

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**ATTORNEY MONTHLY FEE STATEMENT COVER SHEET  
FOR THE PERIOD DECEMBER 22, 2024, THROUGH JANUARY 31, 2025**

In re CCA Construction, Inc.<sup>1</sup>

Applicant: Debevoise & Plimpton LLP

Case No. 24-22548 (CMG)

Client: Debtor and Debtor in Possession

Chapter 11

Case Filed: December 22, 2024

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

RETENTION ORDER ATTACHED.

<u>/s/ M. Natasha Labovitz</u>	<u>May 2, 2025</u>
M. Natasha Labovitz	Date

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<sup>1</sup> The last four digits of CCA's federal tax identification number are 4862. CCA's service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.



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<p style="text-align: center;"><b>SECTION I</b> <b>FEE SUMMARY</b></p>
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Summary of Amounts Requested for the Period

December 22, 2024, through January 31, 2025 (the “**Compensation Period**”)

Fee Total	\$2,633,491.80
Disbursement Total	\$11,649.97
Total Fees Plus Disbursements	\$2,645,141.77

Summary of Amounts Requested for Previous Periods

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

<b>Name of Professional and Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate<sup>2</sup></b>	<b>Fee</b>
M. Natasha Labovitz Partner	1997	112.6	\$2,317.50	\$260,950.50
Sidney P. Levinson Partner	1988	11.8	\$2,317.50	\$27,346.50
Mark P. Goodman Partner	1988	38.6	\$2,317.50	\$89,455.50
Maura Kathleen Monaghan Partner	2000	1.4	\$2,317.50	\$3,244.50
Erica S. Weisgerber Partner	2009	128.7	\$2,025.00	\$258,997.50
Morgan A. Davis Partner	2016	102.7	\$1,755.00	\$180,238.50
Elie J. Worenklein Counsel	2012	226.1	\$1,620.00	\$366,282.00
Xiaoxiao Zhou Associate	2009	17.4	\$1,458.00	\$25,369.20
Molly Baltimore Maass Associate	2018	163.9	\$1,471.50	\$241,178.85
Michael C. Godbe Associate	2018	15.7	\$1,471.50	\$23,102.55
Yuqing Cui Associate	2019	5.2	\$1,458.00	\$7,581.60
Marissa Baron Associate	2020	20.8	\$1,458.00	\$30,326.40
Rebecca Zipursky Associate	2021	116.6	\$1,354.50	\$157,934.70

<sup>2</sup> In accordance with the Retention Order [**Exhibit A** hereto] and the Applicant's retention application [Docket No. 98], these rates reflect a 10% discount to Debevoise's standard rates.

<b>Name of Professional and Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate<sup>2</sup></b>	<b>Fee</b>
Alexander Costin Associate	2022	38.9	\$1,354.50	\$52,690.05
Rory Heller Associate	2022	92.5	\$1,287.00	\$119,047.50
Ann Manov Associate	2022	19.7	\$1,287.00	\$25,353.90
Shefit Koboci Associate	2024	182.5	\$1,192.50	\$217,631.25
Basil Fawaz Associate	2023	54.6	\$1,192.50	\$65,110.50
Fabienne El-Cid Associate	2024	47.6	\$1,017.00	\$48,409.20
Gabriela L. Gabbidon Associate	2024	39.4	\$1,017.00	\$40,069.80
Jacqueline Hayes Associate	2024	4.3	\$1,017.00	\$4,373.10
Deven Kirschenbaum Associate	2024	47.6	\$1,017.00	\$48,409.20
Julia Zhu Associate	2024	5.6	\$1,017.00	\$5,695.20
Benjamin Mishkin Associate	2025	133.0	\$801.00	\$106,533.00
Liza Kheyfets Discovery & Data Management Project Manager	n/a	129.7	\$553.50	\$71,788.95
Yanping Hu Discovery Attorney	2003	34.9	\$522.00	\$18,217.80
Lesley R. Douglas Discovery Attorney	2005	6.2	\$522.00	\$3,236.40

<b>Name of Professional and Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate<sup>2</sup></b>	<b>Fee</b>
Xiaoxia Lin Discovery Attorney	2024	7.5	\$522.00	\$3,915.00
Junho Park Paralegal	n/a	113.5	\$522.00	\$59,247.00
Nakaba Egawa Paralegal	n/a	34.8	\$522.00	\$18,165.60
Darevia Williams Paralegal	n/a	1.9	\$522.00	\$991.80
Alexandra Bassin Discovery & Data Management Senior Analyst	n/a	4.3	\$436.50	\$1,876.95
Yury G. Slobodkin Discovery & Data Management Senior Analyst	n/a	116.2	\$436.50	\$50,721.30
<b>TOTALS</b>		<b>2,076.2</b>		<b>\$2,633,491.80</b>

**SECTION II  
SUMMARY OF SERVICES**

<b>Services Rendered</b>	<b>Hours</b>	<b>Fee</b>
Business Operations	9.6	\$18,481.50
Case Administration	120.9	\$137,490.30
Contested BMLP Matters	105.0	\$132,200.55
Corporate Governance & Board Matters	116.9	\$169,288.65
DIP Financing	1,526.0	\$1,915,481.25
Employment & Fee Applications	120.0	\$131,836.95
Meetings & Communications with Creditors	20.7	\$38,904.30
Non-Working Travel	1.6	\$1,620.00
Relief from Stay and Adequate Protection	33.9	\$54,888.30
Reporting	21.6	\$33,300.00

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>Disbursements</b>	<b>Amount</b>
Computer Assisted Legal Research	\$3,010.75
Court Reporting	\$474.50
Delivery Services/Federal Express	\$130.09
Filing Fees	\$3,619.00
In-House Reproduction	\$1,424.90
Outside Research	\$26.97
Travel	\$2,229.26
Working Meals	\$734.50
Other (Explain)	\$0.00
<b>DISBURSEMENTS TOTAL</b>	<b>\$11,649.97</b>

**SECTION IV  
CASE HISTORY**

- (1) Date case filed: December 22, 2024
- (2) Chapter under which case commenced: Chapter 11
- (3) Date of retention: February 7, 2025, effective as of the Petition Date. *See Exhibit A.*  
If limit on number of hours or other limitations to retention, set forth: n/a.
- (4) Summarize in brief the benefits to the estate and attach supplements as needed<sup>3</sup>:
  - (a) The Applicant prepared and presented the Debtor's various first day motions as well as several other motions and applications for operational and administrative relief.
  - (b) The Applicant negotiated with various constituents, including the Office of the United States Trustee, in connection with the relief requested, and worked towards achieving consensual resolutions of the majority of the motions and applications filed.
  - (c) The Applicant participated in the first day hearing and several discovery status conferences with the Court.
  - (d) The Applicant advised the Debtor on obtaining relief from the automatic stay to allow the Debtor to pursue an appeal before the Supreme Court of the State of New York, Appellate Division – First Department.
  - (e) The Applicant advised the Debtor in connection with debtor-in-possession financing, including preparing for a contested hearing on the proposed debtor-in-possession financing motion. In connection with the debtor-in-possession financing motion, the Applicant assisted the Debtor in responding to extensive discovery requests filed by BML Properties, Ltd. and prepared multiple witnesses for deposition and/or trial testimony.
  - (f) The Applicant addressed various operational issues as they arose.
  - (g) The Applicant advised the Debtor, together with the Debtor's other advisors, on legal issues relating to the preparation of required disclosures, including the Schedules of Assets and Liabilities, Statement of Financial Affairs, and monthly operating reports.

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<sup>3</sup> The following summary is intended to highlight the general categories of services the Applicant rendered on behalf of the Debtor and for the benefit of the estate; it is not intended to itemize each and every professional service which the Applicant performed.



- (h) The Applicant addressed issues related to corporate governance, including routine updates and discussions with the Debtor's board of directors.
  - (i) The Applicant provided legal services in response to the motion to appoint an examiner.
  - (j) The Applicant drafted an application to retain Debevoise & Plimpton LLP as Debtor's co-counsel.
  - (k) The Applicant advised on other matters concerning administration of the chapter 11 case.
  - (l) The Applicant rendered all other services set forth on the invoices attached hereto as **Exhibit B**<sup>4</sup>.
- (5) Anticipated distribution to creditors:
- (a) Administration expense: Unknown at this time.
  - (b) Secured creditors: Unknown at this time.
  - (c) Priority creditors: Unknown at this time.
  - (d) General unsecured creditors: Unknown at this time.
- (6) Final disposition of case and percentage of dividend paid to creditors: Unknown at this time.
- (7) This is the first monthly fee statement.

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<sup>4</sup> The invoices attached hereto as **Exhibit B** contain detailed descriptions of the services rendered and expenses incurred by the Applicant during the Compensation Period.

**Exhibit A**

**Retention Order**



Order Filed on February 7, 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(b)**

**DEBEVOISE & PLIMPTON LLP**

M. Natasha Labovitz (admitted *pro hac vice*)  
Sidney P. Levinson (admitted *pro hac vice*)  
Elie J. Worenklein  
Rory B. Heller (admitted *pro hac vice*)  
66 Hudson Boulevard  
New York, NY 10001  
Telephone: (212) 909-6000  
Facsimile: (212) 909-6836  
nlabovitz@debevoise.com  
slevinson@debevoise.com  
eworenklein@debevoise.com  
rbheller@debevoise.com

**COLE SCHOTZ P.C.**

Michael D. Sirota  
Warren A. Usatine  
Ryan T. Jareck  
Felice R. Yudkin  
Court Plaza North, 25 Main Street  
Hackensack, NJ 07601  
Telephone: (201) 489-3000  
Facsimile: (201) 489-1536  
msirota@coleschotz.com  
wusatine@coleschotz.com  
rjareck@coleschotz.com  
fyudkin@coleschotz.com

*Proposed Co-Counsel to the Debtor and Debtor in Possession*

In re:  
CCA Construction, Inc.,<sup>1</sup>

Debtor.

Case No. 24-22548 (CMG)

Chapter 11

Judge: Christine M. Gravelle

<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 4864. The Debtor's service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

(Page | 2)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

Caption of Order: Order Authorizing the Employment and Retention of Debevoise & Plimpton LLP as Bankruptcy Co-Counsel for the Debtor Effective as of the Petition Date

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**ORDER AUTHORIZING THE EMPLOYMENT AND  
RETENTION OF DEBEVOISE & PLIMPTON LLP AS BANKRUPTCY  
CO-COUNSEL FOR THE DEBTOR EFFECTIVE AS OF THE PETITION DATE**

The relief set forth on the following pages, numbered two (2) through six (6), is  
**ORDERED.**

**DATED: February 7, 2025**

  

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Honorable Christine M. Gravelle  
United States Bankruptcy Judge

(Page | 3)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

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Upon CCA’s application [Docket No. 98] (the “**Application**”)<sup>2</sup> for the entry of an order authorizing CCA’s employment and retention of Debevoise & Plimpton LLP (“**Debevoise**”) as bankruptcy co-counsel effective as of the Petition Date, pursuant to sections 327(a) and 330 of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1; and upon the Labovitz Declaration and the Wei Declaration; 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 *Amended Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.); and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having reviewed the Application, the Labovitz Declaration and the Wei Declaration; and the Court being satisfied based on the representations made in the Application, the Labovitz Declaration and the Wei Declaration that (a) Debevoise does not hold or represent an interest adverse to CCA’s estate and (b) Debevoise is a “disinterested person” as defined in section 101(14) of the Bankruptcy Code and as required by section 327(a) of the Bankruptcy Code; and notice of the Application appearing to be adequate and appropriate under the circumstances; and any objections to the requested relief having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

(Page | 4)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

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1. The Application is granted as set forth herein.
2. Pursuant to sections 327(a) and 330 of the Bankruptcy Code, CCA is authorized to employ and retain Debevoise as its attorneys in accordance with the terms and conditions set forth in the Application and that certain engagement letter attached hereto as **Exhibit 1** (the “**Engagement Letter**”), effective as of December 22, 2024 (the “**Petition Date**”).
3. Debevoise shall apply for (a) compensation for professional services rendered and (b) reimbursement of expenses incurred in connection with CCA’s chapter 11 case, in both cases subject to the Court’s approval and in compliance with the applicable provisions of the Bankruptcy Code (including, but not limited to, sections 331 and 330 of the Bankruptcy Code), the Bankruptcy Rules, the Local Rules and any other applicable procedures or orders of the Court. Debevoise shall make a reasonable effort to comply with the U.S. Trustee Guidelines, both in connection with the Application and the interim and final fee applications to be filed by Debevoise in the chapter 11 case.
4. Notwithstanding anything in this Order to the contrary, Debevoise is also authorized to represent CCA and the non-Debtor defendants in connection with the Baha Mar Litigation and all fees incurred in connection with the Baha Mar Litigation shall be paid by the non-Debtor defendants, and not by CCA, and Court approval shall not be required for such related fees.
5. In order to avoid any duplication of effort and provide services to CCA in the most efficient and cost-effective manner, Debevoise shall coordinate with Cole Schotz P.C. and any additional firms CCA retains regarding their respective responsibilities in the chapter 11

(Page | 5)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

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case. As such, Debevoise shall use its best efforts to avoid duplication of services provided by any of CCA's other retained professionals in the chapter 11 case.

6. Prior to any increases in Debevoise's rates set forth in the Application, Debevoise shall file a supplemental affidavit with the Court and provide 10-days' notice to CCA, the U.S. Trustee and any official committee appointed in the chapter 11 case. All parties in interest retain their 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.

7. Debevoise shall (i) only bill 50% for non-working travel; (ii) not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any filed objections to any of Debevoise's fee applications in this chapter 11 case; (iii) 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) provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the United States Trustee.

8. Notwithstanding anything in the Application or the Labovitz Declaration to the contrary, Debevoise shall seek reimbursement from the Debtor's estate for its engagement-related expenses at the firm's actual cost paid.

9. Notwithstanding anything to the contrary in the Application or the Engagement Letter, to the extent that Debevoise uses the services of independent contractors or subcontractors (collectively, the "**Contractors**") in this chapter 11 case, Debevoise (a) shall

(Page | 6)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

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passthrough the cost of such Contractors to CCA at the same rate that it pays the Contractors; (b) shall seek reimbursement for actual out-of-pocket expenses only; (c) shall ensure that the Contractors submit the same connections disclosures as required of professionals 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 this case. No agreement or understanding exists between Debevoise and any other person other than as permitted by Bankruptcy Code section 504 to share compensation for services rendered in connection with this chapter 11 case, nor shall Debevoise share or agree to share compensation received for services rendered in connection with this case with any other person other than as permitted by Bankruptcy Code section 504.

10. Notwithstanding Debevoise's Terms of Engagement, the provision concerning fee disputes is null and void during the pendency of this Chapter 11 Case.

11. To the extent the Application, the Labovitz Declaration, or any engagement agreement pertaining to this retention is inconsistent with this Order, the terms of this Order shall govern.

12. CCA and Debevoise are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

13. Notwithstanding any Bankruptcy Rule or Local Rule to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

14. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.



**EXHIBIT 1**

**Engagement Letter**



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

**PRIVILEGED & CONFIDENTIAL  
ATTORNEY WORK PRODUCT  
ATTORNEY-CLIENT COMMUNICATION**

September 12, 2024

James McMahon  
CCA Construction, Inc.  
445 South Street, Suite 310  
Morristown, NJ 07960

Dear Mr. McMahon:

We are grateful that you have asked Debevoise & Plimpton LLP to act as counsel to CCA Construction, Inc., CSCEC Bahamas, Ltd. and CCA Bahamas Ltd. (collectively, "Client"). This engagement letter and the attached Debevoise & Plimpton Terms of Engagement (the "Terms of Engagement") together set forth the terms that will govern our work for Client on the matter(s) described in this letter. This engagement letter supplements our November 27, 2023, engagement letter with you.

1. Scope of Engagement

Client has engaged us to represent it in connection with evaluating and implementing a potential restructuring of its financial obligations, whether in-court or out-of-court, and such related additional matters for which you request our services or advice. In this engagement, we are representing Client and not any of its affiliates or any other entity or person associated with or related to Client.

We understand that you will be our principal contact for communications at Client from whom we will receive our instructions, although we may also be working with and receiving instructions from others within your organization during this engagement.

If additional services are requested by Client and agreed to by us, this engagement letter and the attached Terms of Engagement will also apply to such services, unless superseded by another written engagement letter. Our representation is limited to the services that Client requests and we agree to perform on Client's behalf.

2. Staffing

As discussed, Natasha Labovitz and I will lead our firm's work on this matter, and the principal counsel and associates on the matter will be Elie Worenklein, Rory Heller and Shefit Koboci. Other attorneys and support personnel may also perform services. I will be happy to discuss project management and staffing matters with you at any time.

3. Billing Policies and Procedures

Our fees for our services will be based upon our customary hourly rates for matters of this kind.

Our current hourly rates for this matter range from \$810 per hour for our newest associates to \$2,280 per hour for our most experienced partners. The current hourly rate for myself and Natasha Labovitz is \$2,280 per hour; Elie Worenklein's hourly rate is \$1,640; Rory Heller's hourly rate is \$1,315; Shefit Koboci's hourly rate is \$1,205. Rates for project assistants, legal assistants and other support personnel range from \$355 per hour to \$820 per hour. These rates are subject to adjustment by the firm from time to time.

In addition to the above, and in recognition of our relationship:

- Our hourly rates for attorneys and other time-keepers who work on this matter will be subject to a 10% discount from our standard hourly rates.
- In the event that the only three entities required to file for bankruptcy are the Client (i.e., CCA Construction, Inc., CSCEC Bahamas, Ltd. and CCA Bahamas Ltd.), we will, with respect to any fees that are incurred on or prior to the later of October 31, 2024 or 30 days after entry of the state court judgment, apply a discount of 25% for any fees that are incurred in excess of \$750,000 and apply a discount of 50% for any fees incurred in excess of \$1,000,000.
- In the event that more than three entities are required to file for bankruptcy, we will, with respect to any fees that are incurred on or prior to the later of October 31, 2024 or 30 days after entry of the state court judgment, apply a discount of 25% for any fees that are incurred in excess of \$1,000,000 and apply a discount of 50% for any fees incurred in excess of \$1,500,000.
- Please note that the above fee discounts of 25% and 50% shall not apply to any fees incurred for M&A transactions, a prepackaged/prearranged plan, DIP financing, litigation appellate work for NY state court, or combatting an attempted injunction against filing.

To the extent insurance coverage may be available to pay for our services, Client will be responsible for paying any difference between the amount covered and paid by insurance and our above-stated rates for the matter. Unless otherwise agreed in writing, Client shall be responsible for submitting any and all claims to said insurer(s), and shall not withhold or otherwise delay payment of our fees pending reimbursement or a coverage decision or calculation by an insurer or other third party.

We will bill Client for disbursements and other charges that we incur on its behalf. These disbursements and charges may include, among others, filing fees and fees and expenses incurred in connection with court reporters, transcripts, expert witnesses, document retrieval services, travel, postage, express deliveries, and local and other counsel (where appropriate); and charges for messenger services, document preparation (including word processing and duplicating), computerized legal research and other database services, and certain overtime and administrative expenses.

If a disbursement or other charge is significant, our usual practice is to ask Client to pay the provider directly upon receipt of the applicable invoice. In addition, for large expenses the provider may require Client to prepay all or a portion of such expenses.

In accordance with our standard billing practice, we expect to bill Client on a monthly basis or, in accordance with the retainer arrangement described below, more frequently to the extent that such billing may result in our bills exceeding the amount of our estimated fees and expenses described below. In our experience, clients find monthly billing to be helpful in monitoring the nature and amount of services. Depending on the circumstances, estimated or summary bills may be provided during certain billing cycles, with supporting time descriptions and expense summaries to follow thereafter. We expect that Client will pay the amounts shown as due on these statements promptly upon their receipt.

We will seek to consult with you in advance before undertaking any major new task in our representation of Client, and to keep you informed where our fees, disbursements and other charges stand on an ongoing basis, if you so request.

A retainer in the amount of \$250,000 will be payable promptly in connection with our work on this assignment, which is intended to be an “advance payment retainer,” as defined in Opinion 816 of the New York State Bar Association Committee on Professional Ethics and *Entegra Power Group, LLC v. Dewey & Leboeuf LLP (In re Dewey & Leboeuf LLP)*, 493 B.R. 421, 430 (Bankr. S.D.N.Y. 2013). The amount of the initial advance payment retainer has been set to approximate our estimate of fees, expenses and other disbursements that are expected to be accrued and unpaid by Client between payment cycles. Debevoise’s estimate of expected fees and expenses may change based upon actual or expected fees and expenses incurred or expected to be incurred, as applicable. Client agrees to provide additional advance payment retainers upon request by Debevoise to ensure that the amount of any advance payment retainers remains at or above our estimated fees and expenses. Client further agrees that Debevoise may apply the advance payment retainers to satisfy any outstanding fees as services are rendered and to expenses as they are incurred. If an insurer pays such fees and expenses under a Client insurance policy, Debevoise shall refund the Client for any such amounts paid by an insurer.

Client understands and agrees that any advance payment retainers are earned by Debevoise upon receipt; any advance payments retainers become property of Debevoise upon receipt; Client no longer has any property interest in any advance payment retainers upon Debevoise's receipt; any advance payment retainers will be placed in Debevoise's general account and will not be held in a client trust, escrow or similar account; and Client will not earn interest on any advance payment retainer. Client and Debevoise agree that, at the conclusion of this engagement, if the aggregate amount of any advance payment retainers held by Debevoise exceeds the amount of Debevoise's final bill for fees, expenses and other disbursements, then Debevoise will refund the excess amount to Client.

Client further understands and agrees that the use of advance payment retainers is an integral condition of our engagement and is necessary to ensure that Client continues to have access to our services; Debevoise is compensated for its representation of Client; Debevoise is not a prepetition creditor in the event that Client commences, or has commenced against it, a case under the U.S. Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.*; and, in light of the foregoing, the provision of the advance payment retainers is in Client's best interests. The provision of one or more advance payment retainers does not affect Client's right to terminate this representation or the attorney-client relationship.

#### 4. Conflicts

At present, we are not aware of any conflicts of interest in undertaking this representation. As Client is aware, however, our firm represents many other companies and individuals (including other clients who are or may become Client's competitors) in a variety of matters, including, but not limited to, mergers, acquisitions, financings, restructurings, bankruptcies, investigations, fund formations, litigations, and regulatory matters.

It is possible that during the time we are representing Client, some of our present or future clients will have disputes, transactions, or other matters with or involving Client or its affiliates. We may also be asked to seek discovery from Client or its affiliates in connection with the representation of another client in a litigation, arbitration, or other dispute resolution proceeding. In light of the foregoing, we wish to clarify, and confirm Client's agreement, that our representation of Client will not prevent us from representing existing or new clients that may have interests that are adverse to or otherwise different from those of Client or its affiliates, so long as the matter for the other client is neither substantially related to our work for Client nor a litigation, arbitration, or other dispute proceeding in which Client is named as a party adverse to such other client.

Our firm has an active bankruptcy practice. We may from time to time be retained by other clients to represent their interests in bankruptcy cases or out-of-court restructurings in which Client or one of its affiliates is or may be a party with interests adverse to or otherwise different from those of these other clients. Client agrees that our

representation of Client in the matters described in this letter will not, in and of itself, disqualify us from representing other clients in such bankruptcies or restructurings so long as we do not represent such other clients in any litigation in which Client is named as a party adverse to such other clients.

In the course of representing Client we may from time to time consult with the lawyers in our firm responsible for advising our firm, or with outside counsel, on our professional obligations relating to our representation of Client. Such consultations may involve matters including professional ethics issues and potential or actual conflicts of interest. Client acknowledges and agrees that, notwithstanding that there may be potential for conflict between us and Client in consideration of our professional obligations, we are free to consult with our own counsel on such matters without Client's consent and that such consultations are confidential and subject to our attorney-client privilege, as communications between our firm's personnel and counsel to our firm; Client agrees that it shall have no right to such communications.

By consenting to the arrangements described in this letter, Client will be waiving any conflict of interest that might arise in the situations described above and agreeing not to seek to disqualify us or otherwise to assert a conflict in those situations.

We agree that Client's consent to and waiver of conflicts in the preceding paragraphs do not permit us, without Client's prior consent, to disclose to another client confidential information about Client obtained in the course of our representation of Client. Conversely, we will not disclose to Client or use on its behalf any information with respect to which we owe a duty of confidentiality to another client or person.

#### 5. Governing Law and Dispute Resolution

This engagement letter, the attached Terms of Engagement (with the exception of sections B and C thereof) and any other matters relating to or arising directly or indirectly out of our relationship with Client shall be governed by and construed in accordance with the laws of the State of New York, without giving effect to the choice of law provisions thereof.

If a dispute arises as to the amount of the fee being charged, Client may have the right to seek arbitration or mediation of the fee dispute under a procedure established in New York State for resolution of certain fee disputes pursuant to Part 137 of the Chief Administrator Rules. We will provide you with the necessary information regarding such processes in the event of a dispute, or at any time upon request.

Except to the extent otherwise required by such Chief Administrator Rules, any dispute or claim arising out of or in any way relating to our representation of Client, including any work that might have been done prior to entering into this engagement letter (and including, without limitation, any claim of malpractice or breach of contract,

or any claim relating to fees, costs, charges or expenses for the representation) shall be finally settled by arbitration, and judgment upon the award may be entered by any court having jurisdiction thereof or having jurisdiction over the relevant party or its assets.

The arbitration shall be conducted in accordance with the International Institute for Conflict Prevention and Resolution (“CPR”) Non-Administered Arbitration Rules in effect at the time of the arbitration, except as they may be modified herein or by mutual agreement of our firm and Client (collectively, the “parties”). The seat of the arbitration shall be New York, New York and it shall be conducted in the English language. The arbitration shall be conducted by three arbitrators, of whom each party shall appoint one, with the third arbitrator selected by the two party-appointed arbitrators pursuant to the CPR Non-Administered Arbitration Rules.

The parties agree that the arbitration shall be kept confidential and that the existence of the proceeding and any element of it shall not be disclosed beyond the tribunal, the parties and their counsel, experts, insurers and any other person necessary to the conduct of the proceeding. These confidentiality obligations shall not apply if disclosure is required by law or in judicial or administrative proceedings, or as far as disclosure is necessary to enforce the rights arising out of the award.

This agreement to arbitrate shall constitute an irrevocable waiver of each party’s right to a trial by jury, discovery that would customarily be available in a judicial proceeding, and appeal, but the arbitrator shall have the power to grant any remedy for money damages or equitable relief that would be available to such party in a dispute before a court of law in New York. The arbitration shall be governed by the Federal Arbitration Act, 9 U.S.C. §§ 1 et seq. The parties further agree that the arbitral tribunal shall have primary responsibility to hear and determine challenges to the jurisdiction of the arbitral tribunal.

#### 6. Terms of Engagement

The attached Terms of Engagement form an integral part of this engagement letter and are binding on the parties hereto. In the event of any inconsistency between this engagement letter and the attached Terms of Engagement, the terms set forth in this engagement letter shall prevail. In the event of any conflict between the terms of this engagement letter or the attached Terms of Engagement, on the one hand, and any outside counsel guidelines or policies adopted by Client, on the other hand, this engagement letter and the Terms of Engagement shall prevail.

\* \* \*

Above all, our relationship with Client must be based on trust, confidence and clear understanding. If you have any questions about this engagement letter and the attached Terms of Engagement, or about any aspect of the work that the firm, or any of

the firm's lawyers, is performing for Client, please call me directly to discuss the matter. We encourage you to inquire about any matter concerning the attorney-client relationship that is in any way unclear or unsatisfactory.

Please confirm Client's agreement by countersigning a copy of this engagement letter in the space provided below and returning such countersigned copy to me. Please note, however, that Client instructing us or continuing to instruct us on this matter or any other matter on which we agree to represent Client pursuant to the terms of this engagement letter will constitute Client's full acceptance of the terms set out above and attached.

We invite you to consult with us at any time and on any topic. We look forward to continuing our relationship and working with you on this important matter.

Sincerely,



Sidney P. Levinson

ACCEPTED AND AGREED:

CCA Construction, Inc., CSCEC Bahamas Ltd. and CCA Bahamas, Ltd.

  
James McMahon  
General Counsel





## DEBEVOISE & PLIMPTON TERMS OF ENGAGEMENT

Debevoise & Plimpton is a global law firm with offices in the United States, Europe and Asia. It provides services through Debevoise & Plimpton LLP, a limited liability partnership registered in New York and headquartered in New York, and through related entities operating in certain other jurisdictions. The following terms apply either generally or in respect of a specific matter, as appropriate, to the provision of such services. Each matter in respect of which we provide services to you is, for the purposes of these Terms of Engagement, a "Matter". References to "you", "your", or the "Client" are to our client(s) in the Matter. References to "we", "our", "us", the "firm", or "Debevoise" are to the Debevoise & Plimpton entity or entities providing services to you. References to the "Agreement" are to the engagement letter to which these Terms of Engagement are attached and these Terms of Engagement.

### A. GENERAL TERMS

A.1 Client identification. Many jurisdictions have adopted or are in the process of changing or creating anti-money laundering, counter-terrorist financing, embargo, trade sanctions or similar laws, regulations and policies. As part of the firm's responsibility for compliance with such laws, regulations and policies, the firm may be obliged to take detailed steps to verify the identity of our clients and their beneficial owners (if any) and the source of our clients' funds and wealth. Accordingly, prior to commencement of work, the firm may have already requested, or may be requesting shortly, that you provide us with required identification and other documents. A delay or failure on your part to provide information required for verification purposes may prevent us from commencing or continuing work on a Matter. The firm reserves the right to request additional information that it believes is necessary, advisable or appropriate to verify identity and/or to ensure the firm's compliance with applicable laws, regulations and policies from time to time.

A.2 Client assistance and cooperation. To enable us to represent you effectively and for our relationship to succeed, you agree to cooperate fully with us in our representation of you and to make available to us any documents or other information, personnel or agents as necessary to assist us in our representation of you. It is essential for you to provide us with all factual information reasonably relevant and material to the subject matter of our representation, and we will rely on the accuracy and completeness of any documents or other information you may provide.

A.3 Confidentiality. We owe a duty of confidentiality to you. We will not disclose any confidential information that we obtain as a result of our provision of services to you except as you expressly permit; as required by applicable law or regulation; if consistent

with the applicable professional conduct rules; or as required to our professional advisers and third parties who provide business support services to us, subject to their entering into contractual duties of confidentiality with us.

A.4 Sharing Client information with Debevoise entities. You agree that we may share information relating to you or a Matter with all Debevoise & Plimpton entities that are part of our global law firm and any lawyers associated with such entities, all of which are bound by the terms of this Agreement including our confidentiality obligations to you.

A.5 Change in control. In the event that Client is acquired or is otherwise subject to a change in control (including by a person or group becoming a controlling affiliate of yours) after the inception of this engagement, it is understood that the firm does not represent the acquiring entity or such controlling affiliate or otherwise establish a lawyer-client relationship with such entity or affiliate by virtue of such change in control. Furthermore, Client will provide us with sufficient notice to permit us to withdraw as your lawyers, subject to our ethical obligations, if we determine that such affiliation, acquisition or merger creates a conflict of interest, or if we determine that it is otherwise not in the best interests of the firm to continue to represent Client. In addition, Client acknowledges and agrees that any applicable privilege of Client belongs to Client alone and not to any acquiring or successor entity separate from Client, and on behalf of any such acquiring or successor entity Client waives any right or title to, and interest in, Client's privileged information to the extent that such acquiring or successor entity otherwise has any right or title to, or interest in, such information.

A.6 No third party reliance. Our advice, whether provided in written, oral or any other form, is provided for your benefit alone and solely for the purposes of the

(Rev'd March 2024)

particular Matter to which it relates. Unless otherwise agreed in writing, our advice may not be used or relied on by any third party.

that you will promptly notify us if you become aware of any other persons or entities that are or may become involved in a Matter.

- A.7 Use of legal due diligence reports by non-clients. You understand that in the event that we prepare for you a legal due diligence report in connection with a proposed transaction, such report will be prepared solely to assist you in evaluating the proposed transaction. Our report may not be relied upon by any other person or entity, or for any other purpose. You may not describe, show or furnish our report to any other person or entity, and no other person or entity may use our report, without our prior written consent. We may withhold consent in our sole discretion, and any such consent may be conditional upon, among other things, written acknowledgment from any person or entity receiving or using our report that we have not authorized reliance by, owe no duty to and have no liability to such person or entity in connection with our due diligence investigation or our report.
- A.8 Estimates are not binding. Any fee estimate, budget, or projection of hours we may provide is not a commitment to cap our fees or perform the services contemplated within a fixed amount of time or for a fixed fee. Any estimate, budget, or projection of hours is by its nature inexact and our actual fees and other charges may vary.
- A.9 Full payment of all amounts. Our fees, disbursements and other charges as described in this Agreement and as shown on our statements are to be paid without any reduction for withholding taxes or other governmental charges, unless otherwise agreed to by you and us. In appropriate circumstances, Client may also be responsible for value added, sales or other taxes related to our fees, disbursements or other charges.
- A.10 Third party payment of legal fees, disbursements and other charges. Sometimes our fees, disbursements and other charges, or a portion of them, are paid by a third party, such as an insurer. In this event, in the absence of an agreement to the contrary, you will remain responsible for paying the difference, if any, between the amounts shown on our statements and any amounts paid by the third party. The full payment of our fees, disbursements and other charges is ultimately your responsibility as Client.
- A.11 Conflicts check. To enable us to conduct a conflicts check, you represent that you have identified for us all persons and entities that are or may become involved in a Matter to the best of your knowledge. You agree

- A.12 Privacy. Our privacy policy describes our practices with regard to our collection and use of personal information in the course of our business, including in the course of performing legal services for Client. In particular, our privacy policy describes the types of personal information we collect; how we collect, use and share personal information; our legal bases for using personal information; how long we keep personal information; how we protect personal information; the countries to which we may transfer personal information; and the rights of individuals regarding their personal information. Our privacy policy is accessible on our website at <https://www.debevoise.com/footer/privacy>. It is updated from time to time, so we encourage you to review it regularly.

Client represents and warrants to us that any personal information relating to third parties which Client provides to us is collected, used and shared by Client in accordance with applicable data protection laws. In addition, Client agrees to give to us reasonable notice of any proposed transfer by Client to us of data which include personal information and, to the extent necessary to comply with data protection laws, to provide a copy of our privacy policy to any third party whose personal information is transferred by Client to us. In no event shall we retain, use, sell or disclose any third party personal data (including any “consumer’s personal information” as that phrase is used in the California Consumer Privacy Act of 2018) that we have received from Client for any purpose other than for the specific purpose of performing the services specified in this Agreement, except as may be required and/or permitted by law.

- A.13 Use of technology. The firm will use communication, word processing, support, analytic, storage and other technologies in the course of providing services to Client. To enable us efficiently to provide our services to Client, we may use technology service providers that host, store or process confidential or other information that Client provides to us and/or documents or data that we create or use in the course of providing services to Client. These technology service providers may in turn use other parties (including so-called “cloud service providers”) to provide their services. Although we use commercially reasonable efforts to require our technology service providers to protect the confidentiality and security of

confidential information, documents and data provided to them or to which they otherwise might have access, we are unable to guarantee that such providers, or fourth party providers who assist our technology service providers, will not themselves be subject to data security breaches, or that information, documents and data we provide will not be used by such providers in an unauthorized manner. By entering into this Agreement, Client consents to our use of such providers in providing our services.

A.14 Email communications. We recommend that all email communication between us and Client be encrypted in transit. Encryption can help avoid the risks attendant to communication by email, which is capable of being intercepted by others. Our systems are configured to send and receive encrypted email by default, and we would be happy to work with you if you choose to configure your systems to enforce encrypted format. If that is not feasible or you choose not to do so, you consent to the use of unencrypted email in our communications.

A.15 Third party electronic communication providers. We advise against the use of third party electronic communication programs, such as WeChat or WhatsApp, for transmitting confidential information to us, as we cannot vouch for the security of any information transmitted through the use of such programs. If you choose to communicate with us by using any such program, however, such communication by you will be treated as your consent for us to communicate with you using that program.

A.16 Termination. Client may terminate our representation at any time for any reason. Subject to ethical obligations, we reserve the right to withdraw from an engagement if our statements are not being paid in a timely manner, if for any other reason the lawyer-client relationship is not proceeding in a satisfactory manner, or to comply with other legal requirements such as sanctions restrictions. Our representation regarding the Matter to which this Agreement applies will end upon completion of our legal services under this Agreement, when the firm has performed no services for Client under this Agreement for a period of six months or longer, at such time as it reasonably appears that the need for our legal services in connection with the Matter has ended, or at such time as legally required, whichever is earliest.

In the event we choose to terminate our representation, as set forth in our Agreement, you agree not to contest our withdrawal from any court or administrative

proceeding.

Upon termination of our representation in a particular Matter (even if the firm continues active involvement in other Matters on your behalf), the firm will have no further duty to inform you of future developments or changes in law as may be relevant to such Matter. Further, unless we mutually agree in writing to the contrary, the firm will have no obligation to monitor renewal or notice dates or similar deadlines that may arise in connection with Matters for which the firm had been retained but for which we are no longer engaged.

A.17 Disposition of files. Once our work on a Matter ends, at Client's request, the firm will return, retain, or discard the materials pertaining to the Matter to which Client may be entitled under applicable law (the "Client File"). However, unless Client provides written notice to us within one year after a Matter has concluded concerning how Client would like the Client File to be handled, Client understands and agrees that we may retain or destroy the Client File (including all materials contained therein) at our discretion and consistent with our ethical obligations. Client understands that "materials" include originals as well as copies, and also that "materials" include paper files as well as information stored in other forms, including email, electronic documents, audio and video recordings and file materials in other formats.

Our own files pertaining to the Matter will be retained by the firm (as opposed to being sent to Client) or destroyed. These firm files include, for example, certain internal correspondence and work product, firm administrative records, time and expense reports, personnel and staffing materials, and accounting records.

We reserve the right to make and retain, at our expense, copies of all materials generated or received by us in the course of our representation. If Client requests copies of materials from us, copies that we generate will be made at Client's expense. Should Client wish us to retain a large quantity of paper or electronic documents, we will negotiate with Client a reasonable charge, based upon the quantity of the material to be retained and the manner and duration of its retention.

A.18 Hosting data. The firm may offer to electronically host and maintain a platform for Client to share information within Client, or as Client chooses, with other individuals. To the extent that the firm agrees to

offer such a service, you agree to be bound by the "Terms of Use" found at <https://extranet.debevoise.com/debevoise/termsOfUse.action>, as those terms may be periodically updated. You also agree that to the fullest extent permitted by law you will not hold the firm, its partners, employees or affiliates or our service providers liable for any damage related to or arising out of the use of such a platform.

- A.19 Response to subpoenas or other lawful process. If the firm or any of its personnel are required by subpoena or other lawful process to provide testimony or produce documents or records, including electronic records, relating to the firm's representation of you, we will, to the extent permitted by applicable law, inform you before responding so that you have the opportunity to intervene or interpose any objections. You agree to reimburse the firm for its time and expenses incurred in responding to any such requests (with time to be billed at our standard hourly rates then in effect for the particular individuals involved, unless otherwise agreed), even if our representation of you has ended, including the time and expenses incurred in reviewing documents, appearing at depositions or hearings, and otherwise addressing issues raised by any such requests.
- A.20 Publicity. You agree that the firm may, as a part of our public marketing efforts, identify Client as a client and indicate the nature of the Matter and the results achieved, so long as the firm does not disclose Client's confidential information or secrets as defined by applicable professional conduct rules.
- A.21 Reporting. Legislation on money laundering, terrorist financing and financial sanctions places the firm under a legal duty in certain circumstances, where we know or suspect that a Matter involves money laundering or a breach of financial sanctions, to disclose information to the relevant regulatory authorities, to cease providing services or to take other actions as required by law, regulation or order. If, while we are acting for you, it becomes necessary to make a disclosure, the law may prohibit us from informing you that a disclosure has been made or of the reasons for it. To the extent that the law permits us to do so, we will tell you about the issue(s) identified and explain what action we may need to take.
- A.22 UK and European Union "DAC6" reporting. The UK and EU Mandatory Disclosure Rules, introduced pursuant to EU Directive 2018/822 of 25 May 2018 (also sometimes known as "DAC6" rules), may

require us to report details of certain arrangements entered into by our clients to a tax authority in the UK or EU. To be reportable, the arrangement must be cross-border, involving the UK or an EU Member State, and have certain hallmarks. We will consult with you before making any such report if we consider that the rules apply to a Matter.

- A.23 Beneficial Ownership Information Reporting. The U.S. Corporate Transparency Act requires certain corporate entities to report beneficial ownership information ("BOI") to the Financial Crimes Enforcement Network ("FinCEN") of the U.S. Department of the Treasury. Upon request, we are pleased to advise Client in assessing applicable BOI reporting obligations, and also to assist in making any required initial BOI report filings. In the absence of our agreement in writing to provide such advice and assistance, however, we disclaim any obligation to do so. We also disclaim any obligation to update or correct any such reporting to FinCEN in the absence of a written agreement providing that we shall do so.
- A.24 Indian taxpayer identification number. Our Indian unique identification number (PAN) is AAFFD9304D.
- A.25 Release of information to third parties retained by Client. On occasion, our Clients request that we release information about the services we provide to third parties retained by Client, including e-billing platforms and legal analytics firms. In the event that you request us to provide information to such third parties and we agree to do so, you acknowledge that we have no liability for any loss or unauthorized use of information that may occur in connection with our provision of such information, whether through a breach or other information security default of the third party or through other circumstances. You also acknowledge that our firm bears no responsibility for any loss or weakening of the attorney-client privilege or any other privilege or protection that may come about as a result of our fulfilling any such request.
- A.26 Severability. If any provision of this Agreement or the application thereof is held invalid or unenforceable in an arbitration or judicial proceeding, the invalidity or unenforceability shall not affect other provisions or applications of this Agreement which can be given effect without such provisions or application, and to this end the provisions of this Agreement are declared to be severable.
- A.27 Entire agreement. The engagement letter and these Terms of Engagement set out the entire agreement



between you and us concerning our provision of legal services. Any modifications of or amendments to this Agreement must be in writing and agreed by all parties. In the event of any conflict between this Agreement and any outside counsel guidelines or policies adopted by Client, this Agreement will govern.

**B. ADDITIONAL TERMS APPLICABLE WHEN SERVICES ARE PROVIDED BY DEBEVOISE ENTITIES IN LONDON, FRANKFURT, PARIS OR LUXEMBOURG**

- B.1 Insider lists and inside information. In applicable circumstances and in accordance with the UK Market Abuse Regulation and/or the EU Market Abuse Regulation we will draw up and maintain a list of persons at our firm who act for you and have access to inside information about you in relation to a Matter, provided that you inform us when particular information to which you give us access is inside information and when it ceases to be inside information. We will provide to you a copy of the insider list as soon as possible upon request and we will keep the list for five years from the date it was drawn up or last updated. You acknowledge that we are authorized to disclose the insider list and other information relating to Client to a relevant regulatory authority which may request such information and that we have no obligation to notify you of our compliance with any such regulatory request.
- B.2 Proportional liability. Your other advisers may seek to exclude, cap or otherwise limit their liability in connection with their provision of services to you relating to a Matter, as a result of which our own liability to you may be proportionately increased. We would not regard this as appropriate or fair and accordingly you agree that the total amount you may recover from us (and our other Debevoise entities) if we (and our other Debevoise entities) become subject to a claim by you arising out of a Matter, will not exceed what it would have otherwise been in the absence of any such exclusion, cap or limitation by another adviser.
- B.3 Liability cap. We may, if permitted by local law and professional conduct rules, limit our aggregate liability to you for breach of contract or negligence in respect of a Matter to an amount specified in the relevant engagement letter.

**C. ADDITIONAL TERMS APPLICABLE WHEN SERVICES ARE PROVIDED BY DEBEVOISE LONDON**

- C.1 Details of Debevoise London. Debevoise & Plimpton LLP, whose office is at 65 Gresham Street, London EC2V 7NQ, is a limited liability partnership registered in New York. It is authorized and regulated by the Solicitors Regulation Authority. The SRA Code of Conduct for Firms and the SRA Code of Conduct for Solicitors and Registered Foreign Lawyers, at <https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/> and <https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/> respectively, apply to Debevoise London and to our lawyers and employees. The Bar Standards Board Code of Conduct at <http://www.barstandardsboard.org.uk/regulatory-requirements/bsb-handbook/the-handbook-publication> also applies to our barristers. Debevoise London's VAT number is GB 524658924.
- C.2 Professional indemnity insurance. Debevoise London is required to hold a minimum level of insurance cover under the Solicitors' Indemnity Insurance Rules. You may obtain information about our insurance, including contact details of our insurer and the territorial coverage of the insurance, from our London Managing Partner.
- C.3 Financial services. During the course of our provision of services to you nothing we do is, or should be construed as, an invitation or inducement to engage in investment activity for the purposes of the UK Financial Services and Markets Act 2000.
- C.4 Lien. We may exercise a lien over your files, i.e. keep all your documents and materials relating to a Matter, while there is still money owing to us for legal fees, disbursements and other charges. This lien may be similar to liens that apply by statute or common law in other jurisdictions.
- C.5 SRA Accounts Rules. The SRA Accounts Rules require us to have an interest policy which provides for the payment of interest on any monies held by us for you in a client account. You may obtain a copy of our policy from our London Managing Partner.
- C.6 Dispute resolution. If you are at any time dissatisfied with the service you are receiving from us, or with any of our statements, or would like to discuss with us any aspect of a Matter or how our service to you could be

improved, please contact the partner responsible for the overall supervision of the Matter or our London Managing Partner. Our complaints procedure is available on request.

If you are dissatisfied with our handling of your complaint you may be entitled to ask the Legal Ombudsman to consider the complaint. Contact details for, and details of the qualification criteria for access to, the Legal Ombudsman are at [www.legalombudsman.org.uk](http://www.legalombudsman.org.uk).

You may apply to the court for an assessment of any of our statements under Part III of the Solicitors Act 1974.

If a dispute arises between us out of or in connection with the Agreement, or the provision of our services to you whether carried out before, on or after the date of the Agreement, or any non-contractual obligation arising out of or in connection with the Agreement, and it is not resolved under one of the procedures set out above, it will be resolved pursuant to the dispute resolution procedures set forth in the engagement letter.

**D. ADDITIONAL TERMS APPLICABLE WHEN SERVICES ARE PROVIDED BY DEBEVOISE SHANGHAI**

D.1 Details of Debevoise Shanghai. Debevoise & Plimpton Shanghai Representative Office (“Debevoise Shanghai”) is located at 13/F Kerry Centre Tower One 1515 Nanjing Road West Shanghai, 200040, China. Debevoise Shanghai is licensed to operate as a foreign law firm in China by the Ministry of Justice. Under Ministry of Justice regulations, foreign law firms in China are permitted, amongst other things, to provide consultancy services on non-Chinese law and on international conventions and practices, and to provide information on the impact of the Chinese legal environment. Under the same regulations, foreign law firms in China are not permitted to practice Chinese law, including rendering legal opinions upon Chinese law. Debevoise Shanghai’s services in the Matter do not constitute an opinion upon Chinese law. If you require such an opinion, you should obtain it from licensed Chinese counsel and we would be pleased to arrange for assistance.

D.2. Privacy and Data Protection. By voluntarily providing us with data (including any sensitive personal information included therein), you agree

that we may share information relating to you or a Matter with all Debevoise & Plimpton entities that are part of our global law firm and any lawyers associated with such entities. If you wish to restrict the sharing of your information beyond China and retain your information within China, you should inform us in writing before we commence substantive work on the Matter. You understand that, in any event, Client will ultimately retain liability for any cross-border transfer of Client’s data that we effect in connection with the transactions or proceedings for which we are engaged, and to the extent legally permitted, we disclaim any liability in connection with any such transfer.

D.3 Liability Cap. We may limit our aggregate liability to you for breach of contract or negligence in respect of a Matter to an amount specified in the relevant engagement letter.

**Exhibit B**

**Invoices**



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486556

Client Matter 27188.1012

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with BUSINESS OPERATIONS

Fees	\$18,481.50
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$18,481.50</b>

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Date	Timekeeper	Narrative	Hours
12/22/24	Goodman, Mark P.	Revise communications materials.	0.5
12/23/24	Goodman, Mark P.	Review press coverage of chapter 11 filing.	0.2
12/23/24	Worenklein, Elie J.	Phone call with BDO re insurance motion (0.3); phone call with BDO, Cole Schotz and J. Yang [CCA] re UST insurance requirements (0.5).	0.8
12/24/24	Goodman, Mark P.	Review BMLP media statement re bankruptcy filing and media coverage.	0.3
12/24/24	Labovitz, M. Natasha	Review press reports re filing (0.2); respond to questions from L. Cao [CCA] re payroll processing (0.2).	0.4
12/24/24	Worenklein, Elie J.	Respond to email from C. Zhang [CCA] re questions from HSBC on bank accounts (0.3); email exchange with C. Zhang [CCA] re first day operational orders (0.3).	0.6
12/25/24	Goodman, Mark P.	Review press coverage of chapter 11 filing including statements by BMLP.	0.2
12/25/24	Labovitz, M. Natasha	Review new press reports.	0.2
12/26/24	Worenklein, Elie J.	Phone call with BDO team re insurance and schedule questions (0.5); correspond with CCA re insurance certificates (0.2).	0.7
12/27/24	Labovitz, M. Natasha	Review press updates and Bahamas developments.	0.2
12/27/24	Worenklein, Elie J.	Email with J. Schwarz [BDO] re insurance certificates.	0.3
12/30/24	Labovitz, M. Natasha	Correspond with N. Bryan [FGS] and Y. Wei [CCA] re communications materials and developments.	0.2
12/30/24	Worenklein, Elie J.	Phone call with BDO team re insurance certificates (0.2); phone call with A. Behlmann [Lowenstein] re same (0.3); email with BDO and insurance broker re insurance certificates (0.3).	0.8
01/02/25	Labovitz, M. Natasha	Review new press coverage re appeal brief.	0.2
01/03/25	Labovitz, M. Natasha	Review press report summary (0.1); correspond with Y. Wei [CCA] re same (0.1); correspond with R. Heller and J. Yang [CCA] re surety bond status (0.1).	0.3
01/03/25	Worenklein, Elie J.	Phone call with J. Schwarz [BDO] re first day payments and reporting obligations (0.8); review email from BDO re first day order payments (0.2).	1.0
01/07/25	Labovitz, M. Natasha	Correspond with C. Zhang [CCA] and M. Monaghan re new regulatory list and potential business impacts.	0.1
01/14/25	Labovitz, M. Natasha	Review press reports re Bahamian liquidation (0.2); correspond with R. Zipursky and R. Houck [FGS] re corrections to same (0.2).	0.4
01/15/25	Labovitz, M. Natasha	Correspond with R. Zipursky re corrections to press reports (0.1); monitor same (0.1).	0.2
01/17/25	Labovitz, M. Natasha	Address E. Blum [BDO] question re cash transaction and reporting re same (0.2); correspond with E. Worenklein re same (0.1).	0.3
01/21/25	Labovitz, M. Natasha	Respond to questions from M. Davis re scope of ordinary course of business.	0.2

27188.1012 – BUSINESS OPERATIONS

Invoice Number: 2486556

Date	Timekeeper	Narrative	Hours
01/21/25	Worenklein, Elie J.	Phone call with BDO re operating questions and employee updates.	0.8
01/22/25	Labovitz, M. Natasha	Correspond with E. Worenklein re ordinary course question re employee allocations.	0.2
01/22/25	Worenklein, Elie J.	Email Debevoise team re updates on employee roster based on discussions with BDO.	0.4
01/23/25	Labovitz, M. Natasha	Review press report re monthly operating report.	0.1
Total Hours			9.6

27188.1012 – BUSINESS OPERATIONS

Invoice Number: 2486556

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	1.2	2,317.50	2,781.00
	Labovitz, M. Natasha	3.0	2,317.50	6,952.50
	Partner Total	4.2		\$9,733.50
Counsel	Worenklein, Elie J.	5.4	1,620.00	8,748.00
	Counsel Total	5.4		\$8,748.00
<b>Matter Total</b>		<b>9.6</b>		<b>\$18,481.50</b>



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486557

Client Matter 27188.1008

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with CASE  
ADMINISTRATION

Fees	\$137,490.30
Charges and Disbursements	\$11,649.97
<b>TOTAL</b>	<b>\$149,140.27</b>

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Date	Timekeeper	Narrative	Hours
12/22/24	Labovitz, M. Natasha	Review first day hearing PowerPoint presentation and provide comments (0.3); correspond with J. Park re pro hac vice applications (0.1); review M. Goodman comments to suggestion of bankruptcy (0.1).	0.5
12/22/24	Heller, Rory	Draft suggestion of bankruptcy.	1.0
12/22/24	Kirschenbaum, Deven	Make final edits for first day pleadings.	2.8
12/22/24	Mishkin, Benjamin	Finalize first day PowerPoint presentation.	1.0
12/22/24	Park, Junho	Circulate first day hearing information (0.1); correspond with Cole Schotz re first day filing status (0.2); prepare for first day hearing and circulate documents to internal team (1.5).	1.8
12/23/24	Goodman, Mark P.	Revise first day PowerPoint slide deck (0.5); email Debevoise team re same (0.2); draft talking points on litigation for first day hearing (0.5); participate in first day hearing (1.8).	3.0
12/23/24	Labovitz, M. Natasha	Correspond with S. Levinson and E. Worenklein re order of pleadings for first day hearing (0.3); review and sign off on revised PowerPoint for first-day hearing (0.3); correspond with J. Thomson [Verita] to confirm service of motions on BMLP (0.1); update personal talking points for first day hearing (1.4); attend first day hearing, including zoom log-on and waiting time (1.8); call with S. Levinson re hearing outcome and preparation for second day hearing (0.2).	4.1
12/23/24	Levinson, Sidney P.	Exchange emails with N. Labovitz re status of filing (0.3); prepare for first day hearing on DIP motion and cash management motion (4.4); participate in first day hearing (1.8); debrief with N. Labovitz re first day hearing and second day preparation (0.2).	6.7
12/23/24	Worenklein, Elie J.	Draft script for first day hearing (2.5); call with E. Blum [BDO] re preparation for first day hearing (0.8); call with CCA re first day hearing (0.3); call with J. Thompson [Verita] re service for first day hearing (0.5); participate and argue during first day hearing (1.8).	5.9
12/23/24	Heller, Rory	Review presentation for first day hearing (0.7); attend first day hearing (1.8).	2.5
12/23/24	Mishkin, Benjamin	Finalize first day PowerPoint presentation.	1.4
12/23/24	Park, Junho	Correspond with E. Worenklein re first day hearing preparation (0.2); circulate first day information to group (0.2); correspond with E. Worenklein re proposed order preparation (0.2) prepare proposed orders for pending motions (1.6); circulate calendar information to group (0.2); set up for first day hearing (0.6); attend first day hearing to assist with PowerPoint presentation (1.8); coordinate with E. Worenklein and B. Mishkin re next steps (0.3) correspond with E. Worenklein re interim orders (0.2); circulate deadlines and calendar updates re interim orders (0.5); correspond with vendor re transcript of first day hearing (0.2).	6.0
12/24/24	Park, Junho	Correspond with E. Worenklein and R. Heller re docket status (0.1); prepare docket package to client (0.2).	0.3

Date	Timekeeper	Narrative	Hours
12/26/24	Labovitz, M. Natasha	Oversee setting of all key initial dates and calendar items, including communication to client re same.	0.2
12/26/24	Worenklein, Elie J.	Draft email to CCA re 341 meeting.	0.2
12/26/24	Mishkin, Benjamin	Update WIP checklist.	0.6
12/26/24	Park, Junho	Correspond with vendor re transcript (0.3); circulate calendar update to internal team (0.1); correspond with E. Worenklein re hearing logistics (0.1); update docket files for group (0.1); correspond further with transcript vendor re hearing (0.3).	0.9
12/27/24	Worenklein, Elie J.	Correspond with B. Mishkin re open WIP items (0.2); phone call with counsel for interested party re status of CCA case (0.6).	0.8
12/27/24	Park, Junho	Circulate hearing transcript (0.1); update docket files and circulate calendar update (0.3); email B. Mishkin re WIP updates (0.1); update WIP (0.2).	0.7
12/29/24	Park, Junho	Update docket files for attorney review (0.1); correspond with internal team re critical dates (0.2); draft critical date list for attorney review (1.9); update WIP (0.1); send further update to E. Worenklein re critical date list (0.1).	2.4
12/30/24	Levinson, Sidney P.	Provide update to M. Goodman re staffing and scheduling (0.2); telephone call with Y. Wei [CCA] re staffing and scheduling (0.2); email M. Goodman and N. Labovitz re telephone call with Y. Wei [CCA] (0.1).	0.5
12/30/24	Worenklein, Elie J.	Comment on draft critical dates calendar (0.4); emails with Cole Schotz re case management order (0.2); review NJ complex case procedures to determine case management order (0.5).	1.1
12/30/24	Park, Junho	Update critical date list re second day motions and other revisions (0.6); read email exchanges and pleadings re second day motions and next steps (0.4).	1.0
12/31/24	Labovitz, M. Natasha	Review and respond to update from E. Worenklein re update on call with Cole Schotz re case administration and upcoming items.	0.2
12/31/24	Worenklein, Elie J.	Phone call with F. Yudkin [Cole Schotz] re various open items in advance of second day hearing (0.4); draft email to team re recap of call with F. Yudkin [Cole Schotz] and open workstreams (0.2); meet with J. Park re open items and WIP list (0.5).	1.1
12/31/24	Heller, Rory	Research question re creditor matrix.	0.6
12/31/24	Park, Junho	Update chart re critical dates for attorney review (1.9); meet with E. Worenklein re WIP, critical dates, and open items (0.5); update docket files for attorney review (0.2).	2.6
01/01/25	Worenklein, Elie J.	Draft email to Cole Schotz re notice of commencement.	0.2
01/01/25	Park, Junho	Update critical date information.	0.1
01/02/25	Labovitz, M. Natasha	Correspond with E. Worenklein re allocation of responsibilities among professionals for preparation of schedules (0.2); respond to questions re notice of commencement (0.1); correspond with E. Worenklein and M. Goodman re scheduling of omnibus hearings (0.1).	0.4

Date	Timekeeper	Narrative	Hours
01/02/25	Worenklein, Elie J.	Mark up weekly WIP report of open workstreams (0.2); draft email to team re updates from Cole Schotz on open workstreams (0.2); meet with J. Park re case status and next steps (0.4).	0.8
01/02/25	Mishkin, Benjamin	Update WIP checklist.	1.7
01/02/25	Park, Junho	Meet with E. Worenklein re case status and next steps (0.4); update docket files (0.2).	0.6
01/02/25	Williams, Darevia	Review email to track custodial signed notices and responses to questions re the CCA litigation hold (0.7); update tracking chart and case files re the same (1.2).	1.9
01/03/25	Labovitz, M. Natasha	Review WIP report in preparation for team meeting (0.2); attend call with S. Levinson, E. Worenklein, R. Heller, S. Koboci, B. Mishkin and J. Park re all open matters and updates to team to-do list (0.7).	0.9
01/03/25	Levinson, Sidney P.	Participate in weekly WIP call with N. Labovitz, E. Worenklein, R. Heller, B. Mishkin, S. Koboci, and J. Park.	0.7
01/03/25	Worenklein, Elie J.	Participate in weekly WIP call with N. Labovitz, S. Levinson, R. Heller, B. Mishkin, S. Koboci and J. Park.	0.7
01/03/25	Heller, Rory	Attend WIP meeting with E. Worenklein, J. Park, S. Koboci, S. Levinson, M. Labovitz, and B. Mishkin.	0.7
01/03/25	Koboci, Shefit	Provide comments to WIP checklist (0.4); participate in WIP meeting with S. Levinson, N. Labovitz, E. Worenklein, R. Heller, B. Mishkin and J. Park re WIP checklist (0.7); revise checklist (0.2).	1.3
01/03/25	Mishkin, Benjamin	Participate in WIP meeting with N. Labovitz, S. Levinson, E. Worenklein, R. Heller, S. Koboci, and J. Park.	0.7
01/03/25	Park, Junho	Update critical dates list for group (0.4); correspond with S. Koboci re DIP deadlines (0.1); participate in WIP meeting with S. Levinson, N. Labovitz, E. Worenklein, R. Heller, S. Koboci, and B. Mishkin (0.7); circulate calendar updates (0.1).	1.3
01/06/25	Labovitz, M. Natasha	Correspond with E. Worenklein re scheduling of omnibus hearings.	0.1
01/06/25	Worenklein, Elie J.	Phone call with J. Park re reporting requirements and critical dates list.	0.9
01/06/25	Mishkin, Benjamin	Update WIP checklist.	0.1
01/06/25	Park, Junho	Phone call with E. Worenklein re upcoming dates and reporting requirements (0.9); correspond with internal team re case status (0.3); send calendar events and deadline updates to internal team (0.5).	1.7
01/07/25	Labovitz, M. Natasha	Correspond with E. Worenklein and A. Milliaressis [Cole Schotz] re scheduling of upcoming hearings.	0.1
01/08/25	Labovitz, M. Natasha	Correspond with E. Worenklein re hearing scheduling.	0.1
01/08/25	Mishkin, Benjamin	Update critical dates list chart.	1.6

Date	Timekeeper	Narrative	Hours
01/08/25	Park, Junho	Correspond with E. Worenklein re critical dates (0.2); update and send critical date list to S. Koboci, R. Heller, B. Mishkin, and E. Worenklein (1.1); follow up with B. Mishkin re same (0.2).	1.5
01/09/25	Labovitz, M. Natasha	Correspond with E. Worenklein re deadline for filing motions for January 30 hearing.	0.1
01/09/25	Worenklein, Elie J.	Phone call with J. Park re critical dates list (0.5); mark up critical dates calendar (0.4).	0.9
01/09/25	Park, Junho	Correspond with E. Worenklein re case status (0.2); update docket files for attorney review (0.2); speak with E. Worenklein re critical dates and case status (0.5); send updated critical dates list to internal team (1.3).	2.2
01/10/25	Labovitz, M. Natasha	Review WIP report and identify key upcoming tasks (0.2); attend WIP call with E. Worenklein, S. Koboci, R. Heller, B. Mishkin and J. Park (0.6).	0.8
01/10/25	Worenklein, Elie J.	Participate in weekly WIP call (0.6); phone call with B. Mishkin re open WIP items (0.2).	0.8
01/10/25	Heller, Rory	Participate in weekly WIP meeting with E. Worenklein, B. Mishkin, S. Koboci, N. Labovitz, and J. Park.	0.6
01/10/25	Koboci, Shefit	Review WIP checklist (0.8); participate in weekly checklist call with N. Labovitz, E. Worenklein, R. Heller, B. Mishkin and J. Park (0.6).	1.4
01/10/25	Mishkin, Benjamin	Update WIP checklist (1.2); participate in weekly WIP call with N. Labovitz, E. Worenklein, S. Koboci, R. Heller, and J. Park (0.6); call with E. Worenklein re WIP follow up (0.2).	2.0
01/10/25	Park, Junho	Send critical date list updates to Debevoise team (0.6); correspond with S. Koboci re same (0.1); participate in weekly WIP with N. Labovitz, E. Worenklein, B. Mishkin, R. Heller, and S. Koboci (0.6).	1.3
01/12/25	Park, Junho	Draft pro hac vice application for E. Weisgerber.	1.9
01/13/25	Park, Junho	Correspond with E. Worenklein re pro hac vice filing (0.1); coordinate with Cole Schotz team re filing same (0.3); email E. Weisgerber and E. Worenklein re status update (0.2).	0.6
01/16/25	Worenklein, Elie J.	Phone call with B. Mishkin re WIP report updates.	0.4
01/16/25	Mishkin, Benjamin	Update WIP checklist (0.8); call with E. Worenklein re WIP checklist (0.4).	1.2
01/17/25	Labovitz, M. Natasha	Correspond with E. Worenklein re adjourning all matters for omnibus hearing (0.2); follow up with E. Worenklein and Cole Schotz re notice of adjournment and timing for objection deadlines (0.2); review WIP report (0.2); correspond with E. Worenklein re potential notice of filing in bankruptcy court (0.2); correspond with Debevoise team re co-defendants' winding up petitions (0.2).	1.0
01/17/25	Worenklein, Elie J.	Participate in portion of weekly WIP call re open workstreams.	0.8



Date	Timekeeper	Narrative	Hours
01/17/25	Heller, Rory	Review WIP (0.4); attend WIP call with J. Park, E. Worenklein [partial], B. Mishkin and Shefit Koboci (1.0); provide update re same to E. Worenklein (0.1); compile and finalize documents for filing (0.6).	2.1
01/17/25	Koboci, Shefit	Review effective date of interim orders for all motions (0.4); review critical dates list (0.3); review WIP checklist (0.4); participate in WIP checklist call with E. Worenklein [partial], R. Heller, B. Mishkin and J. Park (1.0).	2.1
01/17/25	Mishkin, Benjamin	Prepare WIP checklist (0.5); participate in WIP meeting with E. Worenklein [partial], R. Heller, Shefit Koboci, and J. Park (1.0).	1.5
01/17/25	Park, Junho	Review emails re notice for adjournment re second day hearing pleadings and scheduling (0.3); update critical date list (0.4); participate in WIP meeting with E. Worenklein [partial], R. Heller, Shefit Koboci, and B. Mishkin (1.0); further update critical date list (0.2).	1.9
01/18/25	Park, Junho	Send calendar update to internal team (0.3); email E. Worenklein re same (0.1); update docket files for attorney review (0.2); correspond with N. Labovitz re deadlines (0.1).	0.7
01/21/25	Labovitz, M. Natasha	Correspond with M. Davis re list of outstanding actions for client team.	0.2
01/21/25	Mishkin, Benjamin	Phone call with J. Park re scheduling (0.1); circulate calendar invite to team for January 22 court conference (0.1).	0.2
01/21/25	Park, Junho	Update docket files for attorney review (0.1); phone call with B. Mishkin re scheduling (0.1); send update to internal team re adjourned dates (0.2).	0.4
01/22/25	Park, Junho	Update docket files for attorney review.	0.1
01/23/25	Park, Junho	Update calendar events for group (0.2); correspond with E. Worenklein re file access for internal team (0.1); set up access for team members (0.4); send pleading copies to client (0.3); coordinate with E. Worenklein re second day hearing and deposition schedules (0.3); further update calendar (1.1).	2.4
01/24/25	Worenklein, Elie J.	Participate in portion of weekly internal WIP meeting with S. Koboci, B. Mishkin, and J. Park.	0.9
01/24/25	Koboci, Shefit	Review WIP checklist (0.4); participate in WIP checklist call with E. Worenklein [partial], J. Park and B. Mishkin (1.0).	1.4
01/24/25	Mishkin, Benjamin	Update WIP checklist (1.5); participate in WIP checklist meeting with E. Worenklein [partial], S. Koboci, and J. Park (1.0); call with J. Park re second day hearing (0.1).	2.6
01/24/25	Park, Junho	Participate in WIP meeting with S. Koboci, E. Worenklein [partial], and B. Mishkin (1.0); call with B. Mishkin re hearing (0.1); correspond with Cole Schotz team re pro hac vice (0.2); coordinate with accounting and M. Braccia re pro hac vice fees (1.0).	2.3
01/25/25	Park, Junho	Update docket files for attorney review.	0.1
01/26/25	Labovitz, M. Natasha	Review and comment on draft schedule of key chapter 11 dates for client use.	0.2

Date	Timekeeper	Narrative	Hours
01/27/25	Park, Junho	Update docket files for attorney review (0.2); speak with D. Jones [Debevoise] re attorney information for pro hac vice (0.1); prepare and send document package re pro hac vice fee to DNJ clerk's office (1.4).	1.7
01/28/25	Labovitz, M. Natasha	Correspond with E. Worenklein re updated omnibus hearing time.	0.1
01/28/25	Park, Junho	Update calendar events for Debevoise team (0.3); speak with D. Jones [Debevoise] re NJ assessment forms for pro hac vice (0.1); send prepared forms to E. Weisgerber, N. Labovitz, S. Levinson, M. Davis, M. Goodman, S. Koboci and R. Heller for review (1.3).	1.7
01/29/25	Park, Junho	Update working group list (1.4); send same to B. Mishkin for review (0.1).	1.5
01/30/25	Davis, Morgan A.	Email J. Park re pro hac vice motion (0.1).	0.1
01/30/25	Labovitz, M. Natasha	Sign off on pro hac vice form (0.1); monitor preparation of Rule 2015.3 disclosure (0.1).	0.2
01/30/25	Worenklein, Elie J.	Mark up weekly WIP report.	0.1
01/30/25	Mishkin, Benjamin	Update WIP checklist.	0.9
01/30/25	Park, Junho	Follow up on pro hac vice NJ forms (0.1); update docket files for attorney review (0.2); add additional attorneys to email group (0.1); submit NY Lawyer Fund fees for pro hac vice (1.2); correspond with E. Worenklein re interpreter logistics for second day hearing (0.1); correspond with S. Calahane [Debevoise] and J. Waltner [Debevoise] re interpreter for second day hearing (0.2); correspond with B. Mishkin re case updates (0.2); review emails re schedule and deadline changes (0.3); circulate critical date list to group (1.2).	3.6
01/31/25	Labovitz, M. Natasha	Review WIP report (0.1); attend work-in-process meeting with E. Worenklein, R. Heller, S. Koboci, M. Godbe, B. Mishkin and J. Park (0.6).	0.7
01/31/25	Worenklein, Elie J.	Review updated WIP report (0.3); participate in weekly WIP call with N. Labovitz, R. Heller, S. Koboci, M. Godbe, B. Mishkin and J. Park (0.6); phone call with R. Heller re open workstreams (0.2).	1.1
01/31/25	Godbe, Michael C.	Participate in restructuring team WIP meeting with N. Labovitz, E. Worenklein, R. Heller, S. Koboci, B. Mishkin and J. Park (0.6); review materials re same (0.3).	0.9
01/31/25	Heller, Rory	Participate in WIP meeting with M. Godbe, S. Koboci, E. Worenklein, N. Labovitz, B. Mishkin, and J. Park. (0.6); phone call with E. Worenklein re workstreams (0.2).	0.8
01/31/25	Koboci, Shefit	Review WIP checklist (0.8); checklist call with N. Labovitz, E. Worenklein; M. Godbe, R. Heller, B. Mishkin and J. Park (0.6); revise checklist after call (0.3).	1.7
01/31/25	Mishkin, Benjamin	Update WIP checklist per comments from E. Worenklein (0.6); prepare for WIP meeting (0.1); participate in WIP meeting with N. Labovitz, E. Worenklein, M. Godbe, R. Heller, S. Koboci and J. Park (0.6).	1.3

27188.1008 – CASE ADMINISTRATION

Invoice Number: 2486557

Date	Timekeeper	Narrative	Hours
01/31/25	Park, Junho	Participate in WIP meeting with N. Labovitz, E. Worenklein, M. Godbe, R. Heller, S. Koboci and B. Mishkin (0.6); correspond with B. Mishkin re deadlines (0.1); correspond with M. Godbe re calendar dates (0.1); further update critical date list (0.4); update docket files for attorney review (0.2).	1.4
Total Hours			120.9

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	3.0	2,317.50	6,952.50
	Labovitz, M. Natasha	9.9	2,317.50	22,943.25
	Levinson, Sidney P.	7.9	2,317.50	18,308.25
	Davis, Morgan A.	0.1	1,755.00	175.50
	Partner Total	20.9		\$48,379.50
Counsel	Worenklein, Elie J.	16.7	1,620.00	27,054.00
	Counsel Total	16.7		\$27,054.00
Associate	Godbe, Michael C.	0.9	1,471.50	1,324.35
	Heller, Rory	8.3	1,287.00	10,682.10
	Koboci, Shefit	7.9	1,192.50	9,420.75
	Kirschenbaum, Deven	2.8	1,017.00	2,847.60
	Mishkin, Benjamin	16.8	801.00	13,456.80
	Associate Total	36.7		\$37,731.60
Legal Assistant	Park, Junho	44.7	522.00	23,333.40
	Williams, Darevia	1.9	522.00	991.80
	Legal Assistant Total	46.6		\$24,325.20
<b>Matter Total</b>		<b>120.9</b>		<b>\$137,490.30</b>

**CHARGES AND DISBURSEMENTS SUMMARY**

<b>Description</b>	<b>Amount</b>
Court Reporting	\$474.50
Doc Prod Dept Standard b/w print (per print)	258.40
Doc Prod Dept Standard color print (per print)	1,166.50
Express deliveries & Outside messengers	48.07
Federal Express, DHL & UPS deliveries	82.02
Filing Fees	3,619.00
Lawyer Late Night Meals	734.50
Lexis Services	1,564.54
Research Information Services	26.97
Travel	2,229.26
Westlaw Services	1,446.21
<b>Matter Total</b>	<b>\$11,649.97</b>



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486565

Client Matter 27188.1026

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with CONTESTED BMLP MATTERS

Fees	\$132,200.55
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$132,200.55</b>

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Date	Timekeeper	Narrative	Hours
01/15/25	Park, Junho	Review received BMLP subpoenas from client (0.4); compare against corporate org chart (0.7); prepare subpoena tracker (2.6).	3.7
01/19/25	Weisgerber, Erica S.	Participate in conference with YCST and E. Worenklein re BMLP 2004 discovery requests.	0.8
01/19/25	Worenklein, Elie J.	Phone call with E. Weisgerber and YCST re BMLP subpoenas (0.8); draft email to CCA re call with counsel (0.1).	0.9
01/20/25	Weisgerber, Erica S.	Email with E. Worenklein re 2004 subpoenas to CCA affiliates.	0.2
01/20/25	Worenklein, Elie J.	Phone call with YCST re non-debtor affiliates discovery.	1.2
01/22/25	Labovitz, M. Natasha	Correspond with E. Worenklein re BMLP Rule 2004 discovery and next steps with respect thereto.	0.2
01/23/25	Goodman, Mark P.	Review BMLP's motion to appoint examiner (0.3); email N. Labovitz re same (0.1); speak with N. Labovitz re same (0.2); email re BMLP third-party discovery (0.1).	0.7
01/23/25	Labovitz, M. Natasha	Review examiner motion (0.3); conference with M. Goodman re same (0.2); correspond with M. Davis and E. Weisgerber re same (0.3); correspond with Y. Wei [CCA] re same (0.2); coordinate outreach to press team re examiner motion (0.1).	1.1
01/23/25	Weisgerber, Erica S.	Review research re examiner (0.3); correspond with Lowenstein team re discovery (0.5).	0.8
01/23/25	Worenklein, Elie J.	Review examiner motion (0.9); call with B. Mishkin re same (0.5); phone call with F. Yudkin [Cole Schotz] re examiner motion (0.2).	1.6
01/23/25	Mishkin, Benjamin	Conduct legal research for examiner motion (1.0); call with E. Worenklein re same (0.5).	1.5
01/23/25	Zipursky, Rebecca	Confer with R. Houck [FGS] re motion to appoint an examiner (0.2); revise examiner statement (0.3).	0.5
01/24/25	Davis, Morgan A.	Call with Y. Wei [CCA], M. Goodman, E. Worenklein and E. Weisgerber re motion to appoint examiner.	0.7
01/24/25	Goodman, Mark P.	Review B. Theisen declaration in support of examiner motion (0.2); call with Y. Wei [CCA], E. Worenklein, M. Davis and E. Weisgerber re motion to appoint examiner (0.7); email N. Labovitz re response to examiner motion (0.2); review documents potentially relevant to response to examiner motion (0.2); email re third party discovery (0.2).	1.5
01/24/25	Labovitz, M. Natasha	Coordinate with E. Weisgerber, B. Mishkin, and A. Costin re legal standard for examiner motion (0.6); review update email from E. Worenklein re examiner motion (0.2).	0.8
01/24/25	Weisgerber, Erica S.	Call with Y. Wei [CCA], M. Davis, E. Worenklein and M. Goodman re examiner motion and related issues (0.7); prepare for same (0.1).	0.8
01/24/25	Worenklein, Elie J.	Phone call with Y. Wei [CCA], M. Davis, E. Weisgerber and M. Goodman re examiner motion (0.7); further review and analyze examiner motion filed by BMLP (1.2).	1.9
01/24/25	Mishkin, Benjamin	Research on examiner appointments.	0.9

Date	Timekeeper	Narrative	Hours
01/25/25	Labovitz, M. Natasha	Correspond with E. Weisgerber and B. Mishkin re legal research on standard for appointment of examiner.	0.5
01/25/25	Costin, Alexander	Draft legal research memorandum re examiner motion objection for E. Weisgerber, N. Labovitz and E. Worenklein. (1.4); draft objection to motion for appointment of examiner (1.9).	3.3
01/25/25	Mishkin, Benjamin	Research examiner appointment (4.6); draft email to E. Weisgerber on examiner motion issues (0.4).	5.0
01/26/25	Labovitz, M. Natasha	Correspond with E. Weisgerber and B. Mishkin re legal research and next steps.	0.2
01/26/25	Costin, Alexander	Continue drafting opposition to motion for an examiner.	4.3
01/26/25	Mishkin, Benjamin	Continue research on examiner motion issues.	4.3
01/27/25	Labovitz, M. Natasha	Correspond with M. Godbe re objection to examiner motion (0.1); call with E. Weisgerber re same (0.2); call with E. Worenklein re same (0.1).	0.4
01/27/25	Weisgerber, Erica S.	Call with N. Labovitz re examiner motion.	0.2
01/27/25	Worenklein, Elie J.	Call with N. Labovitz re objection to examiner motion.	0.1
01/27/25	Costin, Alexander	Draft opposition to motion for examiner.	6.3
01/27/25	Kirschenbaum, Deven	Review citations for motion re examiner (1.4); draft section of examiner objection argument (1.2).	2.6
01/27/25	Mishkin, Benjamin	Coordinate with E. Worenklein re examiner motion (0.3); continue research on examiner objection issues (0.4).	0.7
01/28/25	Goodman, Mark P.	Email team re BMLP discovery relating to CCA (0.6); email team re third party subpoenas (0.2); review Rule 2004 subpoenas (0.2).	1.0
01/28/25	Labovitz, M. Natasha	Review motion to quash and joinder thereto (0.5); review new Rule 2004 subpoena filing (0.2); correspond with E. Worenklein and J. Park re same (0.1); correspond with M. Godbe re examiner motion (0.2).	1.0
01/28/25	Worenklein, Elie J.	Comment on draft motion to quash discovery.	0.7
01/28/25	Godbe, Michael C.	Review examiner background materials (0.6); conference with J. Park re same (0.1); coordinate with E. Worenklein re examiner motion (0.3); correspond with B. Mishkin re background materials (0.3); review same (0.5).	1.8
01/28/25	Mishkin, Benjamin	Research precedent re examiner motion (3.1); send precedent and related filings to M. Godbe (0.2); send documents re examiner motion to J. Park (0.6).	3.9
01/28/25	Park, Junho	Speak with M. Godbe re examiner precedent (0.1); prepare research binder re same (0.9); coordinate with B. Mishkin re same (0.1).	1.1
01/29/25	Davis, Morgan A.	Revise portion of objection to examiner motion re underlying litigation.	2.4
01/29/25	Goodman, Mark P.	Email team re CSCEC Holdings motion to quash.	0.3



Date	Timekeeper	Narrative	Hours
01/29/25	Labovitz, M. Natasha	Review updated CSCEC Holding motion to quash (0.3); correspond with M. Davis and E. Worenklein re edits to same (0.1); correspond with M. Davis re aspects of Rule 2004 response (0.3).	0.7
01/29/25	Worenklein, Elie J.	Review research precedent for examiner objection (1.2); call with F. Yudkin [Cole Schotz] and M. Godbe re examiner objection (0.3).	1.5
01/29/25	Godbe, Michael C.	Correspond with J. Park and B. Mishkin re examiner research (0.2); review materials re same (1.2); speak with C. Lambe [YCST] re examiner motion (0.1); call with F. Yudkin [Cole Schotz] and E. Worenklein re examiner research (0.3); meet with B. Mishkin re research (0.1); research legal issues re examiners (3.1).	5.0
01/29/25	Mishkin, Benjamin	Send examiner precedent materials to E. Worenklein and M. Godbe (0.3); draft examiner objection insert (0.9); meet with M. Godbe re same (0.1).	1.3
01/29/25	Park, Junho	Email M. Godbe re case background and onboarding information (0.5); send research and precedent re examiner motion to M. Godbe (1.0); correspond with M. Godbe and B. Mishkin re precedent (0.2); prepare and send examiner objection template to M. Godbe (0.5); correspond with M. Godbe re same (0.3); correspond with E. Worenklein re 2004 subpoenas (0.1); send status update to E. Worenklein re same (0.1).	2.7
01/30/25	Labovitz, M. Natasha	Review as-filed motion to quash and joinder.	1.2
01/30/25	Godbe, Michael C.	Draft objection to examiner motion (0.8); correspond with B. Mishkin re examiner research (0.3).	1.1
01/30/25	Koboci, Shefit	Revise examiner motion objection (4.2); correspond with E. Worenklein re same (0.3).	4.5
01/30/25	Mishkin, Benjamin	Draft summary of research on examiner motions for M. Godbe (2.9); prepare case law binder for examiner motion for M. Godbe (3.8); further update case law binder (0.2); send case law precedent to M. Godbe (0.2).	7.1
01/30/25	Park, Junho	Research examiner motion precedent and send same to B. Mishkin (0.3); correspond with B. Mishkin re research examiner precedent (0.2); compile research re same for M. Godbe review (1.9); update subpoena trackers (1.0); send same to E. Worenklein (0.1).	3.5
01/31/25	Labovitz, M. Natasha	Review new 2004 subpoenas to sureties (0.2); correspond with E. Weisgerber and E. Worenklein re options for same (0.3); coordinate with M. Godbe re status of briefing on examiner motion (0.2).	0.7
01/31/25	Worenklein, Elie J.	Review precedent research on examiner objection (0.9); phone call with M. Godbe re examiner objection (0.2).	1.1
01/31/25	Godbe, Michael C.	Speak with B. Mishkin re examiner research (0.5); draft objection to examiner motion (5.9); speak further with B. Mishkin re research for same (0.1); speak with S. Koboci re same (0.2); phone call with E. Worenklein re same (0.2).	6.9

27188.1026 – CONTESTED BMLP MATTERS

Invoice Number: 2486565

Date	Timekeeper	Narrative	Hours
01/31/25	Koboci, Shefit	Call with M. Godbe re examiner motion objection (0.2); correspond with E. Worenklein re same (0.2); draft fact section of examiner motion (3.9).	4.3
01/31/25	Mishkin, Benjamin	Research case law precedent for examiner motion objection (1.8); call with M. Godbe re the same (0.5); revise draft of section of examiner motion (0.7); speak with M. Godbe re same (0.1).	3.1
01/31/25	Park, Junho	Send background documents to M. Godbe re examiner motion (0.3); send new subpoena update to group (0.1).	0.4
Total Hours			105.0

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	3.5	2,317.50	8,111.25
	Labovitz, M. Natasha	6.8	2,317.50	15,759.00
	Weisgerber, Erica S.	2.8	2,025.00	5,670.00
	Davis, Morgan A.	3.1	1,755.00	5,440.50
	Partner Total	16.2		\$34,980.75
Counsel	Worenklein, Elie J.	9.0	1,620.00	14,580.00
	Counsel Total	9.0		\$14,580.00
Associate	Godbe, Michael C.	14.8	1,471.50	21,778.20
	Costin, Alexander	13.9	1,354.50	18,827.55
	Zipursky, Rebecca	0.5	1,354.50	677.25
	Koboci, Shefit	8.8	1,192.50	10,494.00
	Kirschenbaum, Deven	2.6	1,017.00	2,644.20
	Mishkin, Benjamin	27.8	801.00	22,267.80
	Associate Total	68.4		\$76,689.00
Legal Assistant	Park, Junho	11.4	522.00	5,950.80
	Legal Assistant Total	11.4		\$5,950.80
<b>Matter Total</b>		<b>105.0</b>		<b>\$132,200.55</b>



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486558

Client Matter 27188.1009

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with CORPORATE GOVERNANCE & BOARD MATTERS

Fees	<b>\$169,288.65</b>
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b><u>\$169,288.65</u></b>

Date	Timekeeper	Narrative	Hours
12/22/24	Labovitz, M. Natasha	Draft board update re chapter 11 filing and related next steps.	0.3
12/23/24	Labovitz, M. Natasha	Draft board update re first-day hearing.	0.6
12/24/24	Goodman, Mark P.	Review email updating board on first day hearing.	0.1
12/27/24	Goodman, Mark P.	Review draft email to board and email re same.	0.2
12/27/24	Labovitz, M. Natasha	Review and edit update to board of directors.	0.3
12/27/24	Worenklein, Elie J.	Draft update to board re resolution of stay relief and final order.	0.7
12/30/24	Labovitz, M. Natasha	Correspond with Y. Wei [CCA] and E. Abrams re cancellation of board meeting (0.1); coordinate with R. Heller re same (0.1).	0.2
12/31/24	Goodman, Mark P.	Call with Y. Wei [CCA] re agenda items for next CCA board meeting (0.3); call with E. Worenklein re same (0.2); email to N. Labovitz re same (0.1).	0.6
12/31/24	Labovitz, M. Natasha	Correspond with M. Goodman re topics for upcoming board meeting (0.1); correspond with E. Worenklein re preparation of deck for same (0.1).	0.2
12/31/24	Worenklein, Elie J.	Coordinate with S. Koboci re board presentation (0.3); call with M. Goodman re board meeting (0.2); draft email to team re agenda for board meeting (0.2).	0.7
01/02/25	Labovitz, M. Natasha	Correspond with R. Heller re finalizing pre-filing board minutes.	0.1
01/02/25	Levinson, Sidney P.	Revise board minutes.	0.2
01/02/25	Heller, Rory	Update draft board minutes.	0.2
01/03/25	Labovitz, M. Natasha	Preliminary review of board deck in preparation for January 6 meeting.	0.2
01/03/25	Worenklein, Elie J.	Mark up draft board deck (0.5); phone call with S. Koboci re comments to board deck (0.3).	0.8
01/03/25	Worenklein, Elie J.	Call with E. Abrams re reporting to BMLP.	0.4
01/03/25	Heller, Rory	Continue to draft board minutes.	1.6
01/03/25	Koboci, Shefit	Draft January 6 board presentation (3.8); call with E. Worenklein re comments to board deck (0.3); review E. Worenklein update email to board discussing stay relief (0.9).	5.0
01/05/25	Worenklein, Elie J.	Mark up board presentation for January 6 meeting.	1.4
01/06/25	Goodman, Mark P.	Review slide deck for today's board meeting (0.1); email re same and today's board meeting (0.1); review email re BMLP's financial advisor (0.1); attend CCA board meeting (0.8).	1.1
01/06/25	Labovitz, M. Natasha	Revise board presentation (0.4); review further revision of same (0.1); review and comment on December 22 board minutes (0.3); prepare for board meeting (0.2); attend board meeting (0.8); correspond with S. Koboci re board request for memo on chapter 11 issues (0.2).	2.0
01/06/25	Worenklein, Elie J.	Further mark up draft board deck (0.8); phone call with R. Heller re recap of board meeting (0.3); email with S. Koboci re revisions to board deck (0.4).	1.5

Date	Timekeeper	Narrative	Hours
01/06/25	Heller, Rory	Update board minutes (0.2); circulate board materials (0.1); attend board meeting to take notes for minutes (0.8); phone call with E. Worenklein re board meeting recap (0.3).	1.4
01/06/25	Koboci, Shefit	Review board presentation and provide comments (1.0); correspond with E. Worenklein re comments (0.1); correspond with R. Heller, N. Labovitz and E. Worenklein re memorandum re legal issues (0.3); draft memorandum re same (3.9).	5.3
01/07/25	Labovitz, M. Natasha	Respond to questions from C. Zhang [CCA] re requested memo.	0.1
01/07/25	Worenklein, Elie J.	Mark up memo requested during January 6 board meeting.	2.1
01/07/25	Koboci, Shefit	Revise draft memorandum relating to potential legal issues (2.0); review E. Worenklein edits (0.8); revise memorandum per E. Worenklein comments (1.8).	4.6
01/08/25	Worenklein, Elie J.	Further mark up draft board memo (2.1); phone call with S. Koboci re board memo and additional research (0.3); meet with B. Mishkin re additional research for board memo (0.5); review and revise board minutes (0.8).	3.7
01/08/25	Heller, Rory	Draft board minutes.	0.8
01/08/25	Koboci, Shefit	Draft requested board memo (2.1); call with E. Worenklein re same (0.3); incorporate comments from E. Worenklein to legal memo (1.9).	4.3
01/08/25	Mishkin, Benjamin	Meet with E. Worenklein re research for board memo (0.5); research legal issues for board memo (1.0).	1.5
01/09/25	Mishkin, Benjamin	Draft memo on legal issues for the board.	7.6
01/10/25	Heller, Rory	Draft board minutes.	1.4
01/11/25	Worenklein, Elie J.	Revise draft January 13 board presentation.	0.9
01/11/25	Koboci, Shefit	Draft January 13 board presentation.	3.1
01/12/25	Labovitz, M. Natasha	Correspond with S. Koboci re preparation for board meeting (0.2); comment on board deck (0.4).	0.6
01/12/25	Worenklein, Elie J.	Revise draft update email to CCA board.	0.1
01/12/25	Koboci, Shefit	Review E. Worenklein edits to January 13 board presentation (0.9); correspond with N. Labovitz, M. Goodman and CCA re scheduling of board meeting (0.2).	1.1
01/13/25	Goodman, Mark P.	Review deck for CCA board meeting and email re same (0.1); attend CCA board meeting [partial] (0.6).	0.7
01/13/25	Labovitz, M. Natasha	Revise board presentation (0.3); attend board meeting (0.8).	1.1
01/13/25	Worenklein, Elie J.	Further mark up draft board memo (0.7); mark up board presentation for January 13 (0.3); phone call with S. Koboci re comments to board memo (0.4).	1.4
01/13/25	Heller, Rory	Circulate materials for board meeting (0.2); attend board meeting (0.8).	1.0
01/13/25	Koboci, Shefit	Revise board presentation (0.5); call with E. Worenklein re board memo (0.4).	0.9
01/14/25	Labovitz, M. Natasha	Correspond with E. Worenklein re draft update to board of directors.	0.3

Date	Timekeeper	Narrative	Hours
01/14/25	Worenklein, Elie J.	Draft update email to the board (0.5); revise draft email to the board (0.3).	0.8
01/14/25	Heller, Rory	Draft minutes for board meetings.	1.4
01/15/25	Labovitz, M. Natasha	Revise board update and recommendation email (0.3); correspond with E. Abrams in response to same (0.1); correspond with R. Heller re upcoming board meetings (0.1).	0.5
01/15/25	Heller, Rory	Update and circulate board minutes.	0.6
01/16/25	Goodman, Mark P.	Participate in CCA board meeting.	0.5
01/16/25	Labovitz, M. Natasha	Attend telephonic board meeting.	0.5
01/16/25	Heller, Rory	Circulate special committee minutes (0.1); participate in CCA board meeting (0.5); reschedule board meeting (0.6); draft minutes (1.0).	2.2
01/20/25	Goodman, Mark P.	Send comments to team re board meeting deck.	0.2
01/20/25	Worenklein, Elie J.	Mark up draft board presentation.	0.8
01/20/25	Koboci, Shefit	Draft January 21 board presentation (3.2); correspond with E. Worenklein re the same (0.2).	3.4
01/21/25	Goodman, Mark P.	Review board meeting deck (0.1); attend CCA board meeting (0.5); call with N. Labovitz re same (0.1).	0.7
01/21/25	Labovitz, M. Natasha	Comment on board presentation (0.2); attend board meeting (0.5); call with M. Goodman re same (0.1).	0.8
01/21/25	Worenklein, Elie J.	Further comment on draft board deck.	0.3
01/21/25	Heller, Rory	Circulate board materials (0.2); attend and take minutes at board meeting (0.5).	0.7
01/21/25	Koboci, Shefit	Draft revised board presentation (0.8); correspond with N. Labovitz re finalization of presentation (0.1).	0.9
01/21/25	Park, Junho	Present zoom slides at board meeting.	0.5
01/23/25	Labovitz, M. Natasha	Edit memo re potential legal issues in case (0.8); call with E. Weisgerber re same and related issues (0.4); review and comment on revised version of memo (0.2).	1.4
01/23/25	Weisgerber, Erica S.	Revise board memo re bankruptcy issues (1.4); call with N. Labovitz re same and related legal issues (0.4).	1.8
01/23/25	Worenklein, Elie J.	Further mark up draft board memo on chapter 11 issues (0.8); phone call with B. Mishkin re comments on same (0.5).	1.3
01/23/25	Mishkin, Benjamin	Revise board memo on chapter 11 issues per comments from N. Labovitz, E. Weisgerber and E. Worenklein (5.8); call with E. Worenklein re same (0.5).	6.3
01/24/25	Goodman, Mark P.	Comment on board memo (0.4); call with E. Weisgerber re same (0.3).	0.7
01/24/25	Labovitz, M. Natasha	Finalize board advice memo (0.8); update to board re week's developments (0.4); finalize special committee minutes (0.1).	1.3
01/24/25	Weisgerber, Erica S.	Review board memo (1.7); call with M. Goodman re same (0.3); revise draft board memo re chapter 11 issues (1.3).	3.3

Date	Timekeeper	Narrative	Hours
01/24/25	Worenklein, Elie J.	Draft board update email (0.3); email with B. Mishkin re update for the board (0.3); phone call with E. Abrams re update (0.2).	0.8
01/24/25	Mishkin, Benjamin	Revise board memo on chapter 11 issues per comments from N. Labovitz, E. Weisgerber and E. Worenklein (0.5); prepare board update email (1.1); correspond with E. Worenklein re board update (0.1).	1.7
01/24/25	Park, Junho	Update and send board minutes to N. Labovitz and E. Abrams for signature.	0.6
01/25/25	Goodman, Mark P.	Email re memo on bankruptcy issues (0.2); review board update email and attachments (0.2).	0.4
01/26/25	Worenklein, Elie J.	Draft email to client re upcoming chapter 11 filing deadlines (0.2); revise draft board deck for meeting (0.6).	0.8
01/26/25	Koboci, Shefit	Draft board meeting presentation.	3.6
01/27/25	Goodman, Mark P.	Prepare for board meeting (0.4); attend board meeting (0.8).	1.2
01/27/25	Labovitz, M. Natasha	Finalize materials for board meeting (0.2); prepare for same (0.2); attend board update call (0.8).	1.2
01/27/25	Weisgerber, Erica S.	Review board deck for board meeting.	0.2
01/27/25	Heller, Rory	Prepare for board meeting (1.1); attend and take minutes at board meeting (0.8); organize minutes (0.4).	2.3
01/27/25	Koboci, Shefit	Draft revised board presentation (1.5); correspond with N. Labovitz and E. Worenklein re same (0.3).	1.8
01/27/25	Park, Junho	Attend and present zoom slides at board meeting.	0.8
01/28/25	Heller, Rory	Draft board minutes.	3.9
01/29/25	Goodman, Mark P.	Email re special committee meeting (0.1); email re personnel question (0.2).	0.3
01/29/25	Labovitz, M. Natasha	Email to set time for special committee meeting.	0.2
01/31/25	Goodman, Mark P.	Prepare for special committee call (0.3); attend special committee meeting (0.6).	0.9
01/31/25	Labovitz, M. Natasha	Review examiner motion in preparation for special committee meeting (0.4); call with E. Blum [BDO] in preparation for same (0.3); attend special committee meeting (0.6); work on rescheduling board meeting to accommodate depositions (0.1).	1.4
01/31/25	Heller, Rory	Attend and take minutes for special committee meeting (0.6); gather information as requested by independent director (0.9).	1.5
<b>Total Hours</b>			<b>116.9</b>



**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	7.6	2,317.50	17,613.00
	Labovitz, M. Natasha	13.3	2,317.50	30,822.75
	Levinson, Sidney P.	0.2	2,317.50	463.50
	Weisgerber, Erica S.	5.3	2,025.00	10,732.50
	Partner Total	26.4		\$59,631.75
Counsel	Worenklein, Elie J.	18.5	1,620.00	29,970.00
	Counsel Total	18.5		\$29,970.00
Associate	Heller, Rory	19.0	1,287.00	24,453.00
	Koboci, Shefit	34.0	1,192.50	40,545.00
	Mishkin, Benjamin	17.1	801.00	13,697.10
	Associate Total	70.1		\$78,695.10
Legal Assistant	Park, Junho	1.9	522.00	991.80
	Legal Assistant Total	1.9		\$991.80
<b>Matter Total</b>		<b>116.9</b>		<b>\$169,288.65</b>



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486555

Client Matter 27188.1004

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with DIP FINANCING

Fees	\$1,915,481.25
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$1,915,481.25</b>

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Date	Timekeeper	Narrative	Hours
12/23/24	Labovitz, M. Natasha	Correspond with S. Levinson and E. Blum [BDO] re confirming facts and dollar amounts in preparation for first day hearing (0.2); correspond with E. Worenklein and Y. Wei [CCA] re timing for DIP funding (0.1).	0.3
12/23/24	Levinson, Sidney P.	Review final DIP order (0.4); email E. Worenklein re same (0.1).	0.5
12/23/24	Worenklein, Elie J.	Prepare execution version of DIP credit agreement and exhibits (1.6); mark up draft final DIP order (0.5); compile DIP secretary certificates (0.4); exchange emails with Lowenstein re funding of initial draw (0.4); exchange emails with Y. Wei [CCA] and C. Zhang [CCA] re same (0.2).	3.1
12/23/24	Mishkin, Benjamin	Prepare execution version of DIP Credit Agreement.	1.9
12/24/24	Worenklein, Elie J.	Draft email to A. Behlmann [Lowenstein] re revised DIP order (0.3); draft email to F. Yudkin [Cole Schotz] re filing revised DIP order (0.1); phone call with F. Yudkin [Cole Schotz] re filing revised order (0.2).	0.6
12/24/24	Heller, Rory	Prepare finalized loan agreements.	0.7
12/26/24	Labovitz, M. Natasha	Correspond with E. Worenklein re final closing and funding of DIP.	0.2
12/26/24	Worenklein, Elie J.	Phone calls with E. Blum [BDO] re reporting requirements under DIP.	0.7
12/30/24	Levinson, Sidney P.	Draft email to N. Labovitz re DIP documents.	0.2
12/31/24	Labovitz, M. Natasha	Correspond with S. Levinson re preparation for potential DIP objection.	0.1
01/02/25	Labovitz, M. Natasha	Call with S. Levinson, E. Weisgerber, M. Sirota [Cole Schotz] and F. Yudkin [Cole Schotz] re preparation for potential DIP objections (0.6); call with E. Weisgerber to follow up re same (0.2); correspond with S. Levinson and E. Worenklein re finalizing and filing revised DIP order (0.2).	1.0
01/02/25	Levinson, Sidney P.	Meet with J. Park re DIP binder for E. Weisgerber (0.1); follow up with J. Park and E. Worenklein re filing of revised DIP order (0.2); revise notice of revised DIP order and exchange emails with E. Worenklein re same (0.2); call with E. Blum [BDO] re status and next steps on DIP motion related issues (0.5); call with M. Sirota [Cole Schotz], F. Yudkin [Cole Schotz], E. Weisgerber and N. Labovitz re DIP motion background, strategy, and next steps (0.6); prepare for same (0.3).	1.9
01/02/25	Weisgerber, Erica S.	Prepare for call with M. Sirota [Cole Schotz], F. Yudkin [Cole Schotz], S. Levinson, N. Labovitz re DIP financing motion and upcoming hearing (0.3); participate in call with M. Sirota [Cole Schotz], F. Yudkin [Cole Schotz], S. Levinson, and N. Labovitz re same (0.6); call with N. Labovitz re same (0.2).	1.1
01/02/25	Worenklein, Elie J.	Exchange emails with N. Labovitz and S. Levinson re filing revised proposed DIP order (0.6); draft notice of filing revised DIP order (0.4); phone call with F. Yudkin [Cole Schotz] re revised DIP order (0.3); exchange email with J. Thompson [Verita] re service requirements (0.2); draft email to S. Levinson re DIP reporting requirements and deadlines (0.9).	2.4

Date	Timekeeper	Narrative	Hours
01/02/25	Park, Junho	Meet with S. Levinson re DIP status and documents for E. Weisgerber (0.1); prepare DIP binder for E. Weisgerber review (1.7).	1.8
01/03/25	Labovitz, M. Natasha	Correspond with E. Blum [BDO] and S. Levinson re preparation for possible objection to final DIP order (0.2); review January 6 compliance report and correspond with E. Blum [BDO] re same (0.2); ensure transmittal of report to Lowenstein Sandler in compliance with DIP provisions (0.2).	0.6
01/03/25	Weisgerber, Erica S.	Correspond with S. Levinson re DIP motion issues.	0.2
01/03/25	Worenklein, Elie J.	Phone call with E. Blum [BDO] re reporting to BMLP and DIP lender.	0.4
01/03/25	Koboci, Shefit	Send DIP reporting deadlines to J. Park.	0.3
01/03/25	Park, Junho	Correspond with S. Koboci re DIP deadlines.	0.1
01/04/25	Labovitz, M. Natasha	Correspond with E. Blum [BDO] re DIP reporting.	0.1
01/06/25	Heller, Rory	Draft protective order for DIP discovery.	2.4
01/07/25	Worenklein, Elie J.	Phone call with J. Schwarz [BDO] re DIP requirements (0.4); draft email to S. Koboci re DIP Lender reimbursement requests (0.2).	0.6
01/08/25	Worenklein, Elie J.	Draft email to Lowenstein re DIP reimbursements.	0.2
01/08/25	Koboci, Shefit	Review DIP Lender invoices.	0.9
01/08/25	Koboci, Shefit	Review invoice related to lien searches (0.1); correspond with E. Worenklein re same (0.1).	0.2
01/09/25	Goodman, Mark P.	Review discovery requests relating to DIP financing (0.4); email N. Labovitz re same (0.2).	0.6
01/09/25	Labovitz, M. Natasha	Analyze DIP discovery propounded by BMLP (0.7); correspond with E. Worenklein re same (0.3); correspond with E. Weisgerber and M. Goodman re same (0.2); correspond with E. Weisgerber re preliminary analysis of deposition notices and response (0.4); correspond with E. Worenklein re update to client and BDO (0.1); correspond with E. Worenklein and F. Yudkin [Cole Schotz] re discovery (0.2); coordinate staffing for discovery responses (0.2).	2.1
01/09/25	Weisgerber, Erica S.	Review DIP discovery requests (0.8); correspond with N. Labovitz re preliminary analysis of deposition notices (0.4); correspond with M. Davis re same (0.3); call with E. Worenklein re discovery requests and DIP history (0.4).	1.9
01/09/25	Worenklein, Elie J.	Correspond with N. Labovitz re BMLP discovery requests (0.2); phone call with E. Abrams re DIP discovery requests (0.3); multiple calls with E. Blum [BDO] re discovery from BMLP (0.8); share comments with team on BMLP DIP discovery (0.6); coordinate with R. Zipursky re status of discovery and next steps (0.5); phone call with E. Weisgerber re background on DIP disputes (0.4); mark up draft protective order (2.6); email with team re next steps for discovery disputes (1.2).	6.6
01/09/25	Koboci, Shefit	Review BMLP request for production of documents.	1.6

Date	Timekeeper	Narrative	Hours
01/10/25	Davis, Morgan A.	Review BMLP's requests for production (0.6); correspond with E. Weisgerber, E. Worenklein and M. Kaplan [Lowenstein] re discovery requests and plan for responding to same (0.5); schedule same (0.1); correspond with E. Weisgerber re plan for responding to BMLP requests for production (0.8); communicate with R. Zipursky re plan for document review (0.2); call [partial] with E. Worenklein, S. Koboci and E. Blum [BDO] re document collection (0.4); communicate with CCA re same (0.3).	2.9
01/10/25	Goodman, Mark P.	Continue to review discovery requests (0.2); correspond with E. Weisgerber and M. Davis re responding to same (0.4); call with N. Labovitz, E. Weisgerber and E. Worenklein re discovery requests (0.7); call with CCA, BDO, Cole Schotz, E. Weisgerber, S. Koboci and E. Worenklein re same (0.8); email re discovery requests served on CSCEC Holding (0.2).	2.3
01/10/25	Labovitz, M. Natasha	Email B. Theisen [Gibbons] re discovery requests (0.1); review document requests with notes (1.1); call with M. Goodman, E. Weisgerber and E. Worenklein re strategy and process in response to same (0.7); correspond with E. Weisgerber and M. Davis re item-by-item review of document requests and likely responsive materials (0.5); call with E. Weisgerber re same (0.3); assist in identifying likely locations of key documents (0.5); review court correspondence from Gibbons (0.1); correspond with E. Worenklein re same (0.1); correspond re DIP objection deadline (0.2); correspond with E. Worenklein re analysis of discovery requests to DIP lender (0.2).	3.8
01/10/25	Weisgerber, Erica S.	Correspond with M. Goodman and M. Davis re DIP discovery requests (0.5); call with N. Labovitz re same (0.3); call with N. Labovitz, M. Goodman and E. Worenklein re DIP strategy (0.7); call with CCA, BDO, Cole Schotz, S. Koboci, M. Goodman and E. Worenklein re same (0.8); call with E. Blum [BDO] re specific document requests (0.3); correspond with N. Labovitz and M. Davis re specific document requests (1.0); analyze discovery requests (0.5).	4.1
01/10/25	Worenklein, Elie J.	Review DIP discovery on DIP Lender (0.3); phone call with F. Yudkin [Cole Schotz] re DIP discovery from BMLP (0.4); participate in internal prep call with M. Goodman, N. Labovitz and E. Weisgerber prior to client call (0.7); exchange emails with B. Theisen [Gibbons] re DIP discovery (0.2); correspond with M. Kaplan [Lowenstein], E. Weisgerber and M. Davis re discovery (0.4); zoom meeting with CCA, BDO, Cole Schotz, M. Goodman, S. Koboci and E. Weisgerber re DIP discovery (0.8); coordinate with S. Koboci re DIP discovery documents (0.9); follow-up call with F. Yudkin [Cole Schotz] re status of DIP discussions (0.2); phone call with E. Blum [BDO] re next steps for DIP discovery (0.3); call with E. Blum [BDO], S. Koboci and M. Davis [partial] re gathering documents for BMLP (0.8); call with S. Koboci re DIP discovery (0.2); review files for documents for BMLP (0.5).	5.7
01/10/25	Heller, Rory	Review discovery requests.	1.0

Date	Timekeeper	Narrative	Hours
01/10/25	Koboci, Shefit	Review DIP documents requested by E. Weisgerber (1.9); call with CCA, BDO, Cole Schotz, M. Goodman, E. Worenklein and E. Weisgerber re DIP production (0.8); prepare notes re DIP production call (0.4); call with E. Worenklein to discuss DIP production (0.2); call with E. Blum [BDO], E. Worenklein and M. Davis [partial] to discuss DIP production request (0.8); correspond with E. Worenklein, E. Weisgerber and M. Davis re DIP production (0.5).	4.6
01/10/25	Park, Junho	Review discovery request correspondence.	0.3
01/11/25	Davis, Morgan A.	Call with E. Weisgerber, E. Blum [BDO] and S. Koboci re document collection from BDO (0.5); follow-up correspondence re same (0.1).	0.6
01/11/25	Goodman, Mark P.	Email with E. Weisgerber, et al. re responding to BMLP's discovery requests, request for January 13 meet and confer and January 13 court conference.	0.3
01/11/25	Labovitz, M. Natasha	Respond to numerous questions from E. Weisgerber re document requests and production (0.6); comment on draft email to Gibbons responding to misleading statements (0.3); coordinate with E. Weisgerber re preparation for court conference (0.2).	1.1
01/11/25	Weisgerber, Erica S.	Draft response to BMLP counsel re discovery issues (0.8); call with E. Blum [BDO], M. Davis, and S. Koboci re discovery requests (0.5); review materials sent by BDO in response thereto (1.5); calls with E. Blum [BDO] re DIP issues (0.4).	3.2
01/11/25	Worenklein, Elie J.	Revise draft response email to BMLP re discovery impasse (0.6); comment on status of BMLP requests re recap of calls with BDO (0.5).	1.1
01/11/25	Koboci, Shefit	Call with E. Blum [BDO], E. Weisgerber and M. Davis re DIP production (0.5); review emails to prepare documents requested by BMLP production request (2.3); correspond with E. Worenklein to summarize DIP production updates (0.3).	3.1
01/11/25	Park, Junho	Send responsive document to S. Koboci (0.2); review correspondence and document re discovery (0.6).	0.8
01/11/25	Park, Junho	Set up filing system for initial discovery request documents.	0.9
01/12/25	Davis, Morgan A.	Give instructions to M. Maass and R. Zipursky re document review (0.3); draft proposed approach to document requests (1.5); exchange emails with E. Weisgerber and E. Worenklein re same (0.4); email to W. Usatine [Cole Schotz] and F. Yudkin [Cole Schotz] re same (0.2); review potential documents for production (0.6).	3.0
01/12/25	Goodman, Mark P.	Review and revise draft email to BMLP's counsel (0.8); email re same (0.3); email M. Davis and E. Weisgerber re document discovery and depositions re DIP financing motion (0.2).	1.3

Date	Timekeeper	Narrative	Hours
01/12/25	Labovitz, M. Natasha	Assist in identifying categories of materials in response to document requests (1.0); respond to question from M. Davis re same (0.2); comment on draft email to B. Theisen [Gibbons] (0.4); correspond with E. Weisgerber and M. Goodman re same (0.2); comment on tracker re document request responses (0.9); correspond with E. Weisgerber re preparations for meet & confer (0.2).	2.9
01/12/25	Weisgerber, Erica S.	Participate in call with E. Blum [BDO], S. Koboci, and E. Worenklein re documents collected for discovery requests (0.8); call with F. Yudkin [Cole Schotz] re discovery disputes (0.2); exchange emails with M. Maass and M. Davis re protective order and responses and objections (0.4); revise draft response to BMLP re discovery requests and courts conference (0.4); exchange emails with M. Goodman and N. Labovitz re same (0.3); review DIP motion (1.2); review E. Blum declaration in support of first day motions (0.6); prepare notes and chart for meet and confer with BMLP (1.6); correspond with N. Labovitz re same (0.3); revise draft protective order (0.3); review documents provided by BDO (1.4).	7.5
01/12/25	Worenklein, Elie J.	Revise draft response to BMLP (0.9); phone call with E. Blum [BDO], E. Weisgerber and S. Koboci re response to BMLP discovery (0.8); further revise draft response (0.3); mark up chart of responses to BMLP discovery requests (1.4); revise draft letter to the court prior to status conference (1.3); follow up call with E. Blum [BDO] re DIP discovery requests (0.3); comment on draft protective order (1.6).	6.6
01/12/25	El-Cid, Fabienne J.	Coordinate with internal litigation team re production of documents.	0.1
01/12/25	Koboci, Shefit	Call with E. Blum [BDO], E. Weisgerber, and E. Worenklein re DIP production (0.8); review documents provided by BDO in connection with DIP production (1.8); organize documents re same (2.4); correspond with E. Weisgerber re BDO open items tracker (0.3).	5.3
01/12/25	Maass, Molly Baltimore	Correspond with E. Weisgerber re onboarding (0.3); review emails re document collection (0.5); review background materials re DIP hearing (1.0); draft letter to court re discovery disputes (1.5); review draft protective order (0.5).	3.8
01/12/25	Park, Junho	Send DIP documents to M. Maass (0.1); provide support during discovery meeting with BDO team, E. Weisgerber, E. Worenklein, and S. Koboci (0.5); read correspondence re discovery requests and discovery logistics (0.2).	0.8
01/12/25	Slobodkin, Yury G.	Prepare documents for legal team production.	0.5



Date	Timekeeper	Narrative	Hours
01/13/25	Davis, Morgan A.	Prepare for meet and confer (0.5); participate in meet and confer with B. Theisen [Gibbons], W. Usatine [Cole Schotz], F. Yudkin [Cole Schotz], M. Kaplan [Lowenstein], E. Weisgerber, E. Worenklein and N. Labovitz re document and testimony requests (1.0); discuss debrief and next steps following same with E. Weisgerber and E. Worenklein (0.2); email M. Goodman re strategy re deposition requests (0.1); correspond with M. Maass re background (0.4); call with M. Goodman, N. Labovitz and E. Weisgerber re depositions (0.2); correspond with F. Yudkin [Cole Schotz] re objections to document requests and strategy re same (0.2); correspond with R. Zipursky and M. Maass re document database (0.3).	2.9
01/13/25	Goodman, Mark P.	Email M. Davis re meet and confer and today's court conference (0.2); call with N. Labovitz, M. Davis, and E. Weisgerber re same and re upcoming depositions (0.2); call with Y. Wei [CCA] re DIP related discovery and related matters (0.4); email Debevoise team re discovery issues and protective order (0.4).	1.2
01/13/25	Labovitz, M. Natasha	Prepare for meet & confer re DIP discovery (0.2); review and respond to questions from E. Weisgerber re previous communications (0.2); attend call with B. Theisen [Gibbons], W. Usatine [Cole Schotz], F. Yudkin [Cole Schotz], M. Kaplan [Lowenstein], E. Weisgerber, E. Worenklein and M. Davis re document and testimony requests (1.0); follow up with M. Davis re same (0.1); call with M. Goodman, M. Davis and E. Weisgerber re request for Wei deposition and related items (0.2); correspond with E. Weisgerber re use restriction proposed by BMLP (0.3); prepare for potential court conference (0.2); review comparison of new discovery requests served on lender (0.4); review updated chart of proposed production categories and responses (0.4).	3.0
01/13/25	Weisgerber, Erica S.	Prepare for meet and confer with BMLP counsel re discovery requests (1.5); meet and confer with B. Theisen [Gibbons], W. Usatine [Cole Schotz], F. Yudkin [Cole Schotz], M. Kaplan [Lowenstein], N. Labovitz, E. Worenklein and M. Davis re discovery requests (1.0); follow-up emails with BMLP counsel re protective order and potential court conference (0.5); email with BDO team re document collection (0.4); conference with M. Maass re discovery responses (0.3); conference with M. Davis and E. Worenklein re meet and confer debrief (0.2); conference with N. Labovitz, M. Davis and M. Goodman re discovery re DIP (0.2).	4.1
01/13/25	Worenklein, Elie J.	Participate in meet and confer with B. Theisen [Gibbons], W. Usatine [Cole Schotz], F. Yudkin [Cole Schotz], M. Kaplan [Lowenstein], E. Weisgerber, N. Labovitz and M. Davis re DIP discovery (1.0); call with E. Weisgerber and M. Davis re recap of meet and confer (0.2); follow-up correspondence re same (0.1); review revisions to protective order (0.6); create summary of pending discovery requests (0.8); correspond with R. Heller re recap of meet and confer (0.4); draft outline of talking points for status conference (1.7); review precedent protective orders (0.4); exchange emails with E. Weisgerber re status conference (0.2).	5.4



Date	Timekeeper	Narrative	Hours
01/13/25	Heller, Rory	Review draft protective order (1.2); review discovery requests served on DIP lender (0.4).	1.6
01/13/25	Koboci, Shefit	Compile documents received by BDO team into internal filing platform (2.1); call with Y. Slobodkin re access to Concordance (0.3); review documents for production on Concordance (2.5); correspond with M. Maass re the same (0.3).	5.2
01/13/25	Maass, Molly Baltimore	Revise draft protective order (1.5); review precedent re same (0.5); correspond with Discovery and Data Management team re document collection and review (0.7); correspond with S. Koboci re document review (0.2); draft responses and objections to requests for production (3.7); call with E. Weisgerber re same (0.3); review emails and background materials re DIP hearing (0.9).	7.8
01/13/25	Park, Junho	Send research re protective order to E. Weisgerber.	0.3
01/13/25	Kheyfets, Liza	Manage preparation of documents collection for attorney review and production.	1.7
01/13/25	Slobodkin, Yury G.	Prepare documents for legal team production (4.7); call with S. Koboci re access to Concordance (0.3).	5.0
01/14/25	Davis, Morgan A.	Call with M. Goodman re depositions (0.1); email to Debevoise restructuring team re same (0.1); give instructions to S. Koboci re document review (0.1); review email from BMLP re meet and confer on document requests (0.2); participate in call with E. Weisgerber, E. Worenklein, F. Yudkin [Cole Schotz] and M. Kaplan [Lowenstein] re document requests (1.0); email to CCA re document collection (0.1); participate in call with M. Maass and E. Blum [BDO] re document collection (0.5); review email from BMLP re protective order and cases cited therein (0.4); draft analysis on same for E. Weisgerber (0.4); call with M. Goodman, E. Weisgerber, N. Labovitz and E. Worenklein re document production (0.4); give instructions to B. Fawaz and G. Gabbidon re legal research into protective orders (0.2); correspond with F. Yudkin [Cole Schotz] and W. Usatine [Cole Schotz] re protective orders (0.2); correspond with E. Weisgerber and E. Worenklein re protective orders in similar cases (0.2).	3.9
01/14/25	Goodman, Mark P.	Email re DIP discovery and related issues (0.4); call with M. Davis re same (0.1); email with restructuring team re same (0.1); call with N. Labovitz, M. Davis, E. Weisgerber, and E. Worenklein re same and depositions (0.4); email re seeking extension of schedule re DIP motion (0.2).	1.2

Date	Timekeeper	Narrative	Hours
01/14/25	Labovitz, M. Natasha	Respond to questions from E. Weisgerber in preparation for co-counsel and DIP lender counsel conference (0.3); correspond with E. Weisgerber and F. Yudkin [Cole Schotz] re timing of court conference (0.2); review Y. Wei [CCA] deposition notice (0.2); correspond with E. Weisgerber and E. Worenklein re same (0.2); call with E. Weisgerber, M. Goodman, E. Worenklein, and M. Davis re same and timing of DIP hearing (0.4); respond to numerous substantive questions re specific categories of documents for production (0.8); call with E. Weisgerber re same (0.2); review incoming letter from B. Theisen [Gibbons] (0.3); review case law and potential arguments re non-debtor discovery and provide substantive analysis re same (1.2); comment on responsive language to document requests 36 and 37 (0.3).	4.1
01/14/25	Weisgerber, Erica S.	Conference with F. Yudkin [Cole Schotz], W. Usatine [Cole Schotz], M. Kaplan [Lowenstein], E. Worenklein and M. Davis re discovery requests and court hearing re same (1.0); call with E. Blum [BDO] re DIP (0.4); correspond with M. Davis and M. Maass re document production (0.4); meet with M. Goodman, N. Labovitz, M. Davis and E. Worenklein re DIP (0.4); prepare for same (0.1); call with BDO counsel re document collections (0.4); correspond with M. Maass re discovery responses (0.5); correspond with M. Davis re same (0.3); correspond with BMLP counsel re confidentiality order revisions (0.2); correspond with M. Goodman re same (0.2); revise draft responses and objections to discovery requests (3.9); call with N. Labovitz re same (0.2).	8.0
01/14/25	Worenklein, Elie J.	Call with F. Yudkin [Cole Schotz], W. Usatine [Cole Schotz], M. Kaplan [Lowenstein], E. Weisgerber and M. Davis re DIP discovery (1.0); exchange emails with team re scheduling for DIP hearing (0.3); zoom call with N. Labovitz, M. Davis, M. Goodman, and E. Weisgerber re status of DIP discussions (0.4); phone call with J. Schwarz [BDO] re DIP discovery documents (0.4); revise talking points re BMLP discussions (1.4); revise proposed responses to DIP discovery (2.3); update chart of proposed responses to DIP discovery requests (0.4); phone call with E. Blum [BDO] re scope of DIP discovery (0.4); draft email to team re new deposition notice (0.2).	6.8
01/14/25	El-Cid, Fabienne J.	Coordinate with associate team re DIP discovery.	0.1
01/14/25	Fawaz, Basil	Research protective order re discovery.	2.8
01/14/25	Gabbidon, Gabriela L.	Research bankruptcy precedent re protective order.	1.4
01/14/25	Koboci, Shefit	Review documents for DIP discovery production (3.1); revise Document Request List tracker (0.2); correspond with M. Maass re status of DIP production (0.3); compile additional documents related to drafts of DIP documents for production (1.8).	5.4
01/14/25	Maass, Molly Baltimore	Draft and revise responses and objections (2.0); review proposed production set (3.4); correspond with E. Blum [BDO] re discovery requests (0.5); call with M. Davis and E. Blum [BDO] re same (0.5); review emails re DIP discovery (1.1).	7.5

Date	Timekeeper	Narrative	Hours
01/14/25	Park, Junho	Read email correspondence re DIP discovery (0.1); send DIP documents to E. Weisgerber (0.1); correspond with E. Worenklein re status conference (0.1).	0.3
01/14/25	Slobodkin, Yury G.	Prepare documents for legal team production.	1.0
01/15/25	Davis, Morgan A.	Call with C. Zhang [CCA] re fact question in advance of meet and confer (0.3); correspond with E. Weisgerber re same (0.2); correspond with F. Yudkin [Cole Schotz], W. Usatine [Cole Schotz] and Debevoise team re deposition notice (0.1); draft letter to court (2.8); review emails with E. Weisgerber and Cole Schotz re protective order (0.4).	3.8
01/15/25	Goodman, Mark P.	Email team re DIP financing-related discovery (0.4); review proposed redactions (0.1); review Y. Wei [CCA] deposition notice (0.1); review email correspondence re protective order (0.1); email E. Worenklein re DIP motion hearing schedule (0.1); email team re DIP financing-related discovery (0.2).	1.0
01/15/25	Labovitz, M. Natasha	Provide substantive input to numerous questions re context for discovery requests and responses to same (0.9); call with E. Weisgerber re same (0.2); comment on draft responses and objections (0.8); correspond with E. Weisgerber, M. Davis and M. Maass re same (0.7); correspond with F. Yudkin [Cole Schotz] and M. Sirota [Cole Schotz] re Y. Wei [CCA] deposition notice (0.2); call with E. Weisgerber re draft of letter to court (0.2); correspond with E. Weisgerber re B. Riley outreach to BDO (0.1); correspond with C. Zhang [CCA] re subpoena to CCA South Carolina (0.1); further correspond with E. Worenklein re more subsidiary subpoenas (0.3); correspond with E. Weisgerber and M. Goodman re counsel for non-debtors (0.2); correspond with E. Weisgerber, M. Maass and M. Goodman re treatment of specific privileged items in discovery (0.3); correspond with E. Weisgerber re common interest privilege (0.1); correspond with E. Weisgerber re BDO production (0.2).	4.3
01/15/25	Weisgerber, Erica S.	Revise discovery responses and objections (3.5); call with N. Labovitz re same (0.2); correspond with N. Labovitz, M. Maass and M. Davis re same (0.5); email with E. Worenklein re discovery requests and revisions to responses and objections (0.3); call with W. Usatine [Cole Schotz] and E. Blum [BDO] re discovery (0.3); correspond with M. Davis re discovery responses and documents (0.5); call with N. Labovitz re letter to court (0.2); follow-up correspondence re same (0.2); review Rule 2004 discovery subpoena (0.5); email with M. Goodman and N. Labovitz re same (0.3); email with DIP Lender team re discovery (0.5); review documents for production (1.0).	8.0
01/15/25	Worenklein, Elie J.	Research protective order precedent (0.8); mark up draft responses and objections re DIP discovery (2.2); correspond with CCA re responses to DIP discovery (0.2); multiple calls with M. Maass re discovery requests (0.6); comment on documents from BDO for DIP discovery (1.4); draft insert for letter to the court (1.1); internal team emails re revisions to responses and objections for DIP discovery (0.6).	6.9
01/15/25	El-Cid, Fabienne J.	Coordinate with Debevoise associate team on DIP discovery.	0.1

Date	Timekeeper	Narrative	Hours
01/15/25	Fawaz, Basil	Research cases re protective order and discovery.	2.7
01/15/25	Heller, Rory	Gather board minutes re DIP financing.	1.4
01/15/25	Kirschenbaum, Deven	Review responses for production.	0.6
01/15/25	Koboci, Shefit	Review document production (3.8); correspond with E. Worenklein re outstanding questions for DIP production (0.3); review production to identify privileged documents (1.8).	5.9
01/15/25	Maass, Molly Baltimore	Draft letter to court re discovery issues (1.6); review proposed production re DIP discovery (3.0); revise responses and objections re document requests (2.5); finalize responses and objections re document requests (1.4); calls with E. Worenklein re same (0.6); correspond with N. Labovitz re responses to document requests (0.2).	9.3
01/15/25	Slobodkin, Yury G.	Prepare documents for discovery production.	4.8
01/16/25	Davis, Morgan A.	Call with C. Zhang [CCA] re employee chart (0.4); communicate with Debevoise team re same (0.4); prepare for meet and confer re document request (0.4); lead meet and confer with R. Malone [Gibbons], B. Theisen [Gibbons], Lowenstein, E. Worenklein [partial] and M. Maass re document requests (2.0); call with N. Labovitz, E. Weisgerber, E. Worenklein, S. Koboci and M. Maass re meet and confer (0.6); revise letter to court (2.6); analyze case law on protective orders (0.5); further revise protective order (0.5); debrief call with N. Labovitz, E. Weisgerber, M. Maass and E. Worenklein re next steps (0.7); correspond with E. Weisgerber and N. Labovitz re preparation for court conference (0.5); review BMLP's submission to the court (0.2); call with M. Goodman re court conference (0.2).	9.0
01/16/25	Goodman, Mark P.	Email re DIP financing discovery (0.3); call with M. Davis re same (0.2); review and comment on draft letter to the court re discovery issues (0.2).	0.7
01/16/25	Labovitz, M. Natasha	Correspond with E. Weisgerber re discovery disputes and letter to court (0.2); correspond with E. Worenklein re rescheduling DIP hearing (0.3); correspond with M. Davis and E. Weisgerber re court letter and meet and confer (0.3); review documents for production (0.2); call with M. Davis, M. Maass, E. Worenklein, S. Koboci, and E. Weisgerber re preparation for meet and confer (0.6); revise letter to court re discovery disputes (0.9); review summary reports re meet and confer (0.3); call with M. Davis, M. Maass, E. Worenklein and E. Weisgerber re same and next steps (0.7); further comment on discovery letter (0.4); respond to questions from litigation team re categories of requested documents and context for same (0.6); review court submission from BMLP (0.2).	4.7

Date	Timekeeper	Narrative	Hours
01/16/25	Weisgerber, Erica S.	Call with N. Labovitz, M. Davis, S. Koboci, M. Maass and E. Worenklein re preparation for meet and confer with BMLP (0.6); correspond with M. Maass and M. Davis re draft letter to Court and discovery disputed issues (0.3); revise draft letter to Court re discovery disputes (0.9); correspond with F. Yudkin [Cole Schotz] and W. Usatine [Cole Schotz] re letter to Court and procedure issues (0.3); email with CCA re document collection issues (0.2); prepare talking points for court hearing (0.4); call with N. Labovitz, M. Davis, E. Worenklein, and M. Maass re next steps (0.7).	3.4
01/16/25	Worenklein, Elie J.	Phone call with E. Blum [BDO] re update on DIP discovery and marketing process (0.4); phone call with F. Yudkin [Cole Schotz] re scheduling order (0.3); revise draft letter to the court re discovery disputes (0.8); internal team prep call for meet & confer with N. Labovitz, E. Weisgerber, M. Davis, S. Koboci and M. Maass (0.6); follow-up review re same (0.2); multiple calls with F. Yudkin [Cole Schotz] re DIP timeline and letter to chambers (0.7); review DIP lender R&O prior to meet & confer (0.6); prepare for meet & confer with BMLP (0.4); join [partial] meet and confer with R. Malone [Gibbons], B. Theisen [Gibbons], Lowenstein, M. Maass and M. Davis (1.2); phone call with S. Koboci re research (0.2); zoom call with N. Labovitz, E. Weisgerber, M. Davis and M. Maass re next steps (0.7); research additional precedent for letter to court (1.3); phone calls with A. Behlmann [Lowenstein] re DIP adjournment (0.4); further mark up draft letter to chambers (2.2); emails with F. Yudkin [Cole Schotz] and W. Usatine [Cole Schotz] re letter to chambers (0.6).	10.6
01/16/25	Fawaz, Basil	Research bankruptcy cases re discovery.	2.4
01/16/25	Heller, Rory	Assist with preparation of draft letter to court re discovery disputes.	1.5
01/16/25	Koboci, Shefit	Review correspondence re document production (0.2); correspond with M. Maass re document production (0.3); call with N. Labovitz, E. Worenklein, E. Weisgerber, M. Davis, and M. Maass to prepare for meet and confer (0.6); call with A. Behlmann [Lowenstein] and F. Yudkin [Cole Schotz] to prepare for meet and confer (0.9); finalize notes during meet and confer for Debevoise attorney review (0.4); review documents for DIP production (3.7); call with E. Worenklein re protective order (0.2).	6.3
01/16/25	Maass, Molly Baltimore	Participate in meet and confer with M. Davis, R. Malone [Gibbons], Lowenstein, E. Worenklein [partial] and B. Theisen [Gibbons] re document request (2.0); draft and finalize letter to court re discovery disputes (4.6); correspond with N. Labovitz, E. Weisgerber, E. Worenklein, and M. Davis re meet and confer and letter to court (0.6); correspond with data management team re document collection (1.8); call with N. Labovitz, E. Weisgerber, E. Worenklein and M. Davis re next steps (0.7); correspond with BDO re document collection (0.5); email with L. Douglas re privilege redactions (0.4).	10.6
01/16/25	Douglas, Lesley R.	Correspond with M. Maass re privilege redactions (0.4); redact information for document production (5.8).	6.2

Date	Timekeeper	Narrative	Hours
01/16/25	Kheyfets, Liza	Correspond with M. Maass re document collection (0.2); prepare document collection (0.5).	0.7
01/16/25	Slobodkin, Yury G.	Prepare documents for discovery request.	1.5
01/17/25	Davis, Morgan A.	Comment on talking points for court conference (0.3); participate in court conference (2.0); communicate with M. Monaghan re same (0.3); call with M. Goodman re same (0.1); draft email to client re updates following court hearing and advice re same (0.4); prepare for client call (0.3); participate in client call re same with M. Goodman and E. Weisgerber (0.7); call with E. Worenklein, N. Labovitz, M. Goodman, and E. Weisgerber re debrief from court conference and scope of production (0.8); communicate with E. Weisgerber and M. Maass re document collection and review (0.4); review revised responses and objections (0.2); communicate with M. Maass re same (0.1); communicate with N. Labovitz and E. Weisgerber re protective order requirements and negotiation strategy (0.2).	5.8
01/17/25	Goodman, Mark P.	Call with M. Davis re court conference (0.1); email N. Labovitz re compliance item (0.1); participate [partial] in court conference re discovery (1.0); follow-up call with N. Labovitz, E. Weisgerber, M. Davis, and E. Worenklein re next steps in discovery (0.8); call with client, M. Davis and E. Weisgerber re same (0.7); email Debevoise team re third-party subpoenas (0.2).	2.9
01/17/25	Labovitz, M. Natasha	Comment on E. Weisgerber talking points for court conference (0.4); meet with E. Weisgerber in preparation for conference (0.2); attend court conference including waiting time (2.0); follow-up call with E. Weisgerber, M. Goodman, M. Davis, and E. Worenklein re next steps in document production (0.8); update S. Levinson re discovery (0.2); correspondence with E. Weisgerber and E. Blum [BDO] re BDO document production timing (0.2); review and respond to substantive questions from discovery team re categories of documents for production and steps toward same (0.7); coordinate with E. Worenklein re counsel for affiliate recipients of discovery (0.2).	4.7
01/17/25	Weisgerber, Erica S.	Prepare talking points for court hearing re discovery disputes (2.8); prepare for court hearing re discovery disputes and protective order (1.3); meet with N. Labovitz re same (0.2); email with N. Labovitz and E. Worenklein re same (0.3); participate in court hearing re discovery and BMLP disputes (2.0); debrief call with N. Labovitz, M. Goodman, M. Davis, and E. Worenklein team re same (0.8); call with client, M. Goodman, and M. Davis re court hearing (0.7); participate in conference with BDO counsel re document collection and discovery requests (0.4); call with E. Blum [BDO] re discovery and depositions (0.4); review hearing notice (0.2); email with Cole Schotz team re same (0.2); email with M. Maass and M. Davis re document discovery and review issues (0.5); email with S. Koboci and R. Heller re court hearing (0.3).	10.1



Date	Timekeeper	Narrative	Hours
01/17/25	Worenklein, Elie J.	Mark up draft talking points for DIP status conference (1.2); participate in status conference on DIP discovery (2.0); internal zoom call with M. Goodman, N. Labovitz, E. Weisgerber, and M. Davis re recap of status conference (0.8); phone call with C. Lambe [YCST] re status of DIP discovery (0.3); phone call with F. Yudkin [Cole Schotz] re recap of DIP status conference (0.4); correspond with Debevoise team re additional discovery production (0.4); phone call with F. Yudkin [Cole Schotz] re notice of adjournment and filing notice of appellate brief (0.3).	5.4
01/17/25	El-Cid, Fabienne J.	Correspond with Debevoise associate team re document review for production.	0.3
01/17/25	Heller, Rory	Review notes on status conference for circulation to client (0.9); review organizational chart for discovery (0.2).	1.1
01/17/25	Koboci, Shefit	Correspond with M. Maass re DIP defaults (0.4); prepare summary of court rulings for E. Weisgerber review (0.3); review E. Worenklein summary re DIP status conference (0.3); review document production (1.1); correspond with M. Maass re same (0.2).	2.3
01/17/25	Maass, Molly Baltimore	Review draft talking points re court conference (0.5); correspond with E. Weisgerber re same (0.2); attend court conference re discovery disputes (2.0); research re protective order (0.4); draft summary of rulings from court conference (0.4); emails with team re document review (0.5); draft document review protocol (2.7); call with E. Blum [BDO] re document collection (0.3); exchange emails with client re document collection (0.2).	7.2
01/17/25	Kheyfets, Liza	Assist with preparation of documents collection for attorney review and production.	2.0
01/17/25	Slobodkin, Yury G.	Communicate and coordinate with Debevoise team re document production.	0.9
01/18/25	Davis, Morgan A.	Review BDO emails and document collection status (0.2); email with M. Maass re same (0.1); email with M. Maass and L. Kheyfets re setting up document review database (0.1); communicate with E. Weisgerber re collection of documents (0.1); communicate with client re same (0.2).	0.7
01/18/25	Goodman, Mark P.	Review drafts of protective order (0.2); email E. Weisgerber and M. Davis re same (0.2).	0.4
01/18/25	Labovitz, M. Natasha	Review documents prepared for production in DIP discovery (0.4); correspond with E. Weisgerber and M. Davis re protective order drafts and negotiations (0.6); respond to E. Weisgerber questions re same (0.3).	1.3
01/18/25	Weisgerber, Erica S.	Review BMLP revisions to protective order (0.5); revise protective order to account for court rulings (3.0); correspond with Debevoise and Cole Schotz teams re same (0.4); correspond with M. Maass and M. Davis re document review (0.3).	4.2
01/18/25	Worenklein, Elie J.	Comment on revised protective order to address BMLP comments.	0.9
01/18/25	Heller, Rory	Review documents for production.	0.4

Date	Timekeeper	Narrative	Hours
01/18/25	Kirschenbaum, Deven	Review trial court docket re order.	0.8
01/18/25	Koboci, Shefit	Review intra group loan agreement re DIP discovery (0.5); call with BDO team re same (0.1); correspond with M. Maass re DIP marketing (0.2); correspond with M. Maass re employee org chart (0.1); research re protective order (1.5); correspond with Y. Slobodkin re documents production (0.3); prepare list of responsive documents from BDO for E. Weisgerber (1.3); review BDO documents for production (2.4).	6.4
01/18/25	Maass, Molly Baltimore	Draft document review protocol re DIP discovery (1.5); emails with client and BDO re document collections (0.5); coordinate document review (2.5).	4.5
01/18/25	Manov, Ann	Review discovery protocol.	1.1
01/18/25	Kheyfets, Liza	Prepare document collection for attorney review and production.	4.9
01/18/25	Slobodkin, Yury G.	Further prepare documents collection for production and attorney review.	4.8
01/19/25	Davis, Morgan A.	Coordinate document review re discovery requests (1.4); call with M. Goodman re protective order (0.1); correspond with Debevoise review team re same (0.5).	2.0
01/19/25	Goodman, Mark P.	Call with M. Davis re protective order (0.1); call with E. Weisgerber re same and third-party subpoenas (0.1); review revised drafts of protective order (0.2); email E. Weisgerber re third-party subpoenas to affiliates (0.1).	0.5
01/19/25	Labovitz, M. Natasha	Exchange multiple emails with E. Weisgerber and M. Davis re protective order negotiations (0.9); call with E. Weisgerber re information to be produced and rollout of production (0.3).	1.2
01/19/25	Weisgerber, Erica S.	Review Lowenstein revisions to protective order (0.5); emails with Lowenstein team re same (0.3); revise draft protective order (2.2); revise amended responses & objections to discovery requests (0.4); call with M. Goodman re documents (0.1); call with E. Blum [BDO] re same (0.3); call with N. Labovitz re same (0.3); exchange emails with M. Maass re BDO document collection (0.2); review BMLP's revisions to protective order (0.8); exchange emails with M. Goodman, N. Labovitz and Debevoise team re same (0.3); exchange emails with M. Kaplan [Lowenstein] re updated protective order (0.4); revise and implement comments on protective order (1.2); draft email to BMLP re revisions (0.3).	7.3
01/19/25	Worenklein, Elie J.	Further revise and comment on draft protective order for DIP discovery.	0.9
01/19/25	El-Cid, Fabienne J.	Conduct document review for DIP financing.	0.8
01/19/25	Fawaz, Basil	Analyze documents for production re DIP discovery.	6.2
01/19/25	Gabbidon, Gabriela L.	Review documents for production to BMLP.	5.6
01/19/25	Heller, Rory	Review documents for DIP production.	0.5
01/19/25	Kirschenbaum, Deven	Review production documents for responsiveness and privilege.	5.2



Date	Timekeeper	Narrative	Hours
01/19/25	Koboci, Shefit	Compile documents to be produced for BDO review (4.8); correspond with M. Maass re same (0.2); correspond with R. Heller re production (0.1); coordinate with Debevoise IT team re fileshare (0.1); correspond with Evan Blum [BDO] re produced documents (0.3); correspond with BDO team re potential documents for production (0.2); correspond with C. Zhang [CCA] re same (0.2); coordinate with Debevoise IT team re document production (0.5); review questions received by E. Blum [BDO] re produced documents (0.4); correspond with M. Maass re shared services question (0.1); review documents for production (2.3).	9.2
01/19/25	Maass, Molly Baltimore	Coordinate document review re discovery requests (1.5); correspond with Debevoise review team re same (0.5).	2.0
01/19/25	Manov, Ann	Conduct first-level review of documents.	0.9
01/19/25	Mishkin, Benjamin	Email M. Maass and L. Kheyfets re document review questions (0.4); review documents for BMLP discovery requests (1.2).	1.6
01/19/25	Zipursky, Rebecca	Correspond with E. Weisgerber re trial record (0.9); coordinate with M. Maass and L. Kheyfets re fact review for depositions (1.5); draft production cover letter (0.6); revise the same incorporating M. Maass and E. Weisgerber edits (0.4); conduct fact review (2.7).	6.1
01/19/25	Kheyfets, Liza	Prepare documents collection for attorney review and production.	8.7
01/19/25	Slobodkin, Yury G.	Respond to legal team requests for assistance.	7.0
01/20/25	Davis, Morgan A.	Email M. Maass re status of document review (0.1); email C. Zhang [CCA] re outstanding discovery (0.2); correspond with E. Weisgerber re same (0.2); analyze documents for privilege (0.6).	1.1
01/20/25	Goodman, Mark P.	Review draft of protective order (0.2); email E. Weisgerber re same (0.1); call with E. Weisgerber re same (0.1); email N. Labovitz and E. Weisgerber re protective order and production of documents (0.2).	0.6
01/20/25	Labovitz, M. Natasha	Correspond with E. Weisgerber re protective order negotiations (0.2); comment on disputed provisions of same (0.2); correspond with E. Weisgerber re B. Theisen [Gibbons] email and response (0.2); correspond with E. Weisgerber re substantive questions re discovery (0.5).	1.1
01/20/25	Weisgerber, Erica S.	Email with BMLP counsel re protective order and production (0.5); analyze BMLP proposed revisions to protective order (0.3); call with M. Goodman re same (0.1); email with Lowenstein re same (0.5); revise draft protective order (0.3); email to BMLP counsel re same (0.3).	2.0
01/20/25	Worenklein, Elie J.	Email with Debevoise team re revisions to DIP protective order (1.4); respond to emails from Debevoise team re BMLP strategy (0.4); email with CCA re depositions (0.4); further comment on DIP protective order (0.5); mark up draft notice of adjournment for DIP hearing (0.2); email re discovery related questions (0.2).	3.1
01/20/25	El-Cid, Fabienne J.	Conduct factual research re E. Blum documents for depositions and DIP motion.	5.7

Date	Timekeeper	Narrative	Hours
01/20/25	Fawaz, Basil	Review documents for production re DIP discovery.	3.2
01/20/25	Gabbidon, Gabriela L.	Review document production for DIP discovery.	1.2
01/20/25	Kirschenbaum, Deven	Review document production for responsiveness and privilege.	2.1
01/20/25	Koboci, Shefit	Review document production instructions provided by M. Maass (1.6); review notes from hearing re document production (0.6); correspond with E. Worenklein re same (0.2); review responses and objections to document production requests (1.1); correspondence with B. Mishkin and R. Heller re privileges (0.2); correspond with E. Weisgerber re discovery production (0.1); correspond with A. Del Piano [BDO] re open items related to production (0.3); call with A. Del Piano [BDO] re same (0.1); review document production (6.3).	10.5
01/20/25	Maass, Molly Baltimore	Coordinate document review re discovery requests (1.1); review document production re same (1.9).	3.0
01/20/25	Mishkin, Benjamin	Review documents for BMLP's discovery requests.	3.5
01/20/25	Zipursky, Rebecca	Research fact issues re E. Blum documents for depositions and DIP motion challenge.	6.3
01/20/25	Park, Junho	Correspond with E. Worenklein re subpoena status.	0.1
01/20/25	Kheyfets, Liza	Prepare documents collection for attorney review.	9.3
01/20/25	Slobodkin, Yury G.	Prepare further documents collection for discovery review.	1.8
01/21/25	Davis, Morgan A.	Coordinate with E. Weisgerber, R. Zipursky, and M. Maass re document review status and discussion of privilege and relevance questions (0.5); analyze documents for privilege (1.8); communicate with M. Maass and E. Weisgerber re same (0.9); email C. Zhang [CCA] re weekly check in call (0.2); exchange emails with N. Labovitz re question about ordinary course transactions (0.4); meet with M. Maass, R. Zipursky, L. Kheyfets, Y. Slobodkin, F. El-Cid, D. Kirschenbaum, B. Mishkin, B. Fawaz, and A. Costin re production of DIP negotiation documents (0.2).	4.0
01/21/25	Goodman, Mark P.	Email Debevoise team re protective order (0.3); email Debevoise team re third-party subpoenas (0.2).	0.5
01/21/25	Labovitz, M. Natasha	Comment on response email to B. Theisen [Gibbons] (0.2); correspond with E. Weisgerber re protective order negotiations (0.2); respond to questions from R. Zipursky, R. Heller and M. Davis re document review (0.5); call with E. Weisgerber re discovery and DIP/cash management considerations (0.4); respond to questions from E. Weisgerber re discovery responses (0.2); follow up with E. Weisgerber and E. Worenklein re same (0.2); address new correspondence from C. Anton [Gibbons] (0.1).	1.8

Date	Timekeeper	Narrative	Hours
01/21/25	Weisgerber, Erica S.	Review updated draft protective order from BMLP (0.2); email with DIP Lender and Debevoise teams re same (0.5); call with W. Usatine [Cole Schotz] re protective order (0.2); correspond with N. Labovitz re same (0.2); draft response to BMLP email re same (0.6); email with BMLP counsel re final protective order (0.3); email with document review team re responsiveness and privilege questions (0.5); review privilege question documents (0.6); email with M. Maass and M. Davis re additional document collection and review (0.4); conference with N. Labovitz re depositions and related discovery items (0.4); email with potential deponents re scheduling and availability (0.2); email with L. Kheyfets re production logistics (0.4); email BMLP counsel re deposition call (0.2); review cash management motion (0.8).	5.5
01/21/25	Worenklein, Elie J.	Phone call with Cole Schotz team re discovery related questions (0.4); correspond with Debevoise team re document production to BMLP (0.5); phone call with F. Yudkin [Cole Schotz] re status conference (0.2); review documents to be produced for DIP discovery (2.8); email E. Abrams and E. Blum [BDO] re scheduling depositions (0.3); meet with B. Mishkin re questions on DIP documents (0.3); correspond with S. Koboci re BDO decks (0.2).	4.7
01/21/25	Costin, Alexander	Conduct second-level review for responsiveness and privilege for document production (7.8); call with R. Zipursky and R. Zipursky, F. El-Cid, G. Gabbidon, D. Kirschenbaum, and B. Fawaz re same (0.5); correspond with E. Weisgerber, M. Davis, R. Zipursky re same (1.0); participate in meeting with R. Zipursky, M. Davis, M. Maass, F. El-Cid, D. Kirschenbaum, B. Mishkin, L. Kheyfets, and Y. Slobodkin re status of discovery (0.2).	9.5
01/21/25	El-Cid, Fabienne J.	Conduct document review for DIP financing (6.3); participate in meeting with A. Costin, R. Zipursky, G. Gabbidon, D. Kirschenbaum, and B. Fawaz re same (0.5); participate in meeting with M. Davis, R. Zipursky, L. Kheyfets, Y. Slobodkin, B. Mishkin, M. Maass, D. Kirschenbaum, and A. Costin re same (0.2).	7.0
01/21/25	Fawaz, Basil	Confer [partial] with A. Costin, R. Zipursky, G. Gabbidon, D. Kirschenbaum, and F. El-Cid re DIP discovery (0.4); analyze documents for production re DIP discovery (3.8).	4.2
01/21/25	Gabbidon, Gabriela L.	Meet with A. Costin, G. Gabbidon, B. Fawaz, F. El-Cid and D. Kirschenbaum re bankruptcy production request.	0.5
01/21/25	Heller, Rory	Review documents for production.	4.8
01/21/25	Kirschenbaum, Deven	Review production documents for responsiveness and privilege (3.7); attend briefing with partners and reviewers re same (0.2); meet with A. Costin, R. Zipursky, G. Gabbidon, and F. El-Cid re DIP discovery (0.5).	4.4

Date	Timekeeper	Narrative	Hours
01/21/25	Koboci, Shefit	Correspond with E. Weisgerber re response to document production requests (0.2); correspond with B. Mishkin and R. Heller re open questions related to document production (0.3); correspond with E. Blum [BDO] re same (0.1); correspond with E. Weisgerber re the same (0.1); email with E. Worenklein re DIP allocation (0.3); correspond with E. Blum [BDO] re shared services deck (0.2); review documents for production (5.4); correspond with E. Weisgerber re protective order (0.1); correspond with Lowenstein team re same (0.1); compile executed protective order and send to Gibbons team (0.3); correspond with E. Worenklein re updates to protective order (0.2).	7.3
01/21/25	Maass, Molly Baltimore	Email with Debevoise team re document production (0.2); review documents and preparing document production (3.1); meet with M. Davis, R. Zipursky, L. Kheyfets, Y. Slobodkin, B. Mishkin, F. El-Cid, D. Kirschenbaum, and A. Costin re production of DIP negotiation documents (0.2).	3.5
01/21/25	Manov, Ann	Conduct first-level document review.	5.1
01/21/25	Mishkin, Benjamin	Review documents for BMLP discovery request (5.2); correspond with Debevoise team re discovery requests (0.5); meet with E. Worenklein re discovery (0.3); participate in meeting with R. Zipursky, M. Davis, M. Maass, F. El-Cid, D. Kirschenbaum, A. Costin, L. Kheyfets, and Y. Slobodkin re status of discovery (0.2); email M. Davis re discovery guidelines (0.2).	6.4
01/21/25	Zipursky, Rebecca	Confer with A. Costin, G. Gabbidon, B. Fawaz, F. El-Cid and D. Kirschenbaum re ongoing discovery (0.5); continue first level review of documents for depositions and DIP litigation (1.2); conduct second level review factual research for DIP motion (4.1); meet with M. Davis, M. Maass, B. Mishkin, L. Kheyfets, Y. Slobodkin, F. El-Cid, D. Kirschenbaum, and A. Costin re production of DIP negotiation documents (0.2); coordinate document production (0.3); review and revise production cover letter (0.4).	6.7
01/21/25	Park, Junho	Mark up corporate org chart against served subpoenas (1.2); review emails re discovery and protective order (0.4); correspond with B. Mishkin re status conference (0.1).	1.7
01/21/25	Kheyfets, Liza	Assist Debevoise team with preparation of documents collection for discovery review (4.3); meet with M. Davis, M. Maass, R. Zipursky, Y. Slobodkin, F. El-Cid, D. Kirschenbaum, B. Mishkin, and A. Costin re production of DIP negotiation documents (0.2).	4.5
01/21/25	Slobodkin, Yury G.	Set up collection for document review (1.3); meet with M. Davis, M. Maass, L. Kheyfets, R. Zipursky, F. El-Cid, D. Kirschenbaum, B. Mishkin, and A. Costin re production of DIP negotiation documents (0.2).	1.5

Date	Timekeeper	Narrative	Hours
01/22/25	Davis, Morgan A.	Correspond with R. Zipursky and M. Maass re document production (0.4); participate in court conference re CSCEC Holdings discovery (0.6); call with Lowenstein re status of document production and subpoena response (0.5); correspond with M. Maass and R. Zipursky re document relevance and privilege (1.5); correspond with N. Labovitz re question on document relevance (0.3); analyze documents for production (2.6).	5.9
01/22/25	Goodman, Mark P.	Email re DIP related discovery.	0.3
01/22/25	Labovitz, M. Natasha	Correspond with E. Weisgerber re discovery conference (0.1); review B. Theisen [Gibbons] correspondence in advance of same (0.5); attend discovery conference (0.6); follow up call with E. Weisgerber re same (0.3); respond to questions from M. Davis re specific document production questions and categorization (0.5); correspond with E. Worenklein re same (0.4); correspond with E. Weisgerber re same (0.3); correspond with E. Weisgerber re updates and open discovery items (0.3); coordinate with M. Goodman re same (0.3).	3.3
01/22/25	Weisgerber, Erica S.	Email re depositions with M. Goodman and N. Labovitz (0.3); email with Debevoise document team re document review updates (0.3); email with M. Maass and M. Davis re document discovery issues (0.3); call with C. Zhang [CCA] re discovery and depositions (0.3); prepare for court hearing re discovery (0.3); review BMLP submission to court re discovery disputes with CSCEC Holdings (0.4); attend court conference re CSCEC Holdings discovery disputes (0.6); debrief with N. Labovitz re same (0.3); call with W. Usatine [Cole Schotz], E. Worenklein and M. Maass re discovery issues (0.4); call with B. Theisen [Gibbons] and R. Malone [Gibbons] re deposition scheduling (0.4); review materials re Shared Services Agreements (0.5); review documents for potential production (0.6).	4.7
01/22/25	Worenklein, Elie J.	Attend DIP discovery status conference (0.6); phone call with S. Koboci re recap of status conference (0.3); phone call with W. Usatine [Cole Schotz], E. Weisgerber and M. Maass re DIP discovery questions (0.4); review documents re discovery on affiliates (0.4); correspond with Debevoise team re questions on production documents (2.4); correspond with J. Park re status conference (0.1).	4.2
01/22/25	Costin, Alexander	Conduct second-level review for responsiveness and privilege re DIP Motion document production.	7.8
01/22/25	El-Cid, Fabienne J.	Conduct document review for DIP discovery.	8.3
01/22/25	Fawaz, Basil	Analyze documents for production re DIP discovery.	7.6
01/22/25	Gabbidon, Gabriela L.	Review document production.	7.7
01/22/25	Heller, Rory	Review documents for DIP production.	13.3
01/22/25	Kirschenbaum, Deven	Review production documents for responsiveness and privilege.	6.4

Date	Timekeeper	Narrative	Hours
01/22/25	Koboci, Shefit	Correspond with E. Weisgerber re DIP negotiation (0.2); call with J. Schwarz [BDO] re the same (0.3); correspond with E. Worenklein re requested documents (0.2); correspond with E. Weisgerber re shared services (0.1); coordinate with IT team re additional documents for production (0.2); review documents received by BDO (2.5); correspond with M. Maass re tracker of documents produced (2.1); review documents for production (3.2); attend DIP discovery hearing (0.6); circulate transcript notes to Debevoise team (0.4); call with E. Worenklein re DIP discovery hearing (0.3).	10.1
01/22/25	Maass, Molly Baltimore	Email with team re document collection (0.8); email with team re document production (1.0); review documents re discovery requests (5.7); call with R. Zipursky re document review (0.5); attend court conference re discovery issues (0.6); call with E. Worenklein, E. Weisgerber, and Cole Schotz re court conference (0.4).	9.0
01/22/25	Manov, Ann	Conduct first-level document review re DIP discovery.	7.7
01/22/25	Mishkin, Benjamin	Review documents for DIP discovery (7.7); review correspondence re DIP discovery (0.3).	8.0
01/22/25	Zipursky, Rebecca	Finalize production of documents in connection with DIP financing (1.0); revise production cover letter for opposing counsel (0.1); produce documents to opposing counsel (0.3); confer with M. Maass re document review (0.5); discuss document review with E. Beaver (0.6); meet with N. Egawa re document review and facilitate document review setup (0.7); coordinate with internal data management team, Y. Hu, N. Egawa, and X. Lin re the same (0.5); conduct review of documents in relation to DIP financing discovery (7.2).	10.9
01/22/25	Egawa, Nakaba	Prepare and coordinate document production workflow for attorney review (5.7); meet with R. Zipursky re same (0.7).	6.4
01/22/25	Hu, Yanping	Update search settings for Relativity (3.8); coordinate with X. Lin, R. Zipursky, and N. Egawa re document review (1.5).	5.3
01/22/25	Lin, Xiaoxia	Communicate with N. Egawa re document review (0.2); review emails re document production (0.1).	0.3
01/22/25	Park, Junho	Correspond with E. Worenklein re status conference.	0.1
01/22/25	Kheyfets, Liza	Prepare documents collection for production and attorney review.	9.7
01/22/25	Slobodkin, Yury G.	Prepare additional documents for document production for attorney review.	9.8



Date	Timekeeper	Narrative	Hours
01/23/25	Davis, Morgan A.	Call with C. Zhang [CCA] and C. Cao [CCA] re discovery (0.8); call with M. Goodman re same (0.2); compile information for production (1.4); communicate with N. Labovitz re discovery (0.1); call with M. Goodman re same (0.1); call with E. Weisgerber re same (0.3); meet with E. Weisgerber re same (0.2); review documents for privilege and relevance for production (3.6); correspond with R. Zipursky and E. Weisgerber re scope of document collection (1.0); call with M. Maass and R. Zipursky re document review (0.5); call with E. Worenklein, E. Blum [BDO] and J. Schwarz [BDO] re depositions and discovery (0.5); call with E. Worenklein, N. Labovitz, E. Weisgerber and M. Maass re depositions and document productions (0.5).	9.2
01/23/25	Goodman, Mark P.	Review email re document collection (0.1); email M. Davis re employee list for production (0.1); calls with M. Davis re discovery (0.3); email E. Weisgerber re document discovery and deposition (0.1).	0.6
01/23/25	Labovitz, M. Natasha	Review transcript of January 17th discovery conference (0.3); correspond with M. Davis and E. Weisgerber re scope of ordered production (0.3); call with E. Weisgerber, M. Maass, E. Worenklein and M. Davis re production (0.5); comment on materials for production (0.5); correspond with M. Davis re same (0.2); review new search term requests from BMLP (0.2); review and comment on response re same (0.2).	2.2
01/23/25	Weisgerber, Erica S.	Call with E. Worenklein, M. Davis, M. Maass, and N. Labovitz re discovery and BDO materials (0.5); review documents for proposed production set (1.3); call with M. Davis re documents for production (0.3); review BMLP's proposed new search terms and custodians (0.3); meet with M. Davis re same (0.2); email with R. Zipursky re same (0.3); email with Y. Hu re document production (0.4); draft response to BMLP re new search terms and custodians (0.5); email with N. Labovitz and M. Davis re document production (0.2); email with M. Maass re document production (0.3); email with potential deponents re deposition scheduling and prep (0.4).	4.7
01/23/25	Worenklein, Elie J.	Participate in Zoom call with E. Blum [BDO], J. Schwarz [BDO], and M. Davis re DIP discovery questions (0.5); phone call with E. Blum [BDO] re DIP discovery topics (0.3); review DIP discovery documents (2.4); participate in zoom call with E. Weisgerber, N. Labovitz, M. Davis and M. Maass re DIP discovery questions (0.5); phone call with E. Blum [BDO] re status of DIP discovery and depositions (0.5).	4.2
01/23/25	Costin, Alexander	Conduct first-level document review for production (1.0); conduct second-level review of documents for responsiveness and privilege. (0.6).	1.6
01/23/25	El-Cid, Fabienne J.	Continue document review for DIP document production.	4.2
01/23/25	Fawaz, Basil	Review documents for production re DIP discovery.	8.8
01/23/25	Gabbidon, Gabriela L.	Further review of document production.	5.5
01/23/25	Heller, Rory	Review documents for BMLP discovery production.	3.4
01/23/25	Kirschenbaum, Deven	Review production documents for privilege and responsiveness.	6.5

Date	Timekeeper	Narrative	Hours
01/23/25	Koboci, Shefit	Correspond with M. Maass re review of production (0.2); correspond with IT team re the same (0.3); review produced documents and revise internal tracker of produced documents and bates numbers (5.3); correspond with M. Maass re open questions from production (0.4); review document production (4.3); correspond with E. Worenklein and M. Maass re questions related to produced documents (1.1).	11.6
01/23/25	Maass, Molly Baltimore	Prepare document production re discovery requests (4.8); review documents re same (4.7); meet with M. Davis and R. Zipursky re document review (0.5); call with N. Labovitz, E. Weisgerber, M. Davis, and E. Worenklein re discovery issues (0.5).	10.5
01/23/25	Manov, Ann	Conduct first-level document review.	2.8
01/23/25	Mishkin, Benjamin	Review document production.	5.3
01/23/25	Zipursky, Rebecca	Coordinate documents for review (0.9); review documents re DIP discovery (10.2); meet with M. Maass and M. Davis re discovery (0.5).	11.6
01/23/25	Egawa, Nakaba	Prepare and coordinate additional document production workflow for attorney review (5.5); meet with X. Lin re same (0.3).	5.8
01/23/25	Hu, Yanping	Update additional search terms provided by opposing counsel on Relativity.	3.9
01/23/25	Lin, Xiaoxia	Meet with N. Egawa re CCA DIP discovery (0.3); review correspondence re same (0.1).	0.4
01/23/25	Bassin, Alexandra	Update tracker re reviewed and produced documents.	2.5
01/23/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production as per M. Maass request.	12.5
01/23/25	Slobodkin, Yury G.	Prepare documents for document review.	3.5
01/24/25	Davis, Morgan A.	Review documents marked for production to BMLP re discovery into DIP and cash management motions (8.3); email with M. Maass, and E. Weisgerber, re responsiveness, privilege, technical issues and timing for same (0.8); call with M. Maass and E. Weisgerber re document review and production (0.3); common-interest call with E. Worenklein, M. Maass, F. Yudkin [Cole Schotz], W. Usatine [Cole Schotz], C. Lambe [YCST], and M. Neiburg [YCST] re response to subpoenas and motions (0.6); call with C. Zhang [CCA] re responsive information for production info (0.4).	10.4
01/24/25	Goodman, Mark P.	Email re discovery of debtor.	0.3
01/24/25	Labovitz, M. Natasha	Respond to questions from document review team re context and relevance (0.8); correspond with E. Weisgerber re DIP objection and responses (0.2); review timing schedule for depositions and prep (0.2); review E. Weisgerber correspondence to B. Theisen [Gibbons] (0.1).	1.3



Date	Timekeeper	Narrative	Hours
01/24/25	Weisgerber, Erica S.	Call with M. Maass and M. Davis re document production status and plan (0.3); review BMLP revised proposed additional custodians and search terms (0.3); call with E. Blum [BDO] and R. Zipursky re deposition prep issues (0.5); communicate with M. Davis re document production issues (0.3); draft response to BMLP re updated review criteria/proposals (0.4); review documents for proposed document production (0.5).	2.3
01/24/25	Worenklein, Elie J.	Participate in phone call with F. Yudkin [Cole Schotz], W. Usatine [Cole Schotz], C. Lambe [YCST], M. Neiburg [YCST], M. Davis and M. Maass re BMLP discovery (0.6); prepare for same (0.1); phone call with BDO re DIP discovery (0.4); draft email to team re recap of discovery call (0.3); email internally re DIP discovery questions (0.5).	1.9
01/24/25	Costin, Alexander	Conduct second-level review of documents for production.	4.8
01/24/25	El-Cid, Fabienne J.	Review documents for production for privilege and confidentiality.	3.8
01/24/25	Fawaz, Basil	Review documents for production re DIP discovery.	6.9
01/24/25	Gabbidon, Gabriela L.	Review additional batch for document review.	2.8
01/24/25	Kirschenbaum, Deven	Review production documents for responsiveness and privilege.	2.3
01/24/25	Koboci, Shefit	Correspond with M. Maass re document review issue flagged by J. Park (0.3); draft revised internal tracker of produced documents (1.8); coordinate with document and data management team re production (0.3); correspond with M. Maass re shared services backup (0.2); review produced documents folder to ensure full set of documents included at request of M. Maass (0.9); review production of documents (2.8); correspond with N. Labovitz re document production (0.1); call with E. Abrams [CCA] re document production (0.1); correspond with M. Davis re production (0.1).	6.6
01/24/25	Maass, Molly Baltimore	Participate in call with F. Yudkin [Cole Schotz], W. Usatine [Cole Schotz], C. Lambe [YCST], M. Neiburg [YCST], E. Worenklein, and M. Davis re discovery requests (0.6); review documents and coordinate document production re discovery requests (12.7); call with M. Davis and E. Weisgerber re document production (0.3).	13.6
01/24/25	Mishkin, Benjamin	Correspond with R. Zipursky re document review (0.2); review documents re DIP discovery (1.4).	1.6
01/24/25	Zipursky, Rebecca	Conduct quality control review of documents marked non-responsive (5.2); summarize document review findings for client (0.4); review documents in connection with DIP litigation (7.3); coordinate with L. Kheyfets and Y. Slobodkin re additional documents and supplemental search terms (0.6); attend deposition preparation for E. Blum [BDO] with E. Weisgerber and take notes (0.5); draft outline for E. Blum deposition defense (0.6); communicate with E. Weisgerber to answer opposing counsel questions (0.2); confer with CCA re produced documents (0.3).	15.1
01/24/25	Egawa, Nakaba	Manage workflow of preparing documents for the purpose of production.	2.9

Date	Timekeeper	Narrative	Hours
01/24/25	Hu, Yanping	Work on keyword search term update and tracking (2.4); correspond with R. Zipursky, L. Kheyfets, and Y. Slobodkin re document review and Relativity issues (1.9).	4.3
01/24/25	Park, Junho	Correspond with S. Koboci re DIP discovery documents (0.1); phone calls with clerk re interpreters for DIP hearing (0.2); further correspond with clerk re qualified interpreters (0.1); update E. Worenklein re same (0.2); send list of interpreters to Cole Schotz (0.3); correspond with B. Mishkin re same (0.1).	1.0
01/24/25	Bassin, Alexandra	Assist L. Kheyfets with production preparation.	0.8
01/24/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production.	13.0
01/24/25	Slobodkin, Yury G.	Respond to legal team request for assistance.	8.3
01/25/25	Davis, Morgan A.	Review and analyze documents for production for relevance and privilege.	6.6
01/25/25	Goodman, Mark P.	Email re document discovery.	0.2
01/25/25	Labovitz, M. Natasha	Correspond with Debevoise team re Rule 2004 discovery and affiliates' planned responses thereto (0.3); review identified documents from document review to provide context for privilege/relevance determinations (0.3); review Item 37 reporting (0.2).	0.8
01/25/25	Weisgerber, Erica S.	Correspond with M. Maass and M. Davis re document production and related issues.	0.5
01/25/25	Worenklein, Elie J.	Respond to various questions re DIP production.	0.9
01/25/25	El-Cid, Fabienne J.	Continue document review of DIP financing production.	2.1
01/25/25	Kirschenbaum, Deven	Review production documents for privilege.	4.1
01/25/25	Maass, Molly Baltimore	Review documents and coordinate document production.	9.6
01/25/25	Zipursky, Rebecca	Review documents for supplemental production (7.0); finalize production of responsive documents with Y. Slobodkin and M. Davis (0.3); confer with Y. Slobodkin and L. Kheyfets re supplemental search terms (0.3); confer with CCA re produced documents (0.4).	8.0
01/25/25	Egawa, Nakaba	Manage workflow of additional documents for production.	0.8
01/25/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production (5.7); confer with R. Zipursky and Y. Slobodkin re supplemental search terms (0.3).	6.0
01/25/25	Slobodkin, Yury G.	Respond to legal team request for assistance (12.2); confer with R. Zipursky and L. Kheyfets re supplemental search terms (0.3).	12.5
01/26/25	Davis, Morgan A.	Review documents for privilege and responsiveness (1.0); communicate with R. Zipursky re responsiveness of additional documents (0.2); email C. Zhang [CCA] re status of document production (0.1); email M. Goodman re document collection (0.1); draft email to C. Zhang [CCA] re summary of takeaways from court conference (0.4); coordinate with M. Goodman re document collection (0.1).	1.9
01/26/25	Goodman, Mark P.	Email team re document collection and review.	0.2

Date	Timekeeper	Narrative	Hours
01/26/25	Labovitz, M. Natasha	Review identified documents from review to provide context for privilege/relevance determination (0.7) review new discovery demands from B. Theisen [Gibbons] (0.2); correspond with E. Weisgerber re same (0.2); correspond with E. Weisgerber re key topics and themes for Blum deposition preparation (0.4).	1.5
01/26/25	Weisgerber, Erica S.	Call with E. Worenklein and E. Blum [BDO] re deposition preparation (0.5); correspond with M. Davis re deposition preparation (0.3); prepare for E. Blum deposition preparation (2.8).	3.6
01/26/25	Worenklein, Elie J.	Phone call with E. Blum [BDO] and E. Weisgerber re deposition questions (0.5); email with E. Weisgerber and M. Davis re response to BMLP new requests (0.4); emails with Debevoise team re questions on DIP production (1.2).	2.1
01/26/25	El-Cid, Fabienne J.	Finalize redactions for privileged documents.	2.2
01/26/25	Kirschenbaum, Deven	Review production documents for privilege.	1.8
01/26/25	Koboci, Shefit	Correspond with M. Davis re open DIP production questions.	0.9
01/26/25	Maass, Molly Baltimore	Review documents and coordinate document production.	5.5
01/26/25	Zipursky, Rebecca	Correspond with CCA and M. Davis re produced documents (0.4); coordinate quality control on documents in production (5.1); correspond with M. Davis, M. Maass, and E. Weisgerber re potential supplemental search terms (0.3); review documents related to preparation for deposition of E. Blum (3.1).	8.9
01/26/25	Egawa, Nakaba	Manage workflow of additional documents for the purpose of production.	0.2
01/26/25	Lin, Xiaoxia	Prepare documents for production.	1.7
01/26/25	Park, Junho	Set up deposition preparation rooms for DIP discovery.	0.4
01/26/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production.	8.9
01/26/25	Slobodkin, Yury G.	Respond to legal team request for assistance.	8.0
01/27/25	Davis, Morgan A.	Review email from Gibbons re discovery (0.2); draft response re same (0.9); redact documents (0.4); provide instructions to M. Maass re production of same (0.3); analyze documents for deposition prep of E. Abrams and E. Blum (2.5); lead call with Y. Wei [CCA], E. Worenklein, M. Goodman, R. Zipursky re DIP discovery and upcoming motions (0.5); prepare for same (0.1); communicate with E. Weisgerber re same (0.4); communicate with C. Zhang [CCA] re documents collection, litigation hold (0.4); instruct M. Maass and L. Kheyfets re document upload for review (0.2).	5.9
01/27/25	Goodman, Mark P.	Email with team re depositions and discovery (0.2); call with E. Worenklein re depositions (0.2); call with Y. Wei [CCA], M. Davis, E. Worenklein, R. Zipursky re depositions and related issues (0.5); email M. Davis, E. Worenklein and R. Zipursky re finalizing and producing financial schedules (0.1); additional email to team re discovery (0.2); meet with client re discovery status, motion practice, and current work streams (0.6).	1.8

Date	Timekeeper	Narrative	Hours
01/27/25	Labovitz, M. Natasha	Review identified documents from review to provide context for privilege/relevance determination (0.6); correspond with M. Davis, E. Worenklein and E. Weisgerber re same (0.4); review DIP timeline summary (0.4).	1.4
01/27/25	Levinson, Sidney P.	Call with E. Weisgerber re DIP background questions.	0.3
01/27/25	Weisgerber, Erica S.	Exchange emails with M. Maass and M. Davis re document production (0.3); call with M. Kaplan [Lowenstein] re DIP discovery (0.4); email Debevoise team re DIP discovery and deposition schedule (0.2); exchange emails with E. Worenklein re BDO deposition prep (0.2); exchange emails with R. Zipursky re document searches (0.6); call with S. Levinson re same (0.3); correspond with M. Davis and R. Zipursky re response to BMLP counsel queries re documents (0.3); revise draft E. Abrams deposition prep outline (2.8).	5.1
01/27/25	Worenklein, Elie J.	Phone call with S. Koboci re DIP timeline (0.4); phone call with Y. Wei [CCA], M. Goodman, M. Davis, and R. Zipursky re status of DIP discovery (0.5); mark up draft DIP timeline (2.2); exchange emails with team re questions on DIP deposition preparation questions (1.1); exchange emails with F. Yudkin [Cole Schotz] and W. Usatine [Cole Schotz] re deposition preparation (0.3); review outlines for deposition prep (0.7); call with M. Goodman re depositions (0.2).	5.4
01/27/25	El-Cid, Fabienne J.	Confer with R. Zipursky and D. Kirschenbaum re document review of additional documents.	0.4
01/27/25	Heller, Rory	Assist with deposition preparation.	0.4
01/27/25	Kirschenbaum, Deven	Meet with R. Zipursky and F. El-Cid to discuss review of documents for production.	0.4
01/27/25	Koboci, Shefit	Correspond with E. Worenklein re DIP timeline (0.1); draft DIP timeline (1.1); call with E. Worenklein re draft DIP timeline (0.4); draft revised DIP timeline (6.5); correspond with E. Weisgerber re DIP marketing question (0.1); call with BDO team re same (0.1); correspond with S. Levinson re question re DIP timeline (0.2).	8.5
01/27/25	Maass, Molly Baltimore	Draft deposition outline re upcoming deposition (5.0); coordinate document review and collection (2.0); email with team re discovery issues (1.8).	8.8
01/27/25	Mishkin, Benjamin	Calls with R. Zipursky re deposition preparation (0.2); review documents for deposition preparation (5.2); update deposition outline re shared services (2.2); email outline to R. Zipursky (0.1).	7.7

Date	Timekeeper	Narrative	Hours
01/27/25	Zipursky, Rebecca	Confer with L. Kheyfets and Y. Slobodkin re documents for E. Blum (0.2); calls with B. Mishkin re E. Blum deposition document review (0.2); gather and review documents in connection with deposition prep (2.8); confer with F. El-Cid and D. Kirschenbaum re review of supplemental documents (0.4); prepare for same (0.1); coordinate with Y. Slobodkin re supplemental document review (0.8); review supplemental search terms (1.2); consult with E. Weisgerber re terms (0.3); review documents related to privilege dispute (0.4); review E. Blum deposition outline draft from E. Weisgerber (0.6); draft outline for E. Blum deposition preparation (6.4); participate in call with Y. Wei [CCA], M. Goodman, M. Davis, and E. Worenklein re DIP discovery (0.5).	14.9
01/27/25	Egawa, Nakaba	Manage workflow of preparing additional documents for the purpose of production.	3.0
01/27/25	Hu, Yanping	Assist with preparation of documents for purpose of production review.	2.9
01/27/25	Park, Junho	Set up for deposition preparation for DIP discovery.	0.5
01/27/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production (6.0); meet with R. Zipursky and Y. Slobodkin re same (0.2).	6.2
01/27/25	Slobodkin, Yury G.	Respond to legal team request for assistance per L. Kheyfets (11.6); meet with R. Zipursky and L. Kheyfets re same (0.2).	11.8
01/28/25	Davis, Morgan A.	Prepare for E. Abrams deposition preparation (1.3); participate in E. Abrams deposition prep with M. Maass, E. Worenklein and E. Weisgerber (3.5); prepare for Blum deposition prep (1.5); participate in E. Blum deposition preparation with R. Zipursky, E. Worenklein and E. Weisgerber (3.5); communicate with E. Weisgerber and M. Maass re next steps for document collection and review (0.7); call with M. Liu [CCA] re document collection (0.2); call with Y. Wei [CCA] re document collection (0.2); communicate with M. Maass re document collection (0.2); communicate with C. Zhang [CCA] re document collection (0.4); give instructions to E. Worenklein re planning for E. Abrams deposition (0.1); call with R. Zipursky re document review (0.2).	11.8
01/28/25	Goodman, Mark P.	Email E. Weisgerber re CSCEC Holding deposition.	0.1
01/28/25	Labovitz, M. Natasha	Comment on redactions for certain produced documents (0.7); correspond with M. Maass re same (0.2); respond to questions re context of potential documents for production (0.7); review new email with discovery requests from B. Theisen [Gibbons] (0.1); review E. Abrams deposition preparation outline (0.3).	2.0
01/28/25	Weisgerber, Erica S.	Revise E. Abrams deposition prep outline (1.4); prepare for E. Abrams deposition preparation (1.0); participate in E. Abrams deposition preparation session (3.5); prepare for E. Blum deposition prep (1.0); participate in E. Blum deposition preparation session (3.5); correspond with M. Goodman re depositions (0.2); revise draft email response to opposing counsel re discovery issues (0.4).	11.0

Date	Timekeeper	Narrative	Hours
01/28/25	Worenklein, Elie J.	Attend deposition preparation sessions with E. Abrams (3.5); prepare for same (0.5); attend E. Blum deposition preparation session (3.5); prepare for same (1.5); phone call with M. Liu [CCA] re discovery questions (0.3); review redacted board minutes to be produced (0.4); comment on draft email to Gibbons re discovery (0.2).	9.9
01/28/25	El-Cid, Fabienne J.	Review documents for DIP financing production.	2.7
01/28/25	Fawaz, Basil	Review and analyze documents for production re DIP discovery.	1.6
01/28/25	Gabbidon, Gabriela L.	Review documents for production.	3.9
01/28/25	Heller, Rory	Review documents for production.	2.3
01/28/25	Kirschenbaum, Deven	Review production documents for responsiveness and privilege.	2.7
01/28/25	Koboci, Shefit	Correspond with N. Labovitz re question re funded debt (0.2); correspond with M. Maass re shared services question (0.3); correspond with M. Maass and R. Heller re meeting minutes for production (0.3); review documents for production (4.4).	5.2
01/28/25	Maass, Molly Baltimore	Attend E. Blum [BDO] deposition preparation (3.5); attend E. Abrams deposition preparation; prepare for same (1.2); correspond with CCA re document collection (0.8); coordinate document collection and document review (2.0); draft email to opposing counsel re discovery disputes (1.0).	12.0
01/28/25	Manov, Ann	Perform first level review of documents.	2.1
01/28/25	Mishkin, Benjamin	Prepare deposition preparation materials (1.2); call with J. Park re subpoena requests (0.2); review documents for DIP discovery (2.0).	3.4
01/28/25	Zipursky, Rebecca	Draft deposition outline for E. Blum (2.0); revise outline for E. Blum deposition (2.6); prepare for E. Blum deposition preparation session (1.1); attend deposition preparation for E. Blum (3.5); meet with Y. Slobodkin about supplemental search terms and document review (0.3); correspond with E. Weisgerber and M. Maass re upcoming depositions (0.6); call with M. Davis re upcoming workstreams (0.2); draft mock cross examination for E. Blum deposition (4.1).	14.4
01/28/25	Egawa, Nakaba	Manage workflow of preparing additional documents for the purpose of production.	3.3
01/28/25	Hu, Yanping	Prepare additional documents for production per R. Zipursky's request.	7.5
01/28/25	Park, Junho	Send subpoena tracker update to group (1.4); phone call with B. Mishkin re served entities (0.2); further set up for deposition preparations for DIP discovery (0.9); communicate with E. Worenklein re deposition scheduling and preparation (0.1).	2.6
01/28/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production.	9.3
01/28/25	Slobodkin, Yury G.	Coordinate document collection (10.0); meet with R. Zipursky re supplemental search terms and document review (0.3).	10.3



Date	Timekeeper	Narrative	Hours
01/29/25	Davis, Morgan A.	Revise deposition preparation questions for E. Blum (1.0); prepare for Blum deposition preparation (0.3); correspond with C. Zhang [CCA] re document collection (0.7); participate [partial] in E. Blum deposition prep (3.0); communicate with E. Weisgerber and M. Maass re document privilege issues and document collection (0.5); call with E. Worenklein re DIP Lender discovery (0.2); comment on same (0.5); call with M. Liu [CCA] re document collection (0.2); communicate with E. Weisgerber re same (0.2).	6.6
01/29/25	Goodman, Mark P.	Email N. Labovitz and M. Monaghan re discovery issues and BMLP motions (0.3); email N. Labovitz re today's hearing and deposition schedule (0.2).	0.5
01/29/25	Labovitz, M. Natasha	Correspond with E. Weisgerber and W. Usatine [Cole Schotz] re BMLP attempt to delay E. Abrams deposition and strategic response thereto (0.5); attend discovery conference with court (0.6); follow-up discussion with E. Weisgerber re same (0.3); correspond with E. Worenklein and E. Weisgerber re new briefing schedule for DIP (0.2); address update from M. Maass re production of specific items (0.2); correspond with E. Weisgerber and M. Goodman re interpreter for depositions (0.1); review new deposition schedule (0.1); correspond with E. Weisgerber and M. Davis re same (0.1); correspond with E. Worenklein, M. Goodman and M. Monaghan re BMLP offensive motions and discovery (0.4).	2.5
01/29/25	Weisgerber, Erica S.	Prepare for E. Abrams deposition (0.9); call with BMLP counsel re deposition (0.2); correspond with Debevoise and Cole Schotz re Abrams deposition (0.3); correspond with BMLP counsel re same (0.4); participate in court conference re E. Abrams deposition (0.6); follow-up call with N. Labovitz re same (0.3); meet and confer with BMLP counsel re discovery issues (0.4); confer with M. Maass re same (0.3); prepare materials for E. Blum deposition preparation session (1.9); meet [partial] with E. Blum [BDO] re deposition preparation (2.5); correspond with M. Maass and M. Davis re document review and production issues (0.5).	8.3
01/29/25	Worenklein, Elie J.	Participate in portion of Court discovery status conference (0.3); phone call with E. Blum [BDO] re timing of DIP motion and depositions (0.3); phone call with A. Milliaressis [Cole Schotz] re DIP discovery and other pending matters (0.7); attend deposition preparation meeting with E. Blum [BDO] (4.0); revise summary of deposition preparation session (1.6); exchange emails with Debevoise team re response to Gibbons and scheduling depositions (0.3); call with M. Davis re DIP Lender discovery (0.2).	7.4
01/29/25	Baron, Marissa	Prepare for onboarding re document review (1.0); communicate with M. Maass and J. Hayes re same (0.3); review document review protocol (0.5); communicate with R. Zipursky re second level document review for upcoming production of debtor's documents (0.2); conduct second level review of documents produced by debtor marked for production (3.1).	5.1
01/29/25	Cui, Yuqing	Confer with R. Zipursky re document review (0.6); review document review protocol (0.7).	1.3

Date	Timekeeper	Narrative	Hours
01/29/25	El-Cid, Fabienne J.	Conduct document review for DIP financing production (9.3); meet with R. Zipursky, D. Kirschenbaum, and Y. Slobodkin re same (0.5).	9.8
01/29/25	Fawaz, Basil	Analyze DIP documents for production.	8.2
01/29/25	Gabbidon, Gabriela L.	Review documents for production re DIP discovery.	4.6
01/29/25	Hayes, Jacqueline	Review background materials relating to DIP financing and document review (1.2); correspond with M. Maass re DIP discovery (0.6); review documents in connection with DIP financing (2.5).	4.3
01/29/25	Heller, Rory	Review documents for production.	7.4
01/29/25	Kirschenbaum, Deven	Review production documents for responsiveness and privilege (4.4); meet with R. Zipursky, F. El-Cid, and Y. Slobodkin re DIP discovery (0.5).	4.9
01/29/25	Koboci, Shefit	Correspond with R. Zipursky re requested documents (0.2); correspond with M. Maass re production of meeting minutes (0.3); review documents for production (5.9).	6.4
01/29/25	Maass, Molly Baltimore	Attend court conference re deposition (0.6); exchange emails with team re discovery issues (0.5); coordinate document review and collection (3.1); meet with R. Zipursky, Y. Slobodkin, and L. Kheyfets re DIP discovery (1.2); meet with R. Zipursky re same (0.4); email with staffing re new team members (0.4); correspond with new team members re onboarding (1.0); review documents for production (4.5); meet with E. Weisgerber re discovery issues (0.3).	12.0
01/29/25	Mishkin, Benjamin	Review documents for production.	2.9
01/29/25	Zhou, Xiaoxiao	Conduct document review in preparation for January 31 production (5.1); meet with R. Zipursky re same (0.6).	5.7
01/29/25	Zhu, Julia	Respond to emails from M. Maass re joining matter and upcoming document review (0.3); read background documents to prepare for document review (0.5).	0.8
01/29/25	Zipursky, Rebecca	Draft mock cross examination of E. Blum (0.8); review and revise the same (1.2); confer with Y. Slobodkin, F. El-Cid, and D. Kirschenbaum re supplemental document review for DIP litigation (0.5); confer with M. Maass re additional document production (0.4); meet with Y. Slobodkin, L. Kheyfets, and M. Maass re finalizing set of supplemental documents for review (1.2); meet with X. Zhou to discuss the review of supplemental documents (0.6); meet with Y. Cui to discuss the review of supplemental documents (0.6); conduct review of supplemental documents in connection with DIP litigation (7.2).	12.5
01/29/25	Egawa, Nakaba	Prepare workflow for documents for production.	8.9
01/29/25	Hu, Yanping	Set up discovery documents for document review.	10.7
01/29/25	Park, Junho	Prepare deposition preparation rooms.	0.9
01/29/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production as per M. Maass request (12.5); meet with R. Zipursky, Y. Slobodkin, and M. Maass re DIP discovery (1.2).	13.7



Date	Timekeeper	Narrative	Hours
01/29/25	Slobodkin, Yury G.	Prepare documents collection for legal team review per M. Maass request (7.3); respond to legal team request for assistance per R. Zipursky (0.4); participate in Zoom with R. Zipursky, F. El-Cid, and D. Kirschenbaum re DIP discovery (0.5); meet with R. Zipursky, L. Kheyfets, and M. Maass re same (1.2).	9.4
01/30/25	Davis, Morgan A.	Participate in call with E. Weisgerber and M. Maass re document collection (0.3); prepare for same (0.1); correspond with M. Goodman re same (0.3); review draft filing (0.4); review emails with M. Maass, E. Weisgerber, E. Worenklein and N. Labovitz re relevance of documents and deposition prep (0.4).	1.5
01/30/25	Goodman, Mark P.	Correspond with N. Labovitz, E. Worenklein and M. Monaghan re BMLP offensive motions and discovery (0.8); email internal team re depositions (0.2).	1.0
01/30/25	Labovitz, M. Natasha	Respond to proposed updated deposition and briefing timing (0.3); comment on privilege redactions for certain produced documents (0.4); correspond with M. Maass re same (0.3); review updates from E. Weisgerber re document production and scheduling (0.2).	1.2
01/30/25	Weisgerber, Erica S.	Email BMLP counsel re deposition schedule and documents (0.3); email Debevoise team re client meeting (0.1); confer with M. Maass re document review and production (0.5); review documents for proposed production (0.5); confer with M. Davis and M. Maass re document collection (0.3).	1.7
01/30/25	Worenklein, Elie J.	Exchange emails with team re discovery production questions (0.8); exchange emails with M. Kaplan [Lowenstein] and A. Behlmann [Lowenstein] re DIP schedule (0.2); call with M. Liu [CCA] and M. Maass re DIP discovery (0.3); correspond with M. Goodman, N. Labovitz, M. Monaghan re discovery coordination (0.6); exchange emails with Debevoise team re prep for deposition (0.4).	2.3
01/30/25	Baron, Marissa	Review documents produced for privilege log (8.2); correspond with M. Maass re privilege designations for privilege log (0.5); review emails re responsiveness of documents produced by debtor and production of same (0.7).	9.4
01/30/25	Cui, Yuqing	Review document production.	3.7
01/30/25	Gabbidon, Gabriela L.	Further review document production re DIP discovery.	6.2
01/30/25	Heller, Rory	Review documents for production.	1.1
01/30/25	Koboci, Shefit	Correspond with M. Maass re discovery question (0.2); review document production (2.4).	2.6
01/30/25	Maass, Molly Baltimore	Correspond with M. Baron re privilege log review (0.5); correspond with data discovery management team re document production logistics (1.5); review documents re production (4.5); call with M. Davis and E. Weisgerber re DIP discovery (0.3); call with E. Worenklein and M. Liu [CCA] re same (0.3); coordinate document review and production (3.9); conference with E. Weisgerber re document review and production (0.5); call with J. Zhu re review of additional documents (0.3); meet with R. Zipursky re outstanding document production (0.1).	11.9

Date	Timekeeper	Narrative	Hours
01/30/25	Zhou, Xiaoxiao	Conduct document review in preparation for January 31 production.	5.7
01/30/25	Zhu, Julia	Review document review protocol re DIP discovery (0.4); review amended R&Os and declarations re DIP discovery (0.6); call with M. Maass re additional document review (0.3); review documents for DIP discovery (3.4).	4.7
01/30/25	Zipursky, Rebecca	Confer with M. Maass re outstanding document production.	0.1
01/30/25	Egawa, Nakaba	Manage workflow of preparing additional documents for the purpose of production.	3.5
01/30/25	Lin, Xiaoxia	Review documents for responsiveness and privilege.	5.1
01/30/25	Kheyfets, Liza	Assist legal team with preparation of documents collection for attorney review and production.	11.2
01/30/25	Slobodkin, Yury G.	Respond to legal team request for assistance.	9.5
01/31/25	Goodman, Mark P.	Call with client and E. Worenklein re discovery.	1.0
01/31/25	Labovitz, M. Natasha	Respond to questions from document review team re DIP production (0.3); review updated deposition and briefing schedule (0.6).	0.9
01/31/25	Weisgerber, Erica S.	Call with M. Kaplan [Lowenstein] re discovery (0.3); call with M. Maass re documents and discovery (0.3); call with M. Liu [CCA], E. Worenklein, and M. Maass re same (0.3); correspond with M. Goodman, M. Davis and M. Maass re discovery issues (0.5); email with J. Hayes re research assignment (0.3); exchange emails with M. Liu [CCA] and W. Zhou [CCA] re document collections and discovery issues (0.5); review documents for final production (1.5); email with M. Baron and M. Maass re privilege log (0.4).	4.1
01/31/25	Worenklein, Elie J.	Phone call with M. Maass and M. Liu [CCA] re discovery searches (0.4); draft email to team re privilege questions (0.4); phone call with M. Maass, E. Weisgerber and M. Liu [CCA] re additional discovery searches (0.3); respond to question about DIP productions (0.2); prepare for call re discovery (0.3); participate in call with M. Goodman and CCA re discovery (1.0).	2.6
01/31/25	Baron, Marissa	Review documents produced by debtor and withheld for privilege for privilege log (5.4); confer with M. Maass re privilege log (0.5); review emails re responsiveness of documents produced by debtor (0.2); respond to emails from E. Weisgerber and M. Maass re privilege log (0.2).	6.3
01/31/25	Cui, Yuqing	Correspond with team re supplemental document production (0.1); correspond with E. Weisgerber re client call to discuss document review and production (0.1).	0.2

27188.1004 – DIP FINANCING

Invoice Number: 2486555

Date	Timekeeper	Narrative	Hours
01/31/25	Maass, Molly Baltimore	Coordinate document production re discovery requests (7.1); correspond with CCA re document collection (1.5); correspond with X. Zhou re document review (0.8); call with Lowenstein re common interest legal issues (0.5); call with E. Weisgerber re documents and discovery (0.3); call with M. Liu [CCA], E. Worenklein, and E. Weisgerber re same (0.3); communicate with M. Goodman, M. Davis and E. Weisgerber re discovery issues (0.4); confer with M. Baron re privilege log (0.5); call with E. Worenklein and M. Liu [CCA] re discovery (0.4).	11.8
01/31/25	Zhou, Xiaoxiao	Confer with V. Zhao [CCA] re document production (1.0); confer with M. Liu [CCA] re document production (0.5); conduct document review in preparation for document production (2.5); correspond with M. Maass and E. Weisgerber re document production (0.5); correspond with V. Zhao [CCA] and M. Liu [CCA] re document production (1.5).	6.0
01/31/25	Zhu, Julia	Review team emails re DIP discovery.	0.1
01/31/25	Zipursky, Rebecca	Correspond with M. Maass re outstanding document production.	0.3
01/31/25	Hu, Yanping	Correspond with team re review of documents production.	0.3
01/31/25	Bassin, Alexandra	Assist L. Kheyfets in preparing document production.	1.0
01/31/25	Kheyfets, Liza	Set up document production collection for attorney review.	7.4
01/31/25	Slobodkin, Yury G.	Respond to legal team request for assistance (3.8); prepare document collection for legal team review (0.5).	4.3
<b>Total Hours</b>			<b>1,526.0</b>

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	19.5	2,317.50	45,191.25
	Labovitz, M. Natasha	55.5	2,317.50	128,621.25
	Levinson, Sidney P.	2.9	2,317.50	6,720.75
	Weisgerber, Erica S.	116.6	2,025.00	236,115.00
	Davis, Morgan A.	99.5	1,755.00	174,622.50
	Partner Total	294.0		\$591,270.75
Counsel	Worenklein, Elie J.	113.6	1,620.00	184,032.00
	Counsel Total	113.6		\$184,032.00
Associate	Maass, Molly Baltimore	163.9	1,471.50	241,178.85
	Baron, Marissa	20.8	1,458.00	30,326.40
	Cui, Yuqing	5.2	1,458.00	7,581.60
	Zhou, Xiaoxiao	17.4	1,458.00	25,369.20
	Costin, Alexander	23.7	1,354.50	32,101.65
	Zipursky, Rebecca	115.8	1,354.50	156,851.10
	Heller, Rory	43.3	1,287.00	55,727.10
	Manov, Ann	19.7	1,287.00	25,353.90
	Fawaz, Basil	54.6	1,192.50	65,110.50
	Koboci, Shefit	126.4	1,192.50	150,732.00
	El-Cid, Fabienne J.	47.6	1,017.00	48,409.20
	Gabbidon, Gabriela L.	39.4	1,017.00	40,069.80
	Hayes, Jacqueline	4.3	1,017.00	4,373.10
	Kirschenbaum, Deven	42.2	1,017.00	42,917.40
	Zhu, Julia	5.6	1,017.00	5,695.20
	Mishkin, Benjamin	42.3	801.00	33,882.30
	Associate Total	772.2		\$965,679.30
Lit Analyst / Disc Atty	Douglas, Lesley R.	6.2	522.00	3,236.40
	Egawa, Nakaba	34.8	522.00	18,165.60
	Hu, Yanping	34.9	522.00	18,217.80
	Lin, Xiaoxia	7.5	522.00	3,915.00
	Park, Junho	12.6	522.00	6,577.20
	Legal Assistant Total	96.0		\$50,112.00
Disc / Data Mgt	Kheyfets, Liza	129.7	553.50	71,788.95
	Bassin, Alexandra	4.3	436.50	1,876.95

27188.1004 – DIP FINANCING

Invoice Number: 2486555

Title	Timekeeper	Hours	Rate	Amount
	Slobodkin, Yury G.	116.2	436.50	50,721.30
	Disc / Data Mgt Total	250.2		\$124,387.20
Matter Total		1,526.0		\$1,915,481.25



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486474

Client Matter 27188.1017

FOR PROFESSIONAL SERVICES rendered during the period from December 22, 2024 through January 31, 2025  
in connection with EMPLOYMENT & FEE APPLICATIONS

Fees	\$131,836.95
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$131,836.95</b>

Date	Timekeeper	Narrative	Hours
12/24/24	Worenklein, Elie J.	Review multiple conflict reports and draft summary for retention schedules.	2.4
12/24/24	Park, Junho	Correspond with E. Worenklein re conflicts check status.	0.1
12/25/24	Worenklein, Elie J.	Further review conflict results for retention schedules.	1.3
12/25/24	Park, Junho	Update E. Worenklein re conflict search responses.	0.3
12/26/24	Mishkin, Benjamin	Revise retention application and accompanying declarations.	1.5
12/26/24	Park, Junho	Correspond with internal team re conflicts report (0.3); draft retention application (4.4); correspond with B. Mishkin re same (0.1).	4.8
12/27/24	Labovitz, M. Natasha	Correspond with M. Goodman re Debevoise fee letter (0.2); comment re same (0.2); correspond with E. Worenklein re conflict review and next steps (0.4); further correspond with M. Goodman and S. Levinson re fee letter (0.1); call with E. Weisgerber re same (0.2).	1.1
12/27/24	Levinson, Sidney P.	Correspond with N. Labovitz and M. Goodman re Debevoise engagement.	0.4
12/27/24	Weisgerber, Erica S.	Call with N. Labovitz re retention issue.	0.2
12/27/24	Worenklein, Elie J.	Further comment on draft retention application and schedules.	0.6
12/27/24	Park, Junho	Update retention application schedules and chart.	0.6
12/28/24	Goodman, Mark P.	Call with N. Labovitz and M. Sirota [Cole Schotz] re Debevoise engagement.	0.3
12/28/24	Labovitz, M. Natasha	Correspond with S. Levinson and M. Goodman re Debevoise retention (0.1); call with M. Sirota [Cole Schotz] and M. Goodman re same (0.3).	0.4
12/29/24	Worenklein, Elie J.	Correspond with J. Park re interested party list for various retention applications (0.4); further review responses for Rule 2014 disclosures (0.9).	1.3
12/29/24	Park, Junho	Send email to E. Worenklein re retention app and conflicts status (0.1); send updates re disclosure list to E. Worenklein and B. Mishkin (0.7).	0.8
12/30/24	Park, Junho	Correspond with BDO team re updated interested party list (0.4); send update to S. Levinson, N. Labovitz and E. Worenklein re firm disclosures (0.4); draft disclosure correspondence (0.4).	1.2
12/31/24	Labovitz, M. Natasha	Sign off on firm-wide disclosure email (0.2); follow up re status of all conflict check items (0.1).	0.3
12/31/24	Worenklein, Elie J.	Review drafts of OCP and interim compensation motions from Cole Schotz (1.3); correspond with Debevoise team re Rule 2014 disclosures and connection check process (0.3); call with J. Park re same (0.2).	1.8
12/31/24	Park, Junho	Speak with E. Worenklein re disclosures (0.2); send email to S. Levinson and N. Labovitz re same (0.1).	0.3

Date	Timekeeper	Narrative	Hours
01/02/25	Worenklein, Elie J.	Comment on updated draft retention application (1.8); phone call with B. Mishkin re retention application and other workstreams (0.4); meet with J. Park re questions on retention application (0.2); draft email to N. Labovitz re Verita retention application (0.1); draft email to client re OCP retention motion (0.4); comment on draft OCP motion (0.5).	3.4
01/02/25	Heller, Rory	Update draft OCP motion.	3.1
01/02/25	Mishkin, Benjamin	Meet with J. Park re retention application (0.1); revise retention application (2.4); call with E. Worenklein re same (0.4).	2.9
01/02/25	Park, Junho	Meet with B. Mishkin re retention app (0.1); exchange emails with attorneys re disclosures (0.3); meet with E. Worenklein re disclosure status (0.2); correspond with BDO re interested parties (0.1).	0.7
01/03/25	Labovitz, M. Natasha	Review summary of proposed fee procedures and treatment of ordinary course professionals.	0.2
01/03/25	Worenklein, Elie J.	Correspond with CCA re OCP motion (0.3); phone call with C. Zhang [CCA], R. Heller, and F. Yudkin [Cole Schotz] re OCP motion (0.7); further update draft retention application (0.8).	1.8
01/03/25	Heller, Rory	Update draft of OCP Motion (1.6); participate in call re OCP motion with C. Zhang [CCA], F. Yudkin [Cole Schotz], and E. Worenklein (0.7); update draft of administrative fee motion (1.2).	3.5
01/03/25	Park, Junho	Email firm attorneys re disclosures (0.1); correspond with BDO team re interested parties list (0.2); conduct further conflicts checks (1.3); update E. Worenklein re disclosure responses (0.2).	1.8
01/04/25	Worenklein, Elie J.	Research precedent for interim compensation motion and mark up draft.	0.8
01/06/25	Labovitz, M. Natasha	Correspond with E. Worenklein and R. Heller re revisions to proposed fee procedures.	0.1
01/06/25	Worenklein, Elie J.	Meet with B. Mishkin re conflict check process (0.7); mark up OCP motion (0.9).	1.6
01/06/25	Mishkin, Benjamin	Meet with E. Worenklein re conflict checks for retention application (0.7); draft Wei declaration in support of retention application (2.3); check conflicts with lateral employees (0.3).	3.3
01/07/25	Worenklein, Elie J.	Review comments from Cole Schotz on BDO retention application (0.8); email with Cole Schotz re OCP updates from CCA (0.4); review draft Verita retention application (0.6); call with B. Mishkin re lateral employee conflicts (0.1); further revise draft Debevoise retention application (1.2); draft email to professionals re interested party list for application (0.2).	3.3
01/07/25	Mishkin, Benjamin	Check conflicts with lateral employees (3.0); call with J. Park re conflicts (0.3); call with E. Worenklein re conflict checks for lateral employees (0.1).	3.4



Date	Timekeeper	Narrative	Hours
01/07/25	Park, Junho	Correspond with E. Worenklein re retention application (0.3); update retention application (1.6); phone call with B. Mishkin re conflicts (0.3); further conflicts search and update E. Worenklein and B. Mishkin (0.2); further correspond with B. Mishkin re conflicts disclosure (0.2); send email to E. Worenklein re retention application schedules (0.3).	2.9
01/08/25	Worenklein, Elie J.	Review Cole Schotz retention application (0.4); further update Debevoise retention application (1.7); meet with J. Park re schedule 2 for retention application (0.3).	2.4
01/08/25	Mishkin, Benjamin	Check conflicts of lateral attorneys for retention application disclosures (1.6); update retention application to reflect changes (0.2).	1.8
01/08/25	Park, Junho	Correspond with B. Mishkin re disclosures (0.2); update conflict responses (1.8); correspond with E. Worenklein re case status and conflicts (0.3); check further names for conflicts (0.2); meet with E. Worenklein re retention schedules (0.3); draft retention application (1.8).	4.6
01/09/25	Labovitz, M. Natasha	Sign off on OCP and fee procedures motions (0.2); respond to questions from R. Heller re Cole Schotz retention application (0.2).	0.4
01/09/25	Worenklein, Elie J.	Mark up Cole Schotz retention application (0.7); phone call with R. Heller re Cole Schotz retention application (0.2); call with Cole Schotz re final comments to OCP and interim compensation motions (0.5); review final revisions re same (0.8).	2.2
01/09/25	Heller, Rory	Comment on Cole Schotz retention application (1.7); phone call with E. Worenklein re same (0.2).	1.9
01/09/25	Mishkin, Benjamin	Revise Debevoise retention application per comments from E. Worenklein.	2.7
01/09/25	Park, Junho	Update conflicts chart for retention application.	1.8
01/10/25	Heller, Rory	Circulate comments to Cole Schotz re retention application.	0.2
01/10/25	Mishkin, Benjamin	Review disclosure schedules for retention application (0.7); revise retention application re comments from E. Worenklein (0.4); email to N. Labovitz for review (0.1).	1.2
01/11/25	Labovitz, M. Natasha	Respond to question from A. Milliaressis [Cole Schotz] re Cole Schotz retention application.	0.2
01/11/25	Park, Junho	Begin drafting monthly fee statement (3.1); correspond with E. Worenklein, S. Koboci, and B. Mishkin re same (0.3).	3.4
01/12/25	Mishkin, Benjamin	Check disclosure schedules on retention application.	0.5
01/12/25	Park, Junho	Update draft retention schedules.	0.2
01/14/25	Labovitz, M. Natasha	Correspond with E. Worenklein re UST position on interim compensation order.	0.1
01/15/25	Heller, Rory	Review updated Cole Schotz retention application.	0.4
01/17/25	Mishkin, Benjamin	Phone call with J. Park re monthly fee statement.	0.1

Date	Timekeeper	Narrative	Hours
01/17/25	Park, Junho	Phone call with B. Mishkin re monthly fee statement (0.1); revise exhibit to monthly fee statement (0.5).	0.6
01/21/25	Labovitz, M. Natasha	Comment on Debevoise retention pleadings.	1.1
01/21/25	Worenklein, Elie J.	Revise retention application to incorporate comments from N. Labovitz (1.9); phone call with FGS re OCP motion and payment of invoices (0.3).	2.2
01/21/25	Mishkin, Benjamin	Phone call with J. Park re retention application (0.1); email E. Worenklein re retention application (0.2).	0.3
01/21/25	Park, Junho	Call with B. Mishkin re retention application (0.1); send update to chart re same (0.1); review corporate organization chart and D&O list for further disclosures (1.0).	1.2
01/22/25	Labovitz, M. Natasha	Review F. Yudkin [Cole Schotz] comments to Debevoise retention application.	0.2
01/22/25	Worenklein, Elie J.	Further revise draft retention application (1.2); incorporate comments from Cole Schotz re same (0.4).	1.6
01/23/25	Labovitz, M. Natasha	Correspond with E. Worenklein re revisions to Debevoise retention application.	0.2
01/23/25	Weisgerber, Erica S.	Revise Debevoise retention application (1.5); correspond with E. Worenklein re same (0.3).	1.8
01/23/25	Worenklein, Elie J.	Phone call with F. Yudkin [Cole Schotz] re retention questions (0.3); further revise draft retention application to incorporate comments (1.2); phone call with J. Park re retention application schedules (0.5); exchange emails with F. Yudkin [Cole Schotz] re filing retention applications (0.2).	2.2
01/23/25	Park, Junho	Phone call with E. Worenklein re retention application schedules (0.5); update schedule information on retention application (2.6); update exhibits to monthly fee statement (2.6).	5.7
01/24/25	Labovitz, M. Natasha	Correspond with E. Worenklein re filing of retention applications.	0.2
01/24/25	Worenklein, Elie J.	Email with B. Mishkin re final revisions to retention applications (0.5); phone call with C. Zhang [CCA] re comments to retention application (0.3); draft update email to F. Yudkin [Cole Schotz] re same (0.1).	0.9
01/24/25	Mishkin, Benjamin	Revise retention application per comments from E. Worenklein and N. Labovitz.	3.1
01/25/25	Worenklein, Elie J.	Review revised BDO and Verita applications from Cole Schotz.	0.4
01/27/25	Labovitz, M. Natasha	Final review of retention declaration filing package.	0.4
01/27/25	Worenklein, Elie J.	Comment on draft BDO and Cole Schotz retention applications (0.4); final review and comment on Debevoise retention application (0.5); email with Cole Schotz re filing retention applications (0.2).	1.1
01/27/25	Mishkin, Benjamin	Revise retention application (1.1); send retention application to Cole Schotz for filing (0.1).	1.2
01/27/25	Park, Junho	Update exhibit to monthly fee application (2.1); update retention application for filing (1.3).	3.4

Date	Timekeeper	Narrative	Hours
01/29/25	Heller, Rory	Draft response to UST questions re Debevoise retention application (1.3); speak with J. Park re UST retention questions (0.1).	1.4
01/29/25	Park, Junho	Correspond with B. Mishkin re UST request (0.2); search for documents re UST questions (0.6); meet with R. Heller re same (0.1).	0.9
01/30/25	Labovitz, M. Natasha	Comment on responses to UST questions re Debevoise fee disclosure (0.4); address question from B. Theisen [Gibbons] re same (0.2); coordinate with J. Park re timekeeping compliance (0.1).	0.7
01/30/25	Worenklein, Elie J.	Phone call with F. Yudkin [Cole Schotz] re pending retention applications (0.3); revise proposed answers to UST retention questions (0.7).	1.0
01/30/25	Heller, Rory	Update and revise responses to UST questions (2.9); phone call with J. Park re same (0.1).	3.0
01/30/25	Mishkin, Benjamin	Respond to R. Heller on question re conflicts for retention application.	0.2
01/30/25	Park, Junho	Update information for retention application response to US Trustee (1.3); correspond with R. Heller re response (0.1); exchange emails with E. Worenklein re same and timekeeping (0.3); further update US Trustee responses (0.9); phone call with R. Heller re same (0.1).	2.7
01/31/25	Labovitz, M. Natasha	Coordinate with M. Goodman re fee compliance question (0.1); draft response to question from B. Theisen [Gibbons] re retention declaration (0.2); correspond with R. Heller re responses to US Trustee questions (0.2); correspond with J. Park re matter numbers (0.1).	0.6
01/31/25	Weisgerber, Erica S.	Comment on responses to UST queries re retention application and disclosures.	0.4
01/31/25	Worenklein, Elie J.	Phone call with F. Yudkin [Cole Schotz] re fee applications.	0.2
01/31/25	Heller, Rory	Finalize responses to UST questions re retention (1.1); circulate same to UST (0.2).	1.3
01/31/25	Park, Junho	Revise additional exhibits for monthly fee statement.	3.2
<b>Total Hours</b>			<b>120.0</b>

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	0.3	2,317.50	695.25
	Labovitz, M. Natasha	6.2	2,317.50	14,368.50
	Levinson, Sidney P.	0.4	2,317.50	927.00
	Weisgerber, Erica S.	2.4	2,025.00	4,860.00
	Partner Total	9.3		\$20,850.75
Counsel	Worenklein, Elie J.	32.5	1,620.00	52,650.00
	Counsel Total	32.5		\$52,650.00
Associate	Heller, Rory	14.8	1,287.00	19,047.60
	Mishkin, Benjamin	22.2	801.00	17,782.20
	Associate Total	37.0		\$36,829.80
Legal Assistant	Park, Junho	41.2	522.00	21,506.40
	Legal Assistant Total	41.2		\$21,506.40
<b>Matter Total</b>		<b>120.0</b>		<b>\$131,836.95</b>



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486473

Client Matter 27188.1019

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FOR PROFESSIONAL SERVICES rendered during the period from December 22, 2024 through January 31, 2025  
in connection with MEETINGS & COMMUNICATIONS WITH CREDITORS

Fees	\$38,904.30
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$38,904.30</b>

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Date	Timekeeper	Narrative	Hours
12/26/24	Labovitz, M. Natasha	Review and consider reporting requests from BMLP (0.2); correspond with S. Levinson, E. Blum [BDO] and Y. Wei [CCA] re same (0.4).	0.6
12/27/24	Worenklein, Elie J.	Mark up draft stipulation from BMLP re sharing financial reporting (0.7); email with R. Heller re draft protective order (0.2).	0.9
12/30/24	Labovitz, M. Natasha	Correspond with B. Theisen [Gibbons] and E. Worenklein re reporting stipulation requested by BMLP.	0.2
12/31/24	Heller, Rory	Review precedent protective order for BMLP discovery.	0.5
01/02/25	Labovitz, M. Natasha	Correspond with E. Worenklein re substance and next steps in finalizing BMLP reporting stipulation.	0.3
01/03/25	Goodman, Mark P.	Email re negotiations with Gibbons (0.1); email with team re BMLP stipulation (0.2).	0.3
01/03/25	Labovitz, M. Natasha	Review draft cash outflows report prepared by BDO (0.2); correspond with E. Blum [BDO] re same (0.1); correspond with E. Worenklein re status of BMLP stipulation (0.2); coordinate response to question from client re BMLP counsel (0.2).	0.7
01/06/25	Labovitz, M. Natasha	Correspond with E. Worenklein re finalizing BMLP stipulation (0.3); address new requests from BMLP (0.2); correspond with E. Blum [BDO] re same (0.1); correspond with B. Theisen [Gibbons] re same (0.2); mark up draft protective order re BMLP discovery (1.7); phone call with Y. Wei [CCA] re BMLP reporting (0.4); draft response to client (0.2).	3.2
01/06/25	Worenklein, Elie J.	Email with Debevoise team re status of BMLP stipulation (0.3); draft email to Gibbons re markup of reporting stipulation (0.2); email with team re BMLP question from client (0.4).	0.9
01/06/25	Worenklein, Elie J.	Phone call with Y. Wei [CCA] re BMLP reporting (0.4); draft response to client (0.2).	0.9
01/07/25	Goodman, Mark P.	Email re negotiations re BMLP reporting stipulation (0.2); review diligence list from BMLP and email re same (0.2).	0.4
01/07/25	Labovitz, M. Natasha	Comment on BMLP's proposed revisions to stipulation (0.2); correspond with E. Worenklein and litigation team re same (0.2); further email exchange with E. Worenklein re negotiations for same (0.3); correspond with E. Blum [BDO] re connecting with B. Riley and responding to diligence requests (0.1); review and comment on new BMLP diligence and information request list (0.4); correspond with E. Blum [BDO] re same (0.1).	1.3
01/07/25	Worenklein, Elie J.	Comment on revisions to BMLP discovery stipulation (0.2); correspond with N. Labovitz re revisions to BMLP stipulation (0.5); phone call with B. Thiesen [Gibbons] re stipulation (0.4); phone call with E. Blum [BDO] re BMLP discovery requests (0.3); revise updated protective order for BMLP requests (0.4).	1.8
01/07/25	Heller, Rory	Draft protective order.	1.6
01/08/25	Labovitz, M. Natasha	Call with E. Blum [BDO] re B. Riley information requests (0.2); correspond with F. Yudkin [Cole Schotz] re committee formation process and timing (0.2); call with Y. Wei [CCA] re BMLP communications (0.2); follow up with E. Blum [BDO] re same (0.1).	0.7

Date	Timekeeper	Narrative	Hours
01/08/25	Heller, Rory	Review protective order.	0.1
01/09/25	Labovitz, M. Natasha	Correspond with E. Blum [BDO] re B. Riley meeting (0.2); call with E. Blum [BDO] re updates from same and path forward re information-sharing (0.5); correspond with E. Worenklein re follow-up to same (0.2); review open items in confidentiality stipulation and propose language to bridge same (0.3); coordinate response to questions from Y. Wei [CCA] re informal discovery (0.4).	1.6
01/09/25	Worenklein, Elie J.	Phone call with Y. Wei [CCA] re status of discovery (0.5); phone call with E. Blum [BDO] re recap of meeting with B. Riley (0.8).	1.3
01/09/25	Heller, Rory	Edit protective order.	2.2
01/13/25	Labovitz, M. Natasha	Correspond with F. Yudkin [Cole Schotz] re creditors' committee formation.	0.1
01/14/25	Goodman, Mark P.	Email re no creditors' committee.	0.1
01/14/25	Labovitz, M. Natasha	Correspond with F. Yudkin [Cole Schotz] and E. Worenklein re non-formation of creditors' committee.	0.1
01/16/25	Worenklein, Elie J.	Phone call with J. Schwarz [BDO] re weekly cash reporting (0.2); draft email to team re same (0.1).	0.3
01/17/25	Worenklein, Elie J.	Further phone call with J. Schwarz [BDO] re weekly cash reporting for BMLP.	0.4
01/31/25	Labovitz, M. Natasha	Review disbursements report.	0.2
<b>Total Hours</b>			<b>20.7</b>

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	0.8	2,317.50	1,854.00
	Labovitz, M. Natasha	9.0	2,317.50	20,857.50
	Partner Total	9.8		\$22,711.50
Counsel	Worenklein, Elie J.	6.5	1,620.00	10,530.00
	Counsel Total	6.5		\$10,530.00
Associate	Heller, Rory	4.4	1,287.00	5,662.80
	Associate Total	4.4		\$5,662.80
<b>Matter Total</b>		<b>20.7</b>		<b>\$38,904.30</b>





Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486562

Client Matter 27188.1020

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with NON-WORKING TRAVEL

Fees	\$1,620.00
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$1,620.00</b>

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27188.1020 – NON-WORKING TRAVEL

Invoice Number: 2486562

Date	Timekeeper	Narrative	Hours
01/29/25	Weisgerber, Erica S.	Travel to Newark for E. Abrams deposition (0.8); return travel to NY office (0.8).	1.6
Total Hours			1.6

27188.1020 – NON-WORKING TRAVEL

Invoice Number: 2486562

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Weisgerber, Erica S.	1.6	1,012.50	1,620.00
	Partner Total	1.6		\$1,620.00
<b>Matter Total</b>		<b>1.6</b>		<b>\$1,620.00</b>



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486472

Client Matter 27188.1022

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with RELIEF FROM STAY  
& ADEQUATE PROTECTION

Fees	\$54,888.30
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$54,888.30</b>

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Date	Timekeeper	Narrative	Hours
12/23/24	Goodman, Mark P.	Email E. Worenklein re lift stay hearing (0.1); call with N. Labovitz, E. Worenklein, R. Zipursky, A. Costin, R. Heller, and B. Mishkin re lifting stay motion (0.3).	0.4
12/23/24	Labovitz, M. Natasha	Correspond with M. Goodman, S. Levinson, and M. Davis re hearing commentary re lift-stay motion (0.3); zoom call with M. Goodman, E. Worenklein, R. Zipursky, A. Costin, R. Heller and B. Mishkin re same and path forward to negotiate with BMLP (0.3); follow-up correspondence with E. Worenklein and B. Theisen [Gibbons] re same (0.2).	0.8
12/23/24	Worenklein, Elie J.	Zoom call with M. Goodman, N. Labovitz, R. Zipursky, A. Costin, R. Heller and B. Mishkin re lift stay motion (0.3); exchange emails with counsel for BMLP re lift stay proposed order (0.3).	0.6
12/23/24	Costin, Alexander	Call with M. Goodman, N. Labovitz, R. Zipursky, E. Worenklein, R. Heller and B. Mishkin re lift-stay motion.	0.3
12/23/24	Heller, Rory	Participate in internal call with M. Goodman, N. Labovitz, R. Zipursky, E. Worenklein, A. Costin and B. Mishkin re lift-stay motion.	0.3
12/23/24	Mishkin, Benjamin	Participate in meeting with M. Goodman, N. Labovitz, R. Zipursky, E. Worenklein, R. Heller and A. Costin re lift stay motion.	0.3
12/23/24	Zipursky, Rebecca	Call with M. Goodman, N. Labovitz, A. Costin, E. Worenklein, R. Heller and B. Mishkin.	0.3
12/24/24	Goodman, Mark P.	Email with Debevoise team re resolving disputes relating to lift stay motion (0.1); review proposed order re lift stay (0.1).	0.2
12/24/24	Labovitz, M. Natasha	Participate in call with B. Theisen [Gibbons], R. Malone [Gibbons], E. Worenklein, and A. Costin re potential resolution of lift-stay motion (0.4); prepare for same (0.1); review and comment on proposed revisions to order to reflect discussion (0.2); correspond with E. Worenklein re same (0.2).	0.9
12/24/24	Worenklein, Elie J.	Draft email to team in advance of call with BMLP (0.2); revise draft stay proposed order (0.6); phone call with N. Labovitz, A. Costin, B. Theisen [Gibbons] and R. Malone [Gibbons] re revisions to proposed order (0.4); email with team re further revisions to proposed order (0.3).	1.5
12/24/24	Costin, Alexander	Call with N. Labovitz, E. Worenklein, R. Malone [Gibbons], and B. Theisen [Gibbons] re lift-stay motion.	0.4
12/24/24	Mishkin, Benjamin	Research relief from automatic stay.	0.6
12/24/24	Park, Junho	Correspond with E. Worenklein re proposed order re automatic stay relief and next steps.	0.4
12/25/24	Goodman, Mark P.	Email N. Labovitz and E. Worenklein re negotiations on lift stay motion.	0.2
12/25/24	Labovitz, M. Natasha	Correspond with E. Worenklein re possible resolution of lift-stay motion (0.2); correspond with E. Worenklein and M. Goodman re rules re legal standard for grant of interim relief (0.2).	0.4
12/25/24	Worenklein, Elie J.	Draft email to team re negotiations with BMLP.	0.3

Date	Timekeeper	Narrative	Hours
12/26/24	Goodman, Mark P.	Call with E. Worenklein re lift stay negotiations and next steps (0.2); call with N. Labovitz, E. Worenklein, R. Heller, B. Mishkin, M. Monaghan, and A. Costin re lift stay motion (0.6); email Debevoise team re negotiations with BMLP's counsel re lift stay motion and related issues (0.2); review BMLP's proposed revisions to draft order and email E. Worenklein re same (0.2); email N. Labovitz re financial reporting issue raised by BMLP (0.2).	1.4
12/26/24	Labovitz, M. Natasha	Correspond with E. Worenklein and M. Goodman re stay relief request (0.2); call with E. Worenklein, M. Goodman, M. Monaghan, R. Heller, B. Mishkin and A. Costin re same (0.6); correspond with E. Worenklein, M. Goodman and M. Monaghan re scope of requested relief (0.4); correspond with E. Worenklein re negotiations with Gibbons (0.1); begin outlining argument for potential contested hearing (0.8); address UST comment to lift-stay motion (0.1); correspond with E. Worenklein and F. Yudkin [Cole Schotz] re filing of debtors' version of revised order (0.2); analyze Gibbons' proposal for resolution (0.1); correspond with M. Goodman, E. Worenklein, S. Levinson and Y. Wei [CCA] re negotiation and resolution of matter (0.6); review further revised proposed order (0.2).	3.3
12/26/24	Levinson, Sidney P.	Exchange emails re relief from stay stipulation.	0.2
12/26/24	Monaghan, Maura Kathleen	Call with N. Labovitz, E. Worenklein, R. Heller, B. Mishkin, M. Goodman, and A. Costin re lift stay motion (0.6); exchange emails with Debevoise team re same (0.8).	1.4
12/26/24	Worenklein, Elie J.	Phone call with M. Goodman re stay relief order (0.2); participate in internal team call with N. Labovitz, M. Monaghan, M. Goodman, R. Heller, A. Costin and B. Mishkin re stay proposed order (0.6); email with counsel for BMLP re revisions to proposed order (0.2); email exchange with F. Yudkin [Cole Schotz] re same (0.2); review prior research re lift stay (0.9); phone call with R. Heller re research for lift stay hearing (0.3); phone call with BDO re BMLP requests (0.2); review BMLP comments to proposed order and stipulation (0.4); draft email recommendation to CCA re stay relief (0.5); draft notice of further revised proposed order (0.4); emails with team re BMLP's proposed stipulation (0.8); phone call with F. Yudkin [Cole Schotz] re revisions to the order (0.3); phone call with Y. Wei [CCA] re revisions to proposed order and resolution with BMLP (0.5); phone calls with E. Blum [BDO] re BMLP's stipulation for reporting (0.7); emails with Cole Schotz re status of stay relief negotiations and December 27 hearing (0.5).	6.7
12/26/24	Costin, Alexander	Call with N. Labovitz, E. Worenklein, R. Heller, B. Mishkin, M. Goodman, and M. Monaghan re lift-stay motion.	0.6
12/26/24	Heller, Rory	Call with N. Labovitz, E. Worenklein, B. Mishkin, M. Goodman, M. Monaghan, and A. Costin re relief from automatic stay (0.6); phone call with E. Worenklein re relief from automatic stay hearing (0.3); research notice provision of order granting relief from automatic stay (0.2).	1.1

Date	Timekeeper	Narrative	Hours
12/26/24	Mishkin, Benjamin	Attend meeting with N. Labovitz, E. Worenklein, R. Heller, A. Costin, M. Goodman, and M. Monaghan re relief from stay motion (0.6); update research on relief from automatic stay (1.8).	2.4
12/27/24	Goodman, Mark P.	Email N. Labovitz and E. Worenklein re order lifting stay.	0.2
12/27/24	Labovitz, M. Natasha	Review BMLP reservation of rights (0.2); correspond with E. Worenklein and M. Goodman re same (0.2); correspond with J. Park re revised reservation of rights (0.1).	0.5
12/27/24	Worenklein, Elie J.	Further review BMLP response to stay relief (0.5); email with J. Park re BMLP responses (0.2); email with litigation team re filing stay order with First Department (0.3).	1.0
12/27/24	Heller, Rory	Review BMLP's response to stay relief.	0.7
12/27/24	Park, Junho	Send summary and redlines of BMLP's reservation of rights statement to relief from automatic stay to Debevoise team (0.4); send case background information re lift stay motion to M. Goodman (0.5).	0.9
12/28/24	Labovitz, M. Natasha	Correspond with M. Goodman re timing of briefing (0.1); call with M. Goodman and M. Sirota [Cole Schotz] re same (0.1); update Debevoise working team re same (0.1); follow up with M. Davis re same (0.1).	0.4
12/30/24	Labovitz, M. Natasha	Review notice of filing for lift-stay order in Appellate Division action (0.2); correspond with S. Levinson re same (0.1).	0.3
12/30/24	Levinson, Sidney P.	Exchange emails with N. Labovitz re bankruptcy questions relating to appeal filing.	0.2
01/02/25	Labovitz, M. Natasha	Correspond with A. Costin re update on scheduling preference motion (0.1); review appellate brief to ensure that chapter 11 and appellate arguments are coordinated (0.5).	0.6
01/03/25	Mishkin, Benjamin	Update research memo on lift stay motion per comments from E. Worenklein.	1.8
01/06/25	Mishkin, Benjamin	Revise automatic stay relief research per comments from E. Worenklein.	1.7
01/13/25	Labovitz, M. Natasha	Correspond with M. Davis and R. Zipursky re likely dates for oral argument in appeal.	0.2
01/31/25	Worenklein, Elie J.	Comment on stay relief motion filed by Plaza Florida.	0.4
<b>Total Hours</b>			<b>33.9</b>

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	2.4	2,317.50	5,562.00
	Labovitz, M. Natasha	7.4	2,317.50	17,149.50
	Levinson, Sidney P.	0.4	2,317.50	927.00
	Monaghan, Maura Kathleen	1.4	2,317.50	3,244.50
	Partner Total	11.6		\$26,883.00
Counsel	Worenklein, Elie J.	10.5	1,620.00	17,010.00
	Counsel Total	10.5		\$17,010.00
Associate	Costin, Alexander	1.3	1,354.50	1,760.85
	Zipursky, Rebecca	0.3	1,354.50	406.35
	Heller, Rory	2.1	1,287.00	2,702.70
	Mishkin, Benjamin	6.8	801.00	5,446.80
	Associate Total	10.5		\$10,316.70
Legal Assistant	Park, Junho	1.3	522.00	678.60
	Legal Assistant Total	1.3		\$678.60
<b>Matter Total</b>		<b>33.9</b>		<b>\$54,888.30</b>





Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

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April 30, 2025

Chenyue Zhang  
CCA Construction, Inc.  
445 South Street  
Suite 310  
Morristown, NJ 07960

Invoice #: 2486564

Client Matter 27188.1024

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FOR PROFESSIONAL SERVICES rendered through January 31, 2025 in connection with REPORTING

Fees	\$33,300.00
Charges and Disbursements	\$0.00
<b>TOTAL</b>	<b>\$33,300.00</b>

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Date	Timekeeper	Narrative	Hours
12/27/24	Labovitz, M. Natasha	Coordinate with E. Worenklein re date for IDI.	0.1
12/27/24	Park, Junho	Circulate 341 meeting update (0.1); circulate IDI updates to group (0.3).	0.4
12/29/24	Worenklein, Elie J.	Correspond with J. Park re critical dates for postpetition reporting obligations.	0.3
01/02/25	Worenklein, Elie J.	Phone call with F. Yudkin [Cole Schotz] re schedules and SOFA preparations.	0.3
01/03/25	Labovitz, M. Natasha	Correspond with J. Schwarz [BDO] and E. Worenklein re scheduling of 341 meeting and IDI (0.1); correspond with S. Koboci and E. Worenklein re coordination with BDO and Cole Schotz on schedules and SOFAs (0.2).	0.3
01/03/25	Worenklein, Elie J.	Phone call with S. Koboci re schedules and MOR workstreams (0.3); phone call with J. Schwarz [BDO] re first day payments and reporting obligations (0.8); correspond with E. Blum [BDO] re first day order payments (0.2); emails with Debevoise team re updates on schedules and MOR workstreams (0.3).	1.6
01/03/25	Koboci, Shefit	Call with J. Schwarz [BDO] re schedules and SOFA reporting (0.2); call with E. Worenklein re schedules and SOFA reporting (0.3); correspond with Debevoise internal team re schedules and SOFA update (0.3).	0.8
01/08/25	Koboci, Shefit	Review IDI request submission to US Trustee.	0.8
01/09/25	Koboci, Shefit	Call with BDO, Verita and Cole Schotz teams re schedules and SOFA.	0.4
01/13/25	Koboci, Shefit	Correspond with E. Worenklein re schedules and SOFA (0.4); review re same (1.3).	1.7
01/15/25	Heller, Rory	Organize schedules and SOFA documents.	0.6
01/16/25	Goodman, Mark P.	Review revised schedules and SOFA.	0.3
01/16/25	Koboci, Shefit	Review revised schedules and SOFA prepared by BDO.	0.8
01/19/25	Labovitz, M. Natasha	Correspond with E. Worenklein re preparation for IDI.	0.2
01/20/25	Worenklein, Elie J.	Email exchange with F. Yudkin [Cole Schotz] and CCA re UST IDI meeting.	0.3
01/21/25	Labovitz, M. Natasha	Confirm status of preparation for initial debtor interview (0.1).	0.1
01/22/25	Worenklein, Elie J.	Participate in zoom call with CCA, BDO team and F. Yudkin [Cole Schotz] re IDI meeting with UST (0.6); call with S. Koboci re same (0.3); phone call with E. Blum [BDO] re preparation for UST meeting (0.6); participate in zoom meeting with F. Yudkin [Cole Schotz] and E. Blum [BDO] re prep for UST IDI (0.8); phone call with F. Yudkin [Cole Schotz] re IDI topics (0.3); correspond with E. Blum [BDO] and Cole Schotz team re UST IDI (0.3).	2.9
01/22/25	Koboci, Shefit	Participate in zoom call with CCA, BDO team and F. Yudkin [Cole Schotz] re IDI meeting with UST (0.6); call with E. Worenklein re same (0.3).	0.9

27188.1024 – REPORTING

Invoice Number: 2486564

Date	Timekeeper	Narrative	Hours
01/23/25	Worenklein, Elie J.	Phone call with Y. Wei [CCA] re prep for UST IDI (0.2); phone call with BDO team re questions on schedules and SOFAs (0.3); participate in IDI with UST and CCA (0.6); draft recap of IDI for team (0.4).	1.5
01/24/25	Labovitz, M. Natasha	Correspond with BDO team re schedules and statements.	0.2
01/26/25	Labovitz, M. Natasha	Respond to questions from E. Worenklein re schedules and statements.	0.2
01/26/25	Worenklein, Elie J.	Comment on current draft schedules and SOFA.	1.8
01/27/25	Labovitz, M. Natasha	Correspond with J. Schwarz [BDO] and E. Worenklein re closing off questions on schedules and statements (0.2); phone call with E. Worenklein re same (0.2).	0.4
01/27/25	Worenklein, Elie J.	Phone call with F. Yudkin [Cole Schotz] re revisions to schedules (0.4); correspond with BDO team re comments to draft schedules (0.4); phone call with BDO team re final drafts of schedules (0.3); phone call with N. Labovitz re schedules and other workstreams (0.2); coordinate with M. Goodman re final schedule questions (0.4); phone call with Y. Wei [CCA] and C. Zhang [CCA] re finalizing schedules (0.5); participate in zoom call with CCA, BDO team and F. Yudkin [Cole Schotz] re comments to schedules (1.1); review final revisions to schedules (0.4).	3.7
01/30/25	Worenklein, Elie J.	Phone call with BDO team re Rule 2015.3 reports.	0.7
01/31/25	Worenklein, Elie J.	Phone call with BDO team re weekly cash reporting.	0.3
<b>Total Hours</b>			<b>21.6</b>

27188.1024 – REPORTING

Invoice Number: 2486564

**TIMEKEEPER SUMMARY**

<b>Title</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Partner	Goodman, Mark P.	0.3	2,317.50	695.25
	Labovitz, M. Natasha	1.5	2,317.50	3,476.25
	Partner Total	1.8		\$4,171.50
Counsel	Worenklein, Elie J.	13.4	1,620.00	21,708.00
	Counsel Total	13.4		\$21,708.00
Associate	Heller, Rory	0.6	1,287.00	772.20
	Koboci, Shefit	5.4	1,192.50	6,439.50
	Associate Total	6.0		\$7,211.70
Legal Assistant	Park, Junho	0.4	522.00	208.80
	Legal Assistant Total	0.4		\$208.80
<b>Matter Total</b>		<b>21.6</b>		<b>\$33,300.00</b>

**Description of Disbursements for the Compensation Period**

<b>Date</b>	<b>Timekeeper</b>	<b>Disbursement Category</b>	<b>Narrative</b>	<b>Amount</b>
12/23/2024	Burgos, Luis A.	In-House Reproduction	Duplicating Services	\$203.00
12/23/2024	Worenklein, Elie J.	Travel	Vendor: Concord Limousine 1, LLC; Invoice#: 176055; Date: 12/27/2024 - Taxi Invoice for Concord - 176055 - Taxi: 10375 - 12/23/2024: - 1116710	\$83.23
12/23/2024	Worenklein, Elie J.	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-23; Date: 12/29/2024- Mr. Broadway Kosher Restaurant 12/23/23-780728402440003- Elie Worenklein	\$39.16
12/24/2024	Precost-New York, D&P	Outside Research	Vendor: Pacer Service Center-PACER; Invoice#: DLDL0349DEC2024; Date: 12/1/2024 - Pacer	\$0.60
12/26/2024	Heller, Rory	Computer Assisted Legal Research	Lexis Services	\$107.79
12/26/2024	Heller, Rory	Computer Assisted Legal Research	Lexis Services	\$206.86
12/26/2024	Park, Junho	Court Reporting	Vendor: Park, Junho Invoice#: 7145070501040602 Date: 1/4/2025 - CCA FD Transcript - ;Transcript Fees;12/26/2024;First Day Hearing Transcript	\$474.50
12/26/2024	Precost-New York, D&P	Computer Assisted Legal Research	Lexis Services	\$103.43
12/29/2024	Precost-New York, D&P	Outside Research	Vendor: Pacer Service Center-PACER; Invoice#: DLDL0349DEC2024; Date: 12/1/2024 - Pacer	\$0.70
12/31/2024	Precost-New York, D&P	Computer Assisted Legal Research	Lexis Services	\$103.43
1/2/2025	Weisgerber, Erica S.	Delivery Services/Federal Express	Vendor: DialCar, Inc.; Invoice#: 68005; Date: 1/8/2025 - Taxi Invoice for Dial - 68005 - Taxi: 04794 - 1/2/2025: - 1116815	\$48.07

Date	Timekeeper	Disbursement Category	Narrative	Amount
1/6/2025	Worenklein, Elie J.	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-25; Date: 1/12/2025- Pitopia 1/6/25- 082928540450864- Elie Worenklein	\$32.98
1/7/2025	Mishkin, Benjamin	Travel	Vendor: Mishkin, Benjamin A. Invoice#: 7162977701200605 Date: 1/20/2025 - 1/7 Lyft - ;Taxi;01/07/2025	\$27.84
1/9/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$19.14
1/9/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$63.63
1/9/2025	Mishkin, Benjamin	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-25; Date: 1/12/2025- Dim Sum Chelsea 1/9/25- 461828588428789- Benjamin Mishkin	\$27.55
1/9/2025	Worenklein, Elie J.	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-25; Date: 1/12/2025- Mr. Broadway Kosher Restaurant 1/9/25-341428587977556- Elie Worenklein	\$39.82
1/10/2025	Mishkin, Benjamin	Travel	Vendor: Mishkin, Benjamin A. Invoice#: 7170429401220605 Date: 1/22/2025 - 1/10 Lyft home - ;Taxi;01/10/2025	\$28.49
1/10/2025	Weisgerber, Erica S.	Travel	Vendor: Erica Weisgerber (#4794) Invoice#: 7167790401200605 Date: 1/20/2025 - Uber: January 10 - ;Taxi;01/10/2025	\$50.57
1/10/2025	Worenklein, Elie J.	Travel	Vendor: DialCar, Inc.; Invoice#: 68245; Date: 1/15/2025 - Taxi Invoice for Dial - 68245 - Taxi: 10375 - 1/10/2025: - 1117184	\$84.07
1/15/2025	Park, Junho	Working Meals	Vendor: Park, Junho Invoice#: 7183723901290607 Date:	\$38.61

Date	Timekeeper	Disbursement Category	Narrative	Amount
			1/29/2025;Night/Weekend Working Meals;01/15/2025	
1/15/2025	Park, Junho	Travel	Vendor: Park, Junho Invoice#: 7183723901290607 Date: 1/29/2025;Taxi;01/15/2025	\$75.29
1/15/2025	Worenklein, Elie J.	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-26; Date: 1/19/2025- Mr. Broadway Kosher Restaurant 1/15/25-943128649739497- Elie Worenklein	\$37.77
1/16/2025	Davis, Morgan A.	Travel	Vendor: DialCar, Inc.; Invoice#: 68376; Date: 1/22/2025 - Taxi Invoice for Dial - 68376 - Taxi: 10018 - 1/16/2025: - 1117441	\$61.76
1/16/2025	Weisgerber, Erica S.	Travel	Vendor: Erica Weisgerber (#4794) Invoice#: 7177632001280604 Date: 1/28/2025 - Uber: 1/16 - ;Taxi;01/16/2025;Uber	\$38.35
1/16/2025	Worenklein, Elie J.	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-26; Date: 1/19/2025- Kosher Deluxe Restaurant 1/16/25-023028645809525- Elie Worenklein	\$46.26
1/17/2025	Worenklein, Elie J.	Travel	Vendor: DialCar, Inc.; Invoice#: 68376; Date: 1/22/2025 - Taxi Invoice for Dial - 68376 - Taxi: 10375 - 1/17/2025: - 1117455	\$84.07
1/19/2025	Davis, Morgan A.	Computer Assisted Legal Research	Westlaw	\$63.63
1/19/2025	Weisgerber, Erica S.	Computer Assisted Legal Research	Westlaw	\$127.26
1/21/2025	Costin, Alexander	Travel	Vendor: Uber Technologies, Inc; Invoice#: UBER_NONTRAVEL_1/1/2025; Date: 1/1/2025 - Uber	\$21.94
1/21/2025	Davis, Morgan A.	Travel	Vendor: Plush Services Corp.; Invoice#: 1032025; Date: 1/27/2025 - Taxi Invoice for	\$71.77

Date	Timekeeper	Disbursement Category	Narrative	Amount
			Plush Services - 1032025 - Taxi: 10018 - 1/21/2025: - 1117545	
1/21/2025	Park, Junho	Working Meals	Vendor: Park, Junho Invoice#: 7183725501290607 Date: 1/29/2025;Night/Weekend Working Meals;01/21/2025	\$22.70
1/21/2025	Park, Junho	Travel	Vendor: Park, Junho Invoice#: 7183725501290607 Date: 1/29/2025;Taxi;01/21/2025	\$32.77
1/21/2025	Weisgerber, Erica S.	Travel	Vendor: Erica Weisgerber (#4794) Invoice#: 7184623801300602 Date: 1/30/2025 - Uber: January 21 - ;Taxi;01/21/2025;Uber home	\$49.28
1/21/2025	Worenklein, Elie J.	Travel	Vendor: Concord Limousine 1, LLC; Invoice#: 176444; Date: 1/24/2025 - Taxi Invoice for Concord - 176444 - Taxi: 10375 - 1/21/2025: - 1117548	\$84.07
1/21/2025	Worenklein, Elie J.	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-27; Date: 1/26/2025- Mr. Broadway Kosher Restaurant 1/21/25-543228692837808- Elie Worenklein	\$39.82
1/22/2025	Costin, Alexander	Travel	Vendor: Uber Technologies, Inc; Invoice#: UBER_NONTRAVEL_1/1/2025; Date: 1/1/2025 - Uber	\$25.85
1/22/2025	Costin, Alexander	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-27; Date: 1/26/2025- Patiala Indian Grill 1/22/25- 592628700491625- Alexander Costin	\$40.00
1/22/2025	Maass, Molly Baltimore	Travel	Vendor: Maass, Molly (#10484) (former Baltimor Invoice#: 7189727002020603 Date: 2/2/2025 - Lyft: January 22 & 23 - ;Taxi;01/22/2025;Car home	\$50.17
1/22/2025	Zipursky, Rebecca	Travel	Vendor: Concord Limousine 1, LLC; Invoice#: 176444; Date: 1/24/2025 - Taxi Invoice for	\$69.53



Date	Timekeeper	Disbursement Category	Narrative	Amount
			Concord - 176444 - Taxi: 11536 - 1/22/2025: - 1117614	
1/22/2025	Zipursky, Rebecca	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-27; Date: 1/26/2025- Shang Hai Joe's House 01/22/25- 971428700255300- Rebecca Zipursky	\$38.88
1/23/2025	Davis, Morgan A.	Travel	Vendor: Concord Limousine 1, LLC; Invoice#: 176444; Date: 1/24/2025 - Taxi Invoice for Concord - 176444 - Taxi: 10018 - 1/23/2025: - 1117672	\$61.76
1/23/2025	Hu, Yanping	Travel	Vendor: Plush Services Corp.; Invoice#: 1032025; Date: 1/27/2025 - Taxi Invoice for Plush Services - 1032025 - Taxi: 07833 - 1/23/2025: - 1117677	\$71.12
1/23/2025	Maass, Molly Baltimore	Travel	Vendor: Maass, Molly (#10484) (former Baltimor Invoice#: 7189727002020603 Date: 2/2/2025: January 22 & 23 - ;Taxi;01/23/2025	\$50.32
1/23/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Lexis Services	\$215.57
1/23/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Lexis Services	\$413.73
1/23/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$27.67
1/23/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$84.38
1/23/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$318.15
1/23/2025	Mishkin, Benjamin	Working Meals	Vendor: GrubHub Holding Inc dba Seamless; Invoice#: N2REGB-27; Date: 1/26/2025- Chipotle 1/23/25- 494128720965209- Benjamin Mishkin	\$21.61

Date	Timekeeper	Disbursement Category	Narrative	Amount
1/23/2025	Park, Junho	Working Meals	Vendor: Park, Junho Invoice#: 7206614502100607 Date: 2/10/2025; Night/Weekend Working Meals; 01/23/2025	\$39.28
1/24/2025	Davis, Morgan A.	Filing Fees	Vendor: Clerk, USDC, District of New Jersey; Invoice#: 01/24/25-MAD; Date: 1/24/2025 - Morgan A. Davis	\$250.00
1/24/2025	Davis, Morgan A.	Filing Fees	Vendor: NJ Lawyers' Fund for Client Protection/N; Invoice#: 01/24/25-MAD; Date: 1/24/2025 - MORGAN A. DAVIS	\$267.00
1/24/2025	Goodman, Mark P.	Filing Fees	Vendor: Clerk, USDC, District of New Jersey; Invoice#: 01/24/25-MPG; Date: 1/24/2025 - Mark P. Goodman	\$250.00
1/24/2025	Goodman, Mark P.	Filing Fees	Vendor: NJ Lawyers' Fund for Client Protection/N; Invoice#: 01/24/25-MPG; Date: 1/24/2025 - MARK P. GOODMAN	\$267.00
1/24/2025	Heller, Rory	Filing Fees	Vendor: Clerk, USDC, District of New Jersey; Invoice#: 01/24/25-RH; Date: 1/24/2025 - Rory Heller	\$250.00
1/24/2025	Heller, Rory	Filing Fees	Vendor: NJ Lawyers' Fund for Client Protection/N; Invoice#: 01/24/25-RH; Date: 1/24/2025 - RORY HELLER	\$267.00
1/24/2025	Koboci, Shefit	Filing Fees	Vendor: Clerk, USDC, District of New Jersey; Invoice#: 01/24/25-SK; Date: 1/24/2025 - Shefit Koboci	\$250.00
1/24/2025	Koboci, Shefit	Filing Fees	Vendor: NJ Lawyers' Fund for Client Protection/N; Invoice#: 01/24/25-SK; Date: 1/24/2025 - SHEFIT KOBOCI	\$267.00
1/24/2025	Labovitz, M. Natasha	Filing Fees	Vendor: Clerk, USDC, District of New Jersey; Invoice#: 01/24/25-MNL; Date: 1/24/2025 - M. Natasha Labovitz	\$250.00
1/24/2025	Labovitz, M. Natasha	Filing Fees	Vendor: NJ Lawyers' Fund for Client Protection/N; Invoice#: 01/24/25-N.ML; Date: 1/24/2025 - M. NATASHA LABOVITZ	\$267.00

Date	Timekeeper	Disbursement Category	Narrative	Amount
1/24/2025	Levinson, Sidney P.	Filing Fees	Vendor: Clerk, USDC, District of New Jersey; Invoice#: 01/24/25-SPL; Date: 1/24/2025 - Sidney P. Levinson	\$250.00
1/24/2025	Levinson, Sidney P.	Filing Fees	Vendor: NJ Lawyers' Fund for Client Protection/N; Invoice#: 01/24/25-SPL; Date: 1/24/2025 - SIDNEY P. LEVINSON	\$267.00
1/24/2025	Mishkin, Benjamin	Travel	Vendor: Mishkin, Benjamin A. Invoice#: 7192692202050605 Date: 2/5/2025 - 1/24 car home - ;Taxi;01/24/2025	\$27.79
1/24/2025	Weisgerber, Erica S.	Filing Fees	Vendor: Clerk, USDC, District of New Jersey; Invoice#: 01/24/25-ESW; Date: 1/24/2025 - Erica S. Weisgerber	\$250.00
1/24/2025	Weisgerber, Erica S.	Filing Fees	Vendor: NJ Lawyers' Fund for Client Protection/N; Invoice#: 01/24/25-ESW; Date: 1/24/2025 - ERICA S. WEISGERBER	\$267.00
1/25/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Lexis Services	\$413.73
1/25/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$318.15
1/26/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$64.55
1/26/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$127.26
1/27/2025	Costin, Alexander	Travel	Vendor: Concord Limousine 1, LLC; Invoice#: 176552; Date: 1/31/2025 - Taxi Invoice for Concord - 176552 - Taxi: 13205 - 1/27/2025: - 1117789	\$41.63
1/27/2025	Davis, Morgan A.	Travel	Vendor: Concord Limousine 1, LLC; Invoice#: 176552; Date: 1/31/2025 - Taxi Invoice for Concord - 176552 - Taxi: 10018 - 1/27/2025: - 1117790	\$61.76

Date	Timekeeper	Disbursement Category	Narrative	Amount
1/27/2025	Kirschenbaum, Deven	Computer Assisted Legal Research	Westlaw	\$168.76
1/27/2025	Mishkin, Benjamin	Travel	Vendor: Mishkin, Benjamin A. Invoice#: 7206711802110602 Date: 2/11/2025;Taxi;01/27/2025	\$31.26
1/27/2025	Park, Junho	Delivery Services/Federal Express	Vendor: FedEx (Federal Express) FEDEX-Fedex; Invoice#: 8-756-86431; Date: 1/31/2025 - 1/27/2025 - C KYC - Junho Park - Pro Hac Vice Admissions - 284809102757	\$41.01
1/27/2025	Park, Junho	Working Meals	Vendor: Park, Junho Invoice#: 7206614502100607 Date: 2/10/2025;Night/Weekend Working Meals;01/27/2025	\$40.00
1/27/2025	Park, Junho	Travel	Vendor: Park, Junho Invoice#: 7206614502100607 Date: 2/10/2025;Taxi;01/27/2025	\$78.29
1/27/2025	Precost-New York, D&P	In-House Reproduction	Duplicating Services	\$447.00
1/27/2025	Weisgerber, Erica S.	Travel	Vendor: Erica Weisgerber (#4794) Invoice#: 7196453302060606 Date: 2/6/2025: January 27 - ;Taxi;01/27/2025	\$41.88
1/28/2025	Burgos, Luis A.	In-House Reproduction	Duplicating Services	\$378.00
1/28/2025	Edwards, Albert	In-House Reproduction	Duplicating Services	\$258.40
1/28/2025	Park, Junho	Working Meals	Vendor: Park, Junho Invoice#: 7206614502100607 Date: 2/10/2025;Night/Weekend Working Meals;01/28/2025	\$39.89
1/28/2025	Park, Junho	Travel	Vendor: Park, Junho Invoice#: 7206614502100607 Date: 2/10/2025;Taxi;01/28/2025	\$60.89
1/28/2025	Precost-New York, D&P	In-House Reproduction	Duplicating Services	\$138.50
1/28/2025	Weisgerber, Erica S.	Travel	Vendor: Erica Weisgerber (#4794) Invoice#: 7198285102070601 Date: 2/7/2025: January 28 - ;Taxi;01/28/2025	\$50.63

Date	Timekeeper	Disbursement Category	Narrative	Amount
1/29/2025	Davis, Morgan A.	Travel	Vendor: Uber Technologies, Inc; Invoice#: UBER_NONTRAVEL_1/1/2025; Date: 1/1/2025 - Uber	\$81.37
1/29/2025	El-Cid, Fabienne J.	Working Meals	Vendor: El-Cid, Fabienne J. Invoice#: 7202232702080605 Date: 2/8/2025;Night/Weekend Working Meals;01/29/2025	\$40.00
1/29/2025	El-Cid, Fabienne J.	Travel	Vendor: El-Cid, Fabienne J. Invoice#: 7202232702080605 Date: 2/8/2025;Taxi;01/29/2025	\$57.79
1/29/2025	Godbe, Michael C.	Working Meals	Vendor: Godbe, Michael C. Invoice#: 7200881402070601 Date: 2/7/2025;Night/Weekend Working Meals;01/29/2025	\$32.64
1/29/2025	Godbe, Michael C.	Travel	Vendor: Uber Technologies, Inc; Invoice#: UBER_NONTRAVEL_1/1/2025; Date: 1/1/2025 - Uber	\$55.32
1/29/2025	Heller, Rory	Working Meals	Vendor: Rory B. Heller (#11934) Invoice#: 7201753502080605 Date: 2/8/2025;Night/Weekend Working Meals;01/29/2025	\$37.53
1/29/2025	Heller, Rory	Travel	Vendor: Rory B. Heller (#11934) Invoice#: 7201753502080605 Date: 2/8/2025;Taxi;01/29/2025	\$22.45
1/29/2025	Maass, Molly Baltimore	Travel	Vendor: DialCar, Inc.; Invoice#: 68759; Date: 2/5/2025 - Taxi Invoice for Dial - 68759 - Taxi: 10484 - 1/29/2025: - 1117822	\$197.56
1/29/2025	Park, Junho	Working Meals	Vendor: Park, Junho Invoice#: 7206614502100607 Date: 2/10/2025;Night/Weekend Working Meals;01/29/2025	\$40.00
1/29/2025	Park, Junho	Travel	Vendor: Concord Limousine 1, LLC; Invoice#: 176552; Date: 1/31/2025 - Taxi Invoice for Concord - 176552 - Taxi: 12919 - 1/29/2025: - 1117916	\$106.22
1/30/2025	Park, Junho	Delivery Services/Federal Express	Vendor: FedEx (Federal Express) FEDEX-Fedex; Invoice#: 8-763-63799; Date: 2/7/2025 - 1/30/2025 - D BLISZCZ - Junho Park - NJ PHV - 284921912352	\$41.01

Date	Timekeeper	Disbursement Category	Narrative	Amount
1/30/2025	Park, Junho	Working Meals	Vendor: Park, Junho Invoice#: 7206623802100607 Date: 2/10/2025;Night/Weekend Working Meals;01/30/2025;CCA matters	\$40.00
1/30/2025	Park, Junho	Travel	Vendor: Park, Junho Invoice#: 7206623802100607 Date: 2/10/2025;Taxi;01/30/2025	\$78.84
1/30/2025	Park, Junho	Outside Research	Courtlink Services	\$0.59
1/30/2025	Park, Junho	Outside Research	Courtlink Services	\$25.08
1/30/2025	Zipursky, Rebecca	Travel	Vendor: Uber Technologies, Inc; Invoice#: UBER_NONTRAVEL_1/1/2025; Date: 1/1/2025 - Uber	\$64.10
1/31/2025	Mishkin, Benjamin	Computer Assisted Legal Research	Westlaw	\$63.63
1/31/2025	Weisgerber, Erica S.	Travel	Vendor: Erica Weisgerber (#4794) Invoice#: 7213090602110602 Date: 2/11/2025;Taxi;01/31/2025	\$49.23