

IN THE UNITED STATES DISTRICT COURT  
COURT FOR THE DISTRICT OF NEW JERSEY

Docket #0369 Date Filed: 08/14/2025

ATTORNEY MONTHLY FEE STATEMENT COVER  
SHEET FOR THE PERIOD MAY 19, 2025 THROUGH MAY 31, 2025

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CBRM Realty Inc., *et al.*<sup>1</sup>

Applicant: White & Case LLP

Case No. 25-15343 (MBK)

Client: Debtors and Debtors in Possession

Chapter 11

Case Filed: May 19, 2025

**COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A  
CERTIFICATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C.  
§ 1746.**

**RETENTION ORDER ATTACHED.**

/s/ Gregory F. Pesce  
Gregory F. Pesce  
Partner, White & Case LLP

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: CBRM Realty Inc. (2420), Crown Capital Holdings LLC (1411), Kelly Hamilton Apts LLC (9071), Kelly Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Copper Creek LLC (0874), RH Lakewind East LLC (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), and RH New Orleans Holdings MM LLC (1951). The location of the Debtors' service address in these chapter 11 cases is: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.



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<p style="text-align: center;"><b>SECTION I</b> <b><u>FEE SUMMARY</u></b></p>
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Summary of Amounts Requested for the Period  
May 19, 2025 through May 31, 2025 (the “**Compensation Period**”)

Fee Total	\$ 500,293.00
Disbursement Totals	\$ 1,278.67
Total Fees Plus Disbursements	\$ 501,571.67

Summary of Amounts Requested for Previous Records

Total Previous Fees and Expenses Requested	\$ 0.00
Total Fees and Expenses Allowed to Date	\$ 0.00
Total Retainer Remaining	\$ 0.00
Total Holdback	\$ 0.00
Total Received by Applicant	\$ 0.00

Name	Title	Department	Year Admitted	Hours	Rate	Fee
<b>Aquije, Alonso</b>	<b>Associate</b>	Financial Restructuring & Insolvency Practice (FRI)	2022	30.9	\$1,110.00	\$34,299.00
<b>Chen, Natasha</b>	<b>Associate</b>	Commercial Litigation Practice	2023	11.4	\$990.00	\$11,286.00
<b>Curtis, Lucas</b>	<b>Associate</b>	Financial Restructuring & Insolvency Practice (FRI)	2020	65.3	\$1,280.00	\$83,584.00
<b>Delgado, Gabriela</b>	<b>Associate</b>	Financial Restructuring & Insolvency Practice (FRI)	2023	49.4	\$990.00	\$48,906.00
<b>Desruisseaux, Joline</b>	<b>Associate</b>	Commercial Litigation Practice	2021	27.2	\$1,280.00	\$34,816.00
<b>Giovine, Peter</b>	<b>Associate</b>	Commercial Litigation Practice	2023	54.4	\$990.00	\$53,856.00
<b>Hershey, Samuel</b>	<b>Partner</b>	Financial Restructuring & Insolvency Practice (FRI)	2013	15.9	\$1,790.00	\$28,461.00
<b>Hishorn, Deanna</b>	<b>Legal Assistant</b>	Financial Restructuring & Insolvency Practice (FRI)	N/A	28.0	\$490.00	\$13,720.00
<b>Kava, Sam</b>	<b>Associate</b>	Financial Restructuring & Insolvency Practice (FRI)	2020	24.2	\$1,280.00	\$30,976.00
<b>Levine, Esther</b>	<b>Associate</b>	Commercial Litigation Practice	2022	6.1	\$1,220.00	\$7,442.00
<b>Lingle, Barrett</b>	<b>Associate</b>	Financial Restructuring & Insolvency Practice (FRI)	2020	82.7	\$1,370.00	\$113,299.00
<b>Pepin, Nadine</b>	<b>Associate</b>	Real Estate Industry Group	2016	2.9	\$1,280.00	\$3,712.00
<b>Pesce, Gregory</b>	<b>Partner</b>	Financial Restructuring & Insolvency Practice (FRI)	2011	10.3	\$2,100.00	\$21,630.00
<b>Venes, Aileen</b>	<b>Legal Assistant</b>	Financial Restructuring & Insolvency Practice (FRI)	N/A	24.4	\$490.00	\$11,956.00
<b>Viklund, David</b>	<b>Partner</b>	Real Estate Industry Group	1995	1.0	\$2,350.00	\$2,350.00
<b>Grand Total</b>				<b><u>434.1</u></b>		<b><u>\$500,293.00</u></b>

**SECTION II**  
**SUMMARY OF SERVICES**

<b>Matter Number</b>	<b>Services Rendered</b>	<b>Hours</b>	<b>Fees</b>
<b>B01</b>	Asset Sales: Kelly Hamilton	0.00	\$0.00
<b>B02</b>	Automatic Stay Issues	0.00	\$0.00
<b>B03</b>	Investigations, Avoidance Actions, and Causes of Action	0.00	\$0.00
<b>B04</b>	Vendors, Taxes, Insurance and Business Operations Issues	48.80	\$53,898.00
<b>B05</b>	Case Administration	85.30	\$74,768.00
<b>B06</b>	Case Strategy	2.40	\$3,781.00
<b>B07</b>	Claims Administration & Objections	9.70	\$11,807.00
<b>B08</b>	Financing Matters: NOLA	20.00	\$27,432.00
<b>B09</b>	Financing Matters: Kelly Hamilton	63.50	\$82,047.00
<b>B10</b>	Creditor Meetings & Statutory Committees	0.00	\$0.00
<b>B11</b>	Exclusivity, Plan & Disclosure Statement: Kelly Hamilton	0.00	\$0.00
<b>B12</b>	Executory Contracts & Unexpired Leases	1.60	\$2,048.00
<b>B13</b>	Hearings & Court Matters	15.00	\$21,677.00
<b>B14</b>	Litigation & Discovery	0.00	\$0.00
<b>B15</b>	Nonworking Travel	0.00	\$0.00
<b>B16</b>	Professional Retention & Fees – W&C	0.40	\$548.00
<b>B17</b>	Professional Retention & Fees – Other	6.50	\$7,015.00
<b>B18</b>	Reports, Schedules & U.S. Trustee Issues	12.30	\$13,635.00
<b>B19</b>	Development of Claims & Causes of Action	168.60	\$201,637.00
<b>B20</b>	Asset Sales: NOLA	0.00	\$0.00
<b>B21</b>	Exclusivity, Plan & Disclosure Statement: NOLA	0.00	\$0.00
<b>Grand Total</b>		<b>434.10</b>	<b>\$500,293.00</b>

<p style="text-align: center;"><b>SECTION III</b> <b><u>SUMMARY OF DISBURSEMENTS</u></b></p>
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Disbursements	Amount
Filing Fees	\$1,250.00
Overtime Meals	\$28.67
<b>Grand Total</b>	<b><u>\$1,278.67</u></b>

<p style="text-align: center;"><b>SECTION IV</b> <b><u>CASE HISTORY</u></b></p>
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- (1) Date cases filed: May 19, 2025
- (2) Chapter under which case commenced: Chapter 11
- (3) Date of retention: June 27, 2025 effective as of May 19, 2025. *See **Exhibit A**.*  
  
If limit on number of hours or other limitations to retention, set forth: N/A
- (4) Summarize in brief the benefits to the estate and attach supplements as needed:<sup>1</sup>
  - (a) The Applicant facilitated the commencement of the chapter 11 cases through the filing of nine voluntary petitions.
  - (b) The Applicant drafted, reviewed, revised, and coordinated the filing of the Debtors' first day motions and first day declaration, as well as several other motions and applications, including motions for operational relief, motions to secure postpetition financing, declarations in support of the same, and applications for professional retentions.
  - (c) The Applicant negotiated with various constituents, including the Office of the United States Trustee for the District of New Jersey, in connection with the relief requested, and assisted in achieving consensual resolutions of the first day motions.
  - (d) The Applicant attended and participated in the first day hearing.
  - (e) The Applicant tended to other matters concerning administration of the chapter 11 cases.
  - (f) The Applicant rendered all other services set forth on the invoices attached hereto as **Exhibit B**.<sup>2</sup>
- (5) Anticipated distribution to creditors:
  - (a) Administration expense: Paid in full.
  - (b) Secured creditors: To be paid in accordance with the *Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of its Debtor Affiliates* [Docket No. 338] (the "**Plan**").
  - (c) Priority creditors: To be paid in accordance with the Plan.

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<sup>1</sup> The following summary is intended to highlight the general categories of services the Applicant rendered on behalf of the Debtors and for the benefit of the estates; it is not intended to itemize each and every professional service which the Applicant performed.

<sup>2</sup> The invoice attached hereto as **Exhibit B** contains detailed descriptions of the services rendered and expenses incurred by the Applicant during the Compensation Period.

- (d) General unsecured creditors: To be paid in accordance with the Plan.
- (6) Final disposition of case and percentage of dividend paid to creditors: This is the first monthly fee statement.

**EXHIBIT A**

**Retention Order**





Order Filed on June 27, 2025  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1**

**WHITE & CASE LLP**

Gregory F. Pesce (admitted *pro hac vice*)  
111 South Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 881-5400  
Email: gregory.pesce@whitecase.com

-and-

Andrew Zatz  
Barrett Lingle (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 819-8200  
Email: azatz@whitecase.com  
barrett.lingle@whitecase.com

*Proposed Counsel to Debtors and Debtors-in-Possession*

**KEN ROSEN ADVISORS PC**

Kenneth A. Rosen  
80 Central Park West  
New York, New York 10023  
Telephone: (973) 493-4955  
Email: ken@kenrosenadvisors.com

*Proposed Co-Counsel to Debtors and Debtors-in-Possession*

In re:

CBRM REALTY INC., *et al.*

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-15343 (MBK)  
(Jointly Administered)

**ORDER AUTHORIZING THE RETENTION  
AND EMPLOYMENT OF WHITE & CASE LLP AS  
DEBTORS' COUNSEL, EFFECTIVE AS OF THE PETITION DATE**

As set forth on the following pages, numbered 2 through 7, is **ORDERED**.

**DATED: June 27, 2025**

Honorable Michael B. Kaplan  
United States Bankruptcy Judge

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: CBRM Realty Inc. (2420), Crown Capital Holdings LLC (1411), Kelly Hamilton Apts LLC (1115), Kelly Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Copper Creek LLC (0874), RH Lakewind East LLC (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), and RH New Orleans Holdings MM LLC (1951). The location of the Debtors' service address in these chapter 11 cases is: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.

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Debtor: CBRM REALTY INC, *et al.*

Case No. 25-15343 (MBK)

Caption of Order: ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE AS OF THE PETITION DATE

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Upon the application (the “**Application**”)<sup>1</sup> of White & Case LLP (“**White & Case**”) for entry of an order (this “**Order**”) authorizing the above-captioned debtors and debtors in possession (the “**Debtors**”) to retain and employ White & Case as bankruptcy counsel, effective as of the Petition Date, and in accordance with the terms and conditions set forth in the Engagement Letter, the Application, the Pesce Declaration, and this Order; and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the *Standing Order of Reference to the Bankruptcy Court Under Title 11 of the United States District Court for the District of New Jersey*, dated July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.); and the Court having found that consideration of the Application is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that White & Case provided due, sufficient, and proper notice of the Application under the circumstances and in accordance with the Bankruptcy Rules and Local Rules, and it appearing that no other or further notice is required; and the Court having reviewed the Application and the Pesce Declaration, and having heard statements in support of the Application, if any, at a hearing held before the Court (the “**Hearing**”), if any; and the Court having found and determined that White & Case is a “disinterested person” as that term is defined under section 101(14) of the Bankruptcy Code; and the Court having found that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation thereon and good and

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

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Debtor: CBRM REALTY INC, *et al.*  
Case No. 25-15343 (MBK)  
Caption of Order: ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT  
OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE  
AS OF THE PETITION DATE

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sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Application is GRANTED as set forth herein. Any objections or reservations of rights filed in respect of the Application are overruled, with prejudice.

2. The Debtors are authorized to employ and retain White & Case as bankruptcy counsel pursuant to section 327(a) of the Bankruptcy Code, in accordance with the terms and conditions set forth in the Engagement Letter, the Application, the Pesce Declaration, and this Order, effective as of the Petition Date to the extent set forth herein.

3. White & Case is authorized to provide professional services in the manner described in the Engagement Letter, the Application, the Pesce Declaration, and this Order.

4. Any and all compensation to be paid to White & Case for services rendered on the Debtors' behalf shall be fixed by application to this Court in accordance with sections 330 and 331 of the Bankruptcy Code, applicable provisions of the Bankruptcy Rules and Local Rules, any guidelines of this Court, and such procedures as fixed by this Court's orders. White & Case shall also make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective as of June 11, 2013, both in connection with the Application and any fee applications to be filed by White & Case in the chapter 11 cases.

5. Prior to applying any increase in White & Case's hourly rates beyond the 2025 rates set forth in the Pesce Declaration, White & Case shall file a supplemental affidavit with the Court and provide ten (10) business days' notice to the Debtors, the U.S. Trustee, and any statutory committee, which supplemental affidavit shall be in accordance with section

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Debtor: CBRM REALTY INC, *et al.*

Case No. 25-15343 (MBK)

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330(a)(3)(F) of the Bankruptcy Code and state whether the Debtors have consented to such rate increases. All parties in interest retain all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

6. To avoid any duplication of effort and provide services to the Debtors in the most efficient and cost-effective manner, White & Case shall coordinate with the Debtors' other professionals regarding their respective responsibilities in these chapter 11 cases. White & Case shall use its best efforts to avoid duplication of services provided by any of the Debtors' other retained professionals.

7. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, White & Case (i) shall only bill fifty percent (50%) of its professionals' hourly rate for non-working travel; (ii) shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any objections to any of White & Case's fee applications in these cases; (iii) shall use the billing and expense categories set forth in the U.S. Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"); and (iv) shall provide all monthly fee statements, interim fee applications, and final fee applications in searchable electronic format to the U.S. Trustee.

8. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, White & Case shall seek reimbursement from the Debtors' estates for its engagement-related expenses at the firm's actual cost paid.

9. Notwithstanding anything in the Application, the Pesce Declaration, or Engagement Letter to the contrary, White & Case shall (i) to the extent that White & Case uses

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Debtor: CBRM REALTY INC, *et al.*

Case No. 25-15343 (MBK)

Caption of Order: ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE AS OF THE PETITION DATE

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the services of independent contractors or subcontractors (collectively, the “**Contractors**”) in these cases, pass through the cost of such Contractors at the same rate that White & Case pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for White & Case; (iv) file with this Court such disclosures required by Bankruptcy Rule 2014; and (v) attach any such Contractor invoices to its monthly fee statements, interim fee applications and/or final fee applications filed in these cases.

10. No agreement or understanding exists between White & Case and any other person, other than as permitted by section 504 of the Bankruptcy Code, to share compensation received for services rendered in connection with these cases, nor shall White & Case share or agree to share compensation received for services rendered in connection with these cases with any other person other than as permitted by section 504 of the Bankruptcy Code.

11. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provision in the Engagement Letter that “[s]hould timely payment not be made on any bills, we reserve the right to charge interest at a rate of 9%” shall be null and void during the pendency of these bankruptcy cases.

12. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provision in the Engagement Letter that “[p]ayment for this year end invoice shall be payable by the last business day before December 25” shall be null and void during the pendency of these bankruptcy cases.

13. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provision in the Engagement Letter that “[t]o the extent permitted under applicable law and rules of professional conduct, you waive any claims related

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Debtor: CBRM REALTY INC, *et al.*  
Case No. 25-15343 (MBK)  
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OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE  
AS OF THE PETITION DATE

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to the bill after the twenty day period lapses" shall be null and void during the pendency of these bankruptcy cases.

14. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provisions in the Engagement Letter that the Debtors waive any conflicts concerning White & Case's representation of parties adverse to the Debtors shall be null and void during the pendency of these bankruptcy cases.

15. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, termination during the pendency of these chapter 11 cases will only be allowed upon entry of an Order by the Court.

16. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the Court shall have exclusive jurisdiction over White & Case's engagement during the pendency of these chapter 11 cases.

17. The Debtors, the Independent Fiduciary, and White & Case are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Engagement Letter, the Application, and the Pesce Declaration.

18. Any relief granted to the Debtors pursuant to this Order shall mean the Debtors, acting at the direction of the Independent Fiduciary.

19. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application.

20. To the extent the Engagement Letter, the Application, or the Pesce Declaration are inconsistent with this Order, the terms of this Order shall govern.

21. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

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Debtor: CBRM REALTY INC, *et al.*

Case No. 25-15343 (MBK)

Caption of Order: ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT  
OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE  
AS OF THE PETITION DATE

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22. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

**EXHIBIT B**

**Invoice**



Crown Capital Holdings LLC  
11012 Ne 39th St  
Ste C5  
Vancouver, WA 98682-6791

White & Case LLP  
111 South Wacker Drive  
Suite 5100  
Chicago, Illinois 60606-4302  
T +1 312 881 5400

Federal Identification Number  
13-5605970

**whitecase.com**

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<b>RE:</b>	<b>Project Legal Services</b>	<b>INVOICE NUMBER:</b>	<b>1700-25-00625</b>
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<b>OUR REF:</b>	1906527-0002	<b>INVOICE DATE:</b>	11 August 2025
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For professional services for the period ending 31 May 2025

	<b>USD</b>
<b>TOTAL PROFESSIONAL FEES:</b>	<b>500,293.00</b>
<b>COSTS AND DISBURSEMENTS:</b>	<b>1,278.67</b>
<b>INVOICE TOTAL:</b>	<b>501,571.67</b>

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Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

For professional services for the period ending 31 May 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Vendors, Taxes, Insurance and Business Operations Issues</b>				
19 May 2025	Review and revise first day motions, incorporating comments from B. Lingle.	A Aquije	4.20	4,662.00
20 May 2025	Draft cash management motion.	A Aquije	1.50	1,665.00
20 May 2025	Revise Creditor Matrix Motions.	G Delgado	0.90	891.00
21 May 2025	Coordination re: amendment to D&O insurance (1.3); review, revise cash management motion (1.1).	B Lingle	2.40	3,288.00
21 May 2025	Draft cash management motion.	A Aquije	2.50	2,775.00
21 May 2025	Draft operational motion (3.9); revise same (3.4).	G Delgado	7.30	7,227.00
22 May 2025	Review, revise cash management motion (1.9) and specified claims motion (1.9).	B Lingle	3.80	5,206.00
22 May 2025	Review and revise cash management motion.	A Aquije	0.60	666.00
22 May 2025	Draft operational motion (3.8); revise same (1.3); draft utilities motion (3.7); revise same (1.5).	G Delgado	10.30	10,197.00
22 May 2025	Confer with A. Aquije re: cash management motion (0.1); update cash management interim order (0.1); review precedent re: same (0.1); assist G. Delgado with revising operations motions (0.2).	Hirshorn, Deanna	0.50	245.00
23 May 2025	Coordinate filing of cash management motion (0.6); review, revise specified claims motion (1.9).	B Lingle	2.50	3,425.00
23 May 2025	Review and finalize Debtors' Cash Management Motion (0.2); file same (0.1); coordinate service with Verita re: same (0.1); review and finalize Debtors' specified claims motion (0.2); file same (0.1); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.80	392.00
24 May 2025	Review, revise utilities motion and correspond with G. Delgado re: same.	B Lingle	3.80	5,206.00
24 May 2025	Revise utilities motion.	G Delgado	0.60	594.00
25 May 2025	Revise utilities motion.	G Delgado	3.00	2,970.00
26 May 2025	U.S. Trustee comments re: cash management motion (0.9); incorporate U.S. Trustee comments re: creditor matrix motion (0.5); revise utilities motion (1.3).	G Delgado	2.70	2,673.00
27 May 2025	Incorporate U.S. comments re: cash management.	G Delgado	0.60	594.00

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 May 2025	Correspondence with Directors & Officer insurance broker.	S Hershey	0.30	537.00
29 May 2025	Telephone conference with CAC re D&O insurance and follow up re: amendment to policy.	B Lingle	0.50	685.00
<b>SUBTOTAL: Vendors, Taxes, Insurance and Business Operations Issues</b>			<b>48.80</b>	<b>53,898.00</b>

**Case Administration**

19 May 2025	Prepare petition packages (1.8); telephone conference with A. Swingle re matter and filing (0.5); review, revise CIF manager removal resolutions and corresponding letter (1.3); file chapter 11 cases (2.2).	B Lingle	5.80	7,946.00
19 May 2025	Draft, revise, and compile petitions in advance of filing (1.6); draft resolutions re: manager removal (1.0).	A Aquije	2.60	2,886.00
19 May 2025	Call with B. Lingle re: onboarding (0.3); call with team re: filing and petitions (0.4); prepare petitions for filing (4.0).	G Delgado	4.70	4,653.00
19 May 2025	Research precedent re: master service list (0.5); confer with A. Aquije re: same (0.5); add Top 30 list of creditors to master service list (0.5); coordinate with Managing Clerks re: filing fees for upcoming filing (0.5); emails with G. Pesce, B. Lingle, A. Aquije and A. Venes; review and respond to emails with B. Lingle re: service list (0.5); assist G. Delgado with updating letter to creditor counsel (0.5); assist with finalizing petition packages for review and filing (0.4); file voluntary petitions (0.5).	Hirshorn, Deanna	3.90	1,911.00
19 May 2025	Prepare for and assist team with finalizing petitions and certain first day motions.	A Venes	2.50	1,225.00
20 May 2025	Review, revise first day motions, including joint administration motion, application for complex case (2.7); revise master service list (0.7); review, revise application for expedited first day hearing (0.4); telephone conference, correspond with W&C team re first day motions (2.9); file remaining chapter 11 petitions (0.9).	B Lingle	7.60	10,412.00
20 May 2025	Revise first day motions (1.0); draft and collect materials re: D&O insurance information (1.1); call with W&C team re: upcoming pleadings filing and related work streams (0.3); review and revise work in progress tracker (0.5).	A Aquije	2.90	3,219.00
20 May 2025	Incorporate B. Lingle and A. Swingle comments re: Joint Administration (1.0); team call re: First Day Motions (0.4).	G Delgado	1.40	1,386.00
20 May 2025	Continue to file petitions (0.5); update master service list (0.3); confer with B. Lingle re: same (0.2); review emails from B. Lingle re: filing deficiency (0.1); telephone call to Clerk's office re: filing deficiency (0.1); email B. Lingle, A. Zatz, G. Pesce and A. Venes re: same (0.1);	Hirshorn, Deanna	8.30	4,067.00

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	prepare creditors list in the required format (1.5); confer with B. Lingle re: same (0.2); file creditors list on each debtor docket (0.5); assist G. Delgado with formatting issues (0.1); review and finalize joint administration motion (0.2); file joint administration motion across ten dockets (0.6); review and finalize creditor matrix motion (0.1); file same (0.1); file exhibit to creditor matrix motion (0.1); review and finalize complex case application (0.1); file same (0.1); review and respond to emails with G. Pesce, B. Lingle, A. Swingle and A. Venes re: cash management motion (0.2); email A. Venes re: pro hac vice motion (0.1); review and revise cash management motion (1.6); emails with A. Aquije re: same (0.1); research precedent application for expedited consideration of first day matters (0.2); draft expedited consideration of first day matters (0.4); review and respond to email with L. Curtis re: upcoming filing (0.1); finalize and file Debtors' Application for Expedited Consideration of First Day Matters (0.7).			
20 May 2025	Assist team with finalizing/e-filing petitions (0.5); download, save, filed versions of petitions (0.5); assist team with drafting pro hac vice applications for G. Pesce, B. Lingle, and A. Swingle (0.5); e-file pro hac vice applications (0.5); confirm filings with team (0.5); create matter in Compulaw (0.5); coordinate with MCO setting up ECFX alerts (0.5); update pleadings files (0.5); pull/review form of application for first day hearing (0.5); conference call with team re: next steps (0.9).	A Venes	5.40	2,646.00
21 May 2025	Telephone conference with Verita re service, website (0.3); draft revised joint administration order and file same (0.6).	B Lingle	0.90	1,233.00
21 May 2025	Draft motion template.	G Delgado	1.20	1,188.00
21 May 2025	Update pleadings file (0.1); confer with B. Lingle re: service (0.1); update case calendar (0.1) review and revise cash management motion (0.2); update and email service list to B. Lingle and A. Aquije. (0.1); review local rules and Judge Kaplan's procedures re revised proposed orders (0.1); research precedent re: filing revised proposed order (0.3); draft notice of filing revised proposed joint admin order (0.3); review and revise cash management motion (0.3); provide dropbox documents to G. Pesce, L. Curtis, S. Hershey, B. Lingle and A. Venes (0.2); prepare for upcoming filing (0.5); review, finalize and file Notice of Filing Revised Proposed Joint Admin Motion (0.6); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	3.00	1,470.00
21 May 2025	Correspond with L. Curtis re: drafting of pro hac vice applications for L. Curtis and S. Hershey (0.1); draft pro hac vice papers and send to L. Curtis and S. Hershey for review (0.5).	A Venes	0.60	294.00
22 May 2025	Emails with L. Curtis re: upcoming filing.	Hirshorn, Deanna	0.10	49.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 May 2025	Revise and e-file pro hac vice applications of L. Curtis and S. Hershey (0.3); update iManage and shared drive Court filings files (0.1).	A Venes	0.40	196.00
23 May 2025	Revise first day declaration.	B Lingle	1.70	2,329.00
23 May 2025	Confer with B. Lingle re: upcoming filings, hearing and service (0.2); emails with Verita re: service emails (0.1); review New Jersey complex case procedures for reoccurring deadlines (0.3).	Hirshorn, Deanna	0.60	294.00
25 May 2025	Draft first day declaration.	B Lingle	3.40	4,658.00
26 May 2025	Review and revise first day declaration.	S Hershey	1.10	1,969.00
26 May 2025	Draft first day declaration (2.2); review, revise first day motions (0.4); revise proposed first day orders (0.6).	B Lingle	3.20	4,384.00
26 May 2025	Draft first day declaration.	A Aquije	0.60	666.00
26 May 2025	Incorporate U.S. Trustee comments re: joint admin motion.	G Delgado	0.40	396.00
26 May 2025	Emails with A. Aquije re: first day hearing (0.1); circulate calendar invite to client and A. Aquije (0.1); review precedent re: first day declaration (0.1).	Hirshorn, Deanna	0.30	147.00
26 May 2025	Draft application for expedited consideration of additional first day motions for B. Lingle (0.6); correspond with B. Lingle and team re: same (0.1); revise application incorporating comments from B. Lingle (0.1); prepare for (3.3) and assist with finalizing/e-filing additional first day motion, application for expedited consideration, and agenda for first day hearing (3.2).	A Venes	7.30	3,577.00
27 May 2025	First day hearing coordination with W&C team (0.9); revise first day declaration (0.3).	B Lingle	1.20	1,644.00
27 May 2025	Incorporate U.S. Trustee comments re: joint administration.	G Delgado	0.50	495.00
27 May 2025	Review and respond to emails with G. Pesce, B. Lingle, A. Aquije, G. Delgado and A. Venes regarding calendar invite to hearing (0.3); circulate calendar invite to hearing (0.1); revise calendar invite with dial-in information (0.1); coordinate with Verita re: service of same (0.1); review and respond to emails with B. Lingle, G. Delgado, A. Aquije, A. Swingle and G. Pesce re: upcoming filings of revised proposed orders (0.1); review precedent re: revised proposed orders (0.3); prepare draft notices of filing revised proposed joint admin order (0.2), cash management order (0.2), and creditor matrix order (0.2); finalize and file first day declaration (0.3); review and respond to emails with B. Lingle, G. Delgado, A. Aquije, A. Swingle and G. Pesce re: notices of filing revised proposed order (Joint Admin, Cash Management and Creditor Matrix) (0.2); file	Hirshorn, Deanna	3.30	1,617.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	notices of filing revised proposed order (Joint Admin, Cash Management and Creditor Matrix) (0.4); coordinate service with Verita (0.1); review precedent re: case management procedures (0.1); emails with B. Lingle and A. Venes re: same (0.1); draft proposed complex case management order (0.2); assist A. Aquije with redline of cash management order (0.3).			
27 May 2025	Review and respond to multiple team emails re: additional first day papers/notices of revised proposed orders to be submitted ahead of first day hearing (1.1); assist with finalizing/e-filing notices of filing further revised proposed order granting joint administration in all cases (0.5); correspond further with team/review team correspondence re: diligence documents and next steps (1.0).	A Venes	2.60	1,274.00
28 May 2025	Review and revise first day orders for submission to court (1.2); review and revise work in progress tracker (0.3).	A Aquije	1.50	1,665.00
28 May 2025	Update pleadings file (0.3); telephone call to Chambers for clarification of pro hac vice orders (0.1); confer with B. Lingle re: transcript (0.1); request first day hearing transcript (0.1); update correspondence file for G. Pesce (0.1).	Hirshorn, Deanna	0.70	343.00
28 May 2025	Review and respond to email from A. Swingle re: DIP papers submission (0.1); coordinate service with Veritas (0.1).	A Venes	0.20	98.00
29 May 2025	Revise complex case procedures.	G Delgado	0.50	495.00
29 May 2025	Update pleadings files (0.1); update calendar and share invite (0.1); assist with reviewing/gathering and uploading materials via Dropbox (0.6); assist with e-filing of master service list (0.1); update pleadings files (0.1).	A Venes	1.00	490.00
30 May 2025	Review case filings (1.2); review case management procedures (0.2); email B. Lingle and G. Delgado re: same (0.1).	S Kava	1.50	1,920.00
30 May 2025	Call with S. Kava re: outstanding workstreams (0.5); send S. Kava drafts in progress re: same (0.2).	G Delgado	0.70	693.00
30 May 2025	Pull first days for C. Tuffey (0.2) and email access link to case file (0.1); research and save Octus and Debwire articles re: case for C. Tuffey (0.4); confer with B. Lingle re: upcoming hearing (0.1); email Chambers for speaking line for G. Pesce, S. Hershey, B. Lingle, A. Swingle, L. Curtis and M. Dundon (0.2); emails with NY Accounts payable re: checks for pro hac vice admission for S. Hershey and L. Curtis. (0.1); update pleadings file (0.2).	Hirshorn, Deanna	1.30	637.00
30 May 2025	Provide documents to IslandDundon team in preparation for first day hearing.	A Venes	0.40	196.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
SUBTOTAL: Case Administration			85.30	74,768.00

**Case Strategy**

20 May 2025	Telephone conferences with G. Pesce re next steps.	B Lingle	1.50	2,055.00
26 May 2025	Conferences with clients re: case strategy.	G Pesce	0.70	1,470.00
30 May 2025	Call with B. Lingle re: case strategy.	S Kava	0.20	256.00
SUBTOTAL: Case Strategy			2.40	3,781.00

**Claims Administration & Objections**

21 May 2025	Draft bar date motion.	A Aquije	2.90	3,219.00
22 May 2025	Review, revise bar date motion.	B Lingle	2.30	3,151.00
22 May 2025	Draft bar date motion.	A Aquije	2.00	2,220.00
23 May 2025	Review, revise bar date motion.	B Lingle	1.30	1,781.00
23 May 2025	Draft bar date motion.	A Aquije	0.80	888.00
24 May 2025	Review, revise bar date motion.	B Lingle	0.40	548.00
SUBTOTAL: Claims Administration & Objections			9.70	11,807.00

**Financing Matters: NOLA**

22 May 2025	Telephone conference with ArentFox and DH1 re NOLA DIP financing.	B Lingle	0.50	685.00
26 May 2025	Revise NOLA DIP term sheets (1.2); draft NOLA DIP orders (2.0); revise NOLA DIP term sheets, agenda, and application for expedited consideration (0.2).	B Lingle	3.40	4,658.00
26 May 2025	Incorporate G. Pesce and B. Lingle comments re: NOLA term sheet.	G Delgado	1.00	990.00
28 May 2025	Revise DIP order and motion (0.7); conference with B. Goodman (Arent Fox) re: same (0.4); conferences with SteerCo re: next steps for financing (1.1).	G Pesce	2.20	4,620.00
30 May 2025	Revise NOLA DIP orders (1.2); correspond with G. Pesce, S. Kava re: NOLA DIP order (1.0).	B Lingle	2.20	3,014.00
30 May 2025	Review and revise DIP interim orders for NOLA DIP.	A Aquije	2.10	2,331.00
31 May 2025	Review, revise NOLA DIP orders (0.7); correspond with W&C team re: NOLA DIP orders (0.7).	B Lingle	1.40	1,918.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
31 May 2025	Further revise and draft NOLA interim order based on comments from U.S. Trustee, G. Pesce, and lender.	S Kava	7.20	9,216.00
<b>SUBTOTAL: Financing Matters: NOLA</b>			<b>20.00</b>	<b>27,432.00</b>

**Financing Matters: Kelly Hamilton**

19 May 2025	Revise DIP term sheet.	B Lingle	2.70	3,699.00
19 May 2025	Review and respond to email from G. Pesce re: DIP order.	Hirshorn, Deanna	0.50	245.00
20 May 2025	Telephone conference with potential third-party DIP.	B Lingle	1.00	1,370.00
20 May 2025	Review and revise DIP NDA.	A Aquije	0.10	111.00
21 May 2025	Correspond with W&C team re: mortgages and financing orders.	N Pepin	1.00	1,280.00
22 May 2025	Conference with D. Viklund re: title order (0.5); review and analyze NOLA and Kelly Hamilton legal descriptions (0.5).	N Pepin	1.00	1,280.00
23 May 2025	Participate in conference call re: ongoing workstreams.	D Viklund	1.00	2,350.00
23 May 2025	Telephone conference with counsel to alternative DIP lender re financing (0.5); telephone conference with counsel to DH1 re potential DIP financing (1.0).	B Lingle	1.50	2,055.00
23 May 2025	Conference re: status of DIP financing.	N Pepin	0.50	640.00
25 May 2025	Conference and correspondence re: DIP financing (0.7); revise DIP order (0.7).	G Pesce	1.40	2,940.00
25 May 2025	Pull requested DIP related research for G. Pesce.	Hirshorn, Deanna	0.50	245.00
26 May 2025	Revise DIP order.	G Pesce	1.40	2,940.00
26 May 2025	Revise Kelly Hamilton DIP order (3.2); revise notice of entry into Kelly Hamilton DIP order (0.3).	B Lingle	3.50	4,795.00
26 May 2025	Substantive cite check re: DIP Motion (1.9); call with G. Pesce and B. Lingle re: DIP term sheets (0.3); incorporate G. Pesce and B. Lingle comments re: Kelly Hamilton DIP Term Sheet (1.0).	G Delgado	3.20	3,168.00
26 May 2025	Draft notice of filing DIP term sheet (0.5); emails with B. Lingle, A. Swingle, A. Aquije, G. Delgado, J. Walz, and A. Venes re: same (0.1); email Word versions of requested filed motions to G. Delgado (0.1).	Hirshorn, Deanna	0.70	343.00
27 May 2025	Draft DIP motion (3.7); revise notice of entry into DIP term sheets (0.3).	B Lingle	4.00	5,480.00



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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 May 2025	Call with G. Pesce re: comments re: DIP Motion (0.1); revise same (0.8).	G Delgado	0.90	891.00
27 May 2025	Review and respond to emails with B. Lingle and G. Pesce re: Notice of Filing DIP Term Sheets (0.1); finalize and file same (0.8).	Hirshorn, Deanna	0.90	441.00
28 May 2025	Prepare revised first day orders (0.4); revise DIP motion (2.0); telephone conference with G. Pesce, Dundon re next steps and financing (1.4).	B Lingle	3.80	5,206.00
28 May 2025	Correspond with W&C team re: local counsel invoice and title updates order.	N Pepin	0.40	512.00
28 May 2025	Prepare for (1.3) and assist with filing of DIP motion and exhibits (1.2).	A Venes	2.50	1,225.00
29 May 2025	Conferences with J. Millar (Faegre) re: next steps for financing (0.4); conferences with Island Dundon team re: same (0.7).	G Pesce	1.10	2,310.00
29 May 2025	Correspondence with L. Curtis and G. Pesce re potential DIP objections (0.3).	S Hershey	0.30	537.00
29 May 2025	Review, revise DIP motion (2.2); and Kelly Hamilton DIP order (2.2).	B Lingle	4.40	6,028.00
29 May 2025	Draft notice of motion and hearing re: DIP motion per A. Swingle (0.6); draft application for expedited consideration of DIP motion (0.2); finalize for and assist with submission of these documents (0.5); confirm filings with team (0.1); coordinate service with Veritas (0.1).	A Venes	1.50	735.00
30 May 2025	Conferences with J. Millar (Faegre) re: next steps for financing (0.4); conferences with Island Dundon team re: same (0.7).	G Pesce	1.10	2,310.00
30 May 2025	Correspondence with G. Pesce, L. Curtis and B. Lingle re: DIP objections (0.4).	S Hershey	0.40	716.00
30 May 2025	Revise Kelly Hamilton DIP order (1.2); correspond with G. Pesce, S. Kava re: Kelly Hamilton DIP order (1.2).	B Lingle	2.40	3,288.00
30 May 2025	Review and revise draft DIP Order based on comments from G. Pesce and interested parties.	S Kava	7.70	9,856.00
30 May 2025	Review and revise Kelly Hamilton DIP order (1.3); call with S. Kava re: same (1.3).	A Aquije	2.60	2,886.00
31 May 2025	Review, revise Kelly Hamilton DIP order (0.7); correspond with W&C team re: same (0.7).	B Lingle	1.40	1,918.00
31 May 2025	Research precedent re: interim DIP orders (0.3); email G. Pesce re: same (0.1); revise Kelly Hamilton interim order re same (2.6); further revise and draft interim	S Kava	7.60	9,728.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	order re DIP lender comments (2.4); revise Kelly Hamilton interim order based on comments received from U.S. Trustee (1.7); review 13-week cash flow (0.3); draft email to lender re: mechanics, DIP order, and 13-week cash flow (0.2).			
31 May 2025	Review and revise DIP order.	A Aquije	0.20	222.00
31 May 2025	Meet with team re: DIP reply.	P Giovine	0.30	297.00
<b>SUBTOTAL: Financing Matters: Kelly Hamilton</b>			<b>63.50</b>	<b>82,047.00</b>

**Executory Contracts & Unexpired Leases**

21 May 2025	Review contracts to determine relevant provisions re: assumption and rejection.	L Curtis	1.60	2,048.00
<b>SUBTOTAL: Executory Contracts &amp; Unexpired Leases</b>			<b>1.60</b>	<b>2,048.00</b>

**Hearings & Court Matters**

20 May 2025	Telephone call to Court re: application for hearing date (0.1); confer with B. Lingle re: same (0.1).	Hirshorn, Deanna	0.20	98.00
26 May 2025	Create binder of relevant pleadings in preparation for May 27 hearing.	L Curtis	1.50	1,920.00
26 May 2025	Draft agenda for upcoming hearing (1.0); review and pull precedent of first day agendas (0.2); review and revise agenda (0.1).	Hirshorn, Deanna	1.30	637.00
27 May 2025	Prepare for (1.2) and attend first day hearing (1.2).	G Pesce	2.40	5,040.00
27 May 2025	Prepare for (1.7) and attend first day hearing (1.7).	S Hershey	3.40	6,086.00
27 May 2025	Participate in first day hearing.	B Lingle	1.00	1,370.00
27 May 2025	Create binder of relevant pleadings in preparation re May 27 hearing (1.7); confer with S. Hershey and others re: May 27 hearing (1.1); attend remote hearing (0.6).	L Curtis	3.40	4,352.00
27 May 2025	Attend First Day Hearing.	G Delgado	0.80	792.00
31 May 2025	Correspondence with L. Curtis and B. Lingle re: second day hearing.	S Hershey	0.20	358.00
31 May 2025	Confer with S. Hershey and others re: reply in support of first day motions (0.3); draft outline re: same (0.5).	L Curtis	0.80	1,024.00
<b>SUBTOTAL: Hearings &amp; Court Matters</b>			<b>15.00</b>	<b>21,677.00</b>

**Professional Retention & Fees – W&C**

26 May 2025	Revise parties in interest list.	B Lingle	0.40	548.00
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
SUBTOTAL: Professional Retention & Fees – W&C			0.40	548.00

**Professional Retention & Fees – Other**

19 May 2025	Research re: precedent IslandDundon retention applications for G. Pesce.	Hirshorn, Deanna	0.50	245.00
20 May 2025	Review, revise Verita service agreements (0.6); telephone conference with Verita re same (0.3).	B Lingle	0.90	1,233.00
20 May 2025	Review precedent Verita engagement letters.	G Delgado	1.70	1,683.00
21 May 2025	Review, revise Verita application.	B Lingle	0.70	959.00
23 May 2025	Review and revise claims agent application.	A Aquije	0.80	888.00
27 May 2025	Revise Verita retention application.	A Aquije	0.10	111.00
27 May 2025	Incorporate U.S. Trustee comments re: Verita retention application (0.7); emails with Verita team re: same (0.3).	G Delgado	1.00	990.00
28 May 2025	Emails with Verita team re: U.S. Trustee comments to Verita retention order (0.2); email B. Lingle re: same (0.3).	G Delgado	0.50	495.00
29 May 2025	Correspond with U.S. Trustee, G. Pesce and Verita re: Verita retention.	B Lingle	0.30	411.00
SUBTOTAL: Professional Retention & Fees – Other			6.50	7,015.00

**Reports, Schedules & U.S. Trustee Issues**

20 May 2025	Draft schedules extension motion.	G Delgado	3.00	2,970.00
20 May 2025	Review and respond to emails regarding schedules and statements extension.	Hirshorn, Deanna	0.10	49.00
21 May 2025	Review, revise schedules and SOFAs extension motion.	B Lingle	1.80	2,466.00
21 May 2025	Revise schedules extension motion.	G Delgado	2.10	2,079.00
21 May 2025	Review and revise SOFA extension motion (0.2); review, finalize and file Debtors' Motion to Extend Time to File Schedules and SOFAs (0.3).	Hirshorn, Deanna	0.50	245.00
26 May 2025	Incorporate U.S. Trustee comments to Schedules Extension Motion.	G Delgado	0.40	396.00
27 May 2025	Revised first day orders for U.S. Trustee comments.	B Lingle	2.10	2,877.00
27 May 2025	Revise first day motion order, incorporating comments from U.S. Trustee and interested parties.	A Aquije	2.30	2,553.00

Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
SUBTOTAL: Reports, Schedules & U.S. Trustee Issues			12.30	13,635.00

**Development of Claims and Causes of Action**

20 May 2025	Correspondence with G. Pesce, B. Lingle and L. Curtis re: potential litigation (1.0); review and revise complaint (1.4).	S Hershey	2.40	4,296.00
20 May 2025	Confer with S. Hershey re: preparation of adversary complaint and related pleadings (0.4); draft same (5.6); confer with P. Giovine, J. Desruisseaux, and others re: same; continue drafting same (3.8); confer with P. Giovine, J. Desruisseaux and others re: same (0.3); continue drafting same (2.4); confer with P. Giovine re: same (0.2); draft related pleadings re: same (2.0).	L Curtis	14.70	18,816.00
20 May 2025	Call with L. Curtis re: litigation workstream (0.5); review background documents relevant to causes of action (1.5); analyze caselaw re: potential litigation: (1.3); call with W&C team re: same (0.5); research re: potential litigation claim under New Jersey and Third Circuit law (3.9).	J Desruisseaux	7.70	9,856.00
20 May 2025	Call with L. Curtis, P. Giovine and others re: preparation for potential litigation (0.4); legal research (0.9) and drafting for potential litigation (1.0).	E Levine	2.30	2,806.00
20 May 2025	Legal research re: procedural requirements re: potential litigation (2.2); research re: potential litigation (0.7); draft document re: potential litigation (1.8); research re: same (1.9); draft order to show cause (1.9); legal research re: same (0.3); prepare application for order shortening time and proposed order shortening time (0.8).	P Giovine	9.60	9,504.00
21 May 2025	Review and revise adversary complaint (2.9); correspondence with L. Curtis re: same (0.9).	S Hershey	3.80	6,802.00
21 May 2025	Review, revise complaint.	B Lingle	1.00	1,370.00
21 May 2025	Draft adversary complaint and related pleadings (1.5); draft correspondence to J. Desruisseaux and others re: same (0.4); confer with S. Hershey re: same (0.1); revise same (0.8); confer with P. Giovine, and others re: same (0.3); draft correspondence to B. Lingle and others re: same (0.3); continue revising same (0.8); conduct legal research re: same (1.5); confer with S. Hershey re: same (0.3); conduct legal research re: same (0.8); confer with P. Giovine re: same (0.2); revise same (3.0); confer with S. Hershey re: same (0.1); revise related pleadings re: same (2.4); continue revising same (2.0).	L Curtis	14.50	18,560.00
21 May 2025	Conduct legal research re: potential litigation (1.0); correspond with team re: same (0.2); draft argument re: potential litigation for L. Curtis (2.5); analyze contract claim (2.0); research re: equitable subordination (2.0); review updated draft of complaint for relevant facts (1.0); draft argument re: potential litigation (1.3).	J Desruisseaux	10.00	12,800.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
21 May 2025	Legal research (0.6) and drafting re: potential litigation (0.7).	E Levine	1.30	1,586.00
21 May 2025	Draft complaint re: adversary proceeding.	A Aquije	0.60	666.00
21 May 2025	Research re: potential litigation (3.2); legal research re: property of estate (2.4); draft argument re: potential litigation (2.4); revise complaint (1.1); meet with L. Curtis re: preferential transfer count (0.9); meet with L. Curtis and B. Kakani re: likelihood of success on merits (0.4); legal research re: choice of law (0.7); legal research re: preferential transfer (1.1); call with W&C team re: potential litigation (0.5).	P Giovine	12.70	12,573.00
22 May 2025	Review and revise complaint.	S Hershey	0.90	1,611.00
22 May 2025	Revise adversary complaint and related pleadings (0.3); continue revising same (0.4); confer with P. Giovine and J. Desruisseaux re: same (0.3); continue revising same (3.4); confer with S. Hershey re: same (0.1); revise related pleadings (0.6); confer with S. Hershey re: same (0.2); edit same (2.1); further revise same (2.2).	L Curtis	9.60	12,288.00
22 May 2025	Draft argument re: potential litigation for L. Curtis (1.7); conference with W&C team re: same (0.4); research re: potential litigation (1.8); conference with N. Chen to discuss strategy re: potential litigation (0.5); draft analysis re: potential litigation (2.0); review and analyze counts alleged in complaint for accuracy and legal support (1.2).	J Desruisseaux	7.60	9,728.00
22 May 2025	Legal research (1.1) and drafting of complaint re: potential litigation (1.1); call with L. Curtis, P. Giovine and others to discuss complaint and potential litigation strategy (0.3).	E Levine	2.50	3,050.00
22 May 2025	Review background materials (2.2) and conduct legal research re: potential litigation (2.2); research re: adversary complaint and service requirements (3.5).	N Chen	7.90	7,821.00
22 May 2025	Legal research re: potential litigation (2.2); legal research re: preferential transfers (2.8); Zoom call with W&C team re: potential litigation (0.4); legal research re: property of estate (1.7); revise adversary complaint (3.4); legal research re: fraudulent transfers (0.6); legal research re: preferential transfer (1.2); draft application re: potential litigation (1.1).	P Giovine	13.40	13,266.00
23 May 2025	Review and revise complaint re: potential litigation (1.6); attend call with L. Curtis and Dundon re: same (0.7); correspondence with L. Curtis re: same (0.3).	S Hershey	2.60	4,654.00
23 May 2025	Review and revise adversary complaint (1.8); confer with P. Giovine and J. Desruisseaux re: same (0.2); incorporate edits into same (1.4); confer with P. Giovine re: same (0.9); continue incorporating edits into same (1.1); confer with S. Hershey and others re: same (0.7); confer with S. Hershey re: same (0.1); continue revising same (1.0); incorporate edits into same (0.8).	L Curtis	8.00	10,240.00

Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 May 2025	Review and revise adversary complaint (1.7); team meeting re: same (0.2).	J Desruisseaux	1.90	2,432.00
23 May 2025	Substantive cite check re: adversary complaint.	N Chen	3.50	3,465.00
23 May 2025	Revise complaint counts re: preferential and fraudulent transfer (0.7); substantive cite check re: complaint facts section (2.4); Zoom conference with L. Curtis re: revisions to complaint (0.8).	P Giovine	3.90	3,861.00
24 May 2025	Incorporate edits into adversary complaint .	L Curtis	1.80	2,304.00
28 May 2025	Correspondence with L. Curtis and G. Pesce re: potential avoidance action.	S Hershey	0.50	895.00
28 May 2025	Conduct legal research re: avoidance actions (1.2); confer with S. Hershey re: same (0.2); confer with P. Giovine re: same (0.5); draft correspondence to P. Giovine re: same (0.6).	L Curtis	2.50	3,200.00
28 May 2025	Legal research re: avoidance actions pursuant to sections 548 and 544.	P Giovine	2.10	2,079.00
29 May 2025	Confer with S. Hershey re: avoidance actions (0.1); conduct legal research re: same (0.6); confer with P. Giovine re: same (0.8); draft correspondence re: legal research findings re: same (2.0); conduct fact research re: same (1.3); draft correspondence re: legal research findings re: same (2.1).	L Curtis	6.90	8,832.00
29 May 2025	Legal research re: avoidance of liens under section 548 (1.7); legal research re: avoidance of liens under section 544 (1.6); legal research re: liens under state law (1.1); legal research re: avoidance under section 548 (1.3); legal research re: perfection under state law (3.4); further legal research re: same (1.2); factual research re: perfection of judgment lien (1.3); draft memorandum summarizing research findings (0.8).	P Giovine	12.40	12,276.00
<b>SUBTOTAL: Development of Claims and Causes of Action</b>			<b>168.60</b>	<b>201,637.00</b>
<b>TOTAL</b>			<b>434.10</b>	<b>500,293.00</b>

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

TIMEKEEPER SUMMARY	TITLE	HOURS	RATE
D Viklund	Partner	1.00	2,350.00
G Pesce	Partner	10.30	2,100.00
S Hershey	Partner	15.90	1,790.00
B Lingle	Level 6	82.70	1,370.00
L Curtis	Level 5	65.30	1,280.00
J Desruisseaux	Level 5	27.20	1,280.00
S Kava	Level 5	24.20	1,280.00
N Pepin	Level 5	2.90	1,280.00
E Levine	Level 4	6.10	1,220.00
A Aquije	Level 3	30.90	1,110.00
N Chen	Level 2	11.40	990.00
G Delgado	Level 2	49.40	990.00
P Giovine	Level 2	54.40	990.00
Hirshorn, Deanna	Legal Assistant	28.00	490.00
A Venes	Legal Assistant	24.40	490.00
<b>TOTAL</b>		<b>434.10</b>	

DISBURSEMENT SUMMARY	USD
Business Meals	28.67
Filing Fees	1,250.00
<b>TOTAL</b>	<b>1,278.67</b>