks	0.20	126.00	B320	Correspond with S. Golden, T. Moyron, J. Pomerantz, et. al regarding Premier creditors' stipulation.
01/08/24	R. Wicks	0.50	315.00	B320	Analyze proposed stipulation to extend deadlines for Premier creditors to object to the Plan.
01/08/24	R. Wicks	0.40	252.00	B320	Analyze correspondence with A. Mojdehi, T. Moyron, S. Golden, et. al regarding stipulations to resolve certain issues with Premier creditors and extend deadlines.
01/08/24	R. Wicks	0.20	126.00	B320	Correspond with H. Hong regarding discussion of US Trustee objections to Plan.
01/08/24	S. Maizel	1.30	1,040.00	B320	Zoom conference with T. Moyron and R. Wicks re confirmation issues.
01/08/24	S. Maizel	0.30	240.00	B320	Review and respond to correspondence from creditor re confirmation issues.
01/08/24	G. Medina	0.40	136.80	B320	Correspond with R. Wicks and file notice of errata regarding hearing on fourth motion to extend exclusivity.
01/09/24	S. Maizel	0.30	240.00	B320	Review and respond to emails re Premier objection to plan confirmation.
01/09/24	S. Maizel	0.30	240.00	B320	Review and respond to emails re plan confirmation issues.
01/09/24	R. Wicks	0.30	189.00	B320	Correspond with S. Christianson regarding resolution of Oracle objection to Plan confirmation.
01/09/24	R. Wicks	0.10	63.00	B320	Correspond with Hooper Lundy attorneys regarding Premier stipulation language.
01/09/24	R. Wicks	0.20	126.00	B320	Correspond with G. Miller regarding third party release language.
01/09/24	R. Wicks	0.20	126.00	B320	Call with T. Moyron regarding confirmation brief.
01/09/24	R. Wicks	8.10	5,103.00	B320	Prepare confirmation brief and reply to objections to confirmation.
01/09/24	R. Wicks	0.40	252.00	B320	Analyze correspondence with A. Mojehdi, T. Moyron, S. Golden, et. al regarding stipulation related to Premier claims and the Plan.

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01/09/24	R. Wicks	0.50	315.00	B320	Prepare revisions to stipulation with Premier claimants regarding plan and claim issues.
01/09/24	R. Wicks	0.20	126.00	B320	Correspond with I. Lee regarding Oracle objection and related issues, including payment of invoices.
01/09/24	G. Miller	1.10	801.90	B320	Review UST objection to Plan (.4); review Plan provisions re third party releases and email R. Wicks re same (.7).
01/10/24	G. Miller	0.20	145.80	B320	Call with T. Moyron, R. Wicks and S. Maizel re UST objection to third party releases.
01/10/24	R. Wicks	0.30	189.00	B320	Prepare email to H. Hong regarding release language and UST Objection.
01/10/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from CJ Pease regarding payment of Oracle invoice in relation to Oracle Plan objection.
01/10/24	R. Wicks	0.20	126.00	B320	Call with G. Miller, T. Moyron, S. Maizel regarding release language in Plan.
01/10/24	R. Wicks	0.50	315.00	B320	Call with H. Hong, T. Moyron, S. Golden regarding US Trustee objection.
01/10/24	R. Wicks	0.20	126.00	B320	Call with T. Moyron and S. Golden regarding US Trustee objection.
01/10/24	R. Wicks	0.30	189.00	B320	Call with I. Lee regarding Administrative Claim Reserves and other plan issues.
01/10/24	R. Wicks	4.10	2,583.00	B320	Prepare confirmation brief and reply to objections.
01/10/24	R. Wicks	0.10	63.00	B320	Call with S. Rinaldi regarding Premier Stipulation.
01/10/24	R. Wicks	0.20	126.00	B320	Correspond with S. Reitzel regarding voting declaration.
01/10/24	R. Wicks	0.40	252.00	B320	Analyze correspondence with T. Moyron, A. Mojdehi, S. Golden, et al regarding Premier stipulation.
01/10/24	R. Wicks	0.20	126.00	B320	Prepare revised Premier stipulation to incorporate consensual language.

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01/10/24	T. Moyron	0.50	400.00	B320	Conference call with S. Maizel and S. Rinaldi regarding accounts, stipulation and related matters (.1); call with I. Lee regarding same (.1); and call with S. Maizel regarding language and resolution (.3).
01/10/24	T. Moyron	1.30	1,040.00	B320	Conference call with G. Miller, et al., regarding third party releases and proposed language to partially address UST objection (.2); attention to related language and emails with R. Wicks regarding same (.3); call with H. Hong, S. Golden, and R. Wicks regarding UST objections to plan, questions related thereto, potential resolution on certain issues (.5); call with S. Golden and R. Wicks regarding same (.2); call with R. Wicks regarding potential resolution and related issues (.1).
01/10/24	S. Maizel	1.10	880.00	B320	Telephone conference with T. Moyron, etc. re UST objections to plan (.3); review and respond to emails re same (.3); telephone conference with T. Moyron and I. Lee re issues related to plan confirmation (.2); telephone conference with T. Moyron re plan confirmation issues (.3).
01/11/24	R. Wicks	2.40	1,512.00	B320	Prepare confirmation memo and reply to plan objections.
01/11/24	R. Wicks	0.90	567.00	B320	Prepare motion to exceed page limit.
01/11/24	R. Wicks	1.40	882.00	B320	Prepare voting declaration and tabulation exhibits.
01/11/24	R. Wicks	0.10	63.00	B320	Correspond with I. Lee, S. Rinaldi, et al regarding confirmation memo.
01/11/24	R. Wicks	0.30	189.00	B320	Correspond with S. Golden and J. Pomerantz, et. al regarding confirmation memo.
01/11/24	R. Wicks	0.20	126.00	B320	Correspond with S. Reitzel, T. Moyron, et. al regarding voting declaration.
01/11/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from S. Christianson regarding resolving Oracle objection.
01/11/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from I. Lee regarding disputed claims schedule.

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01/11/24	R. Wicks	1.10	693.00	B320	Finalize and file confirmation brief, motion to exceed page limit, and voting declaration.
01/11/24	S. Maizel	3.00	2,400.00	B320	Review and revise motion to exceed page limit on memo in support of confirmation (.8); review and revise memo in support of confirmation (1.5); multiple calls with T. Moyron re memo in support of confirmation (.7).
01/11/24	T. Moyron	3.40	2,720.00	B320	Analyze, prepare and finalize memorandum including replies to objection therein (2.8); correspond with R. Wicks and S. Maizel re same (.6).
01/11/24	T. Moyron	0.20	160.00	B320	Correspond with S. Rinaldi, R. Richards, et al., regarding draft engagement agreements for KCC and Ankura.
01/11/24	T. Moyron	0.30	240.00	B320	Analyze and provide comment on motion to exceed page limit (.2); correspond with R. Wick re same (.1).
01/11/24	T. Moyron	2.50	2,000.00	B320	Analyze and prepare comments to confirmation memorandum (1.3); analyze emails from I. Lee, S. Golden and K. Coburn re same (.3); analyze voting declaration and attention to various questions (.4); correspond with R. Wicks re same (.2); analyze related emails from KCC and related documents (.3).
01/12/24	T. Moyron	0.20	160.00	B320	Correspond with R. Wicks, et al. regarding KKC re confirmation hearing.
01/12/24	K.M. Howard	0.20	64.80	B320	Email exchanges with S. Maizel and T. Moyron regarding the upcoming confirmation hearing (.1); email exchanges with R. Wicks regarding same (.1).
01/12/24	K.M. Howard	1.70	550.80	B320	Prepare materials for confirmation hearing.
01/12/24	R. Wicks	0.10	63.00	B320	Correspond with T. Cazares regarding payment of Oracle invoice in relation to Oracle plan objection.
01/12/24	R. Wicks	0.20	126.00	B320	Correspond with K. Howard, S. Maizel, et. al regarding preparation for confirmation hearing.

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01/12/24	R. Wicks	0.20	126.00	B320	Correspond with S. Reitzel regarding confirmation hearing.
01/12/24	R. Wicks	0.10	63.00	B320	Review court order granting motion to exceed page limit on confirmation brief.
01/12/24	R. Wicks	0.70	441.00	B320	Prepare proposed confirmation order.
01/12/24	R. Wicks	1.70	1,071.00	B320	Prepare stipulation resolving Oracle objection.
01/12/24	R. Wicks	0.20	126.00	B320	Prepare response to Oracle regarding plan objection.
01/13/24	S. Maizel	0.50	400.00	B320	Telephone conference with T. Moyron re preparation for confirmation hearing.
01/15/24	G. Medina	0.60	205.20	B320	Correspond with R. Wicks and Prepare and file notice of Amended Disputed Claims Schedule.
01/15/24	R. Wicks	0.50	315.00	B320	Prepare notice of amended disputed claims schedule.
01/15/24	R. Wicks	0.20	126.00	B320	Finalize and file notice of amended plan supplement exhibit.
01/15/24	R. Wicks	5.90	3,717.00	B320	Prepare proposed confirmation order.
01/15/24	R. Wicks	0.40	252.00	B320	Prepare notice of confirmation and effective date.
01/15/24	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding confirmation order.
01/15/24	R. Wicks	0.10	63.00	B320	Correspond with S. Golden and J. Pomerantz regarding confirmation order.
01/15/24	T. Moyron	1.20	960.00	B320	Correspond with Ankura, et al., regarding disputed claim schedule (.3); analyze draft notice regarding same and provide comment (.3); attention to confirmation order (.6).
01/16/24	T. Moyron	0.10	80.00	B320	Conference call with R. Wicks re confirmation order.
01/16/24	R. Wicks	0.20	126.00	B320	Call with T. Moyron regarding confirmation hearing.
01/16/24	R. Wicks	0.50	315.00	B320	Finalize and file Oracle stipulation.
01/16/24	R. Wicks	0.10	63.00	B320	Call with Isaac Lee regarding confirmation order, MOR, and Travelers settlement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/16/24	R. Wicks	0.20	126.00	B320	Call with S. Christianson regarding Oracle stipulation.
01/16/24	R. Wicks	1.80	1,134.00	B320	Prepare notice of proposed confirmation order.
01/16/24	R. Wicks	0.40	252.00	B320	Prepare proposed confirmation order.
01/16/24	R. Wicks	0.10	63.00	B320	Call with S. Christianson regarding revisions to Oracle stipulation.
01/16/24	R. Wicks	0.30	189.00	B320	Correspond with T. Moyron and S. Maizel regarding Oracle objection.
01/16/24	R. Wicks	0.30	189.00	B320	Call with T. Moyron, J. Pomerantz, S. Maizel regarding confirmation order.
01/16/24	R. Wicks	0.10	63.00	B320	Correspond with I. Lee, R. Maclsaac, et al regarding Oracle stipulation.
01/16/24	R. Wicks	0.10	63.00	B320	Correspond with S. Golden and J. Pomerantz regarding Oracle stipulation.
01/16/24	R. Wicks	0.10	63.00	B320	Correspond with I. Lee, R. Maclsaac et al regarding confirmation order.
01/16/24	R. Wicks	0.30	189.00	B320	Call with T. Moyron regarding confirmation order.
01/16/24	R. Wicks	0.20	126.00	B320	Analyze tentative ruling confirming plan.
01/16/24	S. Maizel	1.30	1,040.00	B320	Review and respond to emails re confirmation hearing (.5); zoom conference with PSZJ re confirmation issues (.1); review and forward tentative ruling re confirmation hearing (.1); review materials in preparation for confirmation hearing (.6).
01/16/24	T. Moyron	2.30	1,840.00	B320	Analyze comments from Committee counsel re order (.2); analyze emails from Committee counsel, I. Lee, et al., regarding confirmation order (.6); analyze tentative ruling re plan (.1); analyze order and provide comments thereon (1.4).
01/17/24	R. Wicks	2.30	1,449.00	B320	Prepare for hearing including outline of oral argument regarding US Trustee objections.
01/17/24	R. Wicks	1.00	630.00	B320	Attend confirmation hearing.
01/17/24	R. Wicks	2.00	1,260.00	B320	Drive home from confirmation hearing.
01/17/24	R. Wicks	0.40	252.00	B320	Prepare amended proposed order based on confirmation hearing.

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01/17/24	S. Maizel	2.00	1,600.00	B320	Prepare for confirmation hearing (1.0); participate in confirmation hearing (1.0).
01/17/24	T. Moyron	1.80	1,440.00	B320	Meetings with S. Maizel and R. Wicks regarding UST objection, tabulation, and upcoming hearing (1.2); attend confirmation hearing on joint plan (.6).
01/18/24	R. Wicks	0.20	126.00	B320	Analyze correspondence from S. Maizel regarding confirmation order.
01/18/24	S. Maizel	1.50	1,200.00	B320	Review and revise confirmation order.
01/19/24	R. Wicks	1.90	1,197.00	B320	Prepare confirmation order.
01/19/24	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding confirmation order.
01/19/24	R. Wicks	0.10	63.00	B320	Correspond with R. MacIsaac, I. Lee, et. al regarding confirmation order.
01/19/24	R. Wicks	0.10	63.00	B320	Correspond with S. Golden, J. Pomerantz, et. al regarding confirmation order.
01/19/24	R. Wicks	0.10	63.00	B320	Correspond with H. Hong regarding plan confirmation order.
01/21/24	T. Moyron	0.30	240.00	B320	Correspond with I. Lee re workplan and plan effective date call (.1); analyze excel workplan and various line items and tabs (.2).
01/22/24	R. Wicks	1.10	693.00	B320	Conference call with T. Moyron, S. Maizel, I. Lee, et al regarding tasks prior to effective date.
01/22/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from S. Golden regarding confirmation order.
01/22/24	T. Moyron	1.10	880.00	B320	Participate in call with Ankura, S. Maizel, et al., re master work plan and items to be finalized for effective date.
01/23/24	S. Maizel	0.50	400.00	B320	Review working list of post-confirmation tasks from Ankura.
01/23/24	R. Wicks	0.10	63.00	B320	Correspond with H. Hong regarding confirmation order.
01/23/24	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron and S. Maizel regarding confirmation order.
01/24/24	R. Wicks	0.40	252.00	B320	Finalize confirmation order for submission to the Court.

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01/24/24	R. Wicks	0.10	63.00	B320	Call H. Hong regarding confirmation order.
01/24/24	G. Medina	0.60	205.20	B320	Review request from R. Wicks related to conformation order and prepare and assemble confirmation order and send to R. Wicks, T. Moyron and S. Maizel (0.5); upload confirmation order (0.1).
01/25/24	G. Medina	0.20	68.40	B320	Download and circulate confirmation to T. Moyron, S. Maizel and R. Wicks.
01/25/24	R. Wicks	0.20	126.00	B320	Analyze correspondence with S. Rinaldi, I. Lee, T. Moyron et. al regarding confirmation order and liquidating trust documents.
01/25/24	R. Wicks	0.10	63.00	B320	Analyze correspondence with T. Moyron and S. McCandless regarding independent contractor agreements for liquidating trust.
01/25/24	R. Wicks	0.10	63.00	B320	Review order confirming chapter 11 plan.
01/25/24	G. Miller	0.60	437.40	B320	Finalize Liquidating Trust Agreement.
01/25/24	S. Maizel	0.10	80.00	B320	Review and respond to emails re entry of order confirming the plan.
01/26/24	S. Maizel	0.50	400.00	B320	Meeting with N. Ganti, Co-Liquidating Trustee, re post effective date matters.
01/26/24	T. Moyron	0.40	320.00	B320	Analyze email from S. Rinaldi regarding effective date, distributions and related matters (.1); analyze plan in connection therewith (.2); prepare email regarding same (.1).
01/26/24	R. Wicks	0.10	63.00	B320	Analyze correspondence with T. Moyron, S. Rinaldi, et al regarding minimal requirements to go effective.
01/28/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from S. Rinaldi regarding liquidating trust agreement.
01/29/24	R. Wicks	0.10	63.00	B320	Analyze correspondence from N. Ganti regarding liquidating trust agreement.
01/29/24	G. Miller	0.30	218.70	B320	Review revised Liquidating Trust Agreement.
	Subtotal	104.40	70,447.10		

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2729514

February 29, 2024

EMP - Employee matters

Date	Timekeeper	Hours	Amount	Task	Narrative
01/27/24	R. Wicks	0.10	63.00	EMP	Analyze correspondence from S. McCandless regarding independent contractor agreements.
	Subtotal	0.10	63.00		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
01/18/24	T. Moyron	0.80	640.00	MED/CMS	Teams meeting with S. Hull, I. Lee, et al., regarding medicare cost reports and related issues (.5); analyze related emails (.3).
	Subtotal	0.80	640.00		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Maizel	\$ 800.00	26.00	\$ 20,800.00
T. Moyron	\$ 800.00	25.20	\$ 20,160.00
G. Miller	\$ 729.00	2.50	\$ 1,822.50
L. Macksoud	\$ 729.00	3.60	\$ 2,624.40
R. Richards	\$ 800.00	1.10	\$ 880.00
S. McCandless	\$ 800.00	3.30	\$ 2,640.00
R. Wicks	\$ 630.00	75.50	\$ 47,565.00
S. Ruben	\$ 499.50	0.60	\$ 299.70
G. Medina	\$ 342.00	3.50	\$ 1,197.00
K.M. Howard	\$ 324.00	<u>1.90</u>	<u>\$ 615.60</u>
Totals		143.20	\$ 98,604.20

Borrego Community Health Foundation
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SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	9,582.30
B130	Asset Disposition	315.00
B150	Meetings of and Communications with Creditors	189.00
B160	Fee/Employment Applications	526.00
B190	Other Contested Matters (excl. assumption/rejection motions)	1,512.00
B195	Non-Working Travel	1,449.00
B230	Financing/Cash Collections	320.00
B260	Board of Directors Matters	4,000.00
B310	Claims Administration and Objections	9,560.80
B320	Plan and Disclosure Statement (incl. Business Plan)	70,447.10
EMP	Employee matters	63.00
MED/CMS	Medicare/CMS Issues	640.00
	Total This Matter	\$98,604.20

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
1/12/2024	Delivery & Postage ACE ATTORNEY 113898 DELIVER RUSH TO TANIA MOYRON	48.68
1/12/2024	Delivery & Postage ACE ATTORNEY 113898 DELIVER RUSH TO SAM MAZIEL 2	28.33
	SUBTOTAL	77.01
1/8/2024	Lexis WICKS\ REBECCA	47.50
1/25/2024	Lexis MOYRON\ TANIA	52.15
1/25/2024	Lexis MOYRON\ TANIA	150.13
	SUBTOTAL	249.78
	Total Disbursements	\$326.79

Borrego Community Health Foundation February 29, 2024
Invoice #: 2729514

COMBINED TOTALS

Total Hours		143.20
Fee Total, all Matters	\$	98,604.20
Disbursement Total, all Matters	\$	326.79
Invoice Total, all Matters	\$	<u>98,930.99</u>
Amounts Received, Available to Apply Against Current or Future Invoices		100,000.00
Amount Due	\$	98,930.99



of 31
 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

February 29, 2024

Client #: 15810746

Statement of Account

According to our records, as of February 29, 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>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
02/29/24	2729514	\$ 98,930.99	\$ 0.00	\$ 98,930.99
Total Outstanding Invoices				<u>\$ 285,287.86</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