

Docket #0403 Date Filed: 08/19/2025

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
ATTORNEY MONTHLY FEE STATEMENT COVER
SHEET FOR THE PERIOD JUNE 1, 2025 THROUGH JUNE 30, 2025**

CBRM Realty Inc., *et al.*¹

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

¹ 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), RH New Orleans Holdings MM LLC (1951), and Laguna Reserve Apts Investor LLC (N/A). 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.



251534325081900000000003

<p style="text-align: center;">SECTION I <u>FEE SUMMARY</u></p>

Summary of Amounts Requested for the Period
June 1, 2025 through June 30, 2025 (the “**Compensation Period**”)

Fee Total	\$1,818,485.00
Disbursement Totals	\$19,959.12
Total Fees Plus Disbursements	\$1,838,444.12

Summary of Amounts Requested for Previous Records

Total Previous Fees and Expenses Requested	\$ 501,571.67
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
Aquije, Alonso	Associate	Financial Restructuring & Insolvency (FRI) Practice	2022	107.8	\$ 1,110.00	\$ 119,658.00
Baccash, Laura	Partner	Financial Restructuring & Insolvency (FRI) Practice	2003	5.6	\$ 1,690.00	\$ 9,464.00
Binuya, Sebastian Angelo	Litigation Specialist	Practice Technology - Disputes	N/A	0.5	\$ 420.00	\$ 210.00
Campbell, Claire	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	119.6	\$ 1,280.00	\$ 153,088.00
Chemborisov, Gleb	Litigation Specialist	Timekeeper Pool	N/A	4.8	\$ 490.00	\$ 2,352.00
Chen, Tony	Project Manager - Litigation Support	Timekeeper Pool	N/A	9.3	\$ 490.00	\$ 4,557.00
Chen, Ken	Project Manager - Litigation Support	Practice Technology - Disputes	N/A	2.1	\$ 490.00	\$ 1,029.00
Cieply, Adam	Partner	M&A - Corporate Practice	2010	0.5	\$ 1,900.00	\$ 950.00
Curtis, Lucas	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	105.9	\$ 1,280.00	\$ 135,552.00
Delgado, Gabriela	Associate	Financial Restructuring & Insolvency (FRI) Practice	2023	113.8	\$ 990.00	\$ 112,662.00
Giovine, Peter	Associate	Commercial Litigation Practice	2023	57.0	\$ 990.00	\$ 56,430.00
He, Fan	Counsel	Financial Restructuring & Insolvency (FRI) Practice	2007	62.7	\$ 1,630.00	\$ 102,201.00
Hershey, Samuel	Partner	Financial Restructuring & Insolvency (FRI) Practice	2013	35.0	\$ 1,790.00	\$ 62,650.00
Hishorn, Deanna	Legal Assistant	Financial Restructuring & Insolvency (FRI) Practice	N/A	62.2	\$ 490.00	\$ 30,478.00
Kakani, Bhavini	Associate	Litigation Practice	N/A	4.0	\$ 870.00	\$ 3,480.00
Kava, Sam	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	187.6	\$ 1,280.00	\$ 240,128.00
Kim, Jane	Associate	M&A - Corporate Practice	2018	6.8	\$ 1,520.00	\$ 10,336.00
Ko, Alice	Research Professional	Research	2011	5.8	\$ 605.00	\$ 3,509.00
Leone, Eugene	Partner	Real Estate Practice	1983	0.2	\$ 2,200.00	\$ 440.00

Lingle, Barrett	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	189.8	\$ 1,370.00	\$ 260,026.00
Magnaye, Maclin	Litigation Specialist	Practice Technology - Disputes	N/A	1.0	\$ 420.00	\$ 420.00
McCoy, Jason	Partner	Real Estate Practice	2009	1.0	\$ 1,900.00	\$ 1,900.00
Mitra, Anais	Associate	Financial Restructuring & Insolvency (FRI) Practice	2022	148.3	\$ 1,110.00	\$ 164,613.00
Morales, Jon	Project Manager - Litigation Support	Practice Technology - Disputes	N/A	5.2	\$ 490.00	\$ 2,548.00
Pepin, Nadine	Associate	Real Estate Industry Group	2016	89.4	\$ 1,280.00	\$ 114,432.00
Pesce, Gregory	Partner	Financial Restructuring & Insolvency (FRI) Practice	2011	48.8	\$ 2,100.00	\$ 102,480.00
Pezza, David	Partner	Real Estate Practice	1985	2.4	\$ 2,100.00	\$ 5,040.00
Rivero, Devin	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	7.9	\$ 1,280.00	\$ 10,112.00
Trinidad, Val	Project Manager - Litigation Support	Practice Technology - Disputes	N/A	0.5	\$ 490.00	\$ 245.00
Venes, Aileen	Legal Assistant	Financial Restructuring & Insolvency (FRI) Practice	N/A	5.4	\$ 490.00	\$ 2,646.00
Viklund, David	Partner	Real Estate Industry Group	1995	5.1	\$ 2,350.00	\$ 11,985.00
Walz, Jacko	Associate	Financial Restructuring & Insolvency (FRI) Practice	2025	85.9	\$ 870.00	\$ 74,733.00
Wick, Katie	Legal Assistant	Financial Restructuring & Insolvency (FRI) Practice	N/A	2.3	\$ 490.00	\$ 1,127.00
Yoo, Jade	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	11.4	\$ 1,370.00	\$ 15,618.00
Yousef, El Zohiry	Associate	M&A - Corporate Practice	2024	1.4	\$ 990.00	\$ 1,386.00
Grand Total				1,497.0		\$1,818,485.00

SECTION II
SUMMARY OF SERVICES

Matter Number	Services Rendered	Hours	Fees
B01	Asset Sales: Kelly Hamilton	100.70	\$129,704.00
B02	Automatic Stay Issues	0.00	\$0.00
B03	Investigations, Avoidance Actions, and Causes of Action	0.00	\$0.00
B04	Vendors, Taxes, Insurance and Business Operations Issues	34.70	\$36,132.00
B05	Case Administration	115.90	\$116,928.00
B06	Case Strategy	23.50	\$43,553.00
B07	Claims Administration & Objections	40.60	\$45,547.00
B08	Financing Matters: NOLA	165.90	\$210,006.00
B09	Financing Matters: Kelly Hamilton	228.00	\$305,438.00
B10	Creditor Meetings & Statutory Committees	0.00	\$0.00
B11	Exclusivity, Plan & Disclosure Statement: Kelly Hamilton	136.60	\$175,678.00
B12	Executory Contracts & Unexpired Leases	66.70	\$78,290.00
B13	Hearings & Court Matters	108.70	\$137,716.00
B14	Litigation & Discovery	221.10	\$243,406.00
B15	Nonworking Travel	2.80	\$4,676.00
B16	Professional Retention & Fees – W&C	41.70	\$55,832.00
B17	Professional Retention & Fees – Other	91.60	\$99,418.00
B18	Reports, Schedules & U.S. Trustee Issues	70.80	\$79,487.00
B19	Development of Claims & Causes of Action	47.40	\$56,290.00
B20	Asset Sales: NOLA	0.30	\$384.00
B21	Exclusivity, Plan & Disclosure Statement: NOLA	0.00	\$0.00
Grand Total		1,497.00	\$1,818,485.00

<p style="text-align: center;">SECTION III <u>SUMMARY OF DISBURSEMENTS</u></p>
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Disbursements	Amount
Court Costs	\$17,380.00
Deposition Transcripts	\$862.50
Express Mail	\$63.73
Professional Service	\$583.80
Document Research	\$24.98
Transportation	\$672.61
E-Discovery Data Hosting / Storage	\$6.50
E-Discovery Data Processing	\$105.00
E-Discovery Production	\$260.00
Grand Total	<u>\$19,959.12</u>

<p style="text-align: center;">SECTION IV <u>CASE HISTORY</u></p>

- (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:¹
 - (a) The Applicant negotiated and filed revised final orders approving debtor-in-possession financing.
 - (b) The Applicant drafted a response to an objection to the Debtors' motion seeking approval of debtor-in-possession financing.
 - (c) The Applicant reviewed, analyzed, and drafted a response to Cleveland International Fund's motion to dismiss the case of Debtor RH Lakewind East LLC and conducted research relating to the same.
 - (d) The Applicant drafted and obtained approval of a complex case management order.
 - (e) The Applicant drafted, reviewed, revised, and coordinated the filing of additional motions, including the Debtors' utility motion, motion to assume certain asset and property management agreements, and motion to set the claims bar date.
 - (f) The Applicant reviewed, revised, and coordinated the filing of certain retention applications for the Debtors' professionals.
 - (g) The Applicant reviewed, revised, and consulted with its financial advisors regarding the Debtors' schedules of assets and liabilities, statements of financial affairs, and monthly operating reports.
 - (h) 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 motions filed.
 - (i) The Applicant attended and participated in hearings.

¹ 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.

- (j) The Applicant tended to other matters concerning administration of the chapter 11 cases.
 - (k) The Applicant rendered all other services set forth on the invoices attached hereto as **Exhibit B**.²
- (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] and the *Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of its Debtor Affiliates* [Docket No. 389] (collectively, the “**Plans**”).
 - (c) Priority creditors: To be paid in accordance with the Plans.
 - (d) General unsecured creditors: To be paid in accordance with the Plans.
- (6) Final disposition of case and percentage of dividend paid to creditors: This is the second monthly fee statement. Distributions to creditors will be made in accordance with the Plans.

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

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.¹

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

¹ 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

Upon the application (the “**Application**”)¹ 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

¹ 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)

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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

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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AS OF THE PETITION DATE

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

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

RE:	Project Legal Services	INVOICE NUMBER:	1700-25-00725
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OUR REF:	1906527-0002	INVOICE DATE:	19 August 2025
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For professional services for the period ending 30 June 2025

	USD
TOTAL PROFESSIONAL FEES:	1,818,485.00
COSTS AND DISBURSEMENTS:	19,959.12
INVOICE TOTAL:	1,838,444.12

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

For professional services for the period ending 30 June 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Asset Sales: Kelly Hamilton				
12 June 2025	Prepare form of sale nondisclosure agreement.	J Kim	0.80	1,216.00
20 June 2025	Research re: precedent bidding procedures (0.3) and de minimis sale motions (0.3); review same for drafting (3.3).	G Delgado	3.90	3,861.00
23 June 2025	Confer with B. Lingle re: sale strategy (0.3); review research re: same (0.5); confer with C. Campbell re: de minimis asset sale issues (0.6).	F He	1.40	2,282.00
23 June 2025	Review bidding procedures precedent (0.4) and correspond with G. Delgado, F. He re: same (0.4).	B Lingle	0.80	1,096.00
23 June 2025	Emails with Dundon team re: de minimis asset sales.	C Campbell	0.10	128.00
24 June 2025	Confer with B. Lingle re: sale strategy (0.3); confer with G. Delgado re: bid procedures (0.5); confer with T. Rizvi (Dundon Advisors) re: de minimis asset sale issues (0.3); confer with B. Lingle re: same (0.3).	F He	1.40	2,282.00
24 June 2025	Discuss bid procedures plan with F. He.	G Delgado	0.30	297.00
25 June 2025	Draft bid procedures and auction notice.	G Delgado	7.60	7,524.00
26 June 2025	Review and revise bid procedures motion (2.3); confer with B. Lingle re: Kelly Hamilton sale strategy and update (0.3); research re: various issues re: same (0.7); confer with G. Delgado re: revisions to the bid procedures and strategy for Kelly Hamilton sale (0.8).	F He	4.10	6,683.00
26 June 2025	Telephone conference with F. He re: bidding procedures.	B Lingle	0.30	411.00
26 June 2025	Call with F. He re: bid procedures (0.8); incorporate comments re: same into bid procedures motion (3.7); draft bid procedures order (1.7); incorporate F. He comments re: bid procedures motion (1.3); discuss timeline re: same with A. Aquije (0.2).	G Delgado	7.70	7,623.00
26 June 2025	Review and revise NDA re: asset sale.	Y El Zohiry	1.20	1,188.00
26 June 2025	Assist G. Delgado with bid procedures precedent.	A Venes	0.20	98.00
27 June 2025	Conferences with proposed brokers, E. LaPuma and S. Landgraber re: broker and sale process.	G Pesce	0.80	1,680.00
27 June 2025	Draft email memo to IslandDundon re: various issues re: sale and bid procedures (0.5); review and revise bid	F He	4.50	7,335.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	procedures motion (2.4); review and revise bid procedures (1.6).			
27 June 2025	Calls with F. He re: bidding procedures (0.6); finalize draft of bidding procedures motion (4.8) and draft bid procedures (4.8).	G Delgado	10.20	10,098.00
27 June 2025	Revise and circulate NDA re: asset sale.	Y El Zohiry	0.20	198.00
28 June 2025	Revise bidding procedures.	G Pesce	0.70	1,470.00
28 June 2025	Review of Kelly Hamilton sale agreement (1.2) and attendant correspondence and revisions (1.2).	D Pezza	2.40	5,040.00
28 June 2025	Review and revise bid procedures motion and exhibits (3.4); confer with G. Delgado re: same (0.5); review comments and research issues re: bid procedures (2.4).	F He	6.30	10,269.00
28 June 2025	Review and revise bidding procedures.	A Mitra	0.70	777.00
28 June 2025	Call with F. He re: bid procedures (0.3); incorporate comments and update re: same (4.9); draft notice of auction (0.4); incorporate F. He comments re: same (0.4).	G Delgado	6.00	5,940.00
29 June 2025	Review and revise bid procedures motion (1.2); review and revise asset purchase agreement (3.2); further revise bid procedures motion and confer with G. Delgado re: same (2.6); further revise asset purchase agreement (1.5).	F He	8.50	13,855.00
29 June 2025	Review, revise bidding procedures.	B Lingle	2.60	3,562.00
29 June 2025	Review and revise bidding procedures.	A Mitra	1.20	1,332.00
29 June 2025	Incorporate G. Pesce and D. Pezza comments re: asset sale agreement (1.5); incorporate B. Lingle, G. Pesce, and F. He comments re: bid procedures motion (5.1).	G Delgado	6.60	6,534.00
30 June 2025	Review asset purchase agreement.	E Leone	0.20	440.00
30 June 2025	Review and revise bid procedures motion (2.8); correspondence with B. Lingle and G. Pesce re: same (0.2); call with D. Rivero and B. Lingle re: same (0.8); follow up call with D. Rivero re: same (0.1); call with G. Pesce re: same (0.2); correspondence with D. Rivero re: bid procedures (0.1).	L Baccash	4.20	7,098.00
30 June 2025	Review and revise bid procedures motion (0.6); confer with S. Landgraber (Island Dundon) re: sale procedures (0.3).	F He	0.90	1,467.00
30 June 2025	Telephone conference with L. Baccash, D. Rivero, A. Aquije re: bidding procedures motion (0.8); correspond with L. Baccash re: bidding procedures (0.5).	B Lingle	1.30	1,781.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 June 2025	Correspond with W&C re: bid procedures (0.8); review and revise motion for bid procedures (5.7); research re: bidding procedures (0.6); research re: assumption and assignment procedures (0.5); review stalking horse agreement for same (0.3).	D Rivero	7.90	10,112.00
30 June 2025	Call with W&C team re: bidding procedures motion (0.8); research re: precedent re: same (1.2); review and revise bidding procedures order re: same (1.2).	A Aquije	3.20	3,552.00
30 June 2025	Call with F. He re: local rules re: sale disclosures (0.2); email B. Lingle re: same (0.2); email L. Baccash re: same (0.2); review bid procedures motion and asset purchase agreement re: same (0.8); incorporate F. He comments re: bid procedures motion (1.1).	G Delgado	2.50	2,475.00
SUBTOTAL: Asset Sales: Kelly Hamilton			100.70	129,704.00

Vendors, Taxes, Insurance and Business Operations Issues

2 June 2025	Draft interim order re: tenant reimbursements.	B Lingle	0.70	959.00
3 June 2025	Revise tenant reimbursements order.	B Lingle	1.40	1,918.00
4 June 2025	Telephone conference with G. Delgado re: utilities.	B Lingle	0.20	274.00
4 June 2025	Call with T. Rizvi (Dundon) and J. Utz (Lynd) re: outstanding information re: utilities motion (0.3); call with B. Lingle re: same (0.2).	G Delgado	0.50	495.00
5 June 2025	Draft interim operational claims order.	B Lingle	0.80	1,096.00
5 June 2025	Call with T. Rizvi (Dundon) re: utility account numbers (0.1); update Utilities motion re: same (0.8).	G Delgado	0.90	891.00
6 June 2025	Review open questions re: cash management.	C Campbell	0.30	384.00
9 June 2025	Review, revise utilities motion.	B Lingle	1.60	2,192.00
9 June 2025	Revise Utilities motion.	G Delgado	1.40	1,386.00
10 June 2025	Review, revise utilities motion (0.9); telephone conference with G. Pesce, City of Jackson re: Chapel Ridge (0.5).	B Lingle	1.40	1,918.00
10 June 2025	Call with Dundon re: new bank accounts.	A Aquije	0.30	333.00
10 June 2025	Incorporate B. Lingle comments re: utilities motion (0.6); draft application to shorten time re: same (0.8); call with B. Lingle re: same (0.1).	G Delgado	1.50	1,485.00
10 June 2025	Review, finalize and file Utilities Motions (0.2); review, finalize and file application to shorten time re: same (0.2); coordinate with Verita to serve same (0.1); confer with G. Delgado re: upcoming filing (0.2).	Hirshorn, Deanna	0.70	343.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 June 2025	Review, revise multiple applications for shortened notice re: operational motions.	B Lingle	1.10	1,507.00
12 June 2025	Prepare and submit interim claims order to chambers.	B Lingle	1.10	1,507.00
13 June 2025	Draft final order for cash management motion.	A Aquije	0.80	888.00
14 June 2025	Review and revise cash management final order.	A Aquije	0.60	666.00
14 June 2025	Review, finalize and file certificate of no objection re: cash management (0.2); coordinate service with Verita re: same (0.1).	Hirshorn, Deanna	0.30	147.00
16 June 2025	Review, revise creditor matrix final order (0.3); review, revise final order re: tenant obligations (0.4).	B Lingle	0.70	959.00
16 June 2025	Draft Final Order re: tenant reimbursements for filing.	G Delgado	0.70	693.00
16 June 2025	Review and finalize certificate of no objection re: final order authorizing Debtors to Pay Tenant Reimbursement (0.1); file same (0.1); coordinate service of certificates of no objection with Verita (0.1).	Hirshorn, Deanna	0.30	147.00
17 June 2025	Confer with team re: operational motions.	C Campbell	0.20	256.00
17 June 2025	Update utilities motion.	J Walz	1.80	1,566.00
18 June 2025	Revise interim utilities order.	J Walz	0.30	261.00
18 June 2025	Update case calendar re: key dates re: utilities motion (0.1); review declaration (0.1).	Hirshorn, Deanna	0.20	98.00
20 June 2025	Draft ordinary course professionals motion.	J Walz	0.90	783.00
21 June 2025	Telephone conference with J. Walz, K. Taylor re: 345 compliance.	B Lingle	0.50	685.00
21 June 2025	Draft ordinary course professionals motion.	J Walz	0.80	696.00
22 June 2025	Draft ordinary course professionals motion (2.1); draft removal procedures motion (2.0).	J Walz	4.10	3,567.00
23 June 2025	Draft ordinary course professionals motion.	J Walz	2.40	2,088.00
24 June 2025	Draft final operational claims order.	B Lingle	0.70	959.00
25 June 2025	Revise ordinary course professional motion (2.0); correspond with F. He re: same (0.1); conference with F. He re: same (0.2); correspond with J. Utz from Lynd re: same (0.2); research re: same (2.6).	J Walz	5.10	4,437.00
26 June 2025	Review, revise final operational claims order.	B Lingle	0.40	548.00
SUBTOTAL: Vendors, Taxes, Insurance and Business Operations Issues			34.70	36,132.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Case Administration				
1 June 2025	Draft agenda for June 2, 2025 hearing.	A Aquije	0.20	222.00
1 June 2025	Draft chart cross-referencing debtor entities for G. Pesce.	G Delgado	0.50	495.00
2 June 2025	Review, revise agenda.	B Lingle	0.70	959.00
2 June 2025	Review and revise notices in advance of hearing (0.4); review and revise agenda in advance of hearing (0.5).	A Aquije	0.90	999.00
3 June 2025	Calls with B. Lingle and S. Kava re: case status, updates, and ongoing workstreams (0.8); review and comment on work in progress tracker re: same (0.8); research re: complex case management orders and procedures (0.7); modifications re: same (0.6).	C Campbell	2.90	3,712.00
3 June 2025	Draft template motion for upcoming filings.	A Aquije	0.30	333.00
3 June 2025	Confer with S. Kava and C. Campbell re: general case status, workstreams, and assignment allocations (0.3); review docket, first day pleadings, and other background materials re: case background (1.6).	A Mitra	1.90	2,109.00
3 June 2025	Conduct legal research re: New Jersey local rules.	J Walz	2.90	2,523.00
3 June 2025	Confer with S. Kava re: recent filings and revised proposed orders (0.6); research re: filing revised proposed orders in New Jersey (1.1); email to K. Rosen re: same (0.1); telephone call with K. Rosen re: same (0.1); emails with W&C team re: same (0.3).	Hirshorn, Deanna	2.20	1,078.00
4 June 2025	Review case management order.	B Lingle	0.90	1,233.00
4 June 2025	Review and revise work in progress tracker (0.4); confer with team re: same (0.3).	C Campbell	0.70	896.00
4 June 2025	Review and revise work in progress tracker.	S Kava	0.30	384.00
4 June 2025	Review and revise work in progress tracker (0.5); further revise work in progress tracker, incorporating comments from C. Campbell (0.8); revise motion template (0.1).	A Aquije	1.40	1,554.00
4 June 2025	Correspond with A. Aquije re: workstream tracker and deadlines (0.2); confer with S. Kava and correspond with J. Walz re: same (0.1); review C. Tuffey correspondence re: workstream allocations and case strategy (0.1).	A Mitra	0.40	444.00
4 June 2025	Prepare letter package to send to Clerk with check re: pro hac vice fee payment (0.6); update pleadings file (0.2); review and respond to emails with Verita re:	Hirshorn, Deanna	1.20	588.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	service of interim orders (0.1); review interim orders re: key dates (0.2); update case calendar (0.1).			
5 June 2025	Telephone conference with G. Pesce re: action items (0.5); review, revise work in progress materials (0.5).	B Lingle	1.00	1,370.00
5 June 2025	Confer with G. Delgado and D. Hirshorn re: case management order (0.2) and review and comment on same (0.2).	C Campbell	0.40	512.00
5 June 2025	Review and revise work in progress tracker.	A Aquije	0.50	555.00
5 June 2025	Review work in progress tracker (0.1); review C. Tuffey correspondence re: workstream allocations and case strategy (0.1).	A Mitra	0.20	222.00
5 June 2025	Draft invoice for E. LaPuma.	G Delgado	0.40	396.00
5 June 2025	Research re: relevant precedent pleadings.	J Walz	0.70	609.00
5 June 2025	Circulate and save June 2 hearing transcript re: DIP and Verita Retention (0.1); review master service list (0.1); confer with B. Lingle re: same (0.1); file same (0.1); research and locate New Jersey pro hac credentials for S. Hershey and G. Pesce (0.5); review and respond to email from C. Campbell and Research Services re: disclosures (0.1); review and respond to email with C. Campbell and G. Delgado re: proposed complex case management order (0.1); review and revise same (0.1); telephone call to Chambers re: proposed omnibus hearing dates (0.1); update pleadings file (0.1); update case calendar (0.3); prepare invoice for E. LaPuma and email G. Delgado re: same (0.1).	Hirshorn, Deanna	1.80	882.00
6 June 2025	Telephone conference with C. Campbell re: omnibus hearing dates (0.1); correspond with W&C team re: action items (0.4).	B Lingle	0.50	685.00
6 June 2025	Emails with D. Hirshorn, G. Pesce, and Dundon team re: omnibus hearings (0.2); review and revise case management order (0.2); call with B. Lingle re: same (0.2); call with B. Lingle re: case status and work in progress updates (0.2).	C Campbell	0.80	1,024.00
6 June 2025	Telephone call to Chambers re: Omnibus hearing dates (0.1); update case management order re: same (0.1); email C. Campbell and G. Delgado re: same (0.1); confer with C. Tuffey re: proposed order formatting (0.1); review and revise proposed order (0.3); confer with S. Kava re: proposed orders (0.1).	Hirshorn, Deanna	0.80	392.00
7 June 2025	Correspond with W&C and IslandDundon teams re: company bank accounts.	B Lingle	0.20	274.00
7 June 2025	Revise work in progress tracker.	A Aquije	0.10	111.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 June 2025	Telephone conference with W&C team re: work in process.	B Lingle	0.50	685.00
9 June 2025	Review and update work in progress tracker (0.4); call with associate team re: ongoing work streams and case updates (0.5); emails with chambers and United States Trustee re: case management order (0.2).	C Campbell	1.10	1,408.00
9 June 2025	Participate in work in progress call.	S Kava	0.50	640.00
9 June 2025	Call with W&C team re: ongoing workstreams (0.6); call with A. Rovitz (Dundon) re: bank account information (0.1); research and share formation documents re: same (1.3).	A Aquije	2.00	2,220.00
9 June 2025	Attend work in progress call (0.5); review work in progress tracker re: assignments, case timeline (0.1).	A Mitra	0.60	666.00
9 June 2025	Update work-in-progress tracker (0.5); attend work-in-progress meeting (0.5).	J Walz	1.00	870.00
9 June 2025	Research application to shorten time (0.7); prepare same (0.7); confer with B. Lingle re: same (0.2).	Hirshorn, Deanna	1.60	784.00
10 June 2025	Call with team re: case status and ongoing workstreams (0.2); finalize presentation re: case milestones (0.1); review and revise work in progress tracker (0.2).	C Campbell	0.50	640.00
10 June 2025	Update work-in-progress tracker.	J Walz	0.50	435.00
10 June 2025	Review emails with G. Pesce, C. Campbell and L. Hoffman re: upcoming filing (0.1); assist in potential file (1.0).	Hirshorn, Deanna	1.10	539.00
11 June 2025	Call with Chambers re: June 26, 2025 hearing.	A Aquije	0.20	222.00
12 June 2025	Review and confer with team re: retention workstreams and status (0.1); review and revise work in progress tracker (0.2).	C Campbell	0.30	384.00
12 June 2025	Review work in progress tracker and email to J. Waltz re: same (0.1); review W&C Associates correspondence re: workstream allocations and case strategy (0.1).	A Mitra	0.20	222.00
12 June 2025	Update work-in-progress tracker.	J Walz	0.50	435.00
13 June 2025	Update pleadings file (0.1); research precedent and procedures for certificates of no objection (0.3).	Hirshorn, Deanna	0.40	196.00
14 June 2025	Standby for upcoming filing of certificates of no objection.	Hirshorn, Deanna	0.40	196.00
15 June 2025	Review and revise work in progress tracker (0.2); confer with B. Lingle re: case status and ongoing workstreams (0.2).	C Campbell	0.40	512.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 June 2025	Telephone conference with W&C team re: work in process.	B Lingle	0.60	822.00
16 June 2025	Call with associate team re: case status and ongoing workstreams.	C Campbell	0.50	640.00
16 June 2025	Call with W&C team re: work in progress tracker.	S Kava	0.60	768.00
16 June 2025	Review and revise creditor matrix order re: final order (0.7); draft certificates of no objection re: creditor matrix motion (0.3); draft certificate of no objection re: specified claims motion (0.4); weekly call with W&C team re: ongoing workstreams (0.5); further revise certifications, incorporating comments from B. Lingle (0.7).	A Aquije	2.60	2,886.00
16 June 2025	Attend work in progress call (0.5); review work in progress tracker re: assignments, case timeline, and case strategy (0.1).	A Mitra	0.60	666.00
16 June 2025	Attend weekly work in progress call.	G Delgado	0.50	495.00
16 June 2025	Update work in progress tracker (0.3); telephone conference with W&C team re: work in progress (0.5); correspondence with D. Hirshorn re: upcoming hearing scheduling (0.1).	J Walz	0.90	783.00
16 June 2025	Review and finalize hearing agenda (0.1); file same (0.1); coordinate service re: same with Verita (0.1); review and respond to emails with A. Aquije, G. Delgado B. Lingle, S. Kava, A. Venes and C. Campbell re: upcoming certificate of no objection filings (0.1); review and respond to emails with J. Walz re: case calendar (0.1); review and finalize certificate of no objection re: Creditors Matrix (0.1); file same (0.1); confer with B. Lingle re: upcoming filing (0.1); assist with filing (1.1).	Hirshorn, Deanna	1.90	931.00
17 June 2025	Review and revise work in progress tracker (0.3); finalize proposed orders following hearing for submission with court (0.4).	A Aquije	0.70	777.00
17 June 2025	Resolve hearing scheduling discrepancy.	J Walz	0.40	348.00
17 June 2025	Research precedent ordinary course of business motion (0.3) and removal motion for C. Campbell (0.2); coordinate with Document Services re: formatting re: same (0.1).	Hirshorn, Deanna	0.60	294.00
17 June 2025	Notarize Credit Agreement signature packet.	K Wick	0.70	343.00
18 June 2025	Review docket for key dates and deadlines (0.1); review docket, case management order, and local rules for objection deadline time (0.2); review and respond to email with C. Campbell and L. Curtis re: same (0.1); review exhibits to be filed with declaration (0.2); review requested Word formatted precedent from Document Services (0.1); update pleadings file (0.2); standby for upcoming file (0.6).	Hirshorn, Deanna	1.50	735.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 June 2025	Correspondence with W&C team re: delivery of signature packet.	K Wick	0.10	49.00
19 June 2025	Telephone conference with W&C team re: work in process (0.5); review, revise work in process materials and case timeline (2.3).	B Lingle	2.80	3,836.00
19 June 2025	Attend associate work in progress call (0.5); call with J. Walz re: removal motions (0.1); calls with B. Lingle and IslandDundon re: broker retention issues (0.3) and resolve open issues re: same (0.2).	C Campbell	1.10	1,408.00
19 June 2025	Participate in work in progress call with W&C team.	S Kava	0.50	640.00
19 June 2025	Weekly call with W&C team re: ongoing workstreams.	A Aquije	0.50	555.00
19 June 2025	Review work in progress tracker and case calendar (0.1); attend W&C associates call re: same (0.5); review W&C Associates correspondence re: workstream allocations and case strategy (0.1).	A Mitra	0.70	777.00
19 June 2025	Attend work in progress call.	G Delgado	0.60	594.00
19 June 2025	Review correspondence re: ongoing workstreams (0.2); update work in progress tracker and resolve related workstreams discrepancies (3.0); telephone conference with W&C team re: work-in-progress items (0.5); call with C. Campbell re: same (0.2).	J Walz	3.90	3,393.00
19 June 2025	Email Verita re: service for June 18 filing.	Hirshorn, Deanna	0.10	49.00
20 June 2025	Telephone conference with G. Pesce re: case strategy and planning (1.0); coordinate with W&C team re: action items (0.4).	B Lingle	1.40	1,918.00
20 June 2025	Follow up with associate team re: open workstreams and case status.	C Campbell	0.20	256.00
20 June 2025	Review and revise updated petitions.	A Aquije	0.30	333.00
20 June 2025	Revise parties in interest list (1.9); Update bankruptcy petitions (0.8).	J Walz	2.70	2,349.00
21 June 2025	Research re: corporate structure of guarantors.	A Aquije	0.90	999.00
22 June 2025	Telephone conference with F. He re: work in process.	B Lingle	0.30	411.00
22 June 2025	Research re: legal status of certain insiders under the Bankruptcy Code.	J Walz	2.50	2,175.00
23 June 2025	Review materials re: case strategy (0.7); attend work in progress call re: case strategy and work stream with B. Lingle, C. Campbell, A. Aquije, G. Delgado (1.0); confer with J. Waltz re: notice issues (0.3); review and provide comments to motions to shorten (0.7).	F He	2.70	4,401.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 June 2025	Telephone conference with W&C team re: work in process.	B Lingle	1.10	1,507.00
23 June 2025	Attend associate work in progress call (0.6) and follow up with team re: outstanding work in progress tracker questions (0.5).	C Campbell	1.10	1,408.00
23 June 2025	Attend work in progress call.	S Kava	1.10	1,408.00
23 June 2025	Review and revise work in progress tracker (0.2); weekly call with W&C re: ongoing workstream (1.1); call with F. He re: same (0.1); email correspondence with W&C team re: hearing agenda (0.2); email correspondence with Chambers re: amended petitions (0.1).	A Aquije	1.70	1,887.00
23 June 2025	Review work in progress tracker and provide comments to J. Walz (0.1); telephone conference with W&C team re: same and workstream allocation (1.1); draft applications to shorten time and notice re: various upcoming motions (1.5); confer with F. He re: same (0.2); emails with B. Lingle re: same (0.1); emails with F. He re: exigency reasons and comments (0.2).	A Mitra	3.20	3,552.00
23 June 2025	Attend work in progress call.	G Delgado	0.90	891.00
23 June 2025	Update work in progress tracker (0.2); attend team meeting re: ongoing workstreams (1.0); Update work in progress tracker (1.5); conduct legal research on amended petition rules (1.1).	J Walz	3.80	3,306.00
23 June 2025	Review and respond to email from A. Aquije re: agenda (0.1); prepare draft agenda (1.0).	Hirshorn, Deanna	1.10	539.00
23 June 2025	Review diligence materials for LLC agreements of certain entities (0.2); correspond with A. Aquije re: same (0.1).	A Venes	0.30	147.00
24 June 2025	Review removal extension motion (0.3); confer with B. Lingle re: same (0.2); confer with C. Campbell re: case strategy and planning issues (0.4); research and confer with J. Waltz re: key dates and issues with work in progress report (0.4).	F He	1.30	2,119.00
24 June 2025	Matter coordination (0.2); review, revise agenda (0.4).	B Lingle	0.60	822.00
24 June 2025	Emails with K. Rosen re: filing issues and assistance (0.4); follow up research (0.2) and confer with team re: operational motions (0.2).	C Campbell	0.80	1,024.00
24 June 2025	Review F. He comments to draft applications to shorten time and notice re: various upcoming motions (0.2); review and revise drafts re: same (0.9); correspondence with F. He re: same (0.1); confer with C. Campbell re: work streams and priority items (0.1).	A Mitra	1.30	1,443.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
24 June 2025	Legal research re: removal procedures (0.3); Update work in progress tracker (0.1).	J Walz	0.40	348.00
25 June 2025	Correspondence re: various work streams with team.	F He	0.30	489.00
25 June 2025	Review, finalize and file agenda (0.1); update pleadings file (0.2); coordinate with NY Copy Center to print and assemble binders in preparation for the hearing (0.2).	Hirshorn, Deanna	0.50	245.00
26 June 2025	Confer with team re: strategy and work streams.	F He	0.50	815.00
26 June 2025	Review, revise all final orders and submit to chambers for entry.	B Lingle	2.00	2,740.00
26 June 2025	Finalize amended Lakewind petition (0.4); confer with N. Peppin re: entity info requests (0.1) and follow up re: same (0.1).	C Campbell	0.60	768.00
26 June 2025	Draft updated agenda (0.3); revise debtor resolutions re: amended petitions (0.5).	A Aquije	0.80	888.00
26 June 2025	Review and revise work in progress tracker (0.4); correspondence with W&C team re: workstream allocations and case strategy (0.3); review and revise applications to shorten notice (0.2).	A Mitra	0.90	999.00
26 June 2025	Review payment matrix needed to request from IslandDundon team (0.5); revise amended petition (1.5); update work in progress tracker (1.5); draft list of debtor information for real estate team (1.9); circulate motion comparison to A. Aquije (0.1).	J Walz	5.50	4,785.00
26 June 2025	Review and respond to emails with G. Pesce and W&C team re: Lakewind organizational structure (0.3); correspond with G. Pesce and W&C team re: resolutions (0.1); confer with J. Walz re: petition and resolutions (0.1); confer with B. Lingle re: same (0.1); prepare notice re: Lakewind organizational chart and amended petition pursuant to G. Pesce's email (0.2); review and update same with B. Lingle's edits (0.1); review and respond to email from A. Aquije and B. Lingle re: specified claims revised order (0.1); review, finalize and file notice of filing revised proposed specified claims order (0.2); coordinate service of same with Verita (0.1); email J. Walz amended resolutions (0.1); research precedent re: amended petitions (0.2); review numerous emails between W&C team re: amended petitions (0.2); review, finalize and file notice of amended petition and organizational chart (0.6).	Hirshorn, Deanna	2.40	1,176.00
27 June 2025	Call with B. Lingle, S. Kava, G. Delgado and A. Mitra re: work in progress and strategy.	F He	0.40	652.00
27 June 2025	Telephone conference with W&C team re: work in process.	B Lingle	0.70	959.00
27 June 2025	Work in progress call with W&C team re: ongoing workstreams.	S Kava	0.70	896.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 June 2025	Review and revise work in progress tracker (0.2); correspond with W&C team re: workstream allocations and case strategy (0.1).	A Mitra	0.30	333.00
27 June 2025	Call with W&C team re: June 30 workstreams.	G Delgado	0.70	693.00
27 June 2025	Update work in progress tracker (0.5); attend team meeting re: ongoing workstreams (1.0).	J Walz	1.50	1,305.00
27 June 2025	Review and respond to emails with Court re: hearing transcripts (0.2); update pleadings file (0.1).	Hirshorn, Deanna	0.30	147.00
28 June 2025	Draft invoice for E. LaPuma outstanding fiduciary fees.	G Delgado	0.10	99.00
30 June 2025	Attend work in progress call with B. Lingle, S. Kava, A. Aquije, G. Delgado.	F He	0.40	652.00
30 June 2025	Telephone conference with W&C team re: work in process.	B Lingle	0.30	411.00
30 June 2025	Attend work in progress call.	S Kava	0.20	256.00
30 June 2025	Weekly call with W&C team re: ongoing workstreams (0.3); research for G. Pesce re: filing entities (0.8).	A Aquije	1.10	1,221.00
30 June 2025	Attend work in progress call.	A Mitra	0.30	333.00
30 June 2025	Attend work in progress call (0.5); email A. Mitra re: potential parties in interest list (0.1); draft E. LaPuma July retainer invoice (0.1).	G Delgado	0.70	693.00
30 June 2025	Update work in progress tracker (1.1); coordinate with D. Hirshorn to update CompuLaw calendar (0.1); attend associates work in progress meeting (0.3); draft motions to shorten (3.2).	J Walz	4.70	4,089.00
30 June 2025	Update transcript file and circulate June 17 and June 25 hearing transcripts to W&C team (0.1); review and respond to email from B. Lingle re: upcoming filings (0.1); update case calendar and ECFX notifications to include A. Mitra (0.1); confer with A. Venes re: receivership complaints (0.1); review and respond to email with J. Walz re: case calendar (0.1); review work in progress chart (0.1) and update case calendar (0.3); confer with F. He re: upcoming filings tonight (0.1); update pleadings file (0.3).	Hirshorn, Deanna	1.30	637.00
SUBTOTAL: Case Administration			115.90	116,928.00
Case Strategy				
2 June 2025	Conferences with E. LaPuma re: case strategy (1.2) and correspondence with same re: same (1.2).	G Pesce	2.40	5,040.00
3 June 2025	Conferences with E. LaPuma re: case strategy (1.2) and correspondence with same re: same (1.2).	G Pesce	2.40	5,040.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 June 2025	Research re: debtor entity bylaws re: case strategy.	A Aquije	0.90	999.00
4 June 2025	Conferences with E. LaPuma re: case strategy (1.2) and correspondence with same re: same (1.2).	G Pesce	2.40	5,040.00
5 June 2025	Conferences with E. LaPuma re: case strategy (0.6); and correspondence with same re: same (0.6).	G Pesce	1.20	2,520.00
5 June 2025	Coordinate with G. Pesce re: precedent.	A Venes	0.20	98.00
6 June 2025	Conferences with E. LaPuma re: case strategy (0.6) and correspondence with same re: same (0.6).	G Pesce	1.20	2,520.00
8 June 2025	Conferences with E. LaPuma re: case strategy (0.6) and correspondence re: same (0.5).	G Pesce	1.10	2,310.00
9 June 2025	Conferences with E. LaPuma re: case strategy (0.6) and correspondence with same re: same (0.5).	G Pesce	1.10	2,310.00
10 June 2025	Meeting with E. LaPuma, Dundon Advisers, Island Capital and W&C re: next steps.	G Pesce	3.20	6,720.00
10 June 2025	Correspondence re: corporate matters re: case strategy.	A Cieply	0.50	950.00
10 June 2025	Telephone conference with advisor team re: case strategy and next steps (1.4); telephone conference with G. Pesce re: same (0.5).	B Lingle	1.90	2,603.00
11 June 2025	Develop case strategy and action plan (0.8) and correspond with W&C team re: same (0.9).	B Lingle	1.70	2,329.00
16 June 2025	Call with Dundon re: closing on DIP facility and strategy of case.	S Kava	0.50	640.00
17 June 2025	Telephone conference with advisor team re: case strategy.	B Lingle	0.50	685.00
21 June 2025	Confer with G. Pesce re: case strategy.	F He	0.30	489.00
22 June 2025	Confer with B. Lingle re: case strategy and update (0.5); review material re: case background (1.5).	F He	2.00	3,260.00
SUBTOTAL: Case Strategy			23.50	43,553.00

Claims Administration & Objections

9 June 2025	Review, revise application for shortened time re: bar date.	B Lingle	0.60	822.00
9 June 2025	Review and revise bar date motion (0.9); review and revise application shortening time re: same (0.6).	A Aquije	1.50	1,665.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 June 2025	Review, revise bar date motion (1.9) and correspond with G. Pesce re: same (1.9); telephone conference re: claim objection (0.3).	B Lingle	4.10	5,617.00
10 June 2025	Call with S. Hershey, S. Kava, and B. Lingle re: claim objection.	C Campbell	0.30	384.00
11 June 2025	Revise bar date motion.	B Lingle	1.60	2,192.00
11 June 2025	Review and revise application to shorten notice re: bar date motion (0.2); review and revise bar date motion (0.3).	A Aquije	0.50	555.00
11 June 2025	Review and finalize bar date motion (0.2); file same (0.1); update and finalize application to shorten time re: same (0.1); file same (0.1); coordinate with Verita re: same (0.1).	Hirshorn, Deanna	0.60	294.00
15 June 2025	Telephone conference with C. Campbell re: claim objection.	B Lingle	0.60	822.00
17 June 2025	Telephone conference with W&C team re: claim objections.	B Lingle	0.30	411.00
17 June 2025	Call with S. Hershey, L. Curtis, B. Lingle, S. Kava, and A. Aquije re: claims objections.	C Campbell	0.40	512.00
17 June 2025	Call with W&C team re: claim objections (0.3); outline next steps re: upcoming claim objections (2.1); draft claim objection (1.0).	A Aquije	3.40	3,774.00
18 June 2025	Draft substantive claim objection re: chapter 5 relief (2.0); research re: same (1.2); review and revise same (1.2); draft second substantive claim objection re: chapter 5 relief (0.8).	A Aquije	5.20	5,772.00
18 June 2025	Research re: informal proofs of claim.	G Delgado	3.80	3,762.00
19 June 2025	Draft substantive claim objection re: chapter 5 relief (4.2); research re: declaratory judgment re: same (0.8).	A Aquije	5.00	5,550.00
19 June 2025	Research and draft findings re: lien avoidance challenge.	A Mitra	2.60	2,886.00
19 June 2025	Research re: informal proofs of claim (1.1); summarize re: same for A. Aquije (0.8).	G Delgado	1.90	1,881.00
20 June 2025	Draft substantive claim objection re: chapter 5 avoidance.	A Aquije	2.90	3,219.00
20 June 2025	Research re: lien validity issues (2.4); draft response to A. Aquije re: same (0.4); email to L. Curtis and C. Campbell re: same (0.2).	A Mitra	3.00	3,330.00
26 June 2025	Review, revise bar date order.	B Lingle	0.40	548.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 June 2025	Revise bar date order, incorporating comments from United States Trustee (0.3); further revise same, incorporating comments from hearing (0.7).	A Aquije	1.00	1,110.00
26 June 2025	Review and finalize notice of filing revised proposed bar date order (0.1); file same (0.1); coordinate service of same with Verita (0.1); review and respond to email with A. Aquije and B. Lingle re: further revised bar date order and filing (0.1); review, finalize and file further revised bar date order (0.2); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.70	343.00
27 June 2025	Review bar date order for key dates (0.1); update case calendar re: same (0.1).	Hirshorn, Deanna	0.20	98.00
SUBTOTAL: Claims Administration & Objections			40.60	45,547.00

Financing Matters: NOLA

1 June 2025	Review, revise NOLA interim DIP order (0.6); draft notice thereof (0.4);.	B Lingle	1.00	1,370.00
1 June 2025	Revise NOLA DIP Order (3.6); draft notice for order (0.6); review redline from prior version for quality control (1.6).	S Kava	5.80	7,424.00
1 June 2025	Finalize and file NOLA DIP order (0.2); emails with G. Pesce, B. Lingle, S. Kava and A. Venes re: filing of notice of filing revised NOLA DIP order (0.2); finalize and file same (0.2); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.70	343.00
2 June 2025	Revise NOLA DIP Order based on further comments from lender, G. Pesce, interested parties, and United States Trustee (2.6); further revise NOLA DIP order following hearing (3.9).	S Kava	6.50	8,320.00
2 June 2025	Compile Notice of Revised DIP Order for NOLA (0.2); confer with S. Kava re: filing (0.1); file and coordinate service of same (0.1).	Hirshorn, Deanna	0.40	196.00
3 June 2025	Call with Dundon re: 13-week forecast for NOLA (0.2); further revise NOLA DIP Order based on comments received by interested parties and G. Pesce (3.8); call with United States Trustee re: same (0.2); correspond with NOLA DIP Lender (0.5); further revise NOLA DIP (0.7); compile file ready version (0.2); email United States Trustee re: same (0.1).	S Kava	5.70	7,296.00
4 June 2025	Email B. Goodman re: United States Trustee final comments to NOLA DIP Order (0.1); email G. Pesce compiled NOLA DIP Order for filing (0.3); revise NOLA DIP Order per comments (0.2); call with Dundon re: budget and DIP term sheet and funding issues (0.3); multiple correspondences re: DIP Order (0.1); email A. Sherman re: same (0.1); further review and revise NOLA DIP Order (2.3); email correspondences with interested party and NOLA DIP Lender re: same (0.6);	S Kava	4.40	5,632.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	finalize NOLA DIP Order for filing (0.3); email chambers re: same (0.1).			
5 June 2025	Telephone conference re: closing of NOLA DIP facility (0.3); coordination with W&C and IslandDundon teams re: bank accounts and funding re: same (0.9).	B Lingle	1.20	1,644.00
6 June 2025	Review NOLA interim DIP order (1.2) and draft NOLA final DIP Order (1.2); call with Dundon re: opening accounts (0.2); review account set up at Western Alliance (0.4); call Dundon re: opening accounts issue (0.1); email G. Pesce re: next steps for funding (0.1).	S Kava	3.20	4,096.00
9 June 2025	Telephone conference with G. Pesce re: potential financing source (0.5); correspond with G. Pesce, S. Kava and ArentFox re: NOLA DIP economics (3.9); coordinate re: bank accounts (0.5); coordinate execution of nondisclosure agreements and data room access (0.4).	B Lingle	5.30	7,261.00
9 June 2025	Review NOLA DIP re: amendments (0.2); email G. Pesce re: same (0.2); further draft nondisclosure agreement re: same (0.3); email G. Pesce re: same (0.1); multiple email correspondences re: same (0.1); email Western Alliance re: accounts (0.1); call bank re: issues with cash management system (0.1); draft NOLA DIP stipulation (0.7); email G. Pesce re: same (0.1); further coordinate account opening with bank and Dundon (0.8); further revise final order (0.4); email DIP Lender re: same (0.1); email T. Rizvi re: issues with account set up (0.1); email G. Pesce NOLA stipulation (0.1).	S Kava	3.40	4,352.00
10 June 2025	Review and revise DIP declaration.	S Hershey	0.30	537.00
10 June 2025	Coordinate with W&C team re: NOLA DIP financing.	B Lingle	1.20	1,644.00
10 June 2025	Email B. Goodman re: template DACA.	S Kava	0.10	128.00
11 June 2025	Email B. Goodman re: credit agreement and final order.	S Kava	0.10	128.00
12 June 2025	Revise stipulation re: DIP (0.2); email B. Goodman re: same (0.1); review interim order and terms form revisions and amendments (2.3); correspondences re: same (0.6); draft certification of account opening (0.5); email B. Lingle re: same (0.1); further review NOLA interim order (1.5); email A. Rovitz re: W9s (0.2); coordinate closing call (0.3); finalize stipulation and budget (0.5); put together workstream checklist for A. Mitra and C. Tuffey (0.3).	S Kava	6.60	8,448.00
13 June 2025	Participate in NOLA closing call (0.5); coordinate with W&C, IslandDundon, ArentFox teams re: same (1.7); telephone conferences, correspond with same re: bank account issues (1.6).	B Lingle	3.80	5,206.00
13 June 2025	Review and finalize NOLA stipulation for filing (0.3) and emails re: same (0.2).	C Campbell	0.50	640.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 June 2025	Review settlement statement and stipulation re: NOLA DIP (0.5); email correspondences with C. Tuffey re: same (0.2).	S Kava	0.70	896.00
13 June 2025	Review and file stipulation between Debtor Borrowers and NOLA DIP lender (0.2); coordinate service with Verita (0.1).	Hirshorn, Deanna	0.30	147.00
15 June 2025	Email ArentFox re: next steps (0.1); review DACAs (1.0); email ArentFox re: same (0.1).	S Kava	1.20	1,536.00
16 June 2025	Revise nondisclosure agreement (0.3); email counsel re: same (0.1); call with B. Lingle re: closing checklist for NOLA (0.2).	S Kava	0.60	768.00
17 June 2025	Review final DIP order form ArentFox (1.0); call with S. Hershey re: DIP issues (0.3); call with Dundon re: same (0.5); call with Western Alliance re: account issues (0.2); call with B. Lingle re: NOLA DIP (0.2); email W&C team re: collateral package (0.2); email B. Goodman re: final order (0.1); email N. Pepin re: credit agreement issues and outline of negotiations with NOLA (0.5); draft NOLA certificate of no objection (0.6); compile documents for filing final order re: same (0.4); fix docket number references (0.3); coordinate filing with D. Hirshorn (0.3); call with B. Lingle re: same (0.1).	S Kava	4.70	6,016.00
18 June 2025	Draft correspondence re: NOLA DIP reply.	L Curtis	0.20	256.00
18 June 2025	Multiple correspondence re: credit agreement (1.7); review and mark up NOLA credit agreement (1.7); review NOLA DIP Interim Order and Stipulation (1.7); conference re: same (1.9).	N Pepin	7.00	8,960.00
19 June 2025	Confer with S. Hershey and B. Lingle re: NOLA DIP reply (0.3); draft correspondence re: same (0.4).	L Curtis	0.70	896.00
19 June 2025	Review NOLA credit agreement (1.4); email B. Lingle re: same (0.2); email Western Alliance re: DACA (0.1).	S Kava	1.70	2,176.00
20 June 2025	Draft NOLA DIP reply (0.8); confer with S. Hershey re: same (0.1); continue drafting same (0.2); confer with S. Hershey re: same (0.1); conduct legal research re: same (0.5); confer with P. Giovine re: same (0.1); conduct legal research re: same (0.5); draft same (5.2); conduct legal research re: same (0.8); draft reply (1.0).	L Curtis	9.30	11,904.00
21 June 2025	Correspond with S. Kava, IslandDundon re: NOLA financing.	B Lingle	0.50	685.00
21 June 2025	Draft (3.9); review and revise (3.9) and correspond with W&C team re: NOLA DIP reply (4.0).	L Curtis	11.80	15,104.00
21 June 2025	Multiple email correspondences re: financial reporting (0.1); email G. Pesce re: final order and credit agreement (0.1); email B. Goodman re: same (0.1); draft settlement proposal re: same (0.2); email G. Pesce re: same (0.1); review final order and cash management	S Kava	4.50	5,760.00

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	system queries for T. Rivzi (1.4); email G. Pesce re: same (0.2); correspondences with B. Goodman re: final order revisions (0.3); revise final order (0.7); call with G. Pesce re: Dundon questions (0.1); further review questions from Dundon (1.0); email T. Rivzi re: same (0.2).			
22 June 2025	Telephone conference with S. Hershey, L. Curtis re: DIP reply (0.5); review objection to NOLA DIP (0.9) and reply (1.0).	B Lingle	2.40	3,288.00
22 June 2025	Draft NOLA DIP reply (0.4); confer with S. Hershey re: same (0.1).	L Curtis	0.50	640.00
22 June 2025	Consolidate list of outstanding issues re: NOLA DIP (0.3); email G. Pesce re: same (0.1); revise list per G. Pesce (0.2); email United States Trustee redline and final order (0.2); email B. Goodman re: final order and financing mechanics (0.3); email T. Rizvi re: same (0.1); email B. Goodman re: same (0.1); review org chart for NOLA lenders (0.2).	S Kava	1.50	1,920.00
23 June 2025	Telephone conference with ArentFox team re: DIP reply (0.4); telephone conference with S. Kava re: financing (0.3); review, revise DIP reply (0.9); review, revise NOLA loan agreement (1.1).	B Lingle	2.70	3,699.00
23 June 2025	Confer with S. Hershey and others re: NOLA DIP reply (0.4); confer with S. Hershey re: same (0.1).	L Curtis	0.50	640.00
23 June 2025	Revise DACA (0.2); email bank re: same (0.1); multiple email correspondences re: debtor financials (0.3); email N. Pepin re: DIP; review org chart and send to Dundon (0.1); call with Dundon re: same (0.3); email ArentFox re: checklist call and next steps (0.1); email G. Pesce re: DIP objection (0.1); review and comment on NOLA DIP loan agreement (2.5); call with B. Lingle re: accounts (0.2).	S Kava	3.90	4,992.00
23 June 2025	Review objections to NOLA DIP (0.6); research in support of Debtors' NOLA DIP reply (3.2); correspondence with B. Lingle re: same (0.1); confer with A. Aquije re: same (0.2).	A Mitra	4.10	4,551.00
24 June 2025	Revise NOLA DIP reply (0.3); confer with S. Hershey re: same (0.3); continue drafting same (0.2); confer with S. Hershey re: same (0.1); continue drafting DIP reply (1.9); continue revising DIP reply (4.4); confer with P. Giovine re: same (0.1); continue drafting same (0.3); continue drafting same (0.9); confer with B. Lingle re: same (0.1); continue drafting same (0.5); incorporate edits into same (1.1); continue revising same (1.5).	L Curtis	11.70	14,976.00
24 June 2025	Email B. Goodman re: accounts (0.1); review interim DIP order re: adequate protection (0.7); email L. Curtis re: same (0.3); review credit agreement and email N. Pepin (1.2); email B. Lingle re: same (0.1); revise NOLA DIP order and send to G. Pesce (0.4); email N. Pepin re: credit agreement (0.1); email N. Pepin re: account	S Kava	4.50	5,760.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	issues (0.2); email F. He re: milestones (0.2); review DIP reply and response to motion to dismiss (1.2).			
24 June 2025	Research in support of NOLA DIP reply (3.0); correspondence with L. Curtis re: same (0.6); confer with S. Kava re: NOLA DIP reply, arguments, and research strategy (0.3); emails and correspondence with A. Aquije and P. Giovine re: same (0.7); review and revise P. Giovine research response and provide to L. Curtis for review (1.1); supplemental research (2.3); review, revise and cite check draft NOLA DIP reply with A. Aquije and P. Giovine (1.6); correspondence with L. Curtis re: same and follow up points (0.2).	A Mitra	9.80	10,878.00
25 June 2025	Revise NOLA DIP reply (2.3); incorporate edits into same (1.2); further revise same (3.0); incorporate edits into same (0.8); confer with G. Pesce re: same (0.1); incorporate edits into same (0.6); confer with G. Pesce re: same (0.1); incorporate edits into same (0.2).	L Curtis	8.30	10,624.00
25 June 2025	Email B. Goodman re: accounts (0.1); revise DIP order (0.3) and email B. Goodman re: same (0.3); communications with B. Goodman re: stipulations (0.3); review revisions in stipulations (1.0).	S Kava	2.00	2,560.00
25 June 2025	Review NOLA loan agreement (1.0); review relevant provisions of the DIP order and term sheet (1.0); draft open item issues list re: same (1.0); multiple correspondence with lender's counsel and W&C counsel re: cash management accounts/DACAs (1.0).	N Pepin	4.00	5,120.00
25 June 2025	Research in support of NOLA DIP reply (2.2); various correspondence with B. Lingle and W&C team re: same (0.6).	A Mitra	2.80	3,108.00
26 June 2025	Review NOLA DIP order (0.3); telephone conference with G. Pesce re: NOLA DIP order and settlement (0.3).	B Lingle	0.60	822.00
26 June 2025	Email D. Hirshorn re: NOLA final DIP order package (0.2); email N. Pepin re: credit agreement (0.1); call with Dundon re: settlement (0.1); email G. Pesce re: final order (0.1); email B. Goodman re: accounts (0.1); email Western Alliance re: same (0.1); call with Western Alliance re: same (0.1); review outstanding issues in credit agreement (0.6); email G. Pesce re: same (0.1); email D. Hirshorn re: filing DIP order before hearing (0.1); email F. He re: motion to dismiss issues (0.1); email United States Trustee re: revisions to final order (0.2); email correspondences with G. Pesce re: credit agreement (0.2); call with Dundon re: settlement (0.1); revise final order per the settlement (2.3); multiple calls with G. Pesce re: same (0.3); revise final order based on same (0.5); further revise final order based on G. Pesce comments (0.2); email B. Goodman re: final order settlement (0.1); further revise final order based on comments from B. Goodman (0.8); email G. Pesce re: same (0.1).	S Kava	6.50	8,320.00
26 June 2025	Review email from S. Kava re: upcoming filing of revised DIP order (0.1); confer with S. Kava re: upcoming filings	Hirshorn, Deanna	0.30	147.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	re: same (0.1); review, finalize and file notice of filing revised proposed NOLA DIP Order(0.1).			
27 June 2025	Finalize NOLA DIP order (0.2); email B. Goodman re: same (0.1); multiple email correspondences re: same (0.1); email Western Alliance re: account issues (0.1).	S Kava	0.50	640.00
29 June 2025	Review revised final DIP order from counsel (0.8); revise final order (0.6); email ArentFox re: same (0.2).	S Kava	1.60	2,048.00
30 June 2025	Email N. Pepin re: credit agreement (0.1); revise NOLA DIP order (0.8); email B. Goodman re: same (0.1); further revise order (0.2); multiple email correspondences re: same (0.1); review credit agreement (0.4) and provide comments to N. Pepin re: same (0.4); email B. Goodman re: DIP objection (0.1); email G. Pesce re: DIP order (0.1); email ad hoc group re: NOLA DIP (0.1); revise DIP based on comments from ad hoc group comments (0.3); email ArentFox re: same (0.1).	S Kava	2.80	3,584.00
30 June 2025	Review NOLA loan agreement (0.4); prepare open items list for D. Viklund and W&C bankruptcy counsel re: same (0.4); conference re: same (0.4); further revise loan agreement(0.3).	N Pepin	1.50	1,920.00
SUBTOTAL: Financing Matters: NOLA			165.90	210,006.00

Financing Matters: Kelly Hamilton

1 June 2025	Review, revise Kelly Hamilton interim DIP Order (0.6); review, revise DIP declaration (1.8).	B Lingle	2.40	3,288.00
1 June 2025	Review and comment on draft declaration in support of DIP motion.	C Campbell	2.00	2,560.00
1 June 2025	Revise Kelly Hamilton DIP order (4.3); multiple emails with G. Pesce re: filing and revisions (0.6); draft notice for the Kelly Hamilton order (0.6); email Dundon re: 13-week cash flow and budget (0.1); review the same (0.2); call with D. Hirshorn re: filing (0.2); email G. Delgado re: service (0.1); further revise Kelly Hamilton order based on lender and United States Trustee comments (1.2); review redline from prior versions circulated (1.3); revise certain mechanics (0.7); prepare notice for revised version (0.1); revise Kelly Hamilton interim DIP order (0.5); compile notice and order for filing (0.4).	S Kava	10.30	13,184.00
1 June 2025	Draft notice re: revised DIP orders.	A Aquije	0.30	333.00
1 June 2025	Draft Matthew Dundon DIP declaration (3.7); incorporate S. Kava comments re: same (0.9); incorporate C. Campbell comments re: same (1.7).	G Delgado	6.30	6,237.00
1 June 2025	Confer with S. Kava re: upcoming filing (0.1); telephone call with S. Kava re: same (0.1); standby for upcoming filing (0.9); emails with G. Pesce, B. Lingle, S. Kava and	Hirshorn, Deanna	1.50	735.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	A. Venes re: filing of notice of filing revised Kelly Hamilton DIP order (0.4).			
2 June 2025	Review nondisclosure agreement re: DIP financing.	J Kim	1.20	1,824.00
2 June 2025	Review, revise DIP declaration (0.9); revise DIP orders (3.9).	B Lingle	4.80	6,576.00
2 June 2025	Further revise Kelly Hamilton DIP Order and notice based on further comments from Lenders, United States Trustee, and interested parties (1.5); further revise Kelly Hamilton DIP Order following hearing (3.5); correspond with Kelly Hamilton counsel (0.3).	S Kava	5.30	6,784.00
2 June 2025	Review DIP loan agreement re: events of default and notice and cure periods (1.0); review cash flow provisions re: compliance with DIP term sheet (1.1).	N Pepin	2.10	2,688.00
2 June 2025	Incorporate B. Lingle comments re: DIP Declaration (0.9); correspond with G. Pesce and S. Hershey re: same (0.2).	G Delgado	1.10	1,089.00
2 June 2025	Compile Notice of Revised DIP Order for Kelly Hamilton (0.2); confer with S. Kava re: filing (0.1); file and coordinate service of same (0.2).	Hirshorn, Deanna	0.50	245.00
3 June 2025	Revise proxy re: DIP financing (0.5); correspondence with A. Cieply and J. Wiener re: D&O resolutions re: same (0.5).	J Kim	1.00	1,520.00
3 June 2025	Revise challenge provisions in DIP order (0.7); correspond with G. Pesce, S. Kava re: DIP orders (0.4).	B Lingle	1.10	1,507.00
3 June 2025	Further revise Kelly Hamilton DIP Order based on final comments from interested parties (2.8); call with L. Hoffman re: same (0.2); email correspondence with United States Trustee and L. Hoffman re: same (0.2); further revise Kelly Hamilton DIP Order based on last comments (0.4); incorporate interim DIP Order (0.3); call chambers re: filing process (0.1).	S Kava	4.00	5,120.00
3 June 2025	Review DIP term sheet re: cure costs for service agreement assumption.	A Aquije	0.50	555.00
3 June 2025	Draft notices of revised DIP orders (0.5); draft Certificate of Counsel re: same (1.2).	G Delgado	1.70	1,683.00
3 June 2025	Correspond with G. Pesce re: DIP order precedent.	A Venes	0.10	49.00
4 June 2025	Revise resolutions appointing D&O re: DIP financing.	J Kim	0.70	1,064.00
4 June 2025	Correspond with G. Pesce, S. Kava re: DIP orders and review same.	B Lingle	0.60	822.00
4 June 2025	Further revise Kelly Hamilton DIP Order (1.0); review and revise to conform definitions (1.6); correspond with	S Kava	2.90	3,712.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	L. Hoffman and United States Trustee (0.2); email chambers re: DIP Order (0.1).			
4 June 2025	Call with S. Kava re: DIP order.	A Aquije	0.10	111.00
5 June 2025	Review nondisclosure agreement re: DIP financing.	J Kim	0.90	1,368.00
5 June 2025	Draft confidentiality agreement re: financing (1.2); email G. Pesce re: same (0.1).	S Kava	1.30	1,664.00
6 June 2025	Research re: org chart and borrower entities re: Kelly Hamilton financing (0.3); review org chart re: same (0.3); conference re: incorporate governance docs re: Kelly Hamilton financing (0.3), research re: org docs for borrower entities (0.3); correspondence with Lynd re: same (0.3).	N Pepin	1.50	1,920.00
6 June 2025	Review organization charts re: borrower states of formation (0.1); review and summarize case milestones (0.4); review corporate documents re: borrower's certificates of good standing (0.5).	A Aquije	1.00	1,110.00
6 June 2025	Review and reply to email from G. Pesce re: Interim DIP Order.	Hirshorn, Deanna	0.10	49.00
7 June 2025	Email Dundon team re: account set up for Kelly Hamilton DIP funding (0.1); email G. Pesce update re: same (0.1); call with Dundon re: funding on interim basis (0.1); draft email re: account set up for Kelly Hamilton borrowers (0.3); revise interim order to final order (2.4).	S Kava	3.00	3,840.00
8 June 2025	Conferences with Lynd re: DIP (0.9); review materials re: same (1.2).	G Pesce	2.10	4,410.00
9 June 2025	Multiple email correspondence re: DIP (0.6); review draft DIP order (0.6) and draft credit agreement (0.5).	D Viklund	1.70	3,995.00
9 June 2025	Conferences with Lynd re: DIP (0.9); review materials re: same (1.2).	G Pesce	2.10	4,410.00
9 June 2025	Revise proxy agreement re: DIP financing.	J Kim	0.70	1,064.00
9 June 2025	Call with J. Testa re: Kelly Hamilton DIP (0.1); review Kelly Hamilton credit agreement (1.4); review cash management and account set up for Kelly Hamilton closing (0.6).	S Kava	2.10	2,688.00
9 June 2025	Review and revise Kelly Hamilton credit agreement.	N Pepin	8.20	10,496.00
10 June 2025	Review markup of credit agreement and comment (0.7); conference with N Pepin re: same (0.7); review revisions re: same (0.6).	D Viklund	2.00	4,700.00
10 June 2025	Prepare ratification consents (0.4) and nondisclosure agreements (0.5).	J Kim	0.90	1,368.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 June 2025	Telephone conference with S. Kava re: bank accounts, DIP financing (0.2); coordinate with W&C team re: Kelly Hamilton DIP financing (1.2).	B Lingle	1.40	1,918.00
10 June 2025	Review revised DACA from Kelly Hamilton (0.5); email Western Alliance re: same and account issues (0.2); email A. Rovitz re: accounts (0.1); email B. Lingle re: same (0.1); email Kelly Hamilton lawyers re: final order (0.1); review final order (2.0); email all interested parties re: same (0.3); call with Western Alliance re: accounts (0.2); review account issue and email G. Pesce re: same (0.4); email Western Alliance re: DACA (0.2); review nondisclosure agreement revisions (0.2); email correspondences re: same (0.1); revise nondisclosure agreement to execution version (0.1).	S Kava	4.50	5,760.00
10 June 2025	Review and update credit agreement (1.0), conference with D. Viklund re: same (1.1).	N Pepin	2.10	2,688.00
11 June 2025	Conferences re: DIP closing matters.	G Pesce	1.80	3,780.00
11 June 2025	Prepare ratification consents (0.3) and nondisclosure agreements (0.2).	J Kim	0.50	760.00
11 June 2025	Review credit agreement and outstanding points (2.0); email W&C debt finance team re: same (0.6); email correspondences with parties in interest to get comments to final order (0.6); revise Kelly Hamilton final order based on comments received (0.8); draft account formation documents (0.3); draft stipulation based on G. Pesce comments and comments from Dundon (1.2); email lender re: same (0.1).	S Kava	5.60	7,168.00
11 June 2025	Review and mark up credit agreement (3.0); correspond with W&C bankruptcy team and D. Viklund re: same (3.1).	N Pepin	6.10	7,808.00
12 June 2025	Conferences re: DIP closing matters.	G Pesce	1.40	2,940.00
12 June 2025	Correspond with W&C team, IslandDundon team re: bank accounts (0.6); participate in Kelly Hamilton closing call (0.3); coordinate execution of nondisclosure agreements (0.3).	B Lingle	1.20	1,644.00
12 June 2025	Email United States Trustee re: final order (0.1); email Dundon re: DACAs (0.1); email re: closing (0.1); participate in closing call re: same (0.3); email Dundon re: accounts (0.2); draft email re: accounts and cash management issues (0.7); email M. Burstein re: DACAs (0.1); review final order (0.8).	S Kava	2.40	3,072.00
12 June 2025	Review, revise ancillary loan documents.	N Pepin	5.80	7,424.00
13 June 2025	Revise DIP hearing materials.	G Pesce	1.40	2,940.00
13 June 2025	Review nondisclosure agreement.	J Kim	0.10	152.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 June 2025	Correspond with B. Lingle re: bank accounts (0.3); call with M. Burstein re: DACAs (0.1); review credit agreement revisions (2.5); email G. Pesce and team re: comments to Kelly Hamilton revisions (0.5); email B. Lingle re: bank accounts (0.2); email Western alliance re: same (0.1).	S Kava	3.70	4,736.00
13 June 2025	Review lender's comments to loan agreement (2.7) and draft issues list for J. Utz and W&C bankruptcy counsel re: same (2.7), further review of ancillary loan documents (2.7).	N Pepin	8.10	10,368.00
13 June 2025	Incorporate S. Hershey comments re: DIP Declaration (0.3); email re: same to M. Dundon (0.2).	G Delgado	0.50	495.00
14 June 2025	Conference with client re: DIP.	G Pesce	1.00	2,100.00
14 June 2025	Email correspondence re: corporate governance matters re: Kelly Hamilton DIP.	N Pepin	0.50	640.00
15 June 2025	Revise DIP materials to prepare for hearing.	G Pesce	0.60	1,260.00
15 June 2025	Review, revise Kelly Hamilton loan agreement (0.8) and correspond with W&C team re: same (0.9); prepare for hearing with respect to final approval of Kelly Hamilton DIP Facility (1.0).	B Lingle	2.70	3,699.00
15 June 2025	Further revise Kelly Hamilton Final DIP Order (0.6); review credit agreement and comment on the same (1.0); email Kelly Hamilton Lender group (0.1); further revise Kelly Hamilton Final DIP order based on United States Trustee comments (0.5); email correspondence with G. Pesce re: United States Trustee revisions (0.1).	S Kava	2.30	2,944.00
15 June 2025	Review and revise loan agreement and ancillary loan documents (1.7); multiple correspondence with lender's counsel re: same (1.7); multiple correspondence with J. Utz and W&C bankruptcy counsel re: same (1.7).	N Pepin	5.10	6,528.00
16 June 2025	Conferences re: DIP documents.	G Pesce	0.90	1,890.00
16 June 2025	Telephone conference with N. Pepin, Lippe and 3650 teams re: Kelly Hamilton loan agreement (0.7); prepare for Kelly Hamilton closing (2.1); review, revise resolutions re: entry into Kelly Hamilton DIP facility (0.8).	B Lingle	3.60	4,932.00
16 June 2025	Revise DIP declaration (0.4); email G. Delgado re: same (0.1); review Kelly Hamilton credit agreement (1.2); review DACA (0.2); email Western Alliance re: same (0.1); email G. Pesce re: final DIP order (0.1); call with T. Rizvi re: financial reporting (0.6); email G. Pesce re: same (0.1); email McCarter English re: revised DIP order (0.1); email L. Hoffman re: same (0.1); compile final order, term sheet, credit agreement, and approved budget (0.5); email N. Pepin re: schedules for credit agreement (0.2); revise DIP order (0.3); email Kelly Hamilton counsel re: same (0.1); multiple emails with B.	S Kava	4.90	6,272.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Lingle re: order (0.3); further review credit agreement (0.5).			
16 June 2025	Telephone conference with lender's counsel re: credit agreement and ancillaries (1.1); review and revise ancillaries re: same (1.1); correspondence with lender's counsel re: filing resolutions (1.1); correspondence re: resolutions in connection with the Kelly Hamilton financing (1.1); correspondence re: signature pages re: same (1.1); review resolutions prepared for financing (1.1); conference re: loan agreement exhibits (1.1); conference with J. Utz re: loan agreement (0.8).	N Pepin	8.50	10,880.00
16 June 2025	Draft omnibus resolutions re: Kelly Hamilton DIP approval.	A Aquije	1.00	1,110.00
16 June 2025	Emails re: Dundon Declaration (0.4); incorporate M. Dundon comments re: same (0.6).	G Delgado	1.00	990.00
17 June 2025	Prepare for (1.2) and participate in DIP hearing (1.2).	G Pesce	2.40	5,040.00
17 June 2025	Review and revise Kelly Hamilton DIP financing documents.	J McCoy	1.00	1,900.00
17 June 2025	Prepare for Kelly Hamilton closing (2.0); review, revise Kelly Hamilton final DIP order (1.2).	B Lingle	3.20	4,384.00
17 June 2025	Finalize Kelly Hamilton DIP credit agreement.	C Campbell	0.70	896.00
17 June 2025	Attend final DIP hearing re: Kelly Hamilton (0.6); multiple emails with Western Alliance re: DACAs and closing (0.4); email G. Pesce re: same (0.2); revise NOLA final DIP order to conform with United States Trustee issues flagged in Kelly Hamilton (0.7).	S Kava	1.90	2,432.00
17 June 2025	Review lender's comments to ancillaries (1.2); telephone conference with lender's counsel re: same (1.2); conference re: open points with J. McCoy (1.2); multiple conference with bankruptcy team re: Credit Agreement (1.2); review and mark up Credit Agreement (1.2); multiple conference with lender and lender's counsel re: same (1.2); multiple correspondence re: consents (1.2); multiple correspondence re: signature pages (1.2).	N Pepin	9.60	12,288.00
17 June 2025	Draft nondisclosure agreements for potential financing parties (0.6); draft notice of filing revised exhibits to DIP motion (0.3); draft resolutions re: corporate authority to sign credit agreements (0.7); review and revise same (0.3).	A Aquije	1.90	2,109.00
17 June 2025	Review and respond to S. Kava's email re: certificate of no objection to final Kelly Hamilton DIP order (0.1); compiled same for review (0.3); finalize and file same (0.2); coordinate with Verita service of same (0.1); review and finalize notice of filing exhibit to Final DIP Order (0.1); confer with S. Kava and B. Lingle re:	Hirshorn, Deanna	1.10	539.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	finalizing final Kelly Hamilton DIP order (0.1); file same (0.1); coordinate with Verita to serve same (0.1).			
17 June 2025	Edit and prepare executed version of DIP Credit Agreement (0.7); correspondence with W&C team re: same (0.2); coordinate mailing re: same (0.6).	K Wick	1.50	735.00
18 June 2025	Coordination re: Kelly Hamilton closing (0.9); telephone conference with M. Burstein (3650) and M. Bouton (Lippes) re: revised credit agreement and cash management account (0.4); file Kelly Hamilton DIP order (0.7).	B Lingle	2.00	2,740.00
18 June 2025	Multiple emails with Western Alliance re: accounts set up and DACAs (0.4); multiple calls re: closing and account information (0.7); review collateral package under Kelly Hamilton loan (0.4); email western alliance re: authorized signatory and next steps for Kelly Hamilton loan (0.5).	S Kava	2.00	2,560.00
18 June 2025	Review Kelly Hamilton loan documents (1.7); conference re: same (1.7).	N Pepin	3.40	4,352.00
18 June 2025	Compile proposed final Kelly Hamilton DIP order (0.2); review and respond to emails with B. Lingle and S. Kava re: same (0.1).	Hirshorn, Deanna	0.30	147.00
19 June 2025	Telephone conference with S. Hershey, L. Curtis re: DIP reply (0.3); Kelly Hamilton closing coordination (2.3); telephone conference with S. Kava re: Kelly Hamilton closing (0.2).	B Lingle	2.80	3,836.00
19 June 2025	Closing call with Kelly Hamilton lender (0.2); call with B. Lingle re: same (0.2).	S Kava	0.40	512.00
19 June 2025	Attend loan closing checklist call (0.3), review Uniform Commercial Code financing statements (0.3) and comment re: same (0.3), correspondence re: approved budget for loan agreement exhibits (0.3); conference re: exhibits package to credit agreement (0.3); correspondence re: settlement statements (0.5).	N Pepin	2.00	2,560.00
20 June 2025	Telephone conference with G. Pesce, IslandDundon team re: financing workstreams (0.8); telephone conference with Kelly Hamilton closing and further review of Kelly Hamilton credit agreement (0.8).	B Lingle	1.60	2,192.00
20 June 2025	Email M. Burstein re: DACA (0.1); email Western Alliance re: same (0.1).	S Kava	0.20	256.00
20 June 2025	Attend Kelly Hamilton loan closing call (0.4); multiple correspondence re: same (0.4); telephone conference with Lynd re: disclosures in connection with loan agreement (0.4); conference with J. Utz re: loan closing (0.4); review updated loan agreement re: same (0.4).	N Pepin	2.00	2,560.00
22 June 2025	Correspondence re: Uniform Commercial Code lien searches.	N Pepin	0.20	256.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 June 2025	Kelly Hamilton closing coordination.	B Lingle	0.80	1,096.00
23 June 2025	Emails re: closing and DACAs.	S Kava	0.30	384.00
23 June 2025	Review and revise loan agreement (0.7); multiple correspondence with lender's counsel re: same (0.7); multiple correspondence re: Uniform Commercial Code searches re: same (0.6); correspondence re: Kelly Hamilton financing (0.3); attention to various closing emails with lender's counsel, W&C FRI team and Lynd (0.3); research re: updated mortgage re: same (0.3); conference with W&C team re: lien search re: same (0.3); conference with J. Utz re: closing conditions (0.3); review settlement statement re: same (0.3); multiple correspondences re: closing (0.3); coordinate filing re: executed loan documents (0.4).	N Pepin	4.50	5,760.00
23 June 2025	Research re: DIP reply.	A Aquije	1.90	2,109.00
24 June 2025	Review, revise DIP reply (2.1); conference with L. Curtis re: DIP reply (0.3).	B Lingle	2.40	3,288.00
24 June 2025	Review loan agreement (0.3); multiple correspondence re: DACA accounts with lender's counsel and bankruptcy counsel (0.3); correspondence re: Uniform Commercial Code statements (0.4).	N Pepin	1.00	1,280.00
24 June 2025	Substantive cite check re: DIP reply.	A Aquije	1.80	1,998.00
25 June 2025	Review further comments to credit agreement (0.5); emails and telephone call with B Lingle re: same (0.5); email correspondence with G Pesce re: same (0.4).	D Viklund	1.40	3,290.00
25 June 2025	Telephone conference with D. Viklund re: financing (0.3); review, revise DIP reply (1.9).	B Lingle	2.20	3,014.00
25 June 2025	Revise DIP reply (0.1); email L. Curtis re: same (0.1); email W&C team re: accounts (0.1); email Spano re: final order (0.1); draft DACAs and email N. Pepin re: same (0.4); review and revise credit agreement (0.2); further revise based on comments from G. Pesce (1.3); further review credit agreement and provide revisions to N. Pepin (1.4); email Spano re: final DIP order (0.1); draft notice of final order and email B. Lingle (0.5).	S Kava	4.30	5,504.00
25 June 2025	Multiple correspondence with D. Viklund re: Kelly Hamilton financing.	N Pepin	1.10	1,408.00
25 June 2025	Review and respond to email from A. Mitra re: Lingle Declaration in Support of DIP Reply (0.1); finalize exhibits to B. Lingle Declaration in preparation for filing (0.2); confer with L. Curtis re: upcoming filing of reply in support of Debtors' DIP Motion (0.2); review, finalize and file Debtors' Reply in Support of Debtors' DIP Motion (0.2); review, finalize and file Lingle Declaration with corresponding exhibits (0.2); coordinate service of same with Verita (0.1); coordinate with A. Venes to	Hirshorn, Deanna	1.10	539.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	prepare legal authority binders in preparation for DIP hearing (0.1).			
26 June 2025	Review and revise loan agreement(1.2); multiple correspondence with lender's counsel re: open issues re: same (1.2); multiple correspondence with W&C bankruptcy counsel re: open bankruptcy related issues (1.2); correspondence with lender's counsel re: Uniform Commercial Code searches re: same (1.0).	N Pepin	4.60	5,888.00
27 June 2025	Multiple correspondences re: loan agreement.	N Pepin	0.50	640.00
28 June 2025	Multiple email correspondences re: DIP final order (0.1); email G. Pesce re: broker (0.2); review revised final order re: same (0.4); correspondences with G. Pesce re: same (0.2); revise final order (0.6).	S Kava	1.50	1,920.00
29 June 2025	Revise dip order.	G Pesce	0.80	1,680.00
30 June 2025	Revise DIP materials for final order entry.	G Pesce	0.80	1,680.00
SUBTOTAL: Financing Matters: Kelly Hamilton			228.00	305,438.00

Exclusivity, Plan & Disclosure Statement: Kelly Hamilton

4 June 2025	Prepare confirmation and milestones timeline.	B Lingle	0.60	822.00
5 June 2025	Revise confirmation timeline.	B Lingle	0.50	685.00
11 June 2025	Telephone conference with G. Pesce and counsel to Lynd re: plan proposal.	B Lingle	0.70	959.00
20 June 2025	Research re: disclosure statement and plan (1.5); review term sheet re: same (0.3).	S Kava	1.80	2,304.00
20 June 2025	Research re: precedent disclosure statement conditional approval motion.	A Aquije	0.50	555.00
21 June 2025	Telephone conference with G. Pesce re: chapter 11 plan.	B Lingle	0.50	685.00
21 June 2025	Review precedent chapter 11 plans re: drafting re: same.	A Mitra	4.50	4,995.00
22 June 2025	Review additional precedent chapter 11 plans.	A Mitra	1.00	1,110.00
23 June 2025	Correspond with F. He and A. Aquije re: solicitation.	B Lingle	0.40	548.00
23 June 2025	Email correspondence with W&C team re: conditional approval motion (0.3); correspondence with Verita team re: solicitation process (0.3); draft motion to conditionally approve disclosure statement (0.6).	A Aquije	1.20	1,332.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 June 2025	Correspondence with B. Lingle re: plan drafting (0.1); confer with A. Aquije and F. He re: draft conditional Disclosure Statement motion and exhibits (0.2).	A Mitra	0.30	333.00
24 June 2025	Review precedent disclosure statements (1.5); draft disclosure statement (4.8).	S Kava	6.30	8,064.00
24 June 2025	Draft motion to conditionally approve disclosure statement.	A Aquije	2.40	2,664.00
24 June 2025	Review precedent conditional Disclosure Statement motion and exhibits (0.2); correspondence with F. He and A. Aquije re: same (0.1).	A Mitra	0.30	333.00
25 June 2025	Review and revise disclosure statement (3.5); confer with B. Lingle and S. Kava re: same (0.3).	F He	3.80	6,194.00
25 June 2025	Draft chapter 11 plan.	B Lingle	1.00	1,370.00
25 June 2025	Further draft disclosure statement.	S Kava	2.60	3,328.00
25 June 2025	Draft conditional approval of disclosure statement motion.	A Aquije	1.10	1,221.00
25 June 2025	Confer with B. Lingle re: plan precedent (0.1); locate and email same to B. Lingle (0.1).	Hirshorn, Deanna	0.20	98.00
26 June 2025	Review and revise solicitation motion and order (1.8); research re: disclosure statement issues (0.7). confer with S. Kava re: revisions to the disclosure statement (0.3); confer with A. Aquije re: solicitation motion revisions and issues (0.3).	F He	3.10	5,053.00
26 June 2025	Draft Kelly Hamilton plan.	B Lingle	0.70	959.00
26 June 2025	Revise disclosure statement based on stalking horse agreement and bidding process.	S Kava	3.20	4,096.00
26 June 2025	Draft motion to conditionally approve disclosure statement.	A Aquije	2.20	2,442.00
26 June 2025	Correspondence with B. Lingle re: plan drafting (0.1); draft conditional disclosure statement motion exhibits (0.3); confer with A. Aquije and F. He re: same (0.2); review and revise disclosure statement motion and exhibits per S. Kava comments (0.4); emails with same re: same (0.1).	A Mitra	1.10	1,221.00
26 June 2025	Draft disclosure statement exhibits.	G Delgado	1.60	1,584.00
27 June 2025	Revise Kelly Hamilton plan.	G Pesce	1.30	2,730.00
27 June 2025	Review and revise solicitation materials.	F He	0.70	1,141.00
27 June 2025	Draft Kelly Hamilton plan.	B Lingle	6.20	8,494.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 June 2025	Review Kelly Hamilton asset purchase agreement re: disclosure statement drafting (0.7); further draft Kelly Hamilton Disclosure Statement based on asset purchase agreement and deal structure described on work in progress call (4.6).	S Kava	5.30	6,784.00
27 June 2025	Call with W&C team re: plan and disclosure statement workstreams (0.7); draft disclosure statement motion, incorporating comments from F. He (1.0).	A Aquije	1.70	1,887.00
27 June 2025	Strategy call with W&C associates re: confirmation package and drafts (0.6); draft conditional disclosure statement motion exhibits (4.0); confer with A. Aquije and F. He re: same (0.2); supplement drafts re: same (1.8).	A Mitra	6.60	7,326.00
28 June 2025	Revise chapter 11 plan.	G Pesce	0.70	1,470.00
28 June 2025	Review and revise Disclosure Statement (0.9); review draft plan (0.5).	F He	1.40	2,282.00
28 June 2025	Draft Kelly Hamilton plan (3.9) and correspond with G. Pesce re: same (3.9).	B Lingle	7.80	10,686.00
28 June 2025	Further revise disclosure statement (0.8); email B. Lingle re: plan (0.1); review and revise plan (3.5); further revise disclosure statement based on plan terms and bidding procedures (4.2).	S Kava	8.60	11,008.00
28 June 2025	Correspondence with W&C Team re: confirmation package (0.6); draft conditional disclosure statement motion exhibits (4.2); review and revise disclosure statement (0.7) and plan drafts (0.6).	A Mitra	6.10	6,771.00
29 June 2025	Revise chapter 11 plan and sale materials.	G Pesce	1.20	2,520.00
29 June 2025	Review and revise solicitation materials.	F He	0.80	1,304.00
29 June 2025	Revise Kelly Hamilton plan (2.1); review, revise disclosure statement (3.2).	B Lingle	5.30	7,261.00
29 June 2025	Email F. He re: asset purchase agreement re: disclosure statement drafting (0.1); review carveout in asset purchase agreement re: litigation trust re: disclosure statement draft (0.3); email F. He re: same (0.1); revise disclosure statement based on comments from B. Lingle (2.7).	S Kava	3.20	4,096.00
29 June 2025	Revise disclosure statement motion, incorporating comments from F. He.	A Aquije	2.40	2,664.00
29 June 2025	Review and revise updated drafts of plan (1.2), disclosure statement (1.2), disclosure statement motion (1.2) and update conditional disclosure statement motion exhibits re: same (1.4); review, revise and supplement disclosure statement exhibits (4.0); review	A Mitra	9.90	10,989.00

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	and revise disclosure statement per B. Lingle comments (0.8); emails with same and G. Pesce re: same (0.1).			
30 June 2025	Revise plan for filing.	G Pesce	0.80	1,680.00
30 June 2025	Multiple calls with B. Lingle re: plan issues and revisions thereto (0.9); review and revise plan (0.4); call with G. Pesce re: same (0.1).	L Baccash	1.40	2,366.00
30 June 2025	Review, revise Kelly Hamilton plan (6.6); telephone conference with L. Baccash re: plan (0.8); review, revise Kelly Hamilton plan and disclosure statement (1.2) and coordinate filing of same (1.2).	B Lingle	9.80	13,426.00
30 June 2025	Email W&C team re: plan (0.1); further revise disclosure statement (1.8); email Dundon re: same (0.1); review and revise Disclosure Statement motion (3.4); email F. He re: same (0.1); further revise disclosure statement based on comments from B. Lingle (2.3).	S Kava	7.80	9,984.00
30 June 2025	Further revise disclosure statement motion, incorporating comments from F. He (1.1); further revise same, incorporating comments from S. Kava (1.7).	A Aquije	2.80	3,108.00
30 June 2025	Review and revise disclosure statement motion exhibits (1.5); multiple emails with W&C Team re: same (0.4).	A Mitra	1.90	2,109.00
30 June 2025	Confer with S. Kava re: upcoming filing (0.1); assist with filing re: Plan and Disclosure Statement (0.6); review, finalize and file Joint Chapter 11 Plan (0.2); review and respond to email from S. Kava re: Disclosure Statement (0.1); review, finalize and file same (0.2); coordinate with Verita re: service of same (0.1).	Hirshorn, Deanna	1.30	637.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement: Kelly Hamilton			136.60	175,678.00

Executory Contracts & Unexpired Leases

2 June 2025	Research re: motions to assume amended leases (0.2); review and comment on draft proxy agreement and research re: same (0.7); call with G. Pesce re: same (0.1).	C Campbell	1.00	1,280.00
2 June 2025	Review precedent motion re: assumption of executory contracts.	A Aquije	0.60	666.00
3 June 2025	Research (2.0) and draft motion to assume property and asset management agreements (2.0); summarize outstanding questions re: same (1.8).	C Campbell	5.80	7,424.00
3 June 2025	Research re: precedent for assumption of proxy agreement.	A Aquije	0.40	444.00
3 June 2025	Research additional precedent for motion to assume unexpired leases for C. Campbell (0.2); draft shell motion to assume for C. Campbell (0.3); research precedent for declaration in support of motion to	Hirshorn, Deanna	1.00	490.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	assume (0.3); prepare draft declaration of same for C. Campbell (0.2).			
4 June 2025	Review and revise motion to assume amended contracts (0.2); review declarations re: same (0.1).	C Campbell	0.30	384.00
4 June 2025	Research re: motions re: proxy agreements.	A Aquije	1.50	1,665.00
4 June 2025	Draft LaPuma and Dundon Declarations re: motion to assume.	G Delgado	5.10	5,049.00
5 June 2025	Review and revise motion to assume (0.8) and confer with team re: same (0.9).	C Campbell	1.70	2,176.00
5 June 2025	Review C. Tuffey changes re: motion to assume.	G Delgado	0.90	891.00
6 June 2025	Review and revise motion to assume property management and asset management agreements (0.1); emails with G. Delgado re: edits to same (0.2); emails with G. Pesce re: revised agreements (0.1).	C Campbell	0.40	512.00
6 June 2025	Review and revise Motion to Assume Lynd Agreements.	G Delgado	0.90	891.00
8 June 2025	Review motion to assume Lynd property management agreement (0.5) and correspond with W&C team re: same (0.5).	B Lingle	1.00	1,370.00
8 June 2025	Review and revise amended property management and asset management agreements (1.0) and summarize comments to same (1.0).	C Campbell	2.00	2,560.00
9 June 2025	Draft and revise assumption motion (2.2) and amended and restated property management agreements (2.2).	C Campbell	4.40	5,632.00
9 June 2025	Draft motion to assume irrevocable proxy agreement.	A Aquije	2.60	2,886.00
9 June 2025	Update Lynd Agreements per G. Pesce and C. Campbell comments.	G Delgado	3.20	3,168.00
10 June 2025	Review and revise assumption motion (2.2) and amended and restated property management agreements (2.2); review and revise motion to assume proxy agreement (0.6); review and revise application to shorten notice re: same (0.5); extensive revisions re: amended agreements and assumption motion (3.4).	C Campbell	8.90	11,392.00
10 June 2025	Review and revise motion to assume proxy agreement (1.0); review and revise motions to assume property management agreement (1.0).	A Aquije	2.00	2,220.00
10 June 2025	Incorporate G. Pesce comments re: motion to assume Lynd Agreements (1.6); update Dundon Declaration to conform re: same (0.6); review same (0.8).	G Delgado	3.00	2,970.00
10 June 2025	Review exhibits to motion to assume.	Hirshorn, Deanna	0.10	49.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 June 2025	Attention to assumption issues.	G Pesce	1.10	2,310.00
11 June 2025	Review and revise motion to assume (0.7); review and revise application for shortened notice and multiple exhibits (0.7); finalize same for filing and confer with team re: same (0.8).	C Campbell	2.20	2,816.00
11 June 2025	Make final edits to motion to assume Lynd agreement (0.6) and related application to shorten for filing (0.6).	G Delgado	1.20	1,188.00
11 June 2025	Review and respond to emails with B. Lingle, C. Campbell and G. Delgado re: filing of motion to assume (0.2); review and finalize motion to assume with corresponding exhibits (0.3); file same (0.2); review and finalize application to shorten notice re: same (0.1); file same (0.1).	Hirshorn, Deanna	0.90	441.00
13 June 2025	Review documents re: assumption motion (0.4) and correspondence with B. Lingle and C. Campbell re: same (0.5).	S Hershey	0.90	1,611.00
13 June 2025	Call with Spano counsel re: motion to assume (0.1); follow up re: same (0.3); review and summarize amended property and asset management agreements re: termination provisions (0.6).	C Campbell	1.00	1,280.00
14 June 2025	Telephone conference with C. Campbell, S. Hershey re: motion to assume property management agreement (0.5); review same (0.6).	B Lingle	1.10	1,507.00
14 June 2025	Call with S. Hershey and B. Lingle re: assumption motion hearing and witness prep (0.4); draft and revise witness and exhibit list re: same (0.5).	C Campbell	0.90	1,152.00
23 June 2025	Draft rejection procedures motion.	G Delgado	2.70	2,673.00
24 June 2025	Review and revise rejection procedures motion (1.7); confer with G. Delgado re: same (0.2); review revise motion and provide comments (0.4).	F He	2.30	3,749.00
24 June 2025	Review and revise draft rejection procedures (4.4); email re: same to F. He (0.1); incorporate F. He comments re: same (0.9).	G Delgado	5.40	5,346.00
24 June 2025	Research and email precedent of rejection procedures motion for G. Delgado.	Hirshorn, Deanna	0.20	98.00
SUBTOTAL: Executory Contracts & Unexpired Leases			66.70	78,290.00

Hearings & Court Matters

2 June 2025	Attend hearing re: DIP motion (1.4); correspondence with W&C team re: same (0.3).	S Hershey	1.70	3,043.00
2 June 2025	Participate in interim DIP hearing.	B Lingle	1.30	1,781.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 June 2025	Attend DIP hearing.	C Campbell	1.00	1,280.00
2 June 2025	Attend DIP hearing.	L Curtis	1.40	1,792.00
2 June 2025	Attend DIP hearing.	S Kava	1.00	1,280.00
2 June 2025	Attend DIP hearing.	G Delgado	1.50	1,485.00
4 June 2025	Correspond with G. Pesce and Court Reporting Company re: transcript order.	A Venes	0.10	49.00
14 June 2025	Review and respond to emails with C. Campbell re: upcoming filing of witness and exhibit list (0.1); review complex case procedures re: same (0.1); prepare and finalize exhibits for filings (0.3); finalize and file witness and exhibit list (0.1); coordinate service of same with Verita (0.1); email Chambers requesting speaking lines for G. Pesce, S. Hershey, B. Lingle and M. Dundon (0.1).	Hirshorn, Deanna	0.80	392.00
16 June 2025	Prepare for hearing re: DIP.	G Pesce	0.90	1,890.00
16 June 2025	Review, revise agenda.	B Lingle	1.20	1,644.00
16 June 2025	Comment on draft hearing agenda.	C Campbell	0.20	256.00
17 June 2025	Prepare for (1.1) and attend hearing re: assumption motion and DIP motion (1.1).	S Hershey	2.20	3,938.00
17 June 2025	Participate in second day hearing (1.0); prepare for hearing (1.5); review, revise amended agenda (0.7).	B Lingle	3.20	4,384.00
17 June 2025	Review and revise hearing agenda and notices re: same (1.9); prepare for hearing (0.6); attend hearing (0.8).	C Campbell	3.30	4,224.00
17 June 2025	Assist S. Hershey with hearing prep (0.5); attend virtual hearing (0.5).	L Curtis	1.00	1,280.00
17 June 2025	Attend second day hearing (0.8); draft notice re: DIP exhibits for hearing (0.4).	G Delgado	1.20	1,188.00
17 June 2025	Prepare electronic hearing binder for C. Campbell (1.4); coordinate with Copy Center to print and assemble hearing binder (0.1); finalize and file amended agenda (0.1); coordinate with Copy Center to print additional documents ahead of hearing (0.1); review case docket, pleadings and orders for key dates (0.2); update case calendar (0.2).	Hirshorn, Deanna	2.10	1,029.00
23 June 2025	Revise DIP hearing materials (1.4); prepare for DIP and dismissal hearing (2.2).	G Pesce	3.60	7,560.00
24 June 2025	Prepare for DIP and dismissal hearing.	G Pesce	2.20	4,620.00

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24 June 2025	Draft witness and exhibit list in preparation for hearing (0.7); further revise same, incorporating comments from L. Curtis (0.3); coordinate filing re: same (0.2); draft agenda for upcoming hearing (0.6).	A Aquije	1.80	1,998.00
24 June 2025	Review and respond to emails with A. Aquije re: witness and exhibit list to be filed prior to hearing (0.2); pull and finalize exhibits to witness and exhibit list in preparation for filing (1.1); confer with A. Aquije re: updating exhibit list (0.1); finalize and file witness and exhibit list with corresponding exhibits (0.2); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	1.70	833.00
25 June 2025	Prepare for DIP and dismissal hearing.	G Pesce	2.20	4,620.00
25 June 2025	Review, revise agenda (0.7); coordinate with W&C team re: hearing and work in process (0.8); telephone conference with S. Hershey, L. Curtis re: hearing (0.5).	B Lingle	2.00	2,740.00
25 June 2025	Review and revise hearing agenda.	C Campbell	0.40	512.00
25 June 2025	Confer with W. Dolan re: evidence presentation at hearing (0.2); confer with S. Hershey and B. Lingle re: hearing prep (0.5); confer with J. Yoo re: same (0.6); draft correspondence to J. Yoo re: same (0.3); draft script re: same (1.4); continue drafting script re: same (1.5); draft correspondence re: same (1.1); draft script re: same (3.8); revise draft exhibit binders re: same (0.5); draft correspondence to S. Hershey re: same (0.4).	L Curtis	10.30	13,184.00
25 June 2025	Prepare agenda for June 26 hearing (0.3); prepare exhibits for same (1.0); draft revised agenda re: same (0.3).	A Aquije	1.60	1,776.00
25 June 2025	Draft joint exhibit list (3.4); check pleadings and exhibits on docket to include in binders for hearing (2.4); quality check and prepare motion to dismiss binder for hearing (0.8); quality check and prepare DIP motion pleadings binders for hearing (1.0); quality check and prepare legal authority binders for hearing (0.9); quality check and prepare joint exhibit binders for use in hearing (1.4).	P Giovine	9.90	9,801.00
25 June 2025	Confer with L. Curtis re: hearing and joint hearing exhibit binders for the Court and counsel (0.2); confer with P. Giovine re: same (0.3); confer with A. Aquije re: amended exhibit list (0.2); research precedent (0.2); review and finalize amended exhibits for upcoming hearing (0.2); review and finalize additional exhibits (0.6); file amended witness and exhibit list with corresponding exhibits (0.6); coordinate service of same with Verita (0.1); confer with P. Giovine and A. Aquije re: joint exhibit list (0.1); prepare cover for binder of joint exhibits (0.1); assist P. Giovine with finalizing joint exhibits and electronic binder (1.2); coordinate with Copy Center to print and assemble numerous copies of joint exhibit binder (0.1).	Hirshorn, Deanna	3.90	1,911.00

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25 June 2025	Assist with preparation of DIP Motion and supporting Reply e-Binders for June 26 hearing.	A Venes	4.10	2,009.00
26 June 2025	Participate in DIP hearing.	G Pesce	2.20	4,620.00
26 June 2025	Prepare for (3.7) and attend hearing re: motion to dismiss and DIP (3.7).	S Hershey	7.40	13,246.00
26 June 2025	Attend NOLA DIP hearing.	F He	0.70	1,141.00
26 June 2025	Participate in hearing re: motion to dismiss and final approval of NOLA DIP facility (1.9); prepare for same (3.9).	B Lingle	5.80	7,946.00
26 June 2025	Draft script re: hearing prep (3.5); continue revising same (2.0); continue revising same (0.8); confer with G. Pesce and S. Hershey re: same (0.4); continue revising script re: same (2.5); confer with M. Dundon re: same (1.3); continue revising script re: same (0.5); attend hearing (0.5); present at hearing (0.5).	L Curtis	12.00	15,360.00
26 June 2025	Prepare for NOLA DIP hearing (0.4); attend hearing (1.0).	S Kava	1.40	1,792.00
26 June 2025	Attend June 26 hearing.	A Mitra	1.30	1,443.00
26 June 2025	Attend NOLA DIP hearing.	G Delgado	1.30	1,287.00
26 June 2025	Attend hearing re: DIP motion and motion to dismiss (5.8); add cites to joint exhibit list to hearing outline (0.7); further revise joint list (0.2); review new exhibit filed by opposing counsel (0.3).	P Giovine	7.00	6,930.00
26 June 2025	Attend court hearing.	J Walz	1.50	1,305.00
26 June 2025	Emails with Chambers requesting remote line for G. Pesce due to weather conditions (0.1); emails with G. Pesce re: same (0.1); review emails with Copy Center and P. Giovine re: hearing binders (0.1).	Hirshorn, Deanna	0.30	147.00
SUBTOTAL: Hearings & Court Matters			108.70	137,716.00

Litigation & Discovery

1 June 2025	Prepare timeline re: Laguna Reserve dispute.	S Hershey	0.40	716.00
1 June 2025	Draft memo re: motion to dismiss (1.2); review motion to dismiss (0.3).	A Aquije	1.50	1,665.00
2 June 2025	Telephone conference with S. Hershey re: reply to motion to dismiss.	B Lingle	0.20	274.00
2 June 2025	Draft correspondence to S. Hershey and others re: first day motions hearing prep (0.3); confer with S. Hershey	L Curtis	2.10	2,688.00

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	and others re: same (0.3); draft correspondence to G. Pesce re: same (1.5).			
3 June 2025	Correspondence with C. Campbell, S. Kava and B. Lingle re: motion to dismiss.	S Hershey	0.30	537.00
3 June 2025	Telephone conference with C. Campbell, S. Hershey re: reply to motion to dismiss (0.2); telephone conference with C. Campbell re: action items in connection with same (0.1).	B Lingle	0.30	411.00
3 June 2025	Call with S. Hershey, B. Lingle, and S. Kava re: motion to dismiss and DIP objection planning (0.2); call with S. Kava and A. Mitras re: same (0.3); review and follow up re: same (0.1).	C Campbell	0.60	768.00
3 June 2025	Confer re: pending litigation against Debtors (0.5); draft correspondence to G. Pesce re: same (0.8).	L Curtis	1.30	1,664.00
3 June 2025	Review motion to dismiss bankruptcy case.	A Mitra	0.70	777.00
4 June 2025	Review research re: proxy issues and omnibus resolutions (0.2); research re: motion to dismiss objection (0.2) and outline re: same (0.2).	C Campbell	0.60	768.00
4 June 2025	Review pleadings re: foreclosure action.	A Aquije	0.40	444.00
4 June 2025	Correspondence with C. Tuffey and B. Lingle re: motion to dismiss bankruptcy case and opposition (0.2); review Highland Park precedent and prior research for dismissal opposition (0.8); review background materials re: same (0.6); prepare draft shell objection to motion to dismiss bankruptcy case (1.7); confer with C. Tuffey re: same (0.1); continue review of docket, first day declaration, first day pleadings, and other background materials re: drafting objection (2.2); review and analyze motion to dismiss bankruptcy case of RH Lakewind East LLC (0.7).	A Mitra	6.30	6,993.00
5 June 2025	Correspondence with B. Lingle, G. Pesce and L. Curtis re: litigation issues.	S Hershey	0.40	716.00
5 June 2025	Review precedent, transcripts and prior research for dismissal opposition (0.4); review background materials re: preparation of draft objection (0.2); prepare shell objection to motion to dismiss bankruptcy case (0.6); review C. Tuffey and B. Lingle correspondence re: same (0.2); continue review of docket, first day declaration, first day pleadings, and other relevant materials re: drafting objection (0.3); review and analyze motion to dismiss bankruptcy case of RH Lakewind East LLC (0.4); analyze arguments re: objection to motion to dismiss (0.6).	A Mitra	2.70	2,997.00
6 June 2025	Correspondence with C. Tuffey re: motion to dismiss bankruptcy case and opposition (0.1); review and analyze motion to dismiss, operating agreement and	A Mitra	2.00	2,220.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	corresponding materials (1.3); consider and draft facts in preparation of motion to dismiss opposition (0.6).			
8 June 2025	Review motion to dismiss and related research.	C Campbell	0.20	256.00
8 June 2025	Supplemental review re: background materials re: drafting objection.	A Mitra	1.80	1,998.00
9 June 2025	Correspondence with opposing counsel, L. Curtis and B. Lingle re: discovery on motion to dismiss.	S Hershey	0.60	1,074.00
9 June 2025	Telephone conference with S. Hershey, L. Curtis re: motion to dismiss.	B Lingle	0.50	685.00
9 June 2025	Review discovery requests re: Lakewind motion to dismiss (0.3); confer with S. Hershey re: same (0.1); confer with S. Hershey and others re: same (0.4); confer with S. Hershey and B. Lingle re: same (0.5).	L Curtis	1.30	1,664.00
9 June 2025	Review and analyze motion to dismiss and relevant materials (0.9); consider and draft facts and arguments re: motion to dismiss opposition (2.9); search for and review other related documents re: preparing arguments for draft objection (1.8).	A Mitra	5.60	6,216.00
10 June 2025	Correspondence with G. Pesce re: litigation issues (0.3); correspondence with B. Lingle, C. Campbell and S. Kava re: litigation work (0.4).	S Hershey	0.70	1,253.00
10 June 2025	Confer with S. Kava re: additional potential arguments to incorporate in motion to dismiss objection (0.3); correspondence with C. Tuffey re: same (0.1); further review and analyze motion to dismiss and related documents (1.8) and draft opposition to motion to dismiss (1.8); email to C. Tuffey re: same (0.1).	A Mitra	4.10	4,551.00
10 June 2025	Precedent research for adversary case preparation per S. Kava.	A Venes	0.40	196.00
11 June 2025	Discovery re: motion to dismiss.	B Lingle	1.10	1,507.00
12 June 2025	Prepare discovery for motion to dismiss issues.	B Lingle	1.50	2,055.00
12 June 2025	Review and research re: motion to dismiss objection (1.5) and confer with team re: same (1.6); emails re: responses re: assumption motion (0.1).	C Campbell	3.20	4,096.00
12 June 2025	Draft correspondence to S. Hershey re: discovery for motion to dismiss (0.7); confer with C. Campbell re: same (0.4); draft correspondence to S. Hershey re: same (0.5); draft correspondence to S. Hershey re: same (0.8).	L Curtis	2.40	3,072.00
12 June 2025	Coordinate pleadings re: discovery for motion to dismiss.	A Aquije	0.30	333.00

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12 June 2025	Confer with C. Tuffey re: objection to motion to dismiss (0.2); review A. Aquije emails and additional documents re: same (0.6).	A Mitra	0.80	888.00
13 June 2025	Draft and revise objection re: motion to dismiss (3.4); call with L. Curtis re: same (0.3).	C Campbell	3.70	4,736.00
13 June 2025	Draft correspondence to S. Hershey re: discovery for motion to dismiss (0.1); draft correspondence to S. Hershey re: same (0.4); confer with B. Lingle re: same (0.2); draft correspondence to S. Hershey re: same (0.7); confer with S. Hershey re: same (0.1); draft correspondence to S. Hershey re: same (0.8); confer with C. Campbell re: same (0.2); draft correspondence re: same (0.5); draft correspondence re: same (0.1); draft correspondence to S. Hershey re: same (0.6).	L Curtis	3.70	4,736.00
13 June 2025	Review and revise objection to motion to dismiss.	A Aquije	3.00	3,330.00
13 June 2025	Draft objection to motion to dismiss Lakewind bankruptcy case (2.0); review and analyze supporting document production re: same (1.4); further review litigation team notes and incorporate new arguments into draft objection (2.1); continue to review precedent, key documents, and draft objection (1.0).	A Mitra	6.50	7,215.00
13 June 2025	Set up new EZManage entry for the matter (0.4); stage and process documents (0.4); export documents and load to Relativity (0.4); quality control document load (0.4); process additional documents and load to Relativity (0.5).	K Chen	2.10	1,029.00
13 June 2025	New matter setup (0.6); create new document review database (0.6); reviewer groups and user accounts management (0.6); new data validate and stage for processing (0.6); prepare documents for review (0.6); prepare document production (0.4).	T Chen	3.40	1,666.00
13 June 2025	Quality control loaded documents in Relativity (0.3); emails with case team re: data release (0.2); run saved searches for production universe, conflict checks (0.3); emails with case team re: production signoff (0.3); run production set in Relativity (0.6); export, quality control, compress set (0.6); send to practice tech team for further quality control (0.6); release production set to case team, upload to FTP site (0.4); emails with case team re: finalized specs (0.3).	J Morales	3.60	1,764.00
13 June 2025	Review of data validation reports (0.3); Perform Quality control to ensure data integrity (0.3); Error handling of problematic files (0.3); Stage/normalize data for importing; Status update reports for caseteam (0.3); Perform manual high quality level optical character recognition of relevant items (0.3); set up appropriate structure of the metadata (0.3); Deal with files with problematic extracted text values (0.2).	G Chemborisov	2.00	980.00
14 June 2025	Review documents in connection with motion to dismiss.	B Lingle	0.60	822.00

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14 June 2025	Draft and revise objection to motion to dismiss (4.5); call with S. Hershey and B. Lingle re: assumption motion hearing and witness prep (0.4); draft and revise witness and exhibit list re: same (0.5).	C Campbell	5.40	6,912.00
15 June 2025	Review, revise objection to motion to dismiss.	B Lingle	0.70	959.00
15 June 2025	Draft and revise objection to motion to dismiss.	C Campbell	4.00	5,120.00
15 June 2025	Review and revise draft objection to motion to dismiss Lakewind bankruptcy case (1.0); supplement same incorporating B. Lingle and C. Campbell comments (0.6); provide draft objection to S. Hershey for review (0.1); emails with C. Campbell re: draft LaPuma declaration and exhibits in support of objection (0.2); draft same (0.6).	A Mitra	2.50	2,775.00
16 June 2025	Review and revise objection to motion to dismiss.	S Hershey	1.10	1,969.00
16 June 2025	Draft and revise objection re: motion to dismiss (2.7) and summarize outstanding points re: same (2.8).	C Campbell	5.50	7,040.00
16 June 2025	Research re: corporate formation documents.	A Aquije	0.50	555.00
16 June 2025	Review and revise draft objection to motion to dismiss Lakewind bankruptcy case incorporating team comments (0.4); prepare draft supporting declaration (0.6).	A Mitra	1.00	1,110.00
16 June 2025	Review and revise LaPuma declaration.	J Walz	4.70	4,089.00
17 June 2025	Review and revise objection to motion to dismiss (3.6); correspondence with C. Campbell, B. Lingle and L. Curtis re: related objections (0.3).	S Hershey	3.90	6,981.00
17 June 2025	Review, revise objection to motion to dismiss.	B Lingle	0.80	1,096.00
17 June 2025	Review research re: motion to dismiss objection (0.5); revise declaration in support of objection to motion to dismiss (0.5).	C Campbell	1.00	1,280.00
17 June 2025	Draft correspondence to S. Hershey re: adversary proceeding strategy (0.8); Draft correspondence re: discovery production re: motion to dismiss litigation (0.3); draft further correspondence re: same (0.6); confer with S. Hershey, B. Lingle, and others re: litigation strategy (0.3); draft correspondence to A. Aquije re: legal research re: same (0.3); confer with A. Aquije re: same (0.4).	L Curtis	2.70	3,456.00
17 June 2025	Review and revise objection to motion to dismiss, incorporating comments from S. Hershey.	A Aquije	2.20	2,442.00
17 June 2025	Review comments to draft objection to motion to dismiss Lakewind bankruptcy case (1.3) and correspondence with C. Campbell and A. Aquije re: same (1.4); confer with C. Campbell re: same (0.2);	A Mitra	6.20	6,882.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	review and revise draft LaPuma declaration in support of objection (1.1); review key supporting documents and draft exhibits (1.0); review rules and procedures re: objection filing (0.2); correspondence re: objection outline (0.2); review and revise draft objection and incorporate various comments to same (0.8).			
17 June 2025	Revise LaPuma Declaration (1.30); revise objection to motion to dismiss (0.2); correspondence with A. Mitra and C. Campbell re: same (0.1).	J Walz	1.60	1,392.00
17 June 2025	Export bates stamped images in PDF format (0.5); data transfer and FTP upload (0.6).	T Chen	1.10	539.00
17 June 2025	Assist with exporting produced documents from Relativity (0.2); PDF conversion (0.2); optical character recognition run (0.2); post to FTP site (0.2).	G Chemborisov	0.80	392.00
18 June 2025	Review and revise objection to motion to dismiss.	S Hershey	5.10	9,129.00
18 June 2025	Review objection to motion to dismiss (0.5); telephone conference with G. Pesce and US Attorney (0.2).	B Lingle	0.70	959.00
18 June 2025	Review and revise objection re: motion to dismiss (2.8) and declaration re: same (2.8); calls with L. Curtis re: same (0.4); emails with B. Lingle and S. Hershey re: same (0.2).	C Campbell	6.20	7,936.00
18 June 2025	Confer with S. Hershey re: objection to motion to dismiss (0.2); draft correspondence re: discovery re: same (0.5); revise same (0.6); confer with C. Campbell re: same (0.3); revise same (2.9); confer with S. Hershey re: same (0.1); confer with C. Campbell re: same (0.2); revise same (1.3); draft correspondence re: discovery re: same (0.1); incorporate edits into same (0.7); confer with P. Giovine re: same (0.1); incorporate edits into same (0.1); confer re: S. Hershey re: same (0.2); revise same (0.3); confer with S. Hershey re: same (0.1); confer with P. Giovine re: same (0.2); confer with J. Waltz re: same (0.1); revise same (0.5); confer with C. Campbell re: same (0.1); confer with S. Hershey re: same (0.1); confer with C. Campbell re: same (0.1); revise same (0.5); revise relating pleadings re: same (0.2); confer with S. Hershey re: same (0.1); revise same (1.1) draft correspondence re: discovery re: same (0.1); revise same (1.1); confer with S. Hershey re: same (0.2); further revise same (1.6).	L Curtis	13.70	17,536.00
18 June 2025	Review and revise objection to motion to dismiss (0.9); substantive cite check re: same (0.8); coordinate exhibits re: same (0.3).	A Aquije	2.00	2,220.00
18 June 2025	Review and revise portions of draft objection to motion to dismiss Lakewind bankruptcy case (2.0); draft Lingle declaration re: objection to motion to dismiss (0.3); review and revise same (0.2); assist L. Curtis and C. Campbell re: incorporating S. Hershey comments to draft objection (1.9); review and revise drafts of objection and declaration (0.9); review exhibits re: same	A Mitra	5.80	6,438.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1) and correspondence with L. Curtis re: same (0.1); coordinate filing re: same (0.3).			
18 June 2025	Cite check objection to motion to dismiss (4.3); further review re: objection to motion to dismiss and declaration in support (0.4); legal research re: signature of petition (0.8); legal research re: corporate governance matters (0.7).	P Giovine	6.20	6,138.00
18 June 2025	Review and analyze relevant details in objection to motion to dismiss (0.6); revise declaration in support of objection (0.8); further revise same (0.8); conduct research re: judgment creditor research question (3.4); further revise same re: same (3.5).	J Walz	9.10	7,917.00
18 June 2025	Intake new data, validate, prepare data for processing, and prepare documents for review (1.2); run/create production searches, run review coding conflict checks, prepare production images, and perform image quality checks (1.2); create production sets, run production bates stamping, export produced data, and perform data post-export cleanup (1.2); export bates stamped images in PDF format and data transfer (1.2).	T Chen	4.80	2,352.00
18 June 2025	Complete upload of production set to FTP (0.3); emails with case team re: upload completion (0.3).	J Morales	0.60	294.00
18 June 2025	Verify document production.	V Trinidad	0.50	245.00
18 June 2025	Review of data validation reports (0.1); Perform Quality control to ensure data integrity (0.1); Error handling of problematic files (0.1); Stage/normalize data for importing (0.1); Status update reports for caseteam (0.1); Work on production (0.1); set up searches (0.1); check for conflicts (0.1); image and endorse files (0.2); scrub text for redacted items (0.2); apply redactions to images and their families (0.3).	G Chemborisov	1.50	735.00
18 June 2025	Prepare documents for discovery.	M Magnaye	1.00	420.00
18 June 2025	Review email from R. Antonoff re: deadlines related to motion to dismiss (0.1); update case calendar re: same (0.1); prepare and finalize exhibits to Debtors' objection to motion to dismiss (0.5); review and respond to emails with L. Curtis, A. Mitra, A. Aquije, C. Campbell, J. Walz and S. Hershey re: motion to dismiss filing (0.2); confer with L. Curtis re: upcoming filing of motion to dismiss and declaration (0.2); finalize motion to dismiss (0.3). file motion to dismiss (0.1); finalize and file Lingle declaration in support re: same (0.3).	Hirshorn, Deanna	1.80	882.00
19 June 2025	Correspondence with B. Lingle, L. Curtis and opposing counsel re: DIP objection.	S Hershey	0.50	895.00
19 June 2025	Review and revise objection to motion to dismiss.	J Walz	2.50	2,175.00
20 June 2025	Attend meet and confer with opposing counsel (0.3) and follow-up correspondence re: same (0.2).	S Hershey	0.50	895.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 June 2025	Review motion to dismiss objection outline and filing (0.3); email to G. Pesce re: Highland park dismissal transcript precedent (0.1).	A Mitra	0.40	444.00
20 June 2025	Call with L. Curtis re: research re: motion to dismiss (0.2); legal research re: appeal of motion to dismiss petition (2.9); draft email memo re: research findings (0.4); review privileged documents and create privilege log re: same (4.8).	P Giovine	8.30	8,217.00
23 June 2025	Correspondence with L. Curtis and B. Lingle re: motion to dismiss and DIP objection.	S Hershey	0.80	1,432.00
23 June 2025	Meet with L. Curtis re: privilege log (0.2); update privilege log (0.4).	P Giovine	0.60	594.00
24 June 2025	Draft correspondence to P. Giovine re: motion to dismiss objection discovery (1.0); draft further correspondence to P. Giovine re: same (0.2).	L Curtis	1.20	1,536.00
24 June 2025	Legal research re: adequate protection (2.7); research DIP order budgets re: same (1.6); edit and finalize privilege log, updating document ids, custodians and format (1.2); factual research (1.3) and draft section of DIP reply (1.3); substantive cite check re: DIP reply (2.1).	P Giovine	10.20	10,098.00
24 June 2025	Research re: DIP reply.	J Walz	1.50	1,305.00
24 June 2025	Quality control, stage data for upload to Relativity database (0.3); create ticket for upload (0.2); quality control loaded data in Relativity workspace (0.3); emails with case team re: data release (0.2).	J Morales	1.00	490.00
24 June 2025	Assist with document upload (0.1); populate metadata fields (0.1); run optical character recognition (0.1); update index (0.1); run quality control checks (0.1).	G Chemborisov	0.50	245.00
24 June 2025	Assist J. Morales with Processing and promoting records to Relativity.	S Binuya	0.50	210.00
25 June 2025	Review and revise DIP reply (0.9); correspondence with L. Curtis and G. Pesce re: same (0.3); correspondence with L. Curtis and B. Lingle re: same (0.5); prepare for argument (3.2).	S Hershey	4.90	8,771.00
25 June 2025	Substantive check Reply to DIP Objection (2.8); draft argument distinguish case law cited in DIP Objection (0.8); legal research re: adequate protection (2.4); meet with L. Curtis re: contested matter hearing binders (0.2); call with D. Hirshorn re: hearing material preparation (0.2).	P Giovine	6.40	6,336.00
25 June 2025	Review motion to dismiss pleadings (0.5), pull legal authority re: same (0.5); prepare electronic legal authority binder of materials cited in motion to dismiss and corresponding reply (0.9); prepare electronic legal	Hirshorn, Deanna	3.70	1,813.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	authority binder of materials cited in Debtors' objection to motion to dismiss (1.8).			
SUBTOTAL: Litigation & Discovery			221.10	243,406.00

Nonworking Travel

26 June 2025	Non-working travel to and from Trenton for hearing on motion to dismiss and DIP (billed at half time).	S Hershey	2.00	3,580.00
26 June 2025	Travel back from hearing in Trenton (billed at half time).	B Lingle	0.80	1,096.00
SUBTOTAL: Nonworking Travel			2.80	4,676.00

Professional Retention & Fees – W&C

9 June 2025	Review and update W&C retention application (0.8) and follow up re: conflicts search and potential parties in interest list (0.7).	C Campbell	1.50	1,920.00
9 June 2025	Review and revise potential parties in interest list.	A Aquije	0.60	666.00
10 June 2025	Review conflicts report re: retention application (1.0); email summary to B. Lingle re: same (0.3); draft escrow agreement (1.2).	S Kava	2.50	3,200.00
11 June 2025	Review, revise pro fee escrow agreement.	B Lingle	1.20	1,644.00
11 June 2025	Draft pro fee escrow agreement.	S Kava	1.00	1,280.00
12 June 2025	Coordinate re: opening of professional fee escrow.	B Lingle	0.70	959.00
12 June 2025	Research re: precedent retention application (0.3); email G. Delgado re: same (0.1).	Hirshorn, Deanna	0.40	196.00
13 June 2025	Revise pro fee escrow agreement.	S Kava	2.30	2,944.00
15 June 2025	Follow up re: retention applications.	C Campbell	0.20	256.00
16 June 2025	Review conflicts report (2.8); confer with B. Lingle re: conflicts issues (0.4).	F He	3.20	5,216.00
16 June 2025	Review, revise W&C retention application (1.3); review conflicts reports (1.1).	B Lingle	2.40	3,288.00
16 June 2025	Emails with Fan He re: W&C retention application and conflicts search.	C Campbell	0.20	256.00
17 June 2025	Review connection reports for W&C retention and related materials (2.7); confer with B. Lingle re: same (0.3); draft retention disclosure schedule (0.4); review additional conflicts report (0.8).	F He	4.20	6,846.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
17 June 2025	Review, revise W&C retention application (1.0) and correspond with C. Campbell re: same (1.0).	B Lingle	2.00	2,740.00
17 June 2025	Revise retention application (2.8); follow up re: conflicts search and review same (0.3); call with B. Lingle re: same (0.2).	C Campbell	3.30	4,224.00
18 June 2025	Review and revise disclosure for W&C retention (0.6); confer with B. Lingle re: same (0.4); further revise retention disclosure schedule (0.1).	F He	1.10	1,793.00
18 June 2025	Review, revise W&C retention application (1.2); telephone conferences with G. Pesce re: W&C retention application (2.1) and revise same (2.1); conduct conflicts search (0.6).	B Lingle	6.00	8,220.00
18 June 2025	Revise W&C retention application (0.6) and follow up re: same (0.5).	C Campbell	1.10	1,408.00
18 June 2025	Review and revise W&C retention application (0.3); confer with C. Campbell re: same (0.2); research precedent regarding notice for retention applications (0.3); draft email response to B. Lingle re: same (0.2); confer with B. Lingle re: upcoming filing of same (0.1); finalize and file W&C retention application (0.3).	Hirshorn, Deanna	1.40	686.00
20 June 2025	Coordinate with summer associate K. Taylor re: legal research on escrow accounts under the bankruptcy code.	J Walz	0.20	174.00
23 June 2025	Follow up re: W&C retention application connections search.	C Campbell	0.10	128.00
23 June 2025	Review summer associate legal research re: escrow account treatment under the Bankruptcy Code.	J Walz	0.10	87.00
24 June 2025	Draft supplemental Pesce declaration (1.4); revise LaPuma declaration (0.6); revise W&C retention order (0.4).	B Lingle	2.40	3,288.00
24 June 2025	Emails with team re: LaPuma declaration and revisions to W&C retention application (0.2); review comments re: same (0.1).	C Campbell	0.30	384.00
25 June 2025	Revise supplemental Pesce declaration (1.5); coordinate items in connection with W&C retention (1.1).	B Lingle	2.60	3,562.00
25 June 2025	Prepare notice of revised proposed order re: retention application.	A Aquije	0.20	222.00
25 June 2025	Review, finalize and file notice of filing revised proposed W&C retention order (0.2); review, finalize and file LaPuma declaration in support of W&C retention (0.1); review, finalize and file Supplemental Pesce declaration in support of W&C retention (0.1); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.50	245.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
SUBTOTAL: Professional Retention & Fees – W&C			41.70	55,832.00

Professional Retention & Fees – Other

1 June 2025	Incorporate final comments re: Verita retention order (0.3); prepare new order for filing (0.5).	G Delgado	0.80	792.00
2 June 2025	Incorporate final comments re: Verita retention order (0.6); prepare same for filing (0.3).	G Delgado	0.90	891.00
2 June 2025	Review (0.1), finalize (0.1) and file Verita revised proposed retention order (0.1).	Hirshorn, Deanna	0.30	147.00
6 June 2025	Draft retention application for Verita.	A Aquije	2.00	2,220.00
9 June 2025	Review and comment on advisor engagement letters (1.0) and follow up with team re: next steps re: same (1.0).	C Campbell	2.00	2,560.00
9 June 2025	Draft Verita retention application.	A Aquije	0.70	777.00
9 June 2025	Review and revise proposed Verita Retention Application order.	Hirshorn, Deanna	0.10	49.00
11 June 2025	Review, revise IslandDundon engagement letter.	B Lingle	0.80	1,096.00
11 June 2025	Review Dundon retention application and B. Lingle comments (0.2); prepare draft of Dundon retention application (0.3).	A Mitra	0.50	555.00
12 June 2025	Review, revise Verita 327 retention application.	B Lingle	1.90	2,603.00
12 June 2025	Review and revise Verita retention application, incorporating comments from B. Linge (1.1); draft motion to shorten notice re: same (0.1).	A Aquije	1.20	1,332.00
12 June 2025	Correspondence with C. Tuffey re: Dundon retention application (0.2); incorporate engagement letter comments to draft retention application (0.3); prepare draft Dundon retention application (0.7), proposed order (0.7), declaration (0.6); revise connections disclosure schedule (0.4).	A Mitra	2.90	3,219.00
13 June 2025	Review, revise Verita 327 application.	B Lingle	0.70	959.00
13 June 2025	Further revise Verita retention application, incorporating comments from Verita (1.1); review and revise application to shorten time (0.2).	A Aquije	1.30	1,443.00
13 June 2025	Research precedent financial advisor and investment banker retention applications (2.5); emails with C. Tuffey re: Dundon retention application (0.2); review and revise engagement letter (0.3); prepare draft of same (0.3).	A Mitra	3.30	3,663.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
14 June 2025	Research additional restructuring services precedent (2.0); review various Dundon retention applications precedent (1.7); research re: real estate asset focused precedent applications and engagement terms (1.1); prepare draft Dundon retention application and declaration (3.4).	A Mitra	8.20	9,102.00
15 June 2025	Emails with B. Lingle and C. Tuffey re: Dundon retention application (0.2); review other draft retention applications in case (0.6); review engagement agreement (0.4); review and revise draft of same and declaration (1.6).	A Mitra	2.80	3,108.00
16 June 2025	Review, revise Verita 327 order.	B Lingle	0.60	822.00
16 June 2025	Review and respond re: questions re: Dundon retention application (0.1); emails with G. Delgado re: K. Rosen retention application (0.1).	C Campbell	0.20	256.00
16 June 2025	Review and revise Verita retention application, incorporating comments from the U.S. Trustee's office (0.7); draft notice of proposed order re: same (0.2); coordinate filing re: same (0.2).	A Aquije	1.10	1,221.00
16 June 2025	Draft Ken Rosen Advisors retention application.	G Delgado	2.70	2,673.00
16 June 2025	Review and finalize Notice of Filing Revised Verita Retention Order (0.1); file same (0.1); coordinate service of same with Verita (0.1); review and respond to emails with G. Delgado re: Rosen Retention Application (0.1); search for Word version of precedent (0.2); revise Rosen Retention Application (0.7).	Hirshorn, Deanna	1.30	637.00
17 June 2025	Emails with B. Lingle and C. Tuffey re: Dundon retention application.	A Mitra	0.10	111.00
18 June 2025	Finalize K. Rosen retention application.	C Campbell	0.20	256.00
18 June 2025	Draft Dundon declaration re: retention application.	A Mitra	0.40	444.00
18 June 2025	Review Ken Rosen retention application before filing.	G Delgado	0.60	594.00
18 June 2025	Review and finalize retention application for K. Rosen (0.2); file same (0.1).	Hirshorn, Deanna	0.30	147.00
19 June 2025	Telephone conference with C. Campbell re: engagement of real estate broker.	B Lingle	0.50	685.00
19 June 2025	Call with J. Walz re: ordinary course professional motion.	C Campbell	0.10	128.00
19 June 2025	Review precedent investment banker and financial advisor retention applications and engagement terms (1.1); review, revise, and incorporate B. Lingle comments to Dundon engagement letter (0.3); further review and revise Dundon retention application (0.9); email to C. Campbell re: same (0.1).	A Mitra	2.40	2,664.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 June 2025	Review and respond to emails with G. Pesce and W&C Team re: retention application for real estate broker (0.1); research precedent re: same (1.2); email B. Lingle and C. Campbell re: same (0.1).	Hirshorn, Deanna	1.40	686.00
20 June 2025	Review and revise Dundon retention application.	C Campbell	1.20	1,536.00
20 June 2025	Review updated draft Dundon retention application from C. Campbell.	A Mitra	0.20	222.00
20 June 2025	Draft interim compensation motion.	J Walz	0.90	783.00
21 June 2025	Draft letter re: verification of employment re: Elizabeth LaPuma.	G Delgado	0.40	396.00
21 June 2025	Call with summer associate and B. Lingle re: research assignment on treatment of escrow accounts under the bankruptcy code (0.3); draft interim compensation motion (0.8).	J Walz	1.10	957.00
22 June 2025	Draft interim compensation motion.	J Walz	2.10	1,827.00
23 June 2025	Confer with J. Walz re: ordinary course professional motion issues.	F He	0.40	652.00
23 June 2025	Review United States Trustee comments re: Ken Rosen retention application (0.1); follow up with W&C team re: same (0.1); follow up with Dundon team re: connections search and review revisions to retention application (0.2).	C Campbell	0.40	512.00
23 June 2025	Review M. Dundon comments to draft IslandDundon retention application (0.2); emails with C. Campbell re: same (0.1).	A Mitra	0.30	333.00
23 June 2025	Update substance and formatting re: Ken Rosen engagement letter (1.0); email re: same to E. LaPuma (0.1); emails with K. Rosen and W&C team re: United States Trustee comments (0.6); update Ken Rosen retention application re: same (1.1).	G Delgado	2.80	2,772.00
23 June 2025	Draft interim compensation motion.	J Walz	2.40	2,088.00
24 June 2025	Review and revise ordinary course professional motion (1.8); confer with J. Waltz re: issues re: same (0.5); follow up discussion with J. Waltz re: same (0.3); review material for ordinary course professional motion (0.4); confer with J. Waltz re: same (0.3); review and revise interim compensation motion (1.0).	F He	4.30	7,009.00
24 June 2025	Review and revise Ken Rosen retention application (0.8); draft LaPuma declaration re: same (0.8); comment re: exhibits and supplemental declaration (0.7); review and revise broker listing agreement (0.9).	C Campbell	3.20	4,096.00
24 June 2025	Update Ken Rosen order and verified statement.	G Delgado	1.80	1,782.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
24 June 2025	Call with F. He re: ordinary course professional motion (0.2); Revise ordinary course professional Motion (5.9); coordinate with J. Utz from Lynd re: ordinary course professional Motion (0.1).	J Walz	6.20	5,394.00
24 June 2025	Review and respond to emails with G. Delgado re: Rosen retention application.	Hirshorn, Deanna	0.20	98.00
25 June 2025	Confer with J. Walz re: ordinary course professional motion issues (0.3); review and revise ordinary course professional motion (1.2).	F He	1.50	2,445.00
25 June 2025	Review and finalize for filing Ken Rosen retention application, supplemental declarations, and related exhibits (0.9); call with B. Lingle re: revisions to proposed broker agreement (0.2).	C Campbell	1.10	1,408.00
25 June 2025	Review and revise Dundon retention application per M. Dundon comments (1.8); research in connection with same (0.3); review precedent and supplement draft declarations in support of Dundon retention application (0.4).	A Mitra	2.50	2,775.00
25 June 2025	Incorporate C. Campbell comments re: Ken Rosen retention (0.6); emails re: same with K. Rosen and J. Sponder (0.4).	G Delgado	1.00	990.00
25 June 2025	Draft shell of real estate broker retention application.	Hirshorn, Deanna	1.30	637.00
26 June 2025	Call with G. Delgado (0.1) and follow up re: Ken Rosen retention application (0.1).	C Campbell	0.20	256.00
26 June 2025	Turn final comments re: Ken Rosen retention.	G Delgado	0.30	297.00
26 June 2025	Update ordinary course professional motion (1.7); correspondence with F. He re: same (0.1).	J Walz	1.80	1,566.00
26 June 2025	Review emails between G. Delgado, B. Lingle and C. Campbell re: Ken Rosen retention application (0.1); review, finalize and file notice of revised proposed Ken Rosen retention order (0.2); review and file notice of supplemental Ken Rosen statement (0.1); Review and respond to emails with G. Delgado re: upcoming filing (0.1); review, finalize and file verified statement of Kenneth A. Rosen in support of Ken Rosen retention application (0.3); coordinate service with Verita (0.1).	Hirshorn, Deanna	0.90	441.00
28 June 2025	Finalize broker retention issues and address engagement letters.	G Pesce	0.80	1,680.00
28 June 2025	Review financial advisor and investment banker retention precedent in New Jersey (0.2), United States Trustee comments (0.2), and supplemental LaPuma declaration re: retention application (0.2); review and revise additional LaPuma declaration in support of IslandDundon retention accordingly (0.3).	A Mitra	0.90	999.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 June 2025	Confer with G. Delgado re: Hilco retention application.	F He	0.20	326.00
30 June 2025	Emails with team re: ID retention application and outstanding tasks (0.2); review and follow up re: same (0.1).	C Campbell	0.30	384.00
30 June 2025	Call with W&C team re: broker (0.5); review engagement letter re: same (0.2).	S Kava	0.70	896.00
30 June 2025	Review and revise Dundon retention application per M. Dundon comments (1.0); precedent search and research in connection with same (0.6); prepare draft LaPuma declaration in support of Dundon retention application (0.5); call with Island Capital re: connections and disclosure (0.2); attention to correspondence re: Dundon conflicts review and required disclosures (0.3); draft disclosure per same and G. Pesce comments (0.3); correspondence and call with C. Campbell re: same (0.4); further review and revise IslandDundon retention package and incorporate G. Pesce comments (0.2); emails with IslandDundon Team and G. Pesce re: same (0.2).	A Mitra	3.70	4,107.00
30 June 2025	Call with F. He re: Hilco retention (0.2); review and research precedent re: same (2.1); discuss comments re: IslandDundon retention application with A. Mitra (0.5).	G Delgado	2.80	2,772.00
30 June 2025	Revise ordinary course professionals motion (0.5); revise interim compensation motion (0.7).	J Walz	1.20	1,044.00
30 June 2025	Review and revise IslandDundon Retention application for A. Mitra.	Hirshorn, Deanna	0.20	98.00
SUBTOTAL: Professional Retention & Fees – Other			91.60	99,418.00

Reports, Schedules & U.S. Trustee Issues

4 June 2025	Coordinate with IslandDundon and W&C teams re: bank accounts (0.4); telephone conference with IslandDundon re: schedules, MORs, bank accounts (0.6).	B Lingle	1.00	1,370.00
5 June 2025	Confer with team re: research re: schedules and statements (0.1) and review same (0.1).	C Campbell	0.20	256.00
5 June 2025	Review United States Trustee website re: MOR deadline.	Hirshorn, Deanna	0.20	98.00
10 June 2025	Search for legal proceedings, investigations, audits, arbitrations, or mediations from the last year involving Crown Capital and its affiliated debtors.	A Ko	5.80	3,509.00
11 June 2025	Research re: SOFAs.	A Aquije	1.40	1,554.00
12 June 2025	Email Dundon re: initial debtor interview.	S Kava	0.10	128.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 June 2025	Participate in Initial Debtor Interview.	B Lingle	1.60	2,192.00
17 June 2025	Review, revise final orders re: U.S. Trustee comments.	B Lingle	1.80	2,466.00
17 June 2025	Review and revise global notes.	C Campbell	2.30	2,944.00
18 June 2025	Correspond with United States Trustee re: second day orders and file same.	B Lingle	0.70	959.00
18 June 2025	Incorporate U.S. Trustee comments re: final orders.	G Delgado	1.20	1,188.00
20 June 2025	Telephone conference with C. Campbell, A. Aquije, A. Mitra re: schedules and statements (0.5); review, revise schedules and statements (2.4) and global notes re: same (2.4).	B Lingle	5.30	7,261.00
20 June 2025	Call with B. Lingle, A. Mitra, A. Aquije re: schedules and statements review (0.5); review and comment on schedules and statements (2.0); review and revise global notes re: same (1.4); review research re: legal actions for schedules/statements and update same (1.1); further revise schedules and statements (1.0); further revise schedules and statements (0.6) and factual research re: same (0.7).	C Campbell	7.30	9,344.00
20 June 2025	Call with W&C team re: schedules and SOFAs (0.7); review and revise schedules and SOFAs (2.9).	A Aquije	3.60	3,996.00
20 June 2025	Call with B. Lingle, C. Campbell, and A. Aquije re: global notes and schedules and statements (0.6); perform review of schedules and statements for debtors (2.0); draft comments re: Kelly Hamilton entities and Crown entity (0.6); emails with C. Campbell and A. Aquije re: same (0.2); supplement comments and notes (0.5); review global notes markup (0.1).	A Mitra	4.00	4,440.00
21 June 2025	Review, revise schedules and statements, global notes (1.0 and correspond with W&C team re: same (1.0).	B Lingle	2.00	2,740.00
21 June 2025	Review and revise global notes (1.1) and factual research re: same (1.1).	C Campbell	2.20	2,816.00
21 June 2025	Correspondence with B. Lingle, C. Campbell, and A. Aquije re: global notes and schedules and statements (0.4); attention to correspondence with IslandDundon re: same (0.1).	A Mitra	0.50	555.00
22 June 2025	Review, revise schedules and statements, global notes.	B Lingle	2.30	3,151.00
22 June 2025	Review and comment on SOFA/Schedules re: Dundon comments (1.6) and revise global notes re: same (1.6).	C Campbell	3.20	4,096.00
23 June 2025	Review amended petitions (0.5); coordinate re: initial debtor interview follow up items (0.4); review, revise global notes (0.9); review, revise schedules and statements (0.9).	B Lingle	2.70	3,699.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 June 2025	Review and revise schedules and statements and global notes (2.4); multiple follow ups re: questions and outstanding comments to same (2.4); and finalize for filing (2.5).	C Campbell	7.30	9,344.00
23 June 2025	Review proposed schedules and SOFAs prior to filing.	A Aquije	1.00	1,110.00
23 June 2025	Review final drafts of schedules and statements (0.5) and provide comments and issues list to C. Campbell and B. Lingle (0.5); correspondence with same re: same (0.2); review revised finalized drafts for filing (0.2).	A Mitra	1.40	1,554.00
23 June 2025	Coordination re: 341(a) meeting.	J Walz	0.50	435.00
23 June 2025	Review and revise schedules and statements for C. Campbell (0.6); review precedent for filing schedules and statements in New Jersey (0.2); assist in filing re: same (0.8); attempt to file schedules and statements (1.0); confer with C. Campbell re: filing of same and errors (0.5).	Hirshorn, Deanna	3.10	1,519.00
24 June 2025	Coordinate filing of schedules and statements (0.3); conference with C. Campbell re: schedules and statements (0.3).	B Lingle	0.60	822.00
24 June 2025	Calls with D. Hirshorn, K. Rosen and team re: schedules/statements filing and follow up (0.4); emails with IslandDundon team re: same (0.4).	C Campbell	0.80	1,024.00
24 June 2025	Continue filing schedules (0.2); confer with C. Campbell re: next steps (0.1); review emails from C. Campbell re: filing of schedules and statements (0.1); continue filing schedules and statements (0.5); telephone calls to help desk re: error when filing (0.4); confer with C. Campbell re: same (0.3); emails with K. Rosen, M. Parente, G. Pesce, B. Lingle, C. Campbell and Managing Clerks re: same (0.1); emails with New Jersey Bankruptcy Clerk re: internally filing our Schedules and Statements (0.2).	Hirshorn, Deanna	1.90	931.00
27 June 2025	Coordination with IslandDundon team re: schedules of payments (0.7); research re: same (0.5).	J Walz	1.20	1,044.00
28 June 2025	Review and summarize schedules/statements re: open questions (0.3) and emails with B. Lingle and G. Pesce re: same (0.2).	C Campbell	0.50	640.00
30 June 2025	Review MORs (0.6); telephone conference with IslandDundon team re: MORs, amended schedule for CBRM (0.2).	B Lingle	0.80	1,096.00
30 June 2025	Emails with ID team re: schedules/statements amendments.	C Campbell	0.10	128.00
30 June 2025	Review, redact and finalize monthly operating report in preparation for filing (1.5); confer with B. Lingle re: same (0.2); file monthly operating reports (0.5).	Hirshorn, Deanna	2.20	1,078.00
SUBTOTAL: Reports, Schedules & U.S. Trustee Issues			70.80	79,487.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Development of Claims and Causes of Action				
2 June 2025	Review facts re: adversary complaint (0.5) and correspondence with L. Curtis and G. Pesce re: same (0.5); correspondence with opposing counsel re: litigation schedule (0.3).	S Hershey	1.30	2,327.00
20 June 2025	Review correspondence re: procedure re: contesting purported liens.	B Lingle	0.50	685.00
20 June 2025	Draft correspondence to S. Hershey re: adversary proceeding research (0.7); draft further correspondence re: same (0.3).	L Curtis	1.00	1,280.00
20 June 2025	Draft complaint re: avoidance action.	A Aquije	1.60	1,776.00
21 June 2025	Draft complaint re: avoidance action.	A Aquije	0.50	555.00
22 June 2025	Revise adversary proceeding complaint (1.5); further revise same (0.5); further revise same (1.7); further revise same (0.5).	L Curtis	4.20	5,376.00
22 June 2025	Review and revise adversary complaint, incorporating comments from L. Curtis.	A Aquije	3.70	4,107.00
23 June 2025	Conduct research re: status of outstanding litigation (2.4); draft correspondence to G. Pesce and S. Hershey re: same (1.5).	L Curtis	3.90	4,992.00
25 June 2025	Confer with W&C team re: adversary complaint (3.0); assist with drafting and revising adversary complaint (4.0); review exhibits to adversary complaint (0.9).	J Yoo	7.90	10,823.00
25 June 2025	Draft new count and background section for adversary complaint, incorporating comments from G. Pesce (2.0); call with J. Yoo and B. Kakani (0.2); further revise same, incorporating comments from J. Yoo (2.8).	A Aquije	5.00	5,550.00
25 June 2025	Prepare filing checklist for adversary complaint.	B Kakani	2.40	2,088.00
26 June 2025	Assist with drafting and revising adversary complaint (3.0); confer with W&C team re: same (0.5).	J Yoo	3.50	4,795.00
26 June 2025	Substantive cite check re: adversary complaint.	A Aquije	1.20	1,332.00
26 June 2025	Factual research re: operating agreement.	P Giovine	0.30	297.00
26 June 2025	Prepare summons (0.5); notice of pre-trial conference; (0.5) and certificate of service for adversary complaint (0.6).	B Kakani	1.60	1,392.00
28 June 2025	Draft correspondence to S. Hershey re: adversary proceeding legal research.	L Curtis	0.20	256.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 June 2025	Draft correspondence to G. Pesce re: adversary proceeding legal research.	L Curtis	0.30	384.00
29 June 2025	Legal research re: service under FRBP 2004, FRCP 45, and DNJ LBR 2004-1 (1.8); legal research re: applicability of FRCP 30 to Rule 2004 Examination (0.9); legal research re: personal service requirement under FRCP 45 in third circuit (1.2); legal research re: procedures for serving inmate (2.8); legal research re: service via United States Marshals (1.4).	P Giovine	8.10	8,019.00
30 June 2025	Draft correspondence to P. Giovine re: discovery legal research.	L Curtis	0.20	256.00
SUBTOTAL: Development of Claims and Causes of Action			47.40	56,290.00
Asset Sales: NOLA				
28 June 2025	Review and revise NOLA Listing Agreement.	C Campbell	0.30	384.00
SUBTOTAL: Asset Sales: NOLA			0.30	384.00
TOTAL			1,497.00	1,818,485.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

TIMEKEEPER SUMMARY	TITLE	HOURS	RATE
D Viklund	Partner	5.10	2,350.00
E Leone	Partner	0.20	2,200.00
G Pesce	Partner	48.80	2,100.00
D Pezza	Partner	2.40	2,100.00
A Cieply	Partner	0.50	1,900.00
J McCoy	Partner	1.00	1,900.00
S Hershey	Partner	35.00	1,790.00
L Baccash	Partner	5.60	1,690.00
F He	Counsel	62.70	1,630.00
J Kim	Level 9	6.80	1,520.00
B Lingle	Level 6	189.80	1,370.00
J Yoo	Level 6	11.40	1,370.00
C Campbell	Level 5	119.60	1,280.00
L Curtis	Level 5	105.90	1,280.00
S Kava	Level 5	187.60	1,280.00
N Pepin	Level 5	89.40	1,280.00
D Rivero	Level 5	7.90	1,280.00
A Aquije	Level 3	107.80	1,110.00
A Mitra	Level 3	148.30	1,110.00
G Delgado	Level 2	113.80	990.00
Y El Zohiry	Level 2	1.40	990.00
P Giovine	Level 2	57.00	990.00
B Kakani	Level 1	4.00	870.00
J Walz	Level 1	85.90	870.00
T Chen	Project Manager - Litigation Support	9.30	490.00
K Chen	Project Manager - Litigation Support	2.10	490.00
J Morales	Project Manager - Litigation Support	5.20	490.00
V Trinidad	Project Manager - Litigation Support	0.50	490.00

Crown Capital Holdings LLC
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TIMEKEEPER SUMMARY	TITLE	HOURS	RATE
G Chemborisov	Litigation Specialist	4.80	490.00
S Binuya	Litigation Specialist	0.50	420.00
M Magnaye	Litigation Specialist	1.00	420.00
Hirshorn, Deanna	Legal Assistant	62.20	490.00
A Venes	Legal Assistant	5.40	490.00
K Wick	Legal Assistant	2.30	490.00
A Ko	Research Professional	5.80	605.00
TOTAL		1,497.00	

DISBURSEMENT SUMMARY	USD
Court Costs	17,380.00
Deposition Transcripts	862.50
Document Research	24.98
E-Discovery Data Hosting / Storage	6.50
E-Discovery Data Processing	105.00
E-Discovery Production	260.00
Express Mail	63.73
Professional Service	583.80
Taxi - Business	672.61
TOTAL	19,959.12