

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

**ATTORNEY MONTHLY FEE STATEMENT COVER
SHEET FOR THE PERIOD AUGUST 1, 2025 THROUGH AUGUST 31, 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.



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

Summary of Amounts Requested for the Period
August 1, 2025 through August 31, 2025 (the “Compensation Period”)

Fee Total	\$1,459,872.00
Disbursement Totals	\$8,097.39
Total Fees Plus Disbursements	\$1,467,969.39

Summary of Amounts Requested for Previous Records

Total Previous Fees and Expenses Requested	\$3,641,975.44
Total Fees and Expenses Allowed to Date	\$0.00
Total Retainer Remaining	\$0.00
Total Holdback	\$721,870.80 ¹
Total Received by Applicant	\$2,920,104.64 ¹

¹ As of the date hereof, the objection deadline to the third monthly fee statement has passed but payment has not yet been processed.

Name	Title	Year Admitted	Department	Hours	Rate	Fees
Aquije, Alonso	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	132.5	\$1,110.00	\$147,075.00
Baccash, Laura	Partner	2003	Financial Restructuring & Insolvency (FRI) Practice	87.5	\$1,690.00	\$147,875.00
Branson, Ariell	Associate	2023	Litigation Practice	10.4	\$1,110.00	\$11,544.00
Chemborisov, Gleb	Litigation Specialist	N/A	Timekeeper Pool	2.5	\$490.00	\$1,225.00
Chen, Tony	Manager of Litigation Support	N/A	Timekeeper Pool	3.7	\$490.00	\$1,813.00
Cohen, Joel	Partner	1989	White Collar Practice	1.7	\$2,350.00	\$3,995.00
Curtis, Lucas	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	123.3	\$1,280.00	\$157,824.00
Delgado, Gabriela	Associate	2023	Financial Restructuring & Insolvency (FRI) Practice	21.8	\$990.00	\$21,582.00
Gaertner, Reilly	Associate	2016	Real Estate Practice	4.1	\$1,520.00	\$6,232.00
Gallo, Carlos	Legal Assistant	N/A	Litigation Practice	5.9	\$420.00	\$2,478.00
Galvan, Paolo	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	1.0	\$420.00	\$420.00
Giovine, Peter	Associate	2023	Financial Restructuring & Insolvency (FRI) Practice	149.8	\$990.00	\$148,302.00
Hershey, Samuel	Partner	2013	Financial Restructuring & Insolvency (FRI) Practice	21.9	\$1,790.00	\$39,201.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	72.3	\$490.00	\$35,427.00
Kava, Sam	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	175.7	\$1,280.00	\$224,896.00
Lingle, Barrett	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	136.1	\$1,370.00	\$186,457.00
Ludovici, Stephen	Staff Attorney	2014	Financial Restructuring & Insolvency (FRI) Practice	1.3	\$1,110.00	\$1,443.00
Mitra, Anais	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	43.3	\$1,110.00	\$48,063.00
Morales, Jon	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	3.8	\$490.00	\$1,862.00
Pesce, Gregory	Partner	2011	Financial Restructuring & Insolvency (FRI) Practice	20.8	\$2,100.00	\$43,680.00
Pezza, David	Partner	1985	Real Estate Practice	8.2	\$2,100.00	\$17,220.00
Rivero, Devin	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	120.6	\$1,280.00	\$154,368.00
Rosenberg, Erin	Partner	2012	Financial Restructuring & Insolvency (FRI) Practice	1.1	\$1,790.00	\$1,969.00
Sutherland, Gabe	Associate	2023	Financial Restructuring & Insolvency (FRI) Practice	39.0	\$1,110.00	\$43,290.00
Venes, Aileen	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	10.1	\$490.00	\$4,949.00
Wick, Katie	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	11.4	\$490.00	\$5,586.00
Yoo, Jade	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	0.8	\$1,370.00	\$1,096.00
Grand Total				1,210.6		\$1,459,872.00

SECTION II
SUMMARY OF SERVICES

Matter Number	Services Rendered	Hours	Fees
B01	Asset Sales: Kelly Hamilton	16.1	\$20,953.00
B02	Automatic Stay Issues	90.0	\$93,609.00
B04	Vendors, Taxes, Insurance and Business Operations Issues	8.3	\$11,512.00
B05	Case Administration	71.0	\$73,169.00
B06	Case Strategy	7.6	\$10,888.00
B07	Claims Administration & Objections	21.2	\$25,182.00
B08	Financing Matters: NOLA	4.7	\$6,127.00
B09	Financing Matters: Kelly Hamilton	1.0	\$1,380.00
B10	Creditor Meetings & Statutory Committees	0.4	\$512.00
B11	Exclusivity, Plan & Disclosure Statement: Kelly Hamilton	381.3	\$485,942.00
B12	Executory Contracts & Unexpired Leases	34.0	\$17,892.00
B13	Hearings & Court Matters	24.1	\$25,142.00
B14	Litigation & Discovery	84.8	\$92,078.00
B16	Professional Retention & Fees – W&C	38.6	\$47,398.00
B17	Professional Retention & Fees – Other	47.1	\$60,245.00
B18	Reports, Schedules & U.S. Trustee Issues	27.9	\$32,343.00
B19	Development of Claims and Causes of Action	187.4	\$226,820.00
B20	Asset Sales: NOLA	54.2	\$85,820.00
B21	Exclusivity, Plan & Disclosure Statement: NOLA	110.9	\$142,860.00
Grand Total		1,210.6	\$1,459,872.00

SECTION III
SUMMARY OF DISBURSEMENTS

Disbursements	Amount
Computer Services	\$102.40
Courier Service	\$75.63
Court Costs	\$1,976.60
Document Research	\$415.84
E-Discovery Data Hosting / Storage	\$41.80
E-Discovery Data Processing	\$50.40
E-Discovery Production	\$130.00
Express Mail	\$27.69
Filing Fees	\$108.18
Overtime Meals	\$105.12
Service Fees	\$710.00
Taxi - Business	\$4,240.25
Taxi - Overtime	\$55.56
Travel Meals	\$57.92
Grand Total	\$8,097.39

SECTION IV
CASE HISTORY

- (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) With respect to the Kelly Hamilton Debtors, the Applicant reviewed, revised, and negotiated successive iterations of the Debtors' disclosure statement and chapter 11 plan; engaged with stakeholders regarding their formal and informal objections and concerns with respect to the disclosure statement and plan; worked on solicitation of the chapter 11 plan; completed the bidding process for the Kelly Hamilton property, including announcing the winning bidder; prepared and filed plan supplements [Docket Nos. 411, 502, 512]; prepared declarations in support of confirmation [Docket Nos. 462, 471, 472]; prepared a memorandum of law in support of confirmation [Docket No. 470]; prepared for the confirmation hearing, which was held on September 4, 2025; and prepared a proposed confirmation order, which was entered by the Court on September 5, 2025 [Docket No. 525].
 - (b) The Applicant engaged in extensive litigation and discovery, including: opposing a motion to appoint an equity committee [Docket No. 374]; seeking leave to obtain discovery from a prisoner [Docket No. 378]; opposing discovery sought by said prisoner [Docket No. 375]; objecting to the claims of said prisoner [Docket No. 372]; seeking an extension of the Debtors' removal period [Docket No. 385]; and addressing certain state court litigation matters, especially as it may impact the estate.
 - (c) The Applicant assisted the Debtors in finalizing the Court's approval of the retention of its other professionals, particularly IslandDundon, Larry G. Schedler & Associates, and Hilco [Docket No. 434, 435, 514].
 - (d) The Applicant moved forward with an asset sale in connection with the NOLA Properties, including preparing a bid procedures motion [Docket No. 350], and proposed order, later approved by the Court [Docket No. 382]; drafting, negotiating and revising an asset purchase agreement in connection with same, and ancillary

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.

documents; and assisting the Debtors and its professionals in bidder outreach in advance of the bidding deadline.

- (e) With respect to the NOLA Debtors, the Applicant reviewed, revised, and negotiated successive iterations of the Debtors' disclosure statement and chapter 11 plan; engaged with stakeholders regarding their formal and informal objections and concerns with respect to the disclosure statement and plan; prepared and filed a motion seeking conditional approval of the disclosure statement and solicitation procedures [Docket No. 391], later approved by the Court [Docket No. 522]; and began preparing for confirmation of the plan.
 - (f) The Applicant attended and participated in the hearings held August 14 and 21, 2025.
 - (g) The Applicant tended to other matters concerning administration of the chapter 11 cases.
 - (h) 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 *Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of its Debtor Affiliates (With Technical Modifications)* [Docket No. 500] and the *Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of its Debtor Affiliates* [Docket No. 501] (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 fourth 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 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

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Chicago, Illinois 60606
Telephone: (312) 881-5400
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-and-

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Proposed Counsel to Debtors and Debtors-in-Possession

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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**

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

DATED: June 27, 2025

A handwritten signature in black ink, appearing to read "Michael B. Kaplan", is written over a horizontal line.
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.*

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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.*

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

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

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

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

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

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Debtor: CBRM REALTY INC, *et al.*
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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.*

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OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE
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22. The Court retains jurisdiction with respect to all matters arising from or related
to the implementation, interpretation, or enforcement of this Order.

EXHIBIT B

Invoice

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

For professional services for the period ending 31 August 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Asset Sales: Kelly Hamilton				
7 August 2025	Review supplemental assumption notice.	B Lingle	0.30	411.00
8 August 2025	Review filing versions of assumption notices for Kelly Hamilton.	L Baccash	0.30	507.00
8 August 2025	Review amended assumption notice.	B Lingle	0.20	274.00
11 August 2025	Draft notice of successful bidder re: Kelly Hamilton asset sale.	A Aquije	1.00	1,110.00
12 August 2025	Review and revise correspondence re: bid questions from stalking horse bidder re: auction and related matters (0.4); correspondence with G. Pesce re: same (0.2); call with B. Lingle re: auction issues (0.2).	L Baccash	0.80	1,352.00
12 August 2025	Correspond with G. Pesce re: Kelly Hamilton bidding procedures (0.3), requirements for qualified bids (0.3), and process (0.2); analyze same (0.4).	B Lingle	1.20	1,644.00
12 August 2025	Review bid questions from DIP lender re: bidding procedures and auction process (0.3); draft answers re: same (0.5); draft notice of successful bidder re: Kelly Hamilton asset sale (0.6); email correspondence with D. Rivero re: same (0.2); review diligence questions re: potential bidder and draft responses to same (1.5).	A Aquije	3.10	3,441.00
13 August 2025	Correspond with W&C re: Kelly Hamilton bidding procedures and next steps (0.2); review draft notice of successful bidder (0.2).	D Rivero	0.40	512.00
13 August 2025	Email correspondence with W&C team re: auction (0.1); register auction space re: same (0.2); email correspondence with D. Rivero re: notice of successful bidder (0.1).	A Aquije	0.40	444.00
14 August 2025	Telephone conference with S. Landgraber re: Kelly Hamilton bid deadline (0.1) and qualifying bid requirements (0.1).	B Lingle	0.20	274.00
14 August 2025	Revise proposed order re: Kelly Hamilton bidding procedures.	D Rivero	0.20	256.00
14 August 2025	Draft work in progress tracker re: Kelly Hamilton bidding procedures.	A Aquije	2.30	2,553.00
15 August 2025	Finalize stalking horse agreement.	G Pesce	1.10	2,310.00
15 August 2025	Review and revise notice of successful bidder and cancellation of auction.	L Baccash	0.20	338.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
15 August 2025	Review, revise notice of successful bidder and cancellation of auction for Kelly Hamilton.	B Lingle	0.40	548.00
15 August 2025	Correspond with W&C re: Kelly Hamilton bidding procedures and next steps (0.2); finalize, review and revise draft notice of cancellation of auction and successful bidder (0.7).	D Rivero	0.90	1,152.00
15 August 2025	Revise notice of successful bidder (0.2); revise work in progress tracker re: bidding procedures workstreams (0.1).	A Aquije	0.30	333.00
15 August 2025	Review and respond to email with D. Rivero re: filing of notice of cancellation of auction (0.1); file same (0.1); coordinate service with Verita (0.1).	Hirshorn, Deanna	0.30	147.00
20 August 2025	Telephone conference with J. Utz, L. Hoffman, G. Pesce, HUD team re: HAP assignment for Kelly Hamilton (0.5); telephone conference, correspond with D. Pezza re: Kelly Hamilton asset purchase agreement assignment and exhibits re: same (0.6); review same (0.4); correspond with L. Hoffman and Department of Justice re: Kelly Hamilton sale (0.5).	B Lingle	2.00	2,740.00
27 August 2025	Correspond with G. Pesce and L. Baccash re: assignment of Kelly Hamilton asset purchase agreement.	B Lingle	0.20	274.00
28 August 2025	Research re: sale approval.	A Aquije	0.30	333.00
SUBTOTAL: Asset Sales: Kelly Hamilton			16.10	20,953.00

Automatic Stay Issues

6 August 2025	Review and revise stay violation letters (0.4) and correspond with P. Giovine and L. Curtis re: same (0.5).	S Hershey	0.90	1,611.00
7 August 2025	Draft correspondence re: automatic stay violations letter (0.5); draft further correspondence re: same (0.2); confer with S. Kava re: same (0.4); draft further correspondence re: same (0.1); confer with S. Kava re: same (0.1); confer with G. Sutherland re: same (0.1).	L Curtis	1.40	1,792.00
7 August 2025	Review litigation outside of bankruptcy court (1.5); correspondences with L. Curtis re: same (0.4); call with G. Sutherland re: same (0.2); review indications of bankruptcy (0.3).	S Kava	2.40	3,072.00
8 August 2025	Email correspondence with S. Kava and A. Venes re: notice of bankruptcy filing in Louisiana state court.	E Rosenberg	0.10	179.00
8 August 2025	Draft correspondence re: automatic stay violation letter (1.2); confer with S. Kava re: same (0.2); confer with S. Hershey re: same (0.2); confer with S. Kava re: same (0.1).	L Curtis	1.70	2,176.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
8 August 2025	Correspondences with G. Sutherland re: indications of bankruptcy (0.3); research dockets re: same (1.2); call J. Tomlinson re: indications of bankruptcy (0.1); multiple calls to local counsel re: same (0.5); emails to local counsel re: same (0.6); email J. Tomlinson re: local Louisiana action (0.1); correspondences with E. Rosenberg and A. Venes re: Louisiana e-filing system (0.3); email G. Sutherland re: appeal (0.1).	S Kava	3.20	4,096.00
8 August 2025	Prepare indications of bankruptcy for L. Curtis (0.9); legal research re: same (0.6).	G Sutherland	1.50	1,665.00
11 August 2025	Confer with S. Kava re: automatic stay violation letter.	L Curtis	0.20	256.00
11 August 2025	Review list of state court actions (0.5); outreach to local counsel re: indications of bankruptcy (0.7).	S Kava	1.20	1,536.00
11 August 2025	Pull and review documents re: foreclosure actions.	A Aquije	0.90	999.00
13 August 2025	Email L. Hoffman re: indications of bankruptcy.	S Kava	0.10	128.00
14 August 2025	Email correspondence with S. Kava re: options for indication of bankruptcy in Louisiana state court action.	E Rosenberg	0.10	179.00
14 August 2025	Draft correspondence re: automatic stay violation letter (0.5); revise same (0.3); confer with P. Giovine re: same (0.4); confer with P. Giovine re: same (0.2).	L Curtis	1.40	1,792.00
15 August 2025	Review indication of bankruptcy, notice of limited appearance and applicable rules (0.2); email correspondence with W&C team re: same (0.1).	E Rosenberg	0.30	537.00
15 August 2025	Legal research re: service requirements under Louisiana state law (2.8); legal research re: notice of limited appearance under Louisiana state law (2.6); draft notice of limited appearance (0.8); edit indication of bankruptcy to file in state court action. (0.4); call re: Louisiana filing with L. Curtis (0.2); calls re: filing in Louisiana case with D. Hirshorn (0.3); revise documents for filing (0.2).	P Giovine	7.30	7,227.00
15 August 2025	Review and respond to emails with A. Venes and L. Curtis re: Louisiana filing (0.1); emails Managing Clerks re: state court credentials for E. Rosenberg and filing in Louisiana State Court (0.1); research filing in Louisiana State Court (1.3); set up filing credentials for E. Rosenberg with Clerk Connect telephone all to Baton Rouge Clerk re: filing (0.1); telephone calls with P. Giovine test running filing (0.5); file and pay filing fee for notice of limited appearance (0.2); file and pay filing fee for indication of bankruptcy (0.2); set up docket alert and pay fee (0.1); review emails with A. Mitra, L. Baccash and B. Lingle re: motion to extend removal deadline and emails with Verita re: same (0.1); confer with A. Mitra re: upcoming filing (0.2); finalize and file motion (0.4); coordinate service with Verita re: same (0.1).	Hirshorn, Deanna	3.40	1,666.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 August 2025	Docket research re: Pennsylvania case filed against debtors and current status of cases re: indication of bankruptcy.	P Giovine	1.50	1,485.00
17 August 2025	Docket research re: New York cases against debtors (1.2); docket research re: Pennsylvania cases against debtors (3.1); docket research re: Louisiana cases against debtors (3.2); compile spreadsheet cataloguing cases against debtors re: indication of bankruptcy (1.8).	P Giovine	9.30	9,207.00
18 August 2025	Email correspondence with D. Hirshorn re: Louisiana filings.	E Rosenberg	0.10	179.00
18 August 2025	Draft correspondence re: automatic stay violation letter (0.2); revise same (0.8); revise same (1.1).	L Curtis	2.10	2,688.00
18 August 2025	Email L. Hoffman re: indications of bankruptcy (0.2); correspondence with W&C team re: same (0.5); review chart from P. Giovine and compare against notice parties (1.0).	S Kava	1.70	2,176.00
18 August 2025	Legal research re: automatic stay exemptions and enforcement.	A Branson	2.50	2,775.00
18 August 2025	Edit letter in Louisiana action re: automatic stay (0.7); Call with D. Hirshorn re: filing indications of bankruptcy (0.2).	P Giovine	0.90	891.00
18 August 2025	Telephone call to E. Baton Rouge Parish Clerk's office re: confirmation of Friday filings and request for receipts (0.2); email P. Giovine, L. Curtis and E. Rosenberg re: same (0.1); confer with P. Giovine re: filing in 4th Circuit Court of Appeal in Louisiana (0.5); telephone calls to Clerk of Court re: filing notice of suggestion of bankruptcy (0.5); review list of other jurisdictions where suggestions of bankruptcy needs to be filed (0.1); email Managing Clerks for assistance with same (0.1); review receipts from E. Baton Rouge Parish Clerk's office for filing (0.1); download and circulate to P. Giovine and L. Curtis E. Baton Rouge Parish docket stamped copies of filings (0.1).	Hirshorn, Deanna	1.70	833.00
19 August 2025	Review notices of appearance and indications of bankruptcy in various Louisiana state court actions (0.2); email correspondence with P. Giovine re: same (0.1); email correspondence with D. Hirshorn re: filing credentials (0.1).	E Rosenberg	0.40	716.00
19 August 2025	Confer with P. Giovine re: automatic stay violations (0.6); draft correspondence re: same (0.5); revise same (1.2); confer with S. Kava re: same (0.3); confer with P. Giovine re: same (0.3).	L Curtis	2.90	3,712.00
19 August 2025	Legal research re: automatic stay exemptions and enforcement.	A Branson	1.80	1,998.00
19 August 2025	Zoom with L. Curtis, S. Kava and G. Sutherland re:	P Giovine	9.40	9,306.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	litigation tracking and indications of bankruptcy to notify re: automatic stay (0.4); pull relevant filings re: default judgment in state court action in violation of stay (0.3); factual research re: stay violations (2.4); Draft notices of appearance and indications of bankruptcy to file in six Louisiana Orleans Parish cases (3.6); research re: current status of Louisiana cases to determine if further filings necessary (1.9); legal research re: service issues (0.8).			
19 August 2025	Review and respond to emails with Managing Clerks re: filing suggestion of bankruptcy in state courts (0.1); telephone calls to Orleans Civil Clerk re: upcoming of suggestion of bankruptcy (0.2); telephone call with P. Giovine re: same (0.1); register and review Orleans Civil Clerk website re: filing (0.2).	Hirshorn, Deanna	0.60	294.00
20 August 2025	Email correspondence with D. Hirshorn re: filing notice alerts from Louisiana state court system.	E Rosenberg	0.10	179.00
20 August 2025	Revise automatic stay violation letter.	L Curtis	0.50	640.00
20 August 2025	Participate in call with L. Curtis and P. Giovine re: suggestions of bankruptcy (0.3); email L. Curtis re: same (0.1); coordinate filing in local Louisiana court action (0.3); review and draft correspondence re: police actions (0.7); call with L. Curtis re: indications of bankruptcy (0.2); email L. Curtis re: same (0.1); draft email re: local litigation actions (0.5); email L. Curtis re: same (0.1); call with local counsel re: action (0.2); review consent form re: same (0.3); email S. Hershey re: same (0.1).	S Kava	2.90	3,712.00
20 August 2025	Draft letter re: automatic stay violation.	A Branson	1.90	2,109.00
20 August 2025	Revise indications of bankruptcy and notices of appearance for filing in Orleans Parish state court (1.2); revise litigation tracker re: current case status (2.2).	P Giovine	3.40	3,366.00
21 August 2025	Revisions re: draft letter re: automatic stay violation (0.5); correspondence re: same (0.2).	A Branson	0.70	777.00
21 August 2025	Emails with P. Giovine re: upcoming filings of indication of bankruptcy.	Hirshorn, Deanna	0.10	49.00
22 August 2025	Meet with L. Baccash and B. Lingle re: recent litigation (0.4); revise notice of appearance and indication of bankruptcy (0.7); coordinate filing and service re: same (0.8); contact Veritas for mailing attachment re: deficiency judgment suit to Silber (0.2); revise notice of appearance and indications of bankruptcy (0.5); coordinate filing re: same (0.6); proof notice of appearance and indication of bankruptcy (0.6); coordinate filing re: same (0.6); revise notice of appearance and indication of bankruptcy (0.7); coordinate filing re: same (0.6); revise notice of appearance (0.7); coordinate filing re: same (0.6).	P Giovine	7.00	6,930.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 August 2025	Confer with P. Giovine re: filing in numerous state court actions (0.3); research pulling document in East Baton Rouge Parish court (0.1); email with P. Giovine re: same (0.1); research filing in La. Dist. Court (0.3); file notice of appearance and indication of bankruptcy re: state court action (0.2); prepare mailing labels for service of state court filings (0.2); file notice of appearance and indication of bankruptcy in state court action (0.2); prepare mailing labels and electronic packages for service re: state court filings (0.2); file notice of appearance and indication of bankruptcy re: state court action (0.2); prepare mailing labels and electronic packages for service re: state court filings (0.2); file notice of appearance and indication of bankruptcy re: state court action (0.2); prepare mailing labels and electronic packages for service re: state court filings (0.2); file notice of appearance and indication of bankruptcy re: state court action (0.2); prepare mailing labels and electronic packages for service of state court filings (0.2); coordinate service of state court filings with Copy Center and Mailroom (0.4).	Hirshorn, Deanna	3.20	1,568.00
25 August 2025	Emails and call with opposing counsel in state court action re: dismissal stipulation (0.5); research re: Pennsylvania Rules of Civil Procedure (1.1), local rules (1.1) and precedent for filing indications of bankruptcy in Allegheny County Court (1.0); research re: Pennsylvania Rules of Civil Procedure (1.1), local rules (1.1) and precedent for filing indications of bankruptcy in Magisterial District Court (1.2).	P Giovine	7.10	7,029.00
26 August 2025	Contact Pennsylvania counsel to file indication of bankruptcy (0.4); research re: Pennsylvania rules re: appearance and ability of counsel to represent debtors (1.7).	P Giovine	2.10	2,079.00
SUBTOTAL: Automatic Stay Issues			90.00	93,609.00

Vendors, Taxes, Insurance and Business Operations Issues

6 August 2025	Correspond with G. Pesce, IslandDundon re: independent fiduciary fees.	B Lingle	0.60	822.00
7 August 2025	Telephone conference with Independent Fiduciary re: compensation.	B Lingle	0.20	274.00
11 August 2025	Review and revise correspondence re: utility provider issues.	L Baccash	0.20	338.00
11 August 2025	Review, revise correspondence to Waste Solution Services.	B Lingle	0.40	548.00
11 August 2025	Review vendor issue (0.3); draft email re: same (0.6); email B. Lingle re: same (0.1); revise same re: comments from B. Lingle (0.3).	S Kava	1.30	1,664.00
15 August 2025	Telephone conferences with J. Utz and AFCO re: insurance.	B Lingle	0.50	685.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 August 2025	Review and revise AFCO stipulation.	L Baccash	0.30	507.00
19 August 2025	Correspond with L. Baccash, S. Kava re: AFCO stipulation and agreed order (0.3); correspond with J. Utz re: AFCO (0.2); review, revise AFCO stipulation and order (0.3).	B Lingle	0.80	1,096.00
20 August 2025	Review and revise AFCO stipulation.	L Baccash	0.30	507.00
20 August 2025	Review, revise AFCO stipulation and order.	B Lingle	1.50	2,055.00
20 August 2025	Research and draft stipulation re: insurance issues (1.3); email B. Lingle re: same (0.1).	S Kava	1.40	1,792.00
21 August 2025	Prepare for (0.1) and attend call with government attorney, B. Lingle re: tax issues (0.2).	L Baccash	0.30	507.00
21 August 2025	Telephone conference with L. Baccash and Department of Justice re: tax returns.	B Lingle	0.20	274.00
25 August 2025	Correspondence with S. Fryman re: tax issues.	L Baccash	0.10	169.00
27 August 2025	Telephone conference with J. Utz re: asset management agreement.	B Lingle	0.20	274.00
SUBTOTAL: Vendors, Taxes, Insurance and Business Operations Issues			8.30	11,512.00

Case Administration

1 August 2025	Telephone conference with W&C team re: work in process.	B Lingle	0.30	411.00
1 August 2025	Attend work in progress call.	S Kava	0.30	384.00
1 August 2025	Call with W&C team re: ongoing workstreams.	A Aquije	0.30	333.00
1 August 2025	Attend W&C work in progress call.	A Mitra	0.30	333.00
1 August 2025	Attend work in progress call.	G Delgado	0.50	495.00
4 August 2025	Call with B. Lingle re: status and administration issues.	L Baccash	0.50	845.00
4 August 2025	Telephone conference with L. Baccash re: status and case administration issues (0.5); coordinate action items (0.6).	B Lingle	1.10	1,507.00
4 August 2025	Update court filings folder and case calendar.	K Wick	0.10	49.00
5 August 2025	Call with B. Lingle re: case administration and timeline matters.	L Baccash	0.50	845.00
5 August 2025	Review, revise work in process materials (0.6); correspond with W&C team re: case calendar and action items (1.1).	B Lingle	1.70	2,329.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
5 August 2025	Update internal calendar (0.1); correspond with B. Lingle re: same (0.1); standby, prepare for, and assist with e-filing of Notice of Errata Re: Disclosure Statement for Joint Chapter 11 Plan (2.4); confirm filing with team (0.1); update pleadings file (0.1).	A Venes	2.80	1,372.00
5 August 2025	Update court filings folder and case calendar.	K Wick	0.10	49.00
6 August 2025	Revise work in process materials.	B Lingle	0.70	959.00
6 August 2025	Update court filings folder and case calendar.	K Wick	0.10	49.00
7 August 2025	Revise work in process materials.	B Lingle	0.30	411.00
7 August 2025	Draft resolutions for potential new debtor (1.0); revise petitions (0.7); correspondences with J. Walz re: same (0.2); review joint admin order revisions (0.4).	S Kava	2.30	2,944.00
7 August 2025	Update court filings folder and case calendar.	K Wick	0.10	49.00
8 August 2025	Review and revise Laguna petition package and resolutions.	L Baccash	0.40	676.00
8 August 2025	Case administration (0.4); review, revise Laguna Reserve petition and filing resolutions (0.3).	B Lingle	0.70	959.00
8 August 2025	Research N.J. dockets re: other first day pleadings (0.7); email Dundon re: same (0.1); email L. Baccash re: same (0.1); call with chambers re: first day orders (0.1); email L. Baccash re: chambers call (0.1); revise petition for Laguna Reserve (1.2).	S Kava	2.30	2,944.00
8 August 2025	Update internal pleadings files.	A Venes	0.10	49.00
8 August 2025	Update court filings folder and case calendar.	K Wick	0.10	49.00
11 August 2025	Review and revise Laguna first day motion.	L Baccash	0.70	1,183.00
11 August 2025	Telephone conference with W&C team re: work in process (0.5); case administration (0.2); revise work in process materials (0.3); telephone conference with G. Pesce re: action items (0.1); review revised Laguna Reserve petition packet (0.2) and correspond re: amended joint administration order and notice (0.1); review, revise application to extend challenge deadline and joint administration order and notice (1.1); analysis re: debt capacity of certain properties in Crown portfolio (0.1).	B Lingle	2.60	3,562.00
11 August 2025	Draft first day motion and notices for potential new debtor.	S Kava	3.00	3,840.00
11 August 2025	Attend work in process call with W&C re: next steps.	D Rivero	0.40	512.00
11 August 2025	Correspondence with W&C team re: work in progress call (0.2); work in progress call with W&C team (0.5);	A Aquije	1.20	1,332.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Draft notice of revised petition for new debtor (0.5).			
11 August 2025	Review work in progress tracker (0.2); attend W&C work in progress call (0.4).	A Mitra	0.60	666.00
11 August 2025	Review docket for updates.	K Wick	0.10	49.00
12 August 2025	Review and revise first day motion re: Laguna (0.9); correspondence with G. Pesce re: same (0.1).	L Baccash	1.00	1,690.00
12 August 2025	Review, revise omnibus motion re: Laguna Reserve (0.7); correspond with W&C team re: same (0.3); correspond with W&C team re: Laguna Reserve petition (0.3); review, revise NOLA plan and omnibus Laguna Reserve motion (1.8); telephone conference with G. Pesce, L. Baccash re: action items (0.5).	B Lingle	3.60	4,932.00
12 August 2025	Revise petition and joint admin motion (0.3); email G. Pesce re: same (0.1); draft omnibus first day motion and order (2.5); further revise re: comments from B. Lingle (1.2); email B. Lingle re: same (0.1); further revise omnibus motion re: comments (0.3); email G. Pesce re: same (0.1); further revise omnibus motion, order and petition (1.6); email B. Lingle and L. Baccash re: same (0.1); revise dates re: filing timeline (0.2).	S Kava	6.50	8,320.00
13 August 2025	Telephone conference with L. Baccash re: action items (0.4); draft action items list for IslandDundon (0.4).	B Lingle	0.80	1,096.00
13 August 2025	Draft August 14th hearing agenda (0.3); email same for review to B. Lingle, A. Aquije, L. Baccash, L. Curtis and A. Venes (0.1); finalize and file same (0.1); draft witness and exhibit list for August 14th hearing (0.3); prepare and finalize exhibits (0.6); finalize and file witness and exhibit list with exhibits (0.2); coordinate with Verita to file same (0.1); email Chambers for presenter lines for W&C attorneys (0.1).	Hirshorn, Deanna	1.80	882.00
14 August 2025	Coordinate org chart with J. Walz for disclosure statement.	S Kava	0.20	256.00
14 August 2025	Telephone call and email to Chambers re: presenter line status (0.1); review and respond to email with A. Aquije re: listening line for hearing (0.1); review and respond to email with D. Rivero, A. Aquije, B. Lingle and L. Baccash re: hearing dates (0.1).	Hirshorn, Deanna	0.30	147.00
15 August 2025	Telephone conference with W&C team re: work in process (0.5); case administration (0.8).	B Lingle	1.30	1,781.00
15 August 2025	Participate in work in progress call re: filings over weekend.	S Kava	0.60	768.00
15 August 2025	Call with W&C team re: ongoing workstreams.	A Aquije	0.70	777.00
15 August 2025	Confer with P. Giovine re: service to Chambers (0.1);	Hirshorn, Deanna	3.10	1,519.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	email Chambers re: application to shorten time (0.1); emails with S. Hershey, G. Pesce, B. Lingle, L. Baccash, and L. Curtis re: August 21st hearing (0.1); review docket for key dates (0.5); review case management order (0.4); update case calendar (1.0); coordinate service of executed orders with Verita (0.1); update pleadings file (0.2); conference call with L. Baccash, B. Lingle, S. Kava, D. Rivero, J. Walz and A. Aquije (0.5); emails with same with meeting and scheduling (0.1).			
17 August 2025	Review and revise Laguna petition and first day motion for filing.	L Baccash	0.20	338.00
17 August 2025	Review, draft petition (0.2), omnibus motion (0.2), and disclosure statement (0.2); email L. Baccash re: same (0.1); run redlines (0.2); email same to L. Baccash (0.1); revise petition re: comments from B. Lingle (0.1); email B. Lingle re: same (0.1); revise omnibus motion (0.4), petition (0.4), and application to shorten notice (0.4); coordinate and file with D. Hirshorn re: same (0.6); email D. Hirshorn re: omnibus motion order (0.1).	S Kava	3.10	3,968.00
17 August 2025	Assist in preparation of filing re: petitions (3.0); assist in preparation of filing re: plan (3.0) and disclosure statement (2.0); review and respond to emails with S. Kava, L. Baccash and B. Lingle re: upcoming filing (0.1); Finalize Laguna Reserve Apartments Investor LLC petition (0.3); confer with S. Kava re: same (0.2); file same (0.3); finalize and file Laguna Reserve Apartments Omnibus Motion on both dockets (0.3); finalize and file application to shorten time re: omnibus motion on both dockets (0.3); download and coordinate service with Verita (0.1); email Chambers filed courtesy copies and Word version of proposed order to shorten time (0.1).	Hirshorn, Deanna	9.70	4,753.00
18 August 2025	Prepare agenda for upcoming hearing (0.7); prepare witness and exhibit list of upcoming hearing (0.6); emails with L. Curtis, B. Lingle, S. Kava and P. Giovine re: same (0.1); request presenter hearing lines for S. Hershey and L. Curtis for Thursday's hearing (0.1); coordinate service of entered orders with Verita (0.1); update pleadings file (0.3); prepare and finalize exhibits to be filed with witness and exhibit list (0.8); confer with L. Curtis re: upcoming filings (0.1); review, finalize and file agenda for August 21 hearing (0.2); review, finalize and file witness and exhibit list with exhibits (0.5); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	3.60	1,764.00
20 August 2025	Call with T. Rizvi and M. Whalen re: corporate structure.	S Kava	0.70	896.00
20 August 2025	Email Chambers for presenter line for M. Dundon for upcoming hearing.	Hirshorn, Deanna	0.10	49.00
21 August 2025	Update pleadings file.	Hirshorn, Deanna	0.20	98.00
22 August 2025	Telephone conference with L. Baccash re: action items	B Lingle	1.30	1,781.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.5); coordinate with W&C team re: case administration (0.8).			
22 August 2025	Revise omnibus order (0.3); draft notice re: same (0.4); compile same (0.3); further revise omnibus order re: comments from B. Lingle (0.1); compile same (0.2); draft supplemental declaration for K. Rosen (1.0); email K. Rosen re: same (0.1); draft supplemental declaration for Verita (0.7); email Verita re: same (0.1); draft supplemental declaration for Cushman (0.8); email Cushman re: same (0.1); draft supplemental declaration for Schedler (0.4); email L. Schedler re: same (0.1); review prior declarations and omnibus orders (0.6); email L. Baccash and B. Lingle re: filing documents (0.1).	S Kava	5.30	6,784.00
23 August 2025	Review, finalize and file on CBRM and Laguna Reserve dockets Notice of Filing Revised Proposed order re: Debtors' Motion to Apply Certain Order in Initial Debtors' Chapter 11 Cases to Debtor Laguna Reserve Apartments.	Hirshorn, Deanna	0.30	147.00
25 August 2025	Confer with S. Kava re: workstreams.	A Mitra	0.10	111.00
25 August 2025	Finalize and file on both dockets Notice of Filing of Revised Order (A) Applying Certain Orders in Initial Debtors' Chapter 11 Cases to Debtor Laguna Reserve Apartments Investor LLC and (B) Granting Related Relief (0.4); confer with S. Kava re: same (0.1); coordinate service of same with Verita (0.1); update pleadings file (0.1).	Hirshorn, Deanna	0.70	343.00
26 August 2025	Update declaration formatting styles for D. Rivero.	Hirshorn, Deanna	0.40	196.00
28 August 2025	Research receivership cases for A. Aquije (1.1); email Research Services re: additional assistance re receivership cases (0.1).	Hirshorn, Deanna	1.20	588.00
SUBTOTAL: Case Administration			71.00	73,169.00

Case Strategy

1 August 2025	Call with B. Lingle, S. Kava, A. Aquije, G. Delgado and A. Mitra re: case updates and strategy.	L Baccash	0.30	507.00
8 August 2025	Telephone conference with E. LaPuma re: next steps.	B Lingle	0.20	274.00
11 August 2025	Participate in strategy call with W&C team.	L Baccash	0.40	676.00
12 August 2025	Call with G. Pesce and B. Lingle re: status of case.	L Baccash	0.20	338.00
12 August 2025	Coordination call with G. Pesce, IslandDundon team (0.3); prepare property analysis for G. Pesce (1.2).	B Lingle	1.50	2,055.00
13 August 2025	Daily coordination call with G. Pesce, IslandDundon team.	B Lingle	0.40	548.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
14 August 2025	Coordination call with G. Pesce, IslandDundon team.	B Lingle	0.20	274.00
19 August 2025	Call with S. Hershey, B. Lingle and creditor attorney re: Rhodium.	L Baccash	0.20	338.00
19 August 2025	Coordination call with G. Pesce, IslandDundon team (0.5); correspond with G. Pesce re: properties under Hilco receivership (0.3).	B Lingle	0.80	1,096.00
21 August 2025	Call with Hilco, G. Pesce, B. Lingle re: status of various properties.	L Baccash	0.30	507.00
21 August 2025	Telephone conference with G. Pesce, L. Baccash and Hilco re: properties for which Hilco serves as receiver.	B Lingle	0.30	411.00
21 August 2025	Call with T. Rizvi re: case strategy.	S Kava	0.40	512.00
22 August 2025	Correspondence with team re: strategy.	L Baccash	0.20	338.00
22 August 2025	Telephone conference with G. Pesce, M. Dundon, E. LaPuma, Verita re: servicing plan.	B Lingle	0.60	822.00
25 August 2025	Telephone conference with G. Pesce re: CBRM plan and action items (0.2); daily coordination call with G. Pesce, IslandDundon team re: next steps and strategy (0.5).	B Lingle	0.70	959.00
27 August 2025	Daily coordination call with G. Pesce, IslandDundon team, and E. LaPuma re: case strategy (0.5); telephone conference with G. Pesce, J. Millar re: case strategy (0.4).	B Lingle	0.90	1,233.00
SUBTOTAL: Case Strategy			7.60	10,888.00

Claims Administration & Objections

6 August 2025	Correspond with Lynd, IslandDundon team re: Silber taxation claim.	B Lingle	0.30	411.00
7 August 2025	Review Silber claim re: objection (0.1); call with B. Lingle re: same (0.1).	L Baccash	0.20	338.00
11 August 2025	Correspond with L Baccash and B Lingle re: claim objection (0.2); draft objection to proof of claim (2.4); draft declaration in support of objection to proof of claim (1.4); research re: claim objections re: insufficient documentation (0.5).	D Rivero	4.50	5,760.00
11 August 2025	Assist D. Rivero re: draft objection to Silber claim and proposed order thereto (0.5); correspond with D. Rivero re: same (0.4).	A Venes	0.90	441.00
12 August 2025	Correspondence re: bar date with G. Pesce, D. Rivero, B. Lingle (0.2); review and revise claim objection motion (0.6).	L Baccash	0.80	1,352.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 August 2025	Review, revise objection to Silber tax claim.	B Lingle	1.50	2,055.00
12 August 2025	Correspond with G Pesce re: claim objection (0.1); review and revise objection to proof of claim (0.6); review and revise declaration in support of objection to proof of claim (0.4); correspond with W&C re: hearing re: claim objection (0.3).	D Rivero	1.40	1,792.00
12 August 2025	Research re: hearing and objection dates re: claim objection.	A Aquije	0.40	444.00
13 August 2025	Correspond with L. Baccash, D. Rivero re: Silber claim objection.	B Lingle	0.40	548.00
13 August 2025	Correspond with Dundon re: claim objection (0.2); review and revise objection to proof of claim (1.8); review and revise declaration in support of objection to proof of claim (1.5); correspond with L Baccash and B Lingle re: claims register (0.3).	D Rivero	3.80	4,864.00
13 August 2025	Review and respond to email with D. Rivero, S. Hershey, L. Baccash and B. Lingle re: upcoming filing of claim objection and corresponding declaration (0.1); finalize claim objection and declaration for final review by D. Rivero (0.2); standby for filing of same (0.4).	Hirshorn, Deanna	0.70	343.00
14 August 2025	Telephone conference with L. Baccash, D. Rivero re: Silber claim objection (0.3); review, revise Silber claim objection (0.2).	B Lingle	0.50	685.00
14 August 2025	Correspond with W&C re: claim objection (0.2); review Silber's proofs of claim (0.2); review and revise objection to proof of claim (1.8); review and revise declaration in support of objection to proof of claim (0.9).	D Rivero	3.10	3,968.00
14 August 2025	Research re: Rule 3007 (0.6); draft notice re: claim objection (0.5).	A Aquije	1.10	1,221.00
14 August 2025	Review and respond to email from D. Rivero, G. Pesce, L. Baccash and B. Lingle attaching Silber Claim Objection and declaration in support in preparation for filing (0.2); finalize claim objection (0.1); file Silber claim objection (0.1); file declaration in support (0.1); coordinate service with Verita of same (0.1).	Hirshorn, Deanna	0.60	294.00
22 August 2025	Telephone conference with L. Baccash, DOJ re: IRS tax claims.	B Lingle	0.20	274.00
29 August 2025	Finalize and file Notice of Laguna Reserve Bar Date (0.4); coordinate service of same with Verita (0.4).	Hirshorn, Deanna	0.80	392.00
SUBTOTAL: Claims Administration & Objections			21.20	25,182.00

Financing Matters: NOLA

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
1 August 2025	Review escrow agreement for professional fees.	S Kava	0.40	512.00
7 August 2025	Review and revise notice of assumption and bid procedures issues for Kelly Hamilton (0.4); correspondence with A. Aquije re: same (0.1); review CIF notice and related issues (0.3).	L Baccash	0.80	1,352.00
7 August 2025	Review CIF notices of default and reservation of rights.	B Lingle	0.60	822.00
11 August 2025	Correspond with G. Pesce re: extension of NOLA DIP challenge period.	B Lingle	0.60	822.00
13 August 2025	Review revised stipulation re: extension of NOLA challenge deadline.	B Lingle	0.50	685.00
14 August 2025	Review final NOLA DIP order re: stalking horse purchase agreement provisions.	B Lingle	0.40	548.00
23 August 2025	Revise draft SOFA amendment excel to send to Dundon and Verita.	P Giovine	1.40	1,386.00
SUBTOTAL: Financing Matters: NOLA			4.70	6,127.00

Financing Matters: Kelly Hamilton

1 August 2025	Telephone conference with J. Lubertazzi re: professional fee escrow.	B Lingle	0.20	274.00
10 August 2025	Revise escrow agreement (0.1); email lender re: same (0.1).	S Kava	0.20	256.00
13 August 2025	Review revisions to challenge stipulation.	L Baccash	0.20	338.00
13 August 2025	Email J. Lubertazzi re: account set up.	S Kava	0.10	128.00
15 August 2025	Compile execution version of professional fee escrow account (0.2); email J. Lubertazzi re: same (0.1).	S Kava	0.30	384.00
SUBTOTAL: Financing Matters: Kelly Hamilton			1.00	1,380.00

Creditor Meetings & Statutory Committees

26 August 2025	Call creditors re: notice concerns.	S Kava	0.40	512.00
SUBTOTAL: Creditor Meetings & Statutory Committees			0.40	512.00

Exclusivity, Plan & Disclosure Statement: Kelly Hamilton

1 August 2025	Revise solicitation materials (0.2); correspond with Verita re: same (0.1).	A Aquije	0.30	333.00
4 August 2025	Coordinate with Verita re: solicitation.	B Lingle	0.30	411.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
4 August 2025	Revise disclosure statement materials re: solicitation.	A Aquije	0.30	333.00
5 August 2025	Call with A. Aquije, Verita re: solicitation and publication process and updates (0.2); correspond with A. Aquije re: plan and solicitation issues (0.1); review revisions to disclosure statement and related issues (0.2); call with B. Lingle re: same (0.1); call with G. Pesce, B. Lingle re: same (0.2); review notice re: disclosure statement and correspondence re: same with team (0.2); call with S. Kava re: same (0.1); call with B. Lingle re: same (0.2).	L Baccash	1.30	2,197.00
5 August 2025	Telephone conference with G. Pesce, L. Baccash re: notice of errata and revised disclosure statement.	B Lingle	0.30	411.00
5 August 2025	Draft notice of errata (0.6); further revise notice re: comments from B. Lingle (0.4); compile and prepare revised disclosure statement (0.8); coordinate filing with A. Venes (0.1); coordinate filing and solicitation package with Verita (0.3); review precedent errata (0.5); further review revised disclosure statement (0.3).	S Kava	3.00	3,840.00
5 August 2025	Prepare for call with Verita re: solicitation process (0.2); participate in call re: same (0.2).	A Aquije	0.40	444.00
6 August 2025	Call with D. Magee re: plan (0.3); review solicitation package (0.4); email D. Magee re: same (0.2); participate in call with Verita re: solicitation package (0.2).	S Kava	1.10	1,408.00
6 August 2025	Call with S. Kava re: solicitation (0.1); Call with Verita re: solicitation of Kelly Hamilton plan (0.3).	A Aquije	0.40	444.00
8 August 2025	Call with Verita re: solicitation process.	A Aquije	0.10	111.00
11 August 2025	Correspond with L. Curtis, B. Lingle and L. Baccash re: confirmation schedule.	S Hershey	0.70	1,253.00
11 August 2025	Review revisions to disclosure statement motion and exhibits for NOLA debtors (0.5); correspond with A Aquije re: same (0.2).	D Rivero	0.70	896.00
12 August 2025	Review issues re: ballot and voting (0.1); correspond with A. Aquije re: same (0.1); call with B. Lingle re: Silber motion to disallow for voting purposes (0.2); call with B. Lingle re: same (0.2).	L Baccash	0.60	1,014.00
12 August 2025	Revise form of ballot re: treatment (0.2) and correspondence with creditor re: same (0.1); review and revise remaining ballots re: same (0.2).	A Aquije	0.50	555.00
13 August 2025	Address plan solicitation and related edits to solicitation materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
13 August 2025	Confer with D. Rivero re: disclosure statement.	L Curtis	0.30	384.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 August 2025	Call with D. Rivero re: motion to modify solicitation deadlines (0.1); draft expedited consideration application re: same (0.4); call with D. Rivero re: same (0.1); research re: confirmation requirements (1.1).	A Aquije	1.70	1,887.00
14 August 2025	Address plan solicitation and related edits to solicitation materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
14 August 2025	Review and revise disclosure statement (2.4); review and prepare plan supplement documents (1.1); multiple calls with B. Lingle re: plan and disclosure statement (0.5).	L Baccash	4.00	6,760.00
14 August 2025	Draft and coordinate re: exhibits to plan supplement.	B Lingle	1.00	1,370.00
14 August 2025	Revise disclosure statement.	L Curtis	0.40	512.00
14 August 2025	Review precedent (0.4) and review and revise draft supplement (0.3); provide revised draft supplement to B. Lingle for review (0.1).	A Mitra	0.80	888.00
15 August 2025	Call with G. Pesce, B. Lingle re: plan revisions (0.7); review and revise plan (1.8); review and revise disclosure statement (1.6); correspondence with D. Rivero and B. Lingle re: disclosures statement order (0.2).	L Baccash	4.30	7,267.00
15 August 2025	Revise disclosure statement (1.0); confer with P. Giovine re: same (0.4); revise same (0.2).	L Curtis	1.60	2,048.00
16 August 2025	Address plan solicitation and related edits to solicitation materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
17 August 2025	Review and revise disclosure statement order (1.9); review and revise disclosure statement for filing (0.5); review and revise plan for filing (1.9); call with B. Lingle re: same (0.3); correspondence with team re: same (0.3).	L Baccash	4.90	8,281.00
17 August 2025	Review plan (0.5); revise application for order shortening time on disclosure statement motion (0.5).	D Rivero	1.00	1,280.00
18 August 2025	Review plan (0.3) and plan supplement (0.2).	L Baccash	0.50	845.00
18 August 2025	Correspond with W&C team re: Kelly Hamilton confirmation.	B Lingle	0.50	685.00
18 August 2025	Confer with P. Giovine re: plan supplement (0.5); draft same (5.4).	L Curtis	5.90	7,552.00
18 August 2025	Correspond with W&C re: confirmation brief for Kelly Hamilton.	D Rivero	0.30	384.00
18 August 2025	Research re: declarations in support of plan	A Aquije	2.00	2,220.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	confirmation.			
19 August 2025	Review and revise plan supplement (0.8); review and revise plan (0.6); review and revise trust agreement (1.4); calls and correspondence with W&C team re: same (0.2).	L Baccash	3.00	5,070.00
19 August 2025	Revise Kelly Hamilton plan (2.0); review, revise Kelly Hamilton plan supplement (0.8); correspond with L. Baccash, A. Aquije re: Kelly Hamilton plan supplement (0.3).	B Lingle	3.10	4,247.00
19 August 2025	Revise plan supplement (2.9); continue revising same (0.3).	L Curtis	3.20	4,096.00
19 August 2025	Correspond with W&C re: confirmation brief for Kelly Hamilton (0.3); legal research for same (0.4); review draft confirmation brief (0.3).	D Rivero	1.00	1,280.00
19 August 2025	Call with D. Rivero and S. Kava re: declaration in support of confirmation (0.1); draft plan supplement exhibits (2.0).	A Aquije	2.10	2,331.00
20 August 2025	Call with B. Lingle re: plan (0.5); review and revise same (1.4); review comments to markup of litigation trust agreement (0.3) and call with B. Lingle re: same (0.2); review and revise plan supplement documents (0.6).	L Baccash	3.00	5,070.00
20 August 2025	Revise Kelly Hamilton plan and correct NOLA plan re: same (1.5); review, revise plan supplement (0.8); coordinate filing of same (0.6).	B Lingle	2.90	3,973.00
20 August 2025	Draft, review and revise confirmation brief for Kelly Hamilton.	D Rivero	4.20	5,376.00
20 August 2025	Further revise plan supplement exhibits (0.5); draft declaration in support of confirmation (2.5).	A Aquije	3.00	3,330.00
20 August 2025	Review and respond to emails with B. Lingle, L. Baccash and A. Aquije re: filing of plan supplement (0.1); review and finalize same (0.3); file same (0.2); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.70	343.00
20 August 2025	Redact assumed contracts list.	C Gallo	3.00	1,260.00
21 August 2025	Correspondence with A. Aquije re: updated plan supplement (0.1) and review and revision of same (0.1); review declaration in support of confirmation (0.2).	L Baccash	0.40	676.00
21 August 2025	Draft, review and revise confirmation brief for Kelly Hamilton.	D Rivero	3.90	4,992.00
21 August 2025	Draft declaration in support of confirmation (1.4); call with D. Rivero and S. Kava re: same (0.2); further revise same re: comments re: same (1.0); research re:	A Aquije	7.00	7,770.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	same (2.5); further revise declaration re: same (1.0); draft revised plan supplement (0.9).			
21 August 2025	Redact assumed contracts list for D. Hirshorn.	C Gallo	2.90	1,218.00
22 August 2025	Review and revise plan (0.5); review comments from J. Millar to plan (0.2); call with government attorney, B. Lingle re: tax issues (0.2); follow up call with B. Lingle re: same (0.1).	L Baccash	1.00	1,690.00
22 August 2025	Draft, review and revise confirmation brief for Kelly Hamilton.	D Rivero	2.80	3,584.00
22 August 2025	Further revise declaration in support of plan confirmation.	A Aquije	2.00	2,220.00
24 August 2025	Review correspondence from US Trustee re: plan.	L Baccash	0.20	338.00
25 August 2025	Review and revise Kelly Hamilton plan (1.7) and calls with B. Lingle re: same (1.6); call with G. Pesce and B. Lingle re: plan issues (0.5); review and revise declaration in support of confirmation for Kelly Hamilton (0.9).	L Baccash	4.70	7,943.00
25 August 2025	Review, revise CBRM plan re: Ad Hoc Group and US Trustee comments (2.2); coordinate with W&C team, J. Millar re: plan (0.4); revise plan (1.2); review, revise confirmation declaration (1.4); telephone conference with G. Pesce, L. Baccash re: CBRM plan (0.5).	B Lingle	5.70	7,809.00
25 August 2025	Review US Trustee comments to plan (0.4); review and revise research write-up re: releases and exculpation (1.4); revise and revise declaration in support of confirmation (3.9); legal research re: plan discharge (1.3); draft analysis re: same (0.3).	D Rivero	7.30	9,344.00
25 August 2025	Research re: releases and exculpations (2.0); draft memo to D. Rivero re: same (2.3).	A Aquije	4.30	4,773.00
26 August 2025	Review confirmation objections (0.9); correspond with L. Curtis, L. Baccash and D. Rivero re: same (0.4).	S Hershey	1.30	2,327.00
26 August 2025	Office conference with S. Kava re: Kelly Hamilton plan, declaration in support of confirmation and related issues (0.2); call with B. Lingle re: plan confirmation issues (0.5); review objections to confirmation (0.7); call with team re: same (0.3); multiple correspondence with team re: same (0.3); research re: same (0.3); correspondence with D. Rivero re: solicitation (0.2).	L Baccash	2.50	4,225.00
26 August 2025	Draft confirmation order (3.2); revise same (1.0); review confirmation objections and telephone conference with L. Baccash re: same and actions items (0.8); telephone conference with W&C team re: confirmation objections (0.3).	B Lingle	5.30	7,261.00
26 August 2025	Review confirmation objections to Kelly Hamilton plan	L Curtis	7.20	9,216.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.5); confer with S. Hershey re: same (0.2); confer with P. Giovine re: same (0.2); draft outline of reply re: same (1.2); confer with P. Giovine re: same (0.1); continue drafting outline of reply re: same (1.2); confer with L. Baccash and others re: same (0.6); continue drafting outline of reply re: same (3.2).			
26 August 2025	Review objections and draft outline for reply (6.5); review, revise declaration (0.6); email D. Rivero re: same (0.1).	S Kava	7.20	9,216.00
26 August 2025	Review and revise declaration in support of confirmation and incorporate comments to same (5.6); review objections to confirmation (0.5); correspond with W&C re: same (0.5); review and revise reply to objections in support of confirmation (4.2); correspond with Verita re: voting (0.1); review research re: fee examiner re: plan objection (0.5).	D Rivero	11.40	14,592.00
26 August 2025	Further revise declaration in support of plan, incorporating comments from L. Baccash and B. Lingle (4.0); call with D. Rivero re: same (0.2); review filed objections to plan confirmation (0.9); draft response re: same (2.7); draft summary chart re: same (0.8); research re: same (0.5); call with W&C team re: same (0.6).	A Aquije	9.70	10,767.00
26 August 2025	Zoom with W&C team re: objections.	P Giovine	0.50	495.00
27 August 2025	Correspond with L. Curtis, L. Baccash and J. Utz re: confirmation declarations.	S Hershey	1.20	2,148.00
27 August 2025	Review and revise declaration in support of Kelly Hamilton confirmation (1.5); review research and case law re: objections (0.4) and correspondence with team re: same (0.4); call with L. Curtis, S. Hershey, L. Hoffman, J. Utz, B. Lingle and others re: responses to objections to Kelly Hamilton confirmation (1.2); review and revise Kelly Hamilton plan (0.8); calls with B. Lingle re: confirmation issues (0.5); correspondence with L. Hoffman, G. Pesce and others re: objections (0.1).	L Baccash	4.90	8,281.00
27 August 2025	Draft confirmation order (1.4); review, revise confirmation declaration (1.6); telephone conference with G. Pesce re: Kelly Hamilton plan (0.4); telephone conference with W&C team, L. Hoffman, J. Utz re: reply in support of confirmation (1.0); correspond with G. Pesce, L. Baccash re: Kelly Hamilton confirmation (0.3); telephone conference with L. Hoffman and J. Utz re: same (0.4); review second plan supplement (0.3).	B Lingle	5.40	7,398.00
27 August 2025	Confer with L. Baccash, S. Hershey and others re: pleadings in support of confirmation brief (1.1); draft same (1.2).	L Curtis	2.30	2,944.00
27 August 2025	Review cases and research re: plan confirmation (0.7); email L. Curtis re: same (0.2); participate in call with L. Hoffman re: objections (1.1); review objections (2.7);	S Kava	7.50	9,600.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	review, revise reply brief (2.8).			
27 August 2025	Draft, review and revise confirmation brief for Kelly Hamilton (7.1); draft, review and revise declaration in support of confirmation for Kelly Hamilton (4.4); review objections (0.5); correspond with W&C re: objections (0.5).	D Rivero	12.50	16,000.00
27 August 2025	Draft response to confirmation objections (1.8); call with Lynd re: confirmation objection factual support (1.1); call with D. Rivero re: same (0.1); further revise response re: same (4.4); call with S. Kava re: same (0.1); call with S. Kava and D. Rivero re: same (0.3); research re: confirmation objection response (1.0); further draft response re: same (1.2).	A Aquije	10.00	11,100.00
27 August 2025	Research re: Plan objections.	G Delgado	4.10	4,059.00
27 August 2025	Call with Lynd and W&C team re: response to confirmation objections.	P Giovine	0.30	297.00
27 August 2025	Review and revise response to plan objection (0.9); email D. Rivero re: same (0.1).	Hirshorn, Deanna	1.00	490.00
28 August 2025	Correspond with objecting parties re: confirmation litigation.	S Hershey	1.50	2,685.00
28 August 2025	Call with J. Sponder, B. Lingle re: comments to Kelly Hamilton plan (0.4); correspondence with W&C team re: same (0.2); review and revise plan (1.9); call with D. Rivero, B. Lingle re: voting report (0.2); review of same (0.1); call with objectors, L. Hoffman, S. Hershey, B. Lingle re: plan objection (1.1); call with G. Pesce and B. Lingle re: objections to Kelly Hamilton plan (0.5); review and revise confirmation order (2.8); review and revise voting report (0.6); multiple correspondence with D. Rivero, B. Lingle re: same (0.4); review and revise response to objections (0.5).	L Baccash	8.70	14,703.00
28 August 2025	Draft confirmation order (3.9); revise same (0.8); telephone conference with L. Baccash, D. Rivero re: voting report (0.2); telephone conference with L. Baccash, L. Hoffman and counsel to C. Bacon re: objection (1.0).	B Lingle	5.90	8,083.00
28 August 2025	Draft pleadings in support of confirmation reply.	L Curtis	2.70	3,456.00
28 August 2025	Review voting report (0.5); review voting declaration from Verita (0.6); email Verita re: same (0.1); call with D. Rivero re: reply brief and declaration in support of plan (0.4); revise and draft reply brief background (3.5); revise and draft reply brief argument sections (3.7); calls with D. Rivero re: plan confirmation (0.4).	S Kava	9.20	11,776.00
28 August 2025	Draft, review and revise confirmation brief for Kelly Hamilton and reply to objections (6.9); draft, review and revise declaration in support of confirmation for Kelly Hamilton (3.4); review US Trustee objection	D Rivero	12.60	16,128.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.3); correspond with W&C re: confirmation issues and responses to objections (0.8); review declaration re: voting report (0.9); correspond with Verita re: same (0.3).			
28 August 2025	Research re: free and clear sales in plans (1.0); further revise response to plan objections (1.0); call with D. Rivero and A. Mitra re: same (0.2); further revise response, incorporating comments from D. Rivero (1.8); review and revise voting declaration re: plan confirmation (1.2); review and revise declaration in support of confirmation (1.5); further revise same, incorporating comments from L. Baccash (0.6); further revise confirmation response, incorporating comments from S. Kava and D. Rivero (1.4); further revise declaration in support of confirmation, incorporating comments from D. Rivero (0.2).	A Aquije	8.90	9,879.00
28 August 2025	Call and correspondence with D. Rivero, S. Kava, and A. Aquije re: reply to US Trustee Kelly Hamilton Plan releases objection (0.4); review prior research and other materials re: same (2.0); review precedent debtor confirmation briefs (2.0); draft rider to reply re: US Trustee plan objection (2.0); correspondence with D. Rivero re: same (0.2); review formal US Trustee plan objection re: releases (0.5); review, revise and supplement rider to confirmation reply (1.3).	A Mitra	8.40	9,324.00
28 August 2025	Review feasibility response re: Plan objection.	G Delgado	0.90	891.00
28 August 2025	Draft Response to Plan Objection re: trustee appointment (2.4); draft Response to Plan Objection re: fee examiner request (2.2).	P Giovine	4.60	4,554.00
28 August 2025	Research local rules and precedent re: page limitations for confirmation briefs and replies for D. Rivero.	Hirshorn, Deanna	0.80	392.00
29 August 2025	Review Dundon Declaration in support of confirmation (1.8); correspond with team re: same (0.6); correspond with Pittsburgh attorney and team re: objection (0.5).	S Hershey	2.90	5,191.00
29 August 2025	Call with L. Hoffman, G. Pesce, S. Hershey, B. Lingle, Pittsburgh objector attorney re: confirmation objection (0.7); follow up call with G. Pesce re: same (0.2); correspondence with S. Hershey, B. Lingle and team re: confirmation brief and objection responses (0.3); call with W&C team re: confirmation brief, declaration and response to objections (0.6); call with d. Rivero re: declaration (0.2); call with B. Lingle re: confirmation issues (0.3); review and revise revised voting report (0.2); review research re: confirmation issues (0.3); call with B. Lingle and D. Rivero re: plan and declaration issues (0.2); review and revise confirmation brief (3.8); calls with G. Pesce re: same (0.2); calls with D. Rivero re: same (0.1); call with B. Lingle re: same (0.1).	L Baccash	7.20	12,168.00
29 August 2025	Telephone conference with G. Pesce, L. Hoffman, City of Pittsburgh re: confirmation objection (0.7); telephone conference with W&C team re: confirmation brief (0.5);	B Lingle	5.30	7,261.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	revise Kelly Hamilton plan (0.9); telephone conference with G. Pesce, L. Baccash re: confirmation brief (0.4); telephone conference with L. Baccash re: confirmation and revised CBRM and Crown plans (0.6); workstreams re: confirmation objections (1.3); review, revise voting report (0.4); telephone conferences with G. Pesce and L. Baccash re: confirmation action items (0.5).			
29 August 2025	Confer with L. Baccash, S. Hershey and others (0.6); draft pleadings in support of confirmation reply (3.5); revise same (1.9); draft witness and exhibit list for confirmation hearing (0.8); confer with D. Rivero re: confirmation brief pleadings (0.1); continue drafting witness and exhibit list for confirmation hearing (0.5); continue drafting pleadings in support of confirmation reply (1.9).	L Curtis	9.30	11,904.00
29 August 2025	Revise objection chart (0.6); review, revise confirmation brief (4.8); correspondence with D. Rivero re: same (0.2).	S Kava	5.60	7,168.00
29 August 2025	Draft objection chart for confirmation brief (2.4); draft, review and revise confirmation brief for Kelly Hamilton (1.9); review and revise declaration in support of confirmation for Kelly Hamilton (3.4); correspond with W&C re: confirmation issues and responses to objections (0.9); finalize declaration re: voting report (0.3); correspond with Verita re: same (0.2).	D Rivero	9.10	11,648.00
29 August 2025	Further revise response to confirmation objections, incorporating comments from D. Rivero (0.9); call with W&C team re: confirmation declaration (0.5); draft memorandum of law in support of confirmation (5.6).	A Aquije	7.00	7,770.00
29 August 2025	Call with D. Rivero re: reply to US Trustee plan releases objection (0.1); review prior research and precedent debtor confirmation briefs (1.3); supplemental research re: additional argument (2.7); update rider to reply re: US Trustee releases objection (2.0); update same re: US Trustee formal objection and citations (2.0); correspondence with D. Rivero re: same (0.2).	A Mitra	8.30	9,213.00
29 August 2025	Research re: feasibility (4.9); review confirmation brief (0.4) and Bacon objection (0.3).	G Delgado	5.60	5,544.00
29 August 2025	Zoom meeting with W&C team re: Dundon Declaration in Support of Plan Confirmation (0.5); draft Response to Plan Objection re: fee examiner (3.1); draft Response to Plan Objection re: failure under local rules (1.9); legal research re: appointing examiner (2.3); legal research re: case law limiting scope of examiner (2.8); review and edit Witness and Exhibit list for Confirmation Hearing (1.0).	P Giovine	11.60	11,484.00
30 August 2025	Review and revise Utz confirmation declaration.	S Hershey	0.50	895.00
30 August 2025	Research re: response to Bacon objection (1.2); email	S Kava	4.00	5,120.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	G. Delgado re: same (0.3); call with G. Delgado and D. Rivero re: same (0.2); revise draft rider to brief (2.2); email A. Aquije re: same (0.1).			
30 August 2025	Draft, review and revise confirmation brief for Kelly Hamilton and reply to objections (4.6); draft, review and revise declaration in support of confirmation for Kelly Hamilton (1.3).	D Rivero	5.90	7,552.00
30 August 2025	Further revise confirmation brief.	A Aquije	1.20	1,332.00
30 August 2025	Further review precedent and consider argument re: released parties definition (1.0); review and revise rider to Debtors reply re: releases (1.3); correspondence with D. Rivero re: same (0.2).	A Mitra	2.50	2,775.00
30 August 2025	Call with S. Kava and D. Rivero (0.1); draft class certification rider (2.4).	G Delgado	2.50	2,475.00
30 August 2025	Factual research re: excluded parties under Plan and relevant filings in New York state court action.	P Giovine	3.60	3,564.00
31 August 2025	Review and revise confirmation brief.	L Baccash	1.60	2,704.00
31 August 2025	Revise objection chart (0.3); email D. Rivero re: same (0.1); email D. Rivero re: solicitation (0.2); revise response to objections (0.3); email D. Rivero re: same (0.1).	S Kava	1.00	1,280.00
31 August 2025	Draft, review and revise confirmation brief for Kelly Hamilton and reply to objections.	D Rivero	2.10	2,688.00
31 August 2025	Further revise confirmation brief, incorporating comments from D. Rivero and S. Kava.	A Aquije	2.20	2,442.00
31 August 2025	Substantive cite check re: confirmation brief.	G Delgado	7.10	7,029.00
31 August 2025	Substantive review re: examiner section of Confirmation Brief.	P Giovine	2.80	2,772.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement: Kelly Hamilton			381.30	485,942.00

Executory Contracts & Unexpired Leases

7 August 2025	Draft notice of supplemental assumption of contract (1.0); correspondence re: schedules re: same (0.2).	A Aquije	1.20	1,332.00
7 August 2025	Assist team with redacting Schedules for supplemental assumption notices re: Kelly Hamilton Apartments assumed contracts.	A Venes	5.20	2,548.00
8 August 2025	Email to team re: next steps re: finalizing/submitting supplemental assumption notice (0.2); compile unredacted/redacted versions of supplemental assumption notice and send to team for final review (0.2); e-file redacted version of supplemental	A Venes	0.80	392.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	assumption notice (0.2); e-file master service list (0.2).			
19 August 2025	Revise notice of assumption of executory contracts.	A Aquije	0.40	444.00
19 August 2025	Review and respond to emails with A. Aquije, L. Baccash, B. Lingle and D. Rivero re: schedule of executory contracts and unexpired leases (NOLA) (0.2); review and redact schedules pursuant to A. Aquije's request (3.0); prepare individualized redactions for service packages of same (3.3); coordinate with K. Wick to assist with redactions (0.2).	Hirshorn, Deanna	6.70	3,283.00
19 August 2025	Prepare redacted contracts list (2.1); confer and correspondence with D. Hirshorn re: same (2.2).	K Wick	4.30	2,107.00
20 August 2025	Continue to prepare individualized redacted packages of schedule of executory contracts (NOLA) (4.0); coordinate with C. Gallo re: preparing individualized redactions in preparation for service packages (0.1); coordinate with G. Cuevas to combine numerous single page redacted files (0.1); review and respond to emails with D. Rivero, A. Aquije, L. Baccash and B. Lingle re: update on individualized redaction packages (0.2); coordinate with Copy Center to print and scan to flatten redactions (0.1).	Hirshorn, Deanna	4.50	2,205.00
20 August 2025	Prepare redacted contracts list (0.8); confer and correspondence with D. Hirshorn re: same (0.8).	K Wick	1.60	784.00
21 August 2025	Call with D. Rivero and B. Lingle re: assumptions schedule for NOLA.	L Baccash	0.20	338.00
21 August 2025	Review and prepare individualized redacted Schedule A - Assumption list for service; telephone calls with C. Gallo re: same (0.2); telephone call with E. Yu re: same (0.1); prepare for conference call with legal assistants to delegate work preparing individualized redacted schedule A (0.3); conference call with K. Wick, C. Gallo and E. Yu re: preparation of individualized redacted schedule A (0.4); telephone calls with A. Aquije re: assumption list (0.3); telephone calls with D. Rivero re: same (0.2); confer with D. Rivero and A. Aquije re: same (0.1); prepare individualized redacted schedule A for service (4.3).	Hirshorn, Deanna	5.90	2,891.00
21 August 2025	Prepare redacted contracts list (1.4); confer and correspondence with D. Hirshorn re: same (1.4).	K Wick	2.80	1,372.00
22 August 2025	Review and respond to email with D. Rivero re: upcoming filing (0.1); review, finalize and file notice of possible assumption and assignment (0.2); coordinate service of same (0.1).	Hirshorn, Deanna	0.40	196.00
SUBTOTAL: Executory Contracts & Unexpired Leases			34.00	17,892.00

Hearings & Court Matters

14 August 2025	Review hearing outline from B. Lingle (0.2); attend	L Baccash	0.40	676.00
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Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	hearing re: NOLA bid procedures (0.2).			
14 August 2025	Prepare for NOLA bidding procedures hearing (1.4); participate in hearing (0.2).	B Lingle	1.60	2,192.00
14 August 2025	Attend hearing re: bidding procedures.	A Aquije	0.20	222.00
18 August 2025	Draft correspondence re: witness and exhibit list for August 21 hearing (0.1); revise same (0.5); draft correspondence with Verita confirming service (0.5); revise witness and exhibit list (0.2); confer with P. Giovine re: same (0.3); revise same (0.2).	L Curtis	1.80	2,304.00
19 August 2025	Draft correspondence re: hearing preparation for August 21 hearing (0.8); draft outline re: same (1.7).	L Curtis	2.50	3,200.00
19 August 2025	Prepare hearing binder materials for L. Curtis.	K Wick	2.10	1,029.00
20 August 2025	Draft outline for CBRM hearing on August 21 (0.4); continuing drafting same (3.8); continuing drafting same (1.2); confer with S. Hershey re: same (0.3); continue drafting same (1.8).	L Curtis	7.50	9,600.00
21 August 2025	Attend hearing re: Silber motions.	L Baccash	0.50	845.00
21 August 2025	Participate in hearing re: motion to conduct rule 2004 examination.	B Lingle	0.40	548.00
21 August 2025	Attend and argue August 21 hearing.	L Curtis	0.60	768.00
21 August 2025	Attend hearing re: Silber motions.	S Kava	0.30	384.00
21 August 2025	Attend hearing re: opposition to Silber motions.	A Aquije	0.30	333.00
21 August 2025	Attend hearing re: discovery from Silber.	P Giovine	0.30	297.00
29 August 2025	Prepare agenda for upcoming September 4th hearing (1.0); prepare witness and exhibit list for upcoming hearing (1.5); pull and finalize exhibits to witness and exhibit list (1.9); confer with P. Giovine re: same (0.2); file witness and exhibit list with exhibits as attachments (0.9); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	5.60	2,744.00
SUBTOTAL: Hearings & Court Matters			24.10	25,142.00

Litigation & Discovery

1 August 2025	Review litigation emails from P. Giovine.	S Kava	0.30	384.00
1 August 2025	Emails and calls with Litigation Technology re: production in response to subpoena in state case re: debtors (0.4); draft production letter (1.3); review and redact documents for personally identifiable information in preparation for production (0.6); quality check production (0.2); email counsel re: production	P Giovine	2.80	2,772.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.3).			
1 August 2025	Run/create production searches (0.3); run review coding conflict checks (0.3); prepare production images (0.3); and perform image quality checks (0.3); create production sets (0.3); run production bates stamping (0.3); export produced data (0.3); and perform data post-export cleanup (0.3); create new FTP workspace and user account management (0.4).	T Chen	2.80	1,372.00
5 August 2025	Call with L. Curtis and G. Sutherland re: litigation workstreams.	A Aquije	0.20	222.00
6 August 2025	Review, revise notice of abatement of adversary proceeding (0.2); correspond with Lynd, W&C team re: Chenault administrative judgment (0.3).	B Lingle	0.50	685.00
7 August 2025	Correspondence with G. Delgado re: removal extension motion (1.0); research and review precedent re: same (1.0); prepare draft of same (1.0).	A Mitra	3.00	3,330.00
7 August 2025	Calls and emails with W&C team re: open issues and next steps (0.2); analysis for S. Kava re: outstanding litigation items (3.8).	G Sutherland	4.00	4,440.00
7 August 2025	Assist team with e-filing of notice of stipulation and agreed order staying adversary proceeding (0.2); confirm filing with team (0.1).	A Venes	0.30	147.00
8 August 2025	Review precedent and draft removal extension motion.	A Mitra	3.00	3,330.00
8 August 2025	Analysis for S. Kava re: outstanding litigation items.	G Sutherland	4.60	5,106.00
9 August 2025	Review research team and G. Sutherland's analysis on pending litigation against debtors.	S Kava	0.60	768.00
9 August 2025	Analysis for S. Kava and L. Curtis re: outstanding litigation items.	G Sutherland	3.40	3,774.00
10 August 2025	Review research from G. Sutherland re: pending litigation.	S Kava	0.50	640.00
10 August 2025	Analysis for S. Kava and L. Curtis re: outstanding litigation items.	G Sutherland	3.60	3,996.00
11 August 2025	Review and revise removal extension motion.	L Baccash	0.30	507.00
11 August 2025	Draft removal extension motion (0.8); correspondence with L. Baccash and B. Lingle re: same (0.2).	A Mitra	1.00	1,110.00
11 August 2025	Analysis for S. Kava and L. Curtis re: outstanding litigation items (1.1); correspondence with internal teams re: same (0.2).	G Sutherland	1.30	1,443.00
12 August 2025	Correspond with L. Curtis re: litigation matters and declaration.	S Hershey	1.00	1,790.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 August 2025	Review and revise removal extension motion.	L Baccash	0.20	338.00
12 August 2025	Review, revise removal extension motion.	B Lingle	1.00	1,370.00
12 August 2025	Call with L. Curtis and G. Sutherland re: litigation workstreams (0.2); email local counsel re: issue (0.1).	S Kava	0.30	384.00
12 August 2025	Review precedent and draft removal extension motion (0.6); correspondence with L. Baccash and B. Lingle re: same (0.5).	A Mitra	1.10	1,221.00
12 August 2025	Analysis for S. Kava and L. Curtis re: outstanding litigation items (2.2); calls and correspondence with same re: same (0.4).	G Sutherland	2.60	2,886.00
13 August 2025	Review and revise removal extension motion per B. Lingle comments (0.6); correspondence with L. Baccash and B. Lingle re: same (0.3).	A Mitra	0.90	999.00
13 August 2025	Reviewer account management (0.4); provide document review support (0.5).	T Chen	0.90	441.00
13 August 2025	Prepare documents for review re: Crown Capital Holdings LLC: process and export documents in Venio (0.6); upload documents to Relativity (0.4).	P Galvan	1.00	420.00
14 August 2025	Correspondence with A. Mitra re: removal motion and service issues.	L Baccash	0.20	338.00
14 August 2025	Review, revise removal extension motion (0.2); telephone conferences, correspond with D. Hirshorn, A. Mitra re: service of motion to extend removal deadline (0.4).	B Lingle	0.60	822.00
14 August 2025	Call with L. Curtis re: local litigation (0.2); call with L. Hoffman re: same (0.1); review local litigation chart from G. Sutherland (0.3).	S Kava	0.60	768.00
14 August 2025	Substantive review re: filed objections.	A Branson	3.50	3,885.00
14 August 2025	Correspondence with Verita Team re: service of removal extension motion and noticing information (1.0); review various litigation, claims, pending actions re: parties, counsel and service information (2.5); correspondence with D. Hirshorn, B. Lingle, L. Baccash, L. Curtis, G. Sutherland, and others re: same (0.6); call with G. Sutherland re: same (0.2); call with B. Lingle re: same (0.1); calls with D. Hirshorn re: same (0.4); review and revise removal extension motion per B. Lingle comments (0.2); correspondence with L. Baccash and B. Lingle re: same and service process update (0.2).	A Mitra	5.20	5,772.00
14 August 2025	Emails with W&C team re: outstanding litigation (0.1); analysis re: same (0.1).	G Sutherland	0.20	222.00
14 August 2025	Review and respond to emails with A. Mitra re:	Hirshorn, Deanna	3.40	1,666.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	upcoming filing of motion to extend removal period deadline (0.1); prepare notice of hearing re: same (0.5); telephone calls A. Mitra re: motion and locating notice parties (0.3); telephone call with B. Lingle re: notice parties (0.1); research notice parties of state court actions (2.0); update chart and email A. Mitra re: same (0.3); emails with A. Mitra and B. Lingle re: same (0.1).			
15 August 2025	Review, revise notice for removal extension motion (0.3); correspond with A. Mitra re: service information for notice of same (0.5).	B Lingle	0.80	1,096.00
15 August 2025	Call with L. Curtis re: local litigation (0.1); email correspondence re: E. Rosenberg re filing local notices (0.1).	S Kava	0.20	256.00
15 August 2025	Correspondence with Verita Team re: noticing information for various parties to pending actions (0.2); review various litigation, claims, pending actions re: parties, counsel and service information (2.0); correspondence with D. Hirshorn, B. Lingle, L. Baccash, and others re: same (0.3); review and revise removal extension motion per B. Lingle comments (0.3); correspondence with L. Baccash and B. Lingle re: same (0.2); finalize draft and coordinate filing of same and emails with Verita re: service (0.3).	A Mitra	3.30	3,663.00
18 August 2025	Correspondence with W&C Team re: removal extension motion and application to shorten notice of same (0.2); draft same (0.6); review and revise same (0.2); emails with D. Hirshorn and B. Lingle re: same (0.2); coordinate filing of same (0.2).	A Mitra	1.40	1,554.00
18 August 2025	Call with P. Giovine re: state court issues (0.2); emails with W&C team re: same (0.2); legal research re: same (0.2).	G Sutherland	0.60	666.00
18 August 2025	Call with L. Curtis re: litigation tracker chart (0.3); call with G. Sutherland re: preparation of litigation tracker chart (0.1); prepare litigation chart (3.9); identify cases in New Jersey, New York and Louisiana state court for addition to litigation chart (2.4).	P Giovine	6.70	6,633.00
18 August 2025	Review emails with B. Lingle, L. Baccash, and A. Mitra re: application for shortened time re: extension of removal deadline motion (0.1); confer with A. Mitra re: same (0.1); review emails with B. Lingle and A. Mitra re: application for shortening time re: extension of removal notice motion (0.1); finalize and file same (0.1).	Hirshorn, Deanna	0.40	196.00
19 August 2025	Telephone conference with counsel to member of Rhodium Multi Family II LLC re: letter to E. LaPuma.	B Lingle	0.30	411.00
19 August 2025	Correspondence with S. Kava re: litigation chart (0.1); emails with S. Kava, L. Curtis, and P. Giovine re: same (0.1) and review notes re: same (0.1).	A Mitra	0.30	333.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 August 2025	Calls and emails with W&C team re: litigation issues.	G Sutherland	0.40	444.00
19 August 2025	Proof Schedule of Retained Causes of Action (0.5); draft Proposed Order Granting Stay in Nyress, No. 2021-05388 (0.9); prepare spreadsheet noting recent litigation brought against debtors (0.6).	P Giovine	2.00	1,980.00
20 August 2025	Review background materials and request requests from SEC (0.4); emails with client (0.4); call with clients (0.4); call with SEC (0.5).	J Cohen	1.70	3,995.00
20 August 2025	Correspond with G. Pesce, J. Cohen and outside counsel re: document preservation.	S Hershey	0.80	1,432.00
20 August 2025	Emails with E. Rosenberg re: East Baton Rouge court notifications (0.1); emails with P. Giovine re: same (0.1).	Hirshorn, Deanna	0.20	98.00
21 August 2025	Correspond with M. Dundon and L. Curtis in preparation for hearing.	S Hershey	0.50	895.00
21 August 2025	Call with S. Hershey re: local action (0.1); revise consent order for local action (0.5); email local counsel re: same (0.1).	S Kava	0.70	896.00
25 August 2025	Research state court action for P. Giovine (0.2); telephone call to Clerk re: same (0.1); email P. Giovine re: status of state court case (0.1); coordinate with Copy Center and Mailroom to serve Letter to New Orleans Dept of Code Enforcement (0.1).	Hirshorn, Deanna	0.50	245.00
26 August 2025	Legal research re: opposition to examiner motion.	P Giovine	2.20	2,178.00
27 August 2025	Legal research re: opposition to examiner motion (0.2); emails with local re: stipulation (0.4); legal research re: opposition to examiner motion (3.1).	P Giovine	3.70	3,663.00
28 August 2025	Draft correspondence with S. Hershey re: litigation strategy (1.6); confer with S. Hershey re: same (0.3); draft correspondence with S. Hershey re: same (1.0); confer with S. Hershey re: same (0.3).	L Curtis	3.20	4,096.00
SUBTOTAL: Litigation & Discovery			84.80	92,078.00

Professional Retention & Fees – W&C

1 August 2025	Correspondence with B. Lingle and G. Pesce re: retention issues.	L Baccash	0.20	338.00
1 August 2025	Coordinate with W&C team re: time entries.	A Aquije	0.20	222.00
4 August 2025	Revise escrow agreement (0.2); email R. Goldsborough re: same (0.1).	S Kava	0.30	384.00
4 August 2025	Further correspondence with W&C team re: time entry review.	A Aquije	0.10	111.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
5 August 2025	Review and revise fee statement.	L Baccash	0.40	676.00
5 August 2025	Review, revise May monthly fee statement.	B Lingle	1.00	1,370.00
5 August 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (1.2); draft fee statement re: same (1.8).	A Aquije	3.00	3,330.00
6 August 2025	Review, revise May monthly fee statement.	B Lingle	0.30	411.00
6 August 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.5); further revise fee statement, incorporating comments from B. Lingle (1.5).	A Aquije	2.00	2,220.00
7 August 2025	Review, revise May monthly fee statement.	B Lingle	0.50	685.00
7 August 2025	Call with S. Kava re: pro forma review (0.1); correspondence with same re: same (0.1).	A Aquije	0.20	222.00
10 August 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Kava	4.30	5,504.00
10 August 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.2); correspondence with Billing team re: same (0.1).	A Aquije	0.30	333.00
11 August 2025	Further revise first monthly fee statement, incorporating comments from G. Pesce.	A Aquije	0.30	333.00
12 August 2025	Review pro forma time entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	D Rivero	1.20	1,536.00
13 August 2025	Review, revise June fee statement.	B Lingle	1.40	1,918.00
13 August 2025	Further revise monthly fee statement, incorporating comments from G. Pesce.	A Aquije	0.40	444.00
14 August 2025	Review, revise May and June fee statements.	B Lingle	0.40	548.00
14 August 2025	Review pro forma time entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	D Rivero	1.90	2,432.00
14 August 2025	Further revise first monthly fee statement (0.2); draft second monthly fee statement (0.4); review pro forma	A Aquije	1.40	1,554.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.8).			
14 August 2025	Review and respond to email with A. Aquije, L. Baccash and B. Lingle re: W&C May Monthly Fee Statement (0.1); review and finalize same (0.2); file same (0.1); coordinate service with Verita re: same (0.1).	Hirshorn, Deanna	0.50	245.00
18 August 2025	Review, revise June monthly fee statement and correspond with W&C team re: same.	B Lingle	0.90	1,233.00
18 August 2025	Email J. Lubertazzi re: escrow account (0.1); review professional fee escrow agreement sent by M. Burstein (0.5); email WSFS bank re: same (0.1); email IslandDundon team re: wiring instructions (0.1).	S Kava	0.80	1,024.00
18 August 2025	Draft June fee statement.	A Aquije	0.60	666.00
19 August 2025	Correspondence re: fee application with G. Pesce and review of same (0.1); call with D. Rivero re: W&C retention re: Laguna (0.1).	L Baccash	0.20	338.00
19 August 2025	Review June monthly fee statement re: expenses.	B Lingle	0.30	411.00
19 August 2025	Correspond with W&C re: conflicts search for new debtor entity.	D Rivero	0.30	384.00
19 August 2025	Finalize June fee statement.	A Aquije	0.40	444.00
20 August 2025	Review and W&C revise fee statement.	L Baccash	0.50	845.00
20 August 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Kava	2.30	2,944.00
20 August 2025	Review conflicts search for new debtor entity (0.2); draft supplemental retention declaration for new debtor entity (1.9).	D Rivero	2.10	2,688.00
20 August 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (3.7); revise fee statement for invoicing (0.2); correspondence with billing team re: pro forma review (0.2).	A Aquije	4.10	4,551.00
21 August 2025	Review and revise supplemental declaration for retention re: new debtor entity.	D Rivero	1.70	2,176.00
21 August 2025	Extensive correspondence with billing team re: revisions to pro forma.	A Aquije	0.60	666.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 August 2025	Correspondence with S. Kava re: retention issues.	L Baccash	0.20	338.00
22 August 2025	Review and revise supplemental declaration for retention re: new debtor entity.	D Rivero	0.50	640.00
22 August 2025	Review, finalize and file supplemental Pesce declaration in support of W&C retention application (0.2); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.30	147.00
29 August 2025	Coordination re: W&C fee statements and pro fee escrow (0.6); and telephone conference with T. Rizvi, S. Kava re: same (0.6).	B Lingle	1.20	1,644.00
29 August 2025	Draft CNO for W&C May monthly fee statement (0.4); emails with W&C team re: same (0.1); draft instruction letter to escrow agent re: same (0.3); email with W&C team re: same (0.1); finalize escrow letter (0.4).	S Ludovici	1.30	1,443.00
SUBTOTAL: Professional Retention & Fees – W&C			38.60	47,398.00

Professional Retention & Fees – Other

1 August 2025	Review and revise independent fiduciary amendment to engagement letter (0.4); correspondence with G. Pesce and B. Lingle re: same (0.1).	L Baccash	0.50	845.00
1 August 2025	Review, revise LaPuma engagement amendment.	B Lingle	0.50	685.00
1 August 2025	Further revise amendment to E. LaPuma letter, incorporating comments from B. Lingle (0.5); further revise same, incorporating comments from G. Pesce (0.9).	A Aquije	1.40	1,554.00
4 August 2025	Review informal comments from US Trustee re: retentions of Hilco and L&A (0.2); call with B. Lingle re: same (0.2).	L Baccash	0.40	676.00
4 August 2025	Correspond with L. Baccash, S. Kava re: US Trustee comments to L&A and Hilco retention orders.	B Lingle	0.40	548.00
4 August 2025	Email B. Lingle re: L&A and Hilco comments from US Trustee (0.1); draft responses to L&A and Hilco questions (1.3); review precedent real estate broker orders (0.8); revise order (1.2).	S Kava	3.40	4,352.00
5 August 2025	Review draft retention correspondence re: questions from US Trustee re: Hilco and L&A (0.8); review correspondence re: Dundon retention issues from US Trustee (0.2); call with S. Kava, B. Lingle re: retention order revisions (0.2); call with S. Kava, B. Lingle re: retention order revisions (0.2).	L Baccash	1.40	2,366.00
5 August 2025	Review, revise L&A retention order and response to US Trustee.	B Lingle	1.00	1,370.00
5 August 2025	Email B. Lingle redline and research precedent orders	S Kava	3.20	4,096.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.7); revise order L&A order (0.6); further draft responses to US Trustee for B. Lingle (0.8); call with B. Lingle re: same (0.1); further revise order (0.4) and revise answers to US Trustee requests (0.6).			
5 August 2025	Emails with A. Aquije and G. Delgado re: fee application.	A Mitra	0.10	111.00
6 August 2025	Review, revise response to US Trustee comments to L&A and Hilco retention orders.	B Lingle	0.60	822.00
6 August 2025	Further revise retention orders to brokers (2.4); revise answers to US Trustee questions (0.6).	S Kava	3.00	3,840.00
6 August 2025	Draft supplemental declarations re: Hilco and L&A retention.	G Delgado	1.10	1,089.00
7 August 2025	Review retention issues.	L Baccash	0.40	676.00
7 August 2025	Review, revise supplemental L&A declaration and supplemental Hilco declaration.	B Lingle	0.50	685.00
7 August 2025	Draft L&A and Hilco supplemental declarations (0.8); further revise both re: comments from B. Lingle (0.3).	S Kava	1.10	1,408.00
12 August 2025	Correspond with G. Pesce, J. Walz, A. Mitra supplemental ordinary course professional list.	B Lingle	0.30	411.00
12 August 2025	Email US Trustee re: retention orders (0.1); review orders and declaration (0.2).	S Kava	0.30	384.00
12 August 2025	Correspondence with B. Lingle and J. Walz re: ordinary course professionals supplement (0.2); confer with J. Walz re: same (0.1); review ordinary course professionals motion, ordinary course professionals order, and precedent (0.8).	A Mitra	1.10	1,221.00
13 August 2025	Call with B. Lingle and S. Kava re: US Trustee comments to L&A retention.	L Baccash	0.30	507.00
13 August 2025	Telephone conference with L. Baccash, S. Kava re: L&A retention.	B Lingle	0.20	274.00
13 August 2025	Research re: precedent broker apps (1.0); email L. Baccash and B. Lingle re: same (0.1); call L. Schedler re: application (0.2); review L&A retention order (0.3); correspondences with L&A team (0.2); call with L. Baccash and B. Lingle re: same (0.4); discuss ordinary course professional issues with J. Walz (0.3); review email correspondences re: same (0.4).	S Kava	2.90	3,712.00
14 August 2025	Correspondence with L. Baccash, B. Lingle and J. Walz re: ordinary course professionals supplement (0.2); confer with J. Walz re: same (0.1); provide comments to J. Walz (0.1).	A Mitra	0.40	444.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
15 August 2025	Prepare for call with US Trustee (0.2); call with J. Sponder, S. Kava re: Hilco and L&A retentions (0.4); correspondence with S. Kava re: same (0.2).	L Baccash	0.80	1,352.00
15 August 2025	Review, revise supplemental ordinary course professional list.	B Lingle	0.20	274.00
15 August 2025	Review US Trustee comments to retention orders (0.2); participate in call with US Trustee re: same (0.3); email L. Baccash and B. Lingle next steps for resolution (0.2).	S Kava	0.70	896.00
15 August 2025	Correspondence with B. Lingle and L. Baccash re: ordinary course professionals supplement (0.2); review and revise same (0.2); additional review and revisions (0.1); email to N. Pepin re: additional professionals information required for supplement (0.1).	A Mitra	0.60	666.00
16 August 2025	Revise HilCo retention order (0.2); review, draft HilCo supplemental declaration (0.2); revise L&A retention order (0.7); draft Cushman declaration (1.0); review, draft L&A supplemental declaration (0.8).	S Kava	2.90	3,712.00
18 August 2025	Review and revise orders, declarations re: retentions re: Hilco and L&A.	L Baccash	0.70	1,183.00
18 August 2025	Review, revise Hilco and L&A retention orders and supplemental declarations (0.6); review, revise application for shortened time (0.3).	B Lingle	0.90	1,233.00
18 August 2025	Revise Cushman declaration (1.0); revise L&A declaration (0.4); review orders re: same (0.7); review Hilco order and declaration (0.5).	S Kava	2.60	3,328.00
18 August 2025	Emails with B. Lingle and N. Pepin re: additional professionals information required for supplement.	A Mitra	0.10	111.00
19 August 2025	Review and revise retentions re: Hilco and L&A (0.4); review OCP issues (0.2).	L Baccash	0.60	1,014.00
19 August 2025	Correspond with W&C team re: ordinary course professional issues.	B Lingle	0.40	548.00
19 August 2025	Revise Hilco retention order (0.3); draft and revise supplemental declaration (0.8); revise L&A retention order (0.6); draft and revise supplemental declarations (1.0); email J. Azuse re: same and US Trustee questions (0.3); email L. Schedler and Cushman re: same (0.3); email B. Lingle re: same (0.1); revise declaration and order re: Hilco comments (0.3); draft response to US Trustee re: Hilco retention (1.0); email L. Krucks re: Hilco retention (0.1); email L. Schedler re: L&A retention (0.1); email Cushman re: declaration (0.1); email US Trustee re: retention orders (0.1); further email US Trustee re: declarations (0.1); email Verita re: conflicts (0.1); email K. Rosen re: same (0.1); email ID re: same (0.1).	S Kava	5.50	7,040.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 August 2025	Draft supplemental declarations in support of retention applications for Debtors' advisors.	A Aquije	1.10	1,221.00
19 August 2025	Emails with B. Lingle and N. Pepin re: additional professionals information required for supplement (0.1); review and revise ordinary course professionals supplement (0.3).	A Mitra	0.40	444.00
20 August 2025	Review and revise retentions and email to US Trustee re: Hilco and L&A (0.3); correspondence with S. Kava re: same (0.1).	L Baccash	0.40	676.00
20 August 2025	Review, revise supplemental ordinary course professional list.	B Lingle	0.20	274.00
20 August 2025	Further draft email response to US Trustee re: retention of Hilco and L&A.	S Kava	0.70	896.00
20 August 2025	Correspondence with B. Lingle and N. Pepin re: ordinary course professionals supplement (0.2); finalize same for filing (0.1); correspondence with D. Hirshorn and Verita Team re: service on OCP notice parties (0.1).	A Mitra	0.40	444.00
20 August 2025	Review and respond to email from A. Mitra re: upcoming filing of first ordinary course of business supplement (0.1); review, finalize and file same (0.1); coordinate service of same with Verita (0.1); review and respond to email with J. Walz re: filing of ordinary course professional declarations (0.1); review and file OCP declaration (0.1); review and file OCP declaration (0.1); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.70	343.00
21 August 2025	Review fee statement issues for W&C (0.2); review supplemental retention declaration (0.2).	L Baccash	0.40	676.00
21 August 2025	Revise Hilco supplemental declaration (0.4); email Hilco re: same (0.1); email US Trustee re: same (0.1); email D. Hirshorn re: filing of Cushman and L&A supplemental declarations (0.1); email US Trustee re: revise Hilco declaration (0.1); email D. Hirshorn re: Hilco supplemental declaration filing (0.1).	S Kava	0.90	1,152.00
21 August 2025	Review and file Cushman Retention Declaration (0.1); review and file Hilco Retention Declaration (0.1); review and file Larry Schedler Retention Declaration (0.1); review and respond to emails with S. Kava re: same (0.1); coordinate service of declarations with Verita (0.1); file ordinary course professional declaration (0.1).	Hirshorn, Deanna	0.60	294.00
22 August 2025	Coordinate service of Hilco and Schedler retention orders with Veria.	Hirshorn, Deanna	0.10	49.00
23 August 2025	Review, finalize and file supplemental Rosen Declaration in support of NJ Counsel retention application (0.1); review, finalize and file Gershbein Declaration in support of Vertia retention application	Hirshorn, Deanna	0.70	343.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); review, finalize and file Schedler Declaration in support of Larry G. Schedler & Associates retention application (0.1); review, finalize and file Kemether Declaration in support of Larry G. Schedler & Associates retention application (0.1); review, finalize and file Kaup Declaration in support of Hllco retention application (0.1); download and coordinate service of same with Verita (0.2).			
SUBTOTAL: Professional Retention & Fees – Other			47.10	60,245.00

Reports, Schedules & U.S. Trustee Issues

12 August 2025	Review and respond to D. Rivero re: statements and SOFAs.	Hirshorn, Deanna	0.10	49.00
19 August 2025	Correspond with U.S. Trustee re: filing of Laguna Reserve.	B Lingle	0.40	548.00
21 August 2025	Review monthly operating reports (0.2) and call with B. Lingle re: same (0.1); review revisions to schedules and statements (0.2).	L Baccash	0.50	845.00
21 August 2025	Review, revise July monthly operating reports.	B Lingle	1.90	2,603.00
21 August 2025	Review, revise monthly operating reports (1.2); email B. Lingle analysis of prepetition debt (1.0); further review and revise MORs re: cleansing information (1.6); multiple correspondences with D. Hirshorn re: same (0.4).	S Kava	4.20	5,376.00
21 August 2025	Review and redact monthly operating reports in preparation for filing (1.6); confer with S. Kava re: same (0.2); redact additional information (0.1); file monthly operating reports (0.5); download and coordinate service of same with Verita (0.3).	Hirshorn, Deanna	2.70	1,323.00
22 August 2025	Call with P. Giovine and B. Lingle re: amended schedule of litigation.	L Baccash	0.50	845.00
22 August 2025	Telephone conference with L. Baccash, P. Giovine re: amended schedules and statements.	B Lingle	0.50	685.00
22 August 2025	Revise draft SOFA amendment excel to send to Dundon and Verita.	P Giovine	2.80	2,772.00
25 August 2025	Revise Laguna omnibus order (0.5) and draft notice (0.5); email D. Hirshorn re: same (0.1); draft notice re: schedules and bar date (1.7).	S Kava	2.80	3,584.00
26 August 2025	Factual research re: litigation against debtors (1.4) and revise amended Schedules and SOFAs re: same (1.4).	P Giovine	2.80	2,772.00
27 August 2025	Review revised schedules (0.1); review schedules for Laguna (0.2).	L Baccash	0.30	507.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 August 2025	Review, revise Laguna Reserve schedules and statements and notice of deadline to file proof of claims (0.4); correspond with S. Kava re: same (0.2).	B Lingle	0.60	822.00
27 August 2025	Revise schedules from Dundon (0.6); email correspondence with B. Lingle re: same (0.2).	S Kava	0.80	1,024.00
27 August 2025	Review and edit amended SOFA and Schedules.	P Giovine	1.20	1,188.00
28 August 2025	Telephone conference with L. Baccash, US Trustee re: comments to plan (0.4); respond to US Trustee confirmation objections (1.8); telephone conference with L. Baccash re: same (0.4); telephone conference with L. Baccash, S. Kava re: Laguna schedules and statements (0.3).	B Lingle	2.90	3,973.00
28 August 2025	Call with B. Lingle and L. Baccash re: schedules.	S Kava	0.20	256.00
28 August 2025	Review edits re: litigation to amended SOFAs and Schedules.	P Giovine	0.30	297.00
29 August 2025	Call with S. Kava and B. Lingle re: schedules for Laguna.	L Baccash	0.20	338.00
29 August 2025	Telephone conference with L. Baccash, S. Kava re: Laguna Reserve schedules and statements.	B Lingle	0.40	548.00
29 August 2025	Call with B. Lingle and L. Baccash re: schedules (0.1); review and revise same (0.4); email M. Whalen re: same (0.2); call with T. Rizvi and M. Whalen re: same (0.3); email M. Whalen (0.1); coordinate filing of same (0.3).	S Kava	1.40	1,792.00
29 August 2025	Review and file Schedules and SOFAs for Laguna Reserves (0.3); confer with S. Kava re: same (0.1).	Hirshorn, Deanna	0.40	196.00
SUBTOTAL: Reports, Schedules & U.S. Trustee Issues			27.90	32,343.00

Development of Claims and Causes of Action

1 August 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	0.80	1,680.00
1 August 2025	Correspondence with B. Lingle re: Silber motions (0.2); review of equity committee motion filed by Silber (0.2); call with S. Hershey and B. Lingle re: same (0.1).	L Baccash	0.50	845.00
1 August 2025	Confer with W&C team re: discovery in response to subpoena (0.6); confer with W&C team re: Silber motions (0.2).	J Yoo	0.80	1,096.00
1 August 2025	Run quality control over completed production (0.2); confer with PT team about completed quality control (0.2); release to case team (0.1); finalize release of production to case team (0.2); upload to FTP (0.2); calls with case team re: zip troubleshooting (0.2); copy	J Morales	1.50	735.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	data for case team review (0.4).			
1 August 2025	Work on production re: searches and conflicts (0.1); image and endorse files (0.1); scrub text for redacted items (0.1); apply redactions to images and their families (0.1); wipe off metadata (0.1); set up custom made loadfile (0.1); populate metadata (0.1); perform quality control (0.1); export and set up appropriate production structure (0.1); zip up and encrypt (0.1).	G Chemborisov	1.00	490.00
3 August 2025	Prepare materials and analysis re: potential estate claims against targeted parties, including logistics for Silber prison deposition.	G Pesce	0.80	1,680.00
4 August 2025	Prepare materials and analysis re: potential estate claims against targeted parties including Silber prison interview.	G Pesce	0.80	1,680.00
4 August 2025	Research re: 30(b) depositions.	A Aquije	1.40	1,554.00
5 August 2025	Research re: 30(b) depositions (0.6); draft summary re: same (0.5); draft opposition to motion to appoint equity committee (4.7).	A Aquije	5.80	6,438.00
5 August 2025	Multiple calls (0.1) and emails with L. Curtis and A. Aquije re: open issues re: Silber objections (0.2).	G Sutherland	0.30	333.00
5 August 2025	Prepare objection to motion for equity committee for L. Curtis.	G Sutherland	4.90	5,439.00
6 August 2025	Confer with G. Sutherland and others re: objection to Silber equity motion (0.3); draft correspondence re: same (0.6).	L Curtis	0.90	1,152.00
6 August 2025	Review notice of stipulation (0.6); email G. Pesce re: same (0.1); email A. Sherman re: same (0.1); revise stipulation re: comments from Spano (0.1).	S Kava	0.90	1,152.00
6 August 2025	Draft objection to motion for appointment of equity committee (1.4); further revise same, incorporating comments from L. Curtis (0.6); research re: notice to incarcerated individuals (0.2); final review re: same (0.4).	A Aquije	2.60	2,886.00
6 August 2025	Legal research for L. Curtis re: objection to motion for equity committee (4.4); prepare and revise same re: same (2.0).	G Sutherland	6.40	7,104.00
7 August 2025	Correspond re: potential Silber deposition.	S Hershey	0.30	537.00
7 August 2025	Coordinate filing of notice of stipulation in adversary proceeding with A. Venes.	S Kava	0.30	384.00
7 August 2025	Draft motion for leave to depose founder (1.8); research re: same (1.5).	A Aquije	3.30	3,663.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 August 2025	Legal research for L. Curtis re: motion for leave (1.6); emails with W&C team re: same. (1.1); prepare and revise same (2.5).	G Sutherland	5.20	5,772.00
8 August 2025	Telephone conference with S. Hershey, D. Kamensky, J. Millar re: deposition of Silber.	B Lingle	0.30	411.00
8 August 2025	Confer with S. Hershey and others re: objections to Silber motions (0.2); revise same (1.8).	L Curtis	2.00	2,560.00
10 August 2025	Revise objections to Silber motions (2.6); confer with S. Hershey re: same (0.1).	L Curtis	2.70	3,456.00
11 August 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	0.80	1,680.00
11 August 2025	Review Silber motions for equity committee and 2004 discovery.	S Hershey	0.60	1,074.00
11 August 2025	Telephone conference with L. Baccash, S. Hershey, L. Curtis re: Silber deposition and motions (0.3); telephone conference with L. Baccash, D. Rivero re: objection to Silber claim (0.4).	B Lingle	0.70	959.00
11 August 2025	Revise objections to Silber motions (0.9); continue revising same (0.8); confer with L. Baccash and others re: same (0.4); draft correspondence re: same (1.1); confer with S. Hershey re: same (0.2).	L Curtis	3.40	4,352.00
11 August 2025	Confer with S. Hershey re: same (0.4); confer with FCI Danbury re: Silber deposition (0.1).	L Curtis	0.50	640.00
12 August 2025	Prepare materials and analysis re: potential estate claims against targeted parties and Silber interview.	G Pesce	0.80	1,680.00
12 August 2025	Call with S. Hershey re: Silber issues (0.2); call with B. Lingle re: same (0.2).	L Baccash	0.40	676.00
12 August 2025	Telephone conference with D. Kamensky, M. Dundon, J. Millar re: creditor recovery trust.	B Lingle	1.00	1,370.00
12 August 2025	Confer with S. Hershey re: Silber motions (0.2); review Silber motions in support of ancillary pleadings (2.8); confer with S. Hershey re: same (0.3); outline re: same (0.5); confer with S. Hershey and others re: same (0.6); draft ancillary pleadings in support of same (0.5); confer with S. Hershey re: same (0.1); draft correspondence to S. Hershey and others re: same (0.3); draft same (1.1); continue drafting same (1.4).	L Curtis	7.80	9,984.00
12 August 2025	Confer with FCI Danbury re: Silber deposition.	L Curtis	0.20	256.00
13 August 2025	Prepare materials and analysis re: Silber interview, deposition and potential estate claims against targeted parties.	G Pesce	0.80	1,680.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 August 2025	Review supplemental Dundon declaration (1.1); review and revise equity committee opposition (1.2).	S Hershey	2.30	4,117.00
13 August 2025	Call with D. Rivero re: research re: Silber claims/causes of action issues (0.2); review research re: same (0.3); call with B. Lingle, G. Pesce re: same (0.1); review declaration re: objection to Silber motions (0.2); call with D. Rivero and B. Lingle re: Silber claims issues (0.2).	L Baccash	1.00	1,690.00
13 August 2025	Review, revise declaration in support of Silber opposition.	B Lingle	0.30	411.00
13 August 2025	Draft pleadings in support of objections to Silber motions (2.1); revise same (0.8); draft objection to Silber equity motion (0.6); confer with P. Giovine re: same (0.3); revise same (2.8); confer with P. Giovine re: same (0.3); revise objection to Silber Rule 2004 (1.0); continue revising same (2.1); continue revising same (2.4).	L Curtis	12.40	15,872.00
13 August 2025	Draft notice (0.3), application to shorten time (0.3), and proposed order (0.4) re: motion for leave to take deposition; draft proposed order re: Rule 2004 examination (0.7).	A Aquije	1.70	1,887.00
13 August 2025	Call FCI Danbury prison re: deposition of Silber.	P Giovine	0.20	198.00
13 August 2025	Call with L. Curtis re: Opposition to Rule 2004 Motion (0.3); draft motion for leave to conduct rule 2004 examination (1.9); legal research re: case law re: good cause standard governing discovery under FRBP 2004 (0.9); legal research re: relevance and other requirements under FRCP 30(a)(2)(B) (1.3).	P Giovine	4.40	4,356.00
13 August 2025	Download, quality control, stage data for loading into Relativity workspace (0.3); investigate zip containers for data integrity quality control (0.3); confer with operations team re: loading data into Relativity (0.2); quality control loaded documents in Relativity workspace (0.3); emails with case team re: data release (0.2).	J Morales	1.30	637.00
13 August 2025	Review of data validation reports (0.2); Perform Quality control to ensure data integrity (0.2); Error handling of problematic files (0.2); Stage/normalize data for importing (0.2); Status update reports for case team (0.2); Perform manual high quality level optical character recognition of relevant items (0.2); set up appropriate structure of metadata (0.2); Deal with files with problematic extracted text values (0.1).	G Chemborisov	1.50	735.00
14 August 2025	Review and revise objections to Silber 2004 motions.	S Hershey	2.90	5,191.00
14 August 2025	Review and revise objection to Silber 2004 request (0.3); review and revise objection to equity motion (0.4); review and revise objection to Silber proofs of claim (0.5); call with D. Rivero re: same (0.2).	L Baccash	1.40	2,366.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
14 August 2025	Review, revise objection to Silber motion to appoint equity committee.	B Lingle	0.50	685.00
14 August 2025	Review, revise Silber claim objection.	B Lingle	0.20	274.00
14 August 2025	Substantive review re: objection to 2004 motion.	A Aquije	1.00	1,110.00
14 August 2025	Draft facts section and section re: examination in contested matter for motion for leave to conduct rule 2004 examination (3.8); draft section re: deposition under Rule 30 for memorandum (2.9); draft motion for leave to conduct rule 2004 examination (1.8); research re: service of motion and opposition to Silber 2004 discovery (0.5); legal research re: case law re: good cause standard governing discovery under FRBP 2004 (0.6); call and email FCI Danbury re: meet and confer and facility procedures for deposing Moshe Silber (0.6); edit proposed order granting motion to depose (1.1); turn changes for memorandum in support of motion for discovery (1.2); substantive review re: memorandum in support of motion for discovery (2.6); revise application to shorten and proposed order shortening (1.5); revise motion for discovery, notice of motion, and proposed order granting motion for discovery (1.2).	P Giovine	17.80	17,622.00
14 August 2025	Create saved searches for date specific documents (0.3); emails with case team re: search results (0.2); edit saved search for case team (0.3); emails re: new search results (0.2).	J Morales	1.00	490.00
14 August 2025	Review and respond to emails with L. Curtis, P. Giovine and S. Hershey re: upcoming filings re: M. Silber (0.1); review and finalize same (0.1); file Debtors' Objection to Motion to Appoint Equity Committee (0.2); file Opposition to Silber 2004 motion (0.2); file declaration in support of opposition (0.1).	Hirshorn, Deanna	0.70	343.00
14 August 2025	Review and finalize Debtors' Motion for Leave to conduct Rule 2004 Examination of M. Silber with attachments (0.4); file same (0.2); finalize and file application to shorten time re: same (0.2); coordinate service with Verita of same (0.1).	Hirshorn, Deanna	0.90	441.00
15 August 2025	Confer with P. Giovine re: motion for leave to depose Silber (0.1); review same for finalization (1.9).	L Curtis	2.00	2,560.00
15 August 2025	Revise objection to Silber equity motion (0.2); confer with P. Giovine re: same (0.2); revise pleadings in support of same (0.4); revise same (0.8); revise objection to Silber Rule 2004 motion (1.1); continue revising same (1.5); revise pleadings in support of same (1.0); draft correspondence re: same (0.5); continue revising Silber equity motion (1.0); confer with S. Hershey re: same (0.1); revise same (0.1); confer with P. Giovine re: same (0.2); revise same (1.8); confer with S. Hershey re: same (0.1); review same for finalization (0.3).	L Curtis	9.30	11,904.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 August 2025	Prepare for Silber court hearing.	G Pesce	0.80	1,680.00
18 August 2025	Prepare for Silber court hearing.	G Pesce	0.80	1,680.00
19 August 2025	Conferences with W&C team to prepare for Silber court hearing.	G Pesce	0.80	1,680.00
19 August 2025	Review, revise Creditor Recovery Trust Agreement.	B Lingle	0.90	1,233.00
20 August 2025	Revise creditor recovery trust agreement (0.4); correspond with Ad Hoc Group re: creditor recovery trust agreement (0.2); review, revise same (0.5).	B Lingle	1.10	1,507.00
21 August 2025	Confer with M. Dundon re: Silber rule 2004 motion hearing preparation (0.6); preparation re: same (0.2); confer with S. Hershey re: same (0.1); continue prepping re: same (1.5); confer with S. Hershey re: same (0.1).	L Curtis	2.50	3,200.00
21 August 2025	Confer with P. Giovine re: scheduling of Silber deposition with FCI Otisville (0.2); draft outline for Silber deposition (0.4); confer with P. Giovine re: same (0.1); call FCI Otisville re: same (0.1); draft outline for Silber deposition (0.6); confer with P. Giovine re: same (0.5).	L Curtis	1.90	2,432.00
21 August 2025	Update proposed order re: discovery from Silber (0.3); research re: Avon Products decision (0.8); review schedules, comparing current litigation (0.9); research re: service under state law (0.6); factual research re: service addresses in six Louisiana cases (2.8); draft service emails (1.4); draft service cover letters in six Louisiana cases (0.9); revise notices of appearance (0.6); calls with L. Curtis re: service of subpoena on Silber in federal correctional institution (0.4).	P Giovine	8.70	8,613.00
21 August 2025	Review and respond to emails with P. Giovine re: proposed order re: Debtors' Motion to Grant Leave for Rule 2004 Examination of Silber (0.1); email Chambers re: same (0.1).	Hirshorn, Deanna	0.20	98.00
22 August 2025	Calls to FCI Otisville re: service and 2004 examination (0.3); prepare subpoena for service on Silber (0.4); calls and emails to Orange County Sheriff, arranging for service on Silber and FCI Otisville (0.4).	P Giovine	1.10	1,089.00
25 August 2025	Calls to FCI Otisville re: deposition (0.4); coordinate overnight mail to Silber for legal mail received (0.3); coordinate call to New Orleans Parish Court Clerk to determine status of case implicating debtors (0.2); coordinate service re: New Orleans Department of Code Enforcement (0.3).	P Giovine	1.20	1,188.00
26 August 2025	Correspond with L. Curtis, P. Giovine and FTI Otisville re: deposition of Silber.	S Hershey	0.60	1,074.00
26 August 2025	Coordinate requests for Creditor Recovery Trustee.	B Lingle	0.30	411.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 August 2025	Call FCI Otisville re: deposition procedures (0.2); emails with DOJ re: FCI Otisville deposition procedures (0.2); call Orange County Sheriff re: status of service of subpoena on Silber (0.2); email and call court reporter re: deposition (0.3); email W&C team re: post-petition government actions (0.4); draft memo for entrance to FCI Otisville (0.9).	P Giovine	2.20	2,178.00
27 August 2025	Call with S. Hershey and L. Curtis re: litigation issues (0.2); review of correspondence re: same (0.1).	L Baccash	0.30	507.00
27 August 2025	Contact FCI Otisville re: deposition procedures (0.1); research re: prison clearance (0.7) and correspondence with court reporters re: same (0.6).	P Giovine	1.40	1,386.00
28 August 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	0.80	1,680.00
28 August 2025	Telephone conference with underwriters re: D&O insurance for creditor recovery trustee.	B Lingle	0.40	548.00
28 August 2025	Emails and call with court reporters re: Silber deposition (0.4); call Orange County Sheriff re: subpoena for Silber deposition (0.2); emails with Department of Justice (0.2) and edit entrance memo re: FCI Otisville deposition (0.4).	P Giovine	1.20	1,188.00
29 August 2025	Correspond with D. Kamensky, J. Millar, J. Utz, L. Curtis and P. Giovine re: Silber deposition.	S Hershey	1.10	1,969.00
29 August 2025	Draft outline re: Silber deposition (0.5); draft outline re: same (0.8); confer with P. Giovine re: same (0.5); draft outline re: same (0.8).	L Curtis	2.60	3,328.00
29 August 2025	Zoom meeting with W&C team, Lynd and Creditor Recovery Trustee re: Silber deposition (0.6); emails with court reporter re: deposition (0.1); emails with Department of Justice re: deposition procedures (0.1); call Orange County Sheriff office re: service of subpoena (0.1); prepare topics for Silber deposition outline (1.3).	P Giovine	2.20	2,178.00
30 August 2025	Confer with P. Giovine re: Silber deposition (0.3); draft outline re: same (2.5); revise outline re: same (3.1); continuing revising outline re: same (4.0).	L Curtis	9.90	12,672.00
30 August 2025	Compile topics for Silber deposition (1.2); draft questions for Silber deposition re: related entities (1.8); draft questions for Silber deposition re: value of enterprise (0.8).	P Giovine	3.80	3,762.00
31 August 2025	Review and revise Silber deposition outline.	S Hershey	2.80	5,012.00
31 August 2025	Draft outline re: Silber deposition (1.1); continue revising same (3.6); confer with S. Hershey re: same (0.2); incorporate edits into same (1.3); confer with P. Giovine (0.2); confer with S. Hershey re: same (0.1).	L Curtis	6.50	8,320.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
31 August 2025	Revise Silber deposition outline (1.6); research re: state court action for Silber deposition (1.7); draft deposition questions re: prepetition transfers (0.1); emails to counsel and court reporter re: Silber deposition details (0.1); prepare deposition exhibits (2.3); draft deposition questions re: Rule 2004 and Motion to Appoint Equity Committee (1.2); further revise Silber deposition outline (1.0).	P Giovine	8.00	7,920.00
SUBTOTAL: Development of Claims and Causes of Action			187.40	226,820.00

Asset Sales: NOLA

1 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
1 August 2025	Review B. Lingle revisions to short form NOLA purchase agreement (0.7); review of bidding procedures and discuss with B. Lingle (0.6).	D Pezza	1.30	2,730.00
1 August 2025	Review and revise NOLA form asset purchase agreement (1.8); review filing version of NOLA bid motion and exhibits (0.4).	L Baccash	2.20	3,718.00
1 August 2025	Review, revise NOLA bidding procedures order (1.3); review, revise NOLA asset purchase agreement (1.6); telephone conference with D. Pezza re: NOLA asset purchase agreement (0.3).	B Lingle	3.20	4,384.00
1 August 2025	Further revise bidding procedures motion, incorporating comments from B. Lingle and L. Baccash.	A Aquije	0.80	888.00
4 August 2025	Review, revise (0.6) and transmit NOLA purchase agreement to B. Lingle (0.7).	D Pezza	1.30	2,730.00
4 August 2025	Revise purchase agreement for NOLA properties (1.4); confer with D. Pezza re: same (1.4); review bidding procedures re: same (1.3).	R Gaertner	4.10	6,232.00
5 August 2025	Review NOLA purchase agreement.	D Pezza	0.20	420.00
5 August 2025	Review and revise NOLA asset purchase agreement.	L Baccash	0.90	1,521.00
5 August 2025	Review, revise NOLA asset purchase agreement.	B Lingle	0.40	548.00
6 August 2025	Coordinate with IslandDundon re: NOLA asset purchase agreement.	B Lingle	0.30	411.00
11 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
11 August 2025	Review of quitclaim deed (0.6) and conference re: same with R. Strybel at Chicago Title (0.6).	D Pezza	1.20	2,520.00
11 August 2025	Correspond with WSFS re: sale escrow.	B Lingle	0.30	411.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
12 August 2025	Telephone conference with WSFS re: sale escrow.	B Lingle	0.20	274.00
13 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
13 August 2025	Prepare for NOLA bidding procedures hearing (1.2); review, revise agenda for NOLA bidding procedures hearing (0.3); review, revise witness and exhibit list re: same (0.4); correspond with W&C team re: NOLA bidding procedures order and schedule of contracts (0.7); draft sale escrow agreement with WSFS (1.6).	B Lingle	4.20	5,754.00
13 August 2025	Correspond with US Trustee re: NOLA bidding procedures and proposed order (0.3); review same (0.2); correspond with Dundon re: assumption notices for NOLA (0.2).	D Rivero	0.70	896.00
13 August 2025	Review NOLA bidding procedures re: comments from U.S. trustee (0.5); email correspondence with IslandDundon re: schedule of assumed contracts (0.1).	A Aquije	0.60	666.00
14 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
14 August 2025	Review of closing documents.	D Pezza	1.50	3,150.00
14 August 2025	Revise NOLA bidding procedures order.	B Lingle	2.50	3,425.00
14 August 2025	Correspond with W&C and Dundon re: next steps for NOLA.	D Rivero	0.20	256.00
14 August 2025	Revise bidding procedures order, incorporating comments from court.	A Aquije	0.60	666.00
15 August 2025	Telephone conference with potential bidder for NOLA (0.8); review, revise NOLA sale notice (0.2).	B Lingle	1.00	1,370.00
15 August 2025	Correspond with Dundon re: assumption notices for NOLA (0.2); review and revise sale notice for NOLA properties (0.8); correspond with Verita re: same (0.3); review NOLA bidding procedures order (0.2).	D Rivero	1.50	1,920.00
15 August 2025	Draft notice re: NOLA properties sale.	A Aquije	0.40	444.00
17 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
17 August 2025	Review and revise disclosure statement motion and exhibits for NOLA debtors.	D Rivero	3.60	4,608.00
18 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 August 2025	Telephone conference with Lynd, IslandDundon teams re: NOLA properties and other portfolio opportunities (0.5); revise NOLA asset purchase agreement (0.2).	B Lingle	0.70	959.00
18 August 2025	Correspond with team re: assumed contracts (0.2) and sale notice for publication for NOLA debtors (0.1).	D Rivero	0.30	384.00
18 August 2025	Further revise sale notice (0.2); coordinate with Verita re: service re: same (0.1).	A Aquije	0.30	333.00
19 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
19 August 2025	Review sale notice for publication for NOLA debtors (0.2); correspond with Dundon and W&C re: same (0.2); review schedule for executory contracts for NOLA debtors (0.3); correspond with W&C re: same (0.1); review NOLA bidding procedures order re: stalking horse (0.3); revise write up re: same (0.3).	D Rivero	1.40	1,792.00
19 August 2025	Draft responses to questions from L. Baccash re: stalking horse bidder.	A Aquije	0.40	444.00
20 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
20 August 2025	Review of buyer revised closing documents (0.7) and discuss same with B. Lingle and M. Bouton (0.8).	D Pezza	1.50	3,150.00
20 August 2025	Review and revise assumption notice for NOLA properties (0.3); correspond with Verita and Dundon re: sale notice for publication for NOLA properties (0.3).	D Rivero	0.60	768.00
20 August 2025	Review and revise bidding procedures work in progress tracker.	A Aquije	0.40	444.00
21 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
21 August 2025	Coordinate filing of notice of assumption and service with W&C team and Verita.	B Lingle	1.10	1,507.00
21 August 2025	Review and revise assumption notice for NOLA properties (1.5); correspond with W&C and Dundon re: service of same (0.4).	D Rivero	1.90	2,432.00
21 August 2025	Further revise schedule of assumed contracts (0.4); coordinate filing re: same (0.2); calls with D. Rivero re: same (0.2); draft notice of withdrawal re: same (0.2); coordinate filing of revised re: same (0.1).	A Aquije	1.10	1,221.00
22 August 2025	Correspond with Dundon re: assumption notice for NOLA properties (0.3); correspond with D Hirshorn re: filing same (0.2).	D Rivero	0.50	640.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 August 2025	Telephone conference with G. Pesce, Lynd, IslandDundon team re: NOLA sale process.	B Lingle	0.50	685.00
27 August 2025	Telephone conference with G. Pesce, J. Millar and L. Hoffman re: NOLA sale process.	B Lingle	0.70	959.00
28 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
29 August 2025	Conferences with AF and W&C teams re: status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
29 August 2025	Revise and transmit closing documents for review.	D Pezza	1.20	2,520.00
SUBTOTAL: Asset Sales: NOLA			54.20	85,820.00

Exclusivity, Plan & Disclosure Statement: NOLA

1 August 2025	Draft disclosure statement for NOLA Properties.	S Kava	2.50	3,200.00
2 August 2025	Draft disclosure statement.	S Kava	1.60	2,048.00
4 August 2025	Draft disclosure statement.	S Kava	3.00	3,840.00
4 August 2025	Draft solicitation motion re: NOLA disclosure statement (1.5); draft exhibits re: same (2.0).	A Aquije	3.50	3,885.00
5 August 2025	Draft disclosure statement motion (0.7) and exhibits re: NOLA Disclosure Statement (0.8).	A Aquije	1.50	1,665.00
9 August 2025	Draft NOLA chapter 11 plan.	B Lingle	1.70	2,329.00
10 August 2025	Review, revise disclosure statement.	S Kava	1.60	2,048.00
11 August 2025	Review and revise NOLA plan (1.3); call with D. Rivero and B. Lingle re: disclosure statement order and disclosure statement (0.5).	L Baccash	1.80	3,042.00
11 August 2025	Telephone conference with L. Baccash, D. Rivero re: solicitation schedule for NOLA (0.4); correspond with Chambers re: NOLA disclosure statement hearing (0.1); telephone conference with L. Baccash re: disclosure statement schedule (0.2); draft NOLA plan (0.8); review, revise NOLA plan (1.9); telephone conference with G. Pesce re: NOLA plan (0.5).	B Lingle	3.90	5,343.00
11 August 2025	Further revise disclosure statement motion (0.4) and exhibits (0.6); correspondence with D. Rivero re: disclosure statement (0.1).	A Aquije	1.10	1,221.00
12 August 2025	Review and revise NOLA plan.	L Baccash	2.20	3,718.00
12 August 2025	Revise motion to approve disclosure statement and order, incorporating comments from D. Rivero (0.6); further revise exhibits re: same (0.5); email	A Aquije	1.20	1,332.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	correspondence with D. Rivero re: same (0.1).			
13 August 2025	Review and revise NOLA plan (1.5); call with G. Pesce re: same (0.2).	L Baccash	1.70	2,873.00
13 August 2025	Review, revise NOLA plan.	B Lingle	1.30	1,781.00
13 August 2025	Review Crown Plan (3.3); revise disclosure statement re: same (3.8).	S Kava	7.10	9,088.00
13 August 2025	Review revisions to disclosure statement motion and exhibits for NOLA debtors (0.4); review and revise disclosure statement re: Silber litigation (0.5); correspond with S Kava and L Curtis re: same (0.2); legal research re: voting issues (0.7); correspond with L Baccash re: same (0.1).	D Rivero	1.90	2,432.00
13 August 2025	Draft NOLA order to approve disclosure statement (0.8); draft exhibits re: same (1.2).	A Aquije	2.00	2,220.00
14 August 2025	Review, revise NOLA disclosure statement.	B Lingle	3.00	4,110.00
14 August 2025	Review, revise disclosure statement (1.3); further revise disclosure statement re: riders to case background section (0.3); further revise disclosure statement re: comments from L. Baccash and B. Lingle (3.8); email S. Fryman re: same (0.1); revise tax section re: same (0.4); email B. Lingle and L. Baccash revised disclosure statement (0.1).	S Kava	6.00	7,680.00
14 August 2025	Review disclosure statement motion and exhibits for NOLA debtors (1.4); review and revise disclosure statement (1.8); correspond with W&C re: same (0.3).	D Rivero	3.50	4,480.00
15 August 2025	Telephone conference with G. Pesce, L. Baccash with NOLA plan (0.8); draft NOLA plan (1.8); revise same (0.4); review, revise NOLA disclosure statement (1.4).	B Lingle	4.40	6,028.00
15 August 2025	Review updated plan (0.8); review revised riders from D. Rivero and L. Curtis (0.6); review comments from B. Lingle to Disclosure Statement (0.7); review, further revise disclosure statement re: same (3.7); email team re: same (0.1).	S Kava	5.90	7,552.00
15 August 2025	Review revisions to disclosure statement motion and exhibits for NOLA debtors (4.4); review and revise disclosure statement (2.4); correspond with S Kava re: same (0.2); call with W&C re: next steps for disclosure statement and plan (0.3).	D Rivero	7.30	9,344.00
15 August 2025	Revise disclosure statement and exhibits (0.6); call with W&C team re: same (0.6); Further revise disclosure statement and exhibits re: same (2.3).	A Aquije	3.50	3,885.00
16 August 2025	Further revise exhibits to NOLA disclosure statement.	A Aquije	1.10	1,221.00
17 August 2025	Review, revise NOLA disclosure statement order and	B Lingle	6.40	8,768.00

Crown Capital Holdings LLC
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	exhibits (1.8); telephone conference with G. Pesce re: NOLA plan (0.3); review, revise NOLA plan (2.4); review, revise NOLA disclosure statement, disclosure statement motion and order (1.0); and coordinate filing of same (0.9).			
17 August 2025	Revise disclosure statement re: comments from B. Lingle and L. Baccash (0.6); review, revise disclosure statement (1.0); further review, revise disclosure statement re: plan revisions (1.8); compile and coordinate filing of disclosure statement (0.4).	S Kava	3.80	4,864.00
17 August 2025	Further revise disclosure statement motion (2.0) and exhibits (1.5); coordinate filing re: same (1.2).	A Aquije	4.70	5,217.00
17 August 2025	Finalize and file plan for Crown Capital Holdings (0.2); review, finalize and file disclosure statement for Crown Capital Holdings (0.2); review and respond to emails with L. Baccash, B. Lingle, S. Kava, D. Rivero, A. Aquije and J. Walz re: filings (0.1); review, finalize and file Debtors' Motion to Conditionally Approve Disclosure Statement for Crown Capital Holdings (0.4); review, finalize and file application to shorten time re: same (0.2); download most recent docket stamped filings (0.1); coordinate service of same with Verita (0.1); email Chambers courtesy copies of plan/disclosure documents and application to shorten time (0.1).	Hirshorn, Deanna	1.40	686.00
18 August 2025	Email IslandDundon team re: plan and disclosure statement for NOLA (0.2); review plan (0.5), disclosure statement (0.5), and disclosure statement motion (0.5).	S Kava	1.70	2,176.00
18 August 2025	Email L. Baccash, B. Lingle, A. Aquije, D. Rivero, S. Kava and J. Walz docket stamped copies of motion to approve disclosure statement and application to shorten.	Hirshorn, Deanna	0.10	49.00
19 August 2025	Draft declaration in support of plan confirmation.	S Kava	5.30	6,784.00
20 August 2025	Review and revise declaration in support of confirmation.	S Kava	1.00	1,280.00
21 August 2025	Review, revise declaration in support of plan confirmation.	S Kava	2.00	2,560.00
22 August 2025	Review cases flagged by A. Aquije re: plan sales.	S Kava	1.00	1,280.00
23 August 2025	Review and revise liquidation analysis.	S Kava	1.80	2,304.00
25 August 2025	Review and revise liquidation analysis for NOLA.	L Baccash	0.80	1,352.00
25 August 2025	Review, revise NOLA liquidation analysis.	B Lingle	0.80	1,096.00
25 August 2025	Further revise liquidation analysis and email M. Whalen re: same (1.2); review DIP Order re: same (0.5); call with T. Rizvi re: same (0.6); call with B.	S Kava	2.40	3,072.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Goodman re: same (0.1).			
26 August 2025	Email B. Goodman re: asset purchase agreement.	S Kava	0.10	128.00
27 August 2025	Call with IslandDundon re: liquidation analysis re: NOLA (0.3); review and revise NOLA plan (0.7).	L Baccash	1.00	1,690.00
27 August 2025	Telephone conference with L. Baccash, S. Kava, IslandDundon re: NOLA liquidation analysis (0.3); revise NOLA plan (0.6).	B Lingle	0.90	1,233.00
27 August 2025	Revise liquidation analysis for NOLA (0.4); email M. Whalen re: same (0.1); call with Dundon re: same (0.5).	S Kava	1.00	1,280.00
29 August 2025	Review and revise NOLA plan.	L Baccash	0.40	676.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement: NOLA			110.90	142,860.00
TOTAL			1,210.60	1,459,872.00