

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET**

IN RE: CCA Construction, Inc. APPLICANT: Duane Morris LLP

CASE NO.: 24-22548 (CMG) CLIENT: Special Committee of Independent Directors

CHAPTER: 11 CASES FILED: December 22, 2024

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

RETENTION ORDER(S) ATTACHED

SECTION 1
FEE SUMMARY

MONTHLY FEE STATEMENT NO. 1
(April 9, 2025 to May 31, 2025)¹

| | <u>FEES</u> | <u>EXPENSES</u> |
|--------------------------------|-------------|-----------------|
| TOTAL PREVIOUS FEE REQUESTED | \$ <u>0</u> | \$ <u>0</u> |
| TOTAL FEES ALLOWED TO DATE: | \$ <u>0</u> | \$ <u>0</u> |
| TOTAL RETAINER (IF APPLICABLE) | \$ <u>0</u> | \$ <u>0</u> |
| TOTAL HOLDBACK (IF APPLICABLE) | \$ <u>0</u> | \$ <u>0</u> |
| TOTAL RECEIVED BY APPLICANT | \$ <u>0</u> | \$ <u>0</u> |

| NAME OF PROFESSIONAL & TITLE | YEAR ADMITTED (OR YEARS OF PROFESSIONAL SERVICE) | HOURS | RATE | FEE |
|-------------------------------|--|-------|------------|-------------|
| CCA Construction, Inc. | | | | |
| 1. Morris S. Bauer | 1989(NY)/1990(NJ) | 46.70 | \$1,010.00 | \$47,167.00 |
| 2. Geoff Heaton | 2000 (CA) | 7.50 | \$1,010.00 | \$7,575.00 |
| TOTALS | | 54.20 | | \$54,742.00 |

| | |
|-------------------------------|--------------------|
| FEE TOTALS – PAGE 2 | <u>\$54,742.00</u> |
| DISBURSEMENTS TOTALS – PAGE 3 | <u>573.10</u> |
| TOTAL FEE APPLICATION | <u>\$55,315.10</u> |
| | |
| TOTAL FEE REQUEST (80%) | <u>\$43,793.60</u> |
| TOTAL DISBURSEMENTS REQUEST | <u>573.10</u> |
| TOTAL REQUEST THIS STATEMENT | <u>\$44,366.70</u> |

¹ The subject monthly fee statement contains just short of two months period of time because the retention order for Duane Morris LLP (the “DM Firm”) was not entered until May 28, 2025, a date that was past the deadline for filing the monthly fee statement for the month of April 2025. The DM Firm will incorporate the fee information for the month of April 2025 in the DM Firm’s interim fee application for the period ending August 2025.



SECTION II
SUMMARY OF SERVICES

| SERVICES RENDERED | HOURS | FEE |
|---|-------|-------------|
| a) Asset Analysis and Recovery Identification and review of potential assets including causes of action and non-litigation recoveries. | 22.30 | \$22,523.00 |
| b) Asset Disposition Sales, leases, abandonment and related transaction work | | |
| c) Avoidance Action Litigation Preference and fraudulent transfer litigation. | | |
| d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems. | | |
| e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, lists of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries. | 9.20 | \$9,292.00 |
| f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims. | | |
| g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan. | | |
| h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to establish interim procedures. | 4.20 | \$4,242.00 |
| i) Fee/Employment Objections Review of an objection to the employment and fee applications of others. | 17.00 | \$17,170.00 |
| j) Financing Matters under 361, 363, and 364 including cash collateral and secured claims; loan document analysis. | | |
| k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter). | | |
| l) Meeting of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' meetings. | | |
| m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims. | | |
| n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362. | | |

| | | |
|--|-------|-------------|
| o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis. | | |
| p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies. | | |
| q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries. | | |
| r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc. | | |
| s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc. | | |
| t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current. | | |
| u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns. | | |
| v) Valuation Appraise or review appraisals of assets. | | |
| w) Travel Time | 1.50 | \$1,515.00 |
| SERVICE TOTALS: | 54.20 | \$54,742.00 |

SECTION III
SUMMARY OF DISBURSEMENTS

| DISBURSEMENTS | AMOUNT |
|--|-----------------|
| a) Filing Fees Payable to Clerk of Court | |
| b) Computer Assisted Legal Research Westlaw, Lexis and description of manner calculated. | \$554.40 |
| c) Pacer Fees Payable to the Pacer Service Center for search and/or print | \$18.70 |
| d) Fax No. of Pages __ Rate per Page <u>1.00</u> (Max. \$1.00/pg.) | |
| e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. | |
| f) In-house Reproduction Services Exclusive of overhead charges. | |
| g) Outside Reproduction Services Including scanning services. | |
| h) Other Research Title searches, UCC searches, Asset searches, Accurint. | |
| i) Court Reporting Transcripts. | |
| j) Travel Mileage, tolls, airfare, parking. | |
| k) Courier & Express Carries Overnight and personal delivery. | |
| l) Postage & Overnight Mail | |
| m) Other (specify) | |
| DISBURSEMENTS TOTAL | \$573.10 |

I certify under penalty of perjury that the above is true and correct.

Date: June 24, 2025

/s/ Morris S. Bauer
SIGNATURE

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

DUANE MORRIS LLP

Morris S. Bauer, Esq. (NJ Bar No. 039711990)
200 Campus Drive, Suite 300
Florham Park, New Jersey 07932-1007
Telephone: (973) 424-2037
Facsimile: (973) 556-1380
E-mail: MSBauer@duanemorris.com

*Counsel to the Special Committee of Independent
Directors*

In Re:

CCA Construction, Inc.,

Debtor.¹

Chapter 11

Case No. 24-22548

Judge: Hon. Christine M. Gravelle

**MONTHLY FEE STATEMENT OF DUANE MORRIS LLP, COUNSEL TO THE
SPECIAL COMMITTEE OF INDEPENDENT DIRECTORS,
FOR THE PERIOD OF APRIL 9, 2025 TO MAY 31, 2025²**

TO: THE HONORABLE CHRISTINE M. GRAVELLE
UNITED STATES BANKRUPTCY JUDGE

The Monthly Fee Statement of Duane Morris LLP (“DM” or “Your Applicant”) respectfully shows unto Your Honor and alleges:

1. Your Applicants are attorneys of the State of New Jersey, duly admitted to practice before this Honorable Court.

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

² The subject monthly fee statement contains just short of two months period of time because the retention order for Duane Morris LLP (the “DM Firm”) was not entered until May 28, 2025, a date that was past the deadline for filing the monthly fee statement for the month of April 2025. The DM Firm will incorporate the fee information for the month of April 2025 in the DM Firm’s interim fee application for the period ending August, 2025.

2. Your Applicants further show that on December 22, 2024, CCA Construction, Inc. (the “Debtor” or “CCA”) filed a voluntary petition for reorganization pursuant to chapter 11 of the United States Bankruptcy Code (the “Chapter 11 Case”), and at that time was continued in possession of its assets.

3. On May 28, 2025, an Order was entered in the Chapter 11 Case authorizing the retention of DM as Counsel to the Special Committee of Independent Directors. See Docket No. 343. Attached hereto as Exhibit “A” is a copy of the retention order.

4. On February 16, 2025, the *Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court* (the “Interim Compensation Order”) was entered in the Chapter 11 Case, which order sets for the Compensation Procedure for, *inter alia*. Professional to submit Monthly Fee Statements such that Professionals may be paid 80% of their monthly fees and 100% of their expenses. See Docket No. 178.

5. The services rendered by DM on behalf of the Special Committee of Independent Directors in conjunction with the Chapter 11 Case between April 9, 2025 and May 31, 2025, included the following, *inter alia*:

- a) Preparation of retention pleadings for DM, review same with Debtor and client; coordinate filing and service; discussions regarding possible objection to retention and attempt to resolve; review objection to retention; prepare reply; and attendance at hearing thereon;
- b) Numerous conversations and correspondence with client regarding engagement, case background and on-going investigation;
- c) Review docket and pertinent documents to obtain background information;
- d) Weekly conversations with Cole Schotz representatives regarding on-going investigation; and
- e) Review documents pertinent to investigation.

6. Your Applicants show that annexed hereto as Exhibit “B” is a computer printout itemizing all services performed by members and associates of DM by task codes in accordance with the United States Trustee guidelines for the period commencing April 9, 2025 through May 31, 2025. As shown on said exhibit, DM devoted in excess of 54.20 hours of services having a value of \$54,742.00 at this firm’s then-existing billing rates. The names of the attorneys and the paralegals involved in this matter, their hourly billing rates, the time spend by each of them and the total fees resulting therefrom are as follows:

| NAME OF PROFESSIONAL & TITLE | YEAR ADMITTED (OR YEARS OF PROFESSIONAL SERVICE) | HOURS | RATE | FEE |
|------------------------------|--|-------|------------|-------------|
| 1. Morris S. Bauer | 1989(NY)/1990(NJ) | 46.70 | \$1,010.00 | \$47,167.00 |
| 2. Geoff Heaton | 2000 (CA) | 7.50 | \$1,010.00 | \$7,575.00 |
| TOTALS | | 54.20 | | \$54,742.00 |

7. Your Applicants further show that they have incurred out-of-pocket expenses in the sum of \$573.10, which are specifically set forth in the Fee Application Cover Sheet submitted simultaneously herewith.

8. Your Applicants certify that the Special Committee of Independent Directors will have received and will have ample opportunity to review the within application for compensation and reimbursement of expenses.

WHEREFORE, subject to no objections being interposed by the objection deadline, Your Applicants will respectfully request that the Special Committee of Independent Directors remit thereto 80% of the requested fees and 100% of their out-of-pocket expenses in the amounts of \$43,793.60 and \$573.10, respectively, in accordance with the Interim Compensation Order.

DUANE MORRIS LLP.
Attorneys for Special Committee of
Independent Directors

Dated: June 24, 2025

By: /s/ Morris S. Bauer
MORRIS S. BAUER

EXHIBIT A

Duane Morris Retention Order



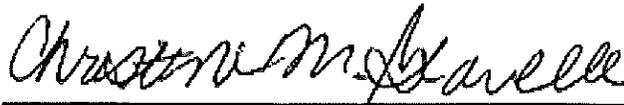
Order Filed on May 28, 2025
by Clerk
U.S. Bankruptcy Court
District of New Jersey

| | |
|---|-----------------------------------|
| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Caption in Compliance with D.N.J. LBR 9004-1(b) | |
| DUANE MORRIS LLP Morris S. Bauer, Esq. (NJ Bar No. 039711990) 200 Campus Drive, Suite 300 Florham Park, New Jersey 07932-1007 Telephone: (973) 424-2037 Facsimile: (973) 556-1380 E-mail: MSBauer@duanemorris.com | |
| <i>Proposed Counsel to the Special Committee of Independent Directors</i> | |
| In Re: | Chapter 11 |
| CCA Construction, Inc., | Case No. 24-22548 |
| Debtor. ¹ | Judge: Hon. Christine M. Gravelle |

**ORDER AUTHORIZING RETENTION OF DUANE MORRIS LLP AS ATTORNEYS
FOR THE SPECIAL COMMITTEE OF INDEPENDENT DIRECTORS
EFFECTIVE APRIL 9, 2025**

The relief set forth on the following page, numbered two (2), is hereby **ORDERED**.

DATED: May 28, 2025


Honorable Christine M. Gravelle, Chief Judge
United States Bankruptcy Judge

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

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Debtor: CCA Construction, Inc.
Case No. 24-22548 (CMG)
Caption of Order: Order Authorizing Retention of Duane Morris LLP as Attorneys for the Special
Committee of Independent Directors Effective April 9, 2025

Upon the applicant's request for authorization to retain Duane Morris LLP ("DM") as attorneys for the committee of independent directors of the board of CCA Construction, Inc. (the "Debtor"), it is hereby ORDERED:

1. The applicant is authorized to retain DM with respect to all matters for which the Special Committee has been delegated authority, including with respect to the Special Committee's oversight of the investigation of potential claims or causes of action of the Debtor, if any, against third parties and related matters in the Chapter 11 Case as the representation proceeds (the "Matter"), at the direction of and with the approval of the Special Committee. DM shall use its best efforts to avoid duplication of services provided by any of the other professionals retained in the Chapter 11 Case.

The professional's address is: Duane Morris LLP
200 Campus Drive, Suite 300
Florham Park, NJ 07932-1007
Attn: Morris S. Bauer

2. Compensation will be paid by the Debtor in such amounts as may be allowed by the Court on proper application(s).
3. The effective date of retention is the April 9, 2025.

EXHIBIT B

Detailed Time Records

Duane Morris®

May 9, 2025

ELIZABETH ABRAMS
127 WEST 83RD STREET, BOX 1012
NEW YORK, NY 10024

FILE# J4781

INVOICE# 3305157

IRS# 23-1392502

FOR PROFESSIONAL SERVICES RECORDED THROUGH
APRIL 30, 2025 IN CONNECTION WITH THE FOLLOWING
MATTERS:

| Matter Number | Matter Name | Fee Amount | Disbursement Amount | Total Amount |
|------------------------------|-------------|---------------|------------------------|-----------------|
| 00001 | CCA | \$20,200.00 | \$1.40 | \$20,201.40 |
| | | \$20,200.00 | \$1.40 | \$20,201.40 |
| TOTAL FEES | | | | \$20,200.00 |
| TOTAL DISBURSEMENTS | | | | \$1.40 |
| TOTAL FEES AND DISBURSEMENTS | | | | \$20,201.40 |
| CURRENT INVOICE | | | | \$20,201.40 |

DUANE MORRIS LLP

30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196

PHONE: 215.979.1000 FAX: 215.979.1020

Duane Morris US
 May 9, 2025
 Page 3

File # J4781.00001 INVOICE# 3305157
 CCA CONSTRUCTION, INC.

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|----------|-------|------------|---|-------|------------|
| 04/10/25 | 09935 | M. BAUER | REVIEW EMAILS FROM/SEND EMAILS TO S. KLEPPER RE: SCHEDULING CONFERENCE CALL | 0.20 | \$202.00 |
| 04/10/25 | 09935 | M. BAUER | PREPARE IN DRAFT RETENTION PLEADINGS | 1.00 | \$1,010.00 |
| 04/11/25 | 09935 | M. BAUER | REVIEW AND REVISE RETENTION PLEADINGS (0.3); SEND EMAIL TO E. ABRAMS (0.1) RE: DRAFT RETENTION PLEADINGS; SEND INTERNAL EMAIL FOR ADDITIONAL INFORMATION FOR RETENTION PLEADINGS (0.1) | 0.50 | \$505.00 |
| 04/11/25 | 09935 | M. BAUER | REVIEW EMAILS FROM/SEND EMAIL TO E. ABRAMS RE: COMMENTS TO RETENTION PLEADINGS | 0.20 | \$202.00 |
| 04/11/25 | 09935 | M. BAUER | TEAMS CONFERENCE WITH S. KLEPPER RE: BACKGROUND, DOCUMENTS TO COMMENCE REVIEW | 0.40 | \$404.00 |
| 04/12/25 | 09935 | M. BAUER | REVIEW EMAILS FROM S. KLEPPER RE: VARIOUS DOCUMENTS | 0.10 | \$101.00 |
| 04/12/25 | 09935 | M. BAUER | REVIEW AND REVISE DRAFT RETENTION PLEADINGS TO INCORPORATE COMMENTS; SEND EMAIL TO COLE AND DEBEVOISE FOR REVIEW | 0.70 | \$707.00 |
| 04/14/25 | 09935 | M. BAUER | REVIEW EMAILS FROM COLE SCHOTZ (0.3) RE: CLAWBACK AGREEMENT; TELEPHONE CALL FROM/TO K. KULP (0.3) RE: DISCUSS AGREEMENT IN DETAIL REVIEW EMAIL FROM E. ABRAMS AND SEND EMAIL RESPONSE (0.1) | 0.70 | \$707.00 |
| 04/15/25 | 09935 | M. BAUER | REVIEW REVISED CLAWBACK AGREEMENT (0.1); SEND EMAIL TO/FROM CLIENT (0.1) RE: SIGN-OFF; REVIEW EMAIL FROM/SEND EMAIL TO J. MELZER (0.1) RE: STATUS ON AGREEMENT, EXECUTED AGREEMENT | 0.30 | \$303.00 |
| 04/15/25 | 09935 | M. BAUER | PARTICIPATE IN CONFERENCE CALL WITH CLIENT AND COLE SCHOTZ REPS RE: DISCUSS INVESTIGATION | 0.50 | \$505.00 |
| 04/15/25 | 09935 | M. BAUER | REVIEW SUGGESTED REVISIONS TO DM RETENTION PLEADINGS AND CORRESPOND WITH CLIENT | 0.50 | \$505.00 |
| 04/16/25 | 09935 | M. BAUER | REVIEW AND REVISE DM RETENTION PLEADINGS TO INCORPORATE COMMENTS AND CORRECTIONS, SEND EMAIL TO CLIENT FOR | 0.50 | \$505.00 |

DUANE MORRIS LLP

30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196

PHONE: 215.979.1000 FAX: 215.979.1020

Duane Morris US
 May 9, 2025
 Page 4

File # J4781.00001 INVOICE# 3305157
 CCA CONSTRUCTION, INC.

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|----------------------|-------|------------|--|-------|------------|
| REVIEW AND SIGNATURE | | | | | |
| 04/17/25 | 09935 | M. BAUER | REVIEW VARIOUS DOCUMENTS, INCLUDING STATE COURT DECISION | 1.00 | \$1,010.00 |
| 04/17/25 | 09935 | M. BAUER | MEET WITH CLIENT RE: BACKGROUND, DISCUSS CASE, DISCUSS INVESTIGATION | 0.70 | \$707.00 |
| 04/17/25 | 09935 | M. BAUER | MINOR REVISION TO RETENTION PLEADINGS (0.1); SEND EMAIL TO/FROM CLIENT (0.1) RE: EXECUTED RETENTION APPLICATION; COORDINATE FILING OF RETENTION PLEADINGS (0.2); SEND EMAIL TO KCC (0.1) RE: SERVICE AND REVIEW RESPONSE | 0.50 | \$505.00 |
| 04/17/25 | 09935 | M. BAUER | REVIEW MINUTES OF WEEKLY MEETINGS | 0.20 | \$202.00 |
| 04/18/25 | 09935 | M. BAUER | CONTINUED REVIEW OF VARIOUS DOCUMENTS | 0.70 | \$707.00 |
| 04/18/25 | 09935 | M. BAUER | CONTINUED REVIEW OF STATE COURT DECISION | 0.50 | \$505.00 |
| 04/18/25 | 09935 | M. BAUER | REVIEW EMAIL FROM/SEND EMAIL TO E. ABRAMS RE: BUDGET ON FEES | 0.30 | \$303.00 |
| 04/18/25 | 09935 | M. BAUER | REVIEW DOCKETS AND COMMENCE REVIEW OF VARIOUS SELECT PLEADINGS | 1.00 | \$1,010.00 |
| 04/19/25 | 09935 | M. BAUER | CONTINUED REVIEW OF DOCUMENTS | 0.50 | \$505.00 |
| 04/19/25 | 09935 | M. BAUER | REVIEW OF DOCUMENTS PERTAINING TO REPRESENTATION | 1.00 | \$1,010.00 |
| 04/20/25 | 09935 | M. BAUER | CONTINUED REVIEW OF VARIOUS DOCUMENTS | 1.60 | \$1,616.00 |
| 04/21/25 | 09935 | M. BAUER | CONTINUED REVIEW OF PLEADINGS, MORS AND OTHER DOCUMENTS | 0.70 | \$707.00 |
| 04/21/25 | 09935 | M. BAUER | REVIEW EMAIL FROM/SEND EMAIL TO F. STEELE RE: QUESTIONS ON RETENTION, RESPONSES | 0.20 | \$202.00 |
| 04/21/25 | 09935 | M. BAUER | CONTINUED REVIEW OF DOCUMENTS | 1.00 | \$1,010.00 |
| 04/22/25 | 09935 | M. BAUER | CONFERENCE WITH COLE SCHOTZ INVESTIGATION TEAM | 0.70 | \$707.00 |
| 04/22/25 | 09935 | M. BAUER | REVIEW EMAILS TO SCHEDULE CONFERENCE WITH BDO | 0.10 | \$101.00 |
| 04/23/25 | 09935 | M. BAUER | TELEPHONE CALL FROM E. ABRAMS RE: DISCUSS ANTICIPATED OBJECTION TO DM | 0.30 | \$303.00 |

DUANE MORRIS LLP

30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196

PHONE: 215.979.1000 FAX: 215.979.1020

Duane Morris US
 May 9, 2025
 Page 5

File # J4781.00001
 CCA CONSTRUCTION, INC.

INVOICE# 3305157

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|----------------------------------|-------|------------|---|--------------|--------------------|
| RETENTION, DISCUSS INVESTIGATION | | | | | |
| 04/23/25 | 09935 | M. BAUER | REVIEW EMAIL FROM F. YUDKIN RE: HEARING SCHEDULE | 0.10 | \$101.00 |
| 04/23/25 | 09935 | M. BAUER | REVIEW EMAIL FROM F. YUDKIN RE: B. THIESEN EMAIL, OBJECTION TO DM RETENTION COMMENT; DISCUSS WITH F. YUDKIN | 0.20 | \$202.00 |
| 04/24/25 | 09935 | M. BAUER | REVIEW EMAIL FROM B. THIESEN RE: OBJECTION TO RETENTION; SEND EMAIL TO E. ABRAMS RE: COPY | 0.10 | \$101.00 |
| 04/25/25 | 09935 | M. BAUER | TELEPHONE CALLS FROM/TO F. YUDKIN (0.2) RE: SCHEDULING HEARING ON RETENTION APPLICATION AND OBJECTION | 0.20 | \$202.00 |
| 04/26/25 | 09935 | M. BAUER | RESEARCH RE: RETENTION ISSUE | 0.30 | \$303.00 |
| 04/28/25 | 09935 | M. BAUER | REVIEW EMAIL FROM F. YUDKIN (0.1) RE: REVISIONS TO RETENTION ORDER CONVERSATION WITH GIBBONS; SEND EMAIL TO F. YUDKIN RE: PROPOSED REVISIONS (0.4); REVIEW RESPONSE FROM F. YUDKIN (0.1); REVIEW ORDER AND SEND EMAIL TO B. THIESEN (0.2); SEND EMAIL TO CLIENT (0.1) | 0.90 | \$909.00 |
| 04/29/25 | 09935 | M. BAUER | PARTICIPATE IN CONFERENCE CALL WITH CLIENT, COLE REPRESENTATIVES AND BDO REPRESENTATIVES (1.0 OF 1.3); REVIEW MINUTES FROM PRIOR CALL (0.1) | 1.10 | \$1,111.00 |
| 04/29/25 | 09935 | M. BAUER | REVIEW COURT NOTICE AND UST APPLICATION FOR APPT OF EXAMINER; SEND EMAIL TO CLIENT | 0.20 | \$202.00 |
| 04/30/25 | 09935 | M. BAUER | SEND EMAILS AND REVIEW EMAIL RESPONSES RE: STATUS ON DM PROPOSED RETENTION ORDER | 0.20 | \$202.00 |
| 04/30/25 | 09935 | M. BAUER | REVIEW EMAILS REGARDING SCHEDULING AND SEND EMAIL RESPONSE | 0.10 | \$101.00 |
| Total Services: | | | | 20.00 | \$20,200.00 |

DISBURSEMENTS

04/24/2025 0038 PACER FEDERAL DOCKET COSTS \$1.40

DUANE MORRISLLP

30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196

PHONE: 215.979.1000 FAX: 215.979.1020

Duane Morris US
May 9, 2025
Page 6

File # J4781.00001
CCA CONSTRUCTION, INC.

INVOICE# 3305157

Total Disbursements: \$1.40

Timekeeper

| No. | Name | Hours | Amount |
|-------|----------|-------------|-------------------|
| 09935 | M. BAUER | 20.00 | \$20,200.00 |
| | | <hr/> 20.00 | <hr/> \$20,200.00 |

| | |
|------------------------------|-------------------|
| TOTAL FEES | \$20,200.00 |
| TOTAL DISBURSEMENTS | \$1.40 |
| TOTAL FEES AND DISBURSEMENTS | <hr/> \$20,201.40 |

CURRENT INVOICE \$20,201.40

Duane Morris*

June 5, 2025

ELIZABETH ABRAMS
127 WEST 83RD STREET, BOX 1012
NEW YORK, NY 10024

FILE# J4781

INVOICE# 3315910

IRS# 23-1392502

FOR PROFESSIONAL SERVICES RECORDED THROUGH MAY
31, 2025 IN CONNECTION WITH THE FOLLOWING MATTERS:

| Matter Number | Matter Name | Fee Amount | Disbursement Amount | Total Amount |
|------------------|-------------|---------------|------------------------|-----------------|
| 00001 | CCA | \$34,542.00 | \$571.70 | \$35,113.70 |
| | | \$34,542.00 | \$571.70 | \$35,113.70 |

| | |
|------------------------------|-------------|
| TOTAL FEES | \$34,542.00 |
| TOTAL DISBURSEMENTS | \$571.70 |
| TOTAL FEES AND DISBURSEMENTS | \$35,113.70 |
| CURRENT INVOICE | \$35,113.70 |

DUANE MORRIS LLP

10 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196

PHONE: 215.979.1000 FAX: 215.979.1020

Duane Morris US
 June 5, 2025
 Page 3

File # J4781.00001
 CCA CONSTRUCTION, INC.

INVOICE# 3315910

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|----------|-------|------------|---|-------|------------|
| 05/01/25 | 09935 | M. BAUER | TELEPHONE CALL TO F. YUDKIN (0.2) RE: DISCUSS BML POSITION; PREPARE IN DRAFT LETTER TO JUDGE GRAVELLE (0.5); REVIEW CASES ON ISSUE (0.3); SEND EMAILS TO F. YUDKIN (0.1); REVIEW EMAILS FROM B. THIESEN, F. YUDKIN, N. LABOVITZ (0.3) RE: ISSUES ON RETENTION, ETC.; SEND EMAIL TO/REVIEW EMAIL FROM F. YUDKIN RE: ADJOURN TO 5-22-25 (0.1) | 1.50 | \$1,515.00 |
| 05/01/25 | 09935 | M. BAUER | REVIEW EMAILS RESCHEDULING WEEKLY CALLS (0.1); REVIEW EMAIL ON INTERVIEW LIST (0.1); REVIEW EMAILS ON MEETING MINUTES AND ASSOCIATED ITEMS (0.3) | 0.50 | \$505.00 |
| 05/01/25 | 09935 | M. BAUER | REVIEW EMAIL FROM B. THEISEN RE: ISSUE WITH RETENTION | 0.10 | \$101.00 |
| 05/02/25 | 09935 | M. BAUER | REVIEW EMAILS FROM COLE SCHOTZ AND E. ABRAMS RE: ON-GOING INVESTIGATION | 0.20 | \$202.00 |
| 05/02/25 | 09935 | M. BAUER | REVIEW B. THIESEN EMAIL ON ADJOURNMENT (0.1); PREPARE ADJOURNMENT REQUEST AND SEND EMAIL TO T. SANTORELLI (0.3); SEND EMAIL TO/FROM F. STEELE (0.1); DISCUSS WITH M. TEDESCO (JUDGE GRAVELLE) (0.1); SEND TEXT TO AND COORDINATE EMAILING ADJOURNMENT REQUEST (0.1); REVIEW COURT NOTICE AND COURT EMAIL ON ADJOURNMENT (0.1) | 0.80 | \$808.00 |
| 05/05/25 | 09935 | M. BAUER | REVIEW DEBTOR RESPONSE TO BML OBJECTION TO DM RETENTION, COURT NOTICE ON SCHEDULING HEARING ON EXAMINER SCOPE AND BUDGET, STAY RELIEF GRANTED | 0.20 | \$202.00 |
| 05/07/25 | 09935 | M. BAUER | CONFERENCE CALL WITH COLE REPS AND CLIENT RE: INVESTIGATION (0.9); DEBRIEFING CALL WITH E. ABRAMS (0.1) | 1.00 | \$1,010.00 |
| 05/07/25 | 09935 | M. BAUER | SEND EMAIL TO E. ABRAMS RE: STAY RELIEF ORDER, DEBTOR RESPONSE TO BML OBJECTION, ITEMS FOR UPCOMING CALL | 0.30 | \$303.00 |
| 05/08/25 | 09935 | M. BAUER | REVIEW EMAIL FROM/SEND EMAIL TO F. YUDKIN RE: RESPONSE TO BML OBJECTION TO DM RETENTION | 0.10 | \$101.00 |
| 05/08/25 | 09935 | M. BAUER | REVIEW T. HARRISON LETTER AND B. THIESEN LETTER AND RELATED EMAILS, CORRESPOND WITH CLIENT WITH RESPECT TO SAME | 0.30 | \$303.00 |

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File # J4781.00001 INVOICE# 3315910
 CCA CONSTRUCTION, INC.

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|----------|-------|------------|--|-------|------------|
| 05/09/25 | 09935 | M. BAUER | REVIEW EMAIL FROM D. HARRIS (0.2) RE: PROPOSED LETTER RESPONSES TO THIESEN AND HARRISON; SEND EMAIL TO/FROM E. ABRAMS (0.2) RE: DRAFT LETTERS, POSITION, RESEARCH ON RETENTION ISSUE, RESPONSE | 0.40 | \$404.00 |
| 05/09/25 | 09935 | M. BAUER | REVIEW EMAILS ON LETTERS BEING SENT TO B. THIESEN AND T. HARRISON | 0.10 | \$101.00 |
| 05/09/25 | 09935 | M. BAUER | TELEPHONE CALL TO G. HEATON RE: BACKGROUND, RESEARCH ISSUE | 0.30 | \$303.00 |
| 05/09/25 | 04332 | G. HEATON | INVESTIGATE INTO ISSUES RE APPOINTMENT OF COUNSEL FOR INDEPENDENT DIRECTOR. | 0.50 | \$505.00 |
| 05/10/25 | 09935 | M. BAUER | REVIEW PRIOR DAY EMAILS RE: COLE SCHOTZ LETTER, DOCKET UPDATE, RESPONSE TO BML OBJECTION TO DM RETENTION, PRELIMINARILY REVIEW INTERVIEW NOTES | 0.40 | \$404.00 |
| 05/11/25 | 04332 | G. HEATON | INVESTIGATE INTO AUTHORITIES RE INDEPENDENT DIRECTORS' RETENTION OF COUNSEL OUT OF ESTATE. | 0.70 | \$707.00 |
| 05/12/25 | 09935 | M. BAUER | CONTINUED REVIEW OF COLE INTERVIEW OUTLINE (0.6); SEND EMAIL TO CLIENT (0.3) RE: COMMENTS; REVIEW EMAILS TO RE-SCHEDULE CALL (0.1) | 1.00 | \$1,010.00 |
| 05/12/25 | 09935 | M. BAUER | REVIEW EMAILS FROM/SEND EMAILS TO G. HEATON RE: RESEARCH FINDINGS | 0.30 | \$303.00 |
| 05/12/25 | 04332 | G. HEATON | REVIEW AND ANALYSIS OF CASE LAW, OTHER AUTHORITIES RE GROUNDS FOR INDEPENDENT DIRECTOR'S RETENTION OF COUNSEL, PAYMENT OF OF SAME OUT OF ESTATE, AND REPORT ON SAME. | 6.30 | \$6,363.00 |
| 05/14/25 | 09935 | M. BAUER | PREPARE IN DRAFT REPLY TO BMLP OBJECTION TO DM RETENTION, SEND EMAIL TO CLIENT WITH DRAFT | 1.00 | \$1,010.00 |
| 05/14/25 | 09935 | M. BAUER | REVIEW MULTIPLE EMAILS RESCHEDULING CONFERENCE CALL TWICE; SEND EMAIL RESPONSE | 0.10 | \$101.00 |
| 05/14/25 | 09935 | M. BAUER | REVIEW EMAILS FROM S. KLEPPER AND E. ABRAMS (0.1) RE: INTERVIEW OUTLINE COMMENTS; SEND EMAIL TO S. KLEPPER RE: COMMENTS (0.1) | 0.20 | \$202.00 |

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 CCA CONSTRUCTION, INC.

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|----------|-------|------------|---|-------|----------|
| 05/14/25 | 09935 | M. BAUER | REVIEW EMAIL FROM E. ABRAMS RE: EXAMINER, MCDERMOTT, GIBBONS, PROPOSED CORRESPONDENCE | 0.20 | \$202.00 |
| 05/15/25 | 09935 | M. BAUER | REVIEW COLE LETTER TO T. HARRISON AND SEND EMAIL TO E. ABRAMS (0.2); SEND EMAIL TO E. ABRAMS (0.1) RE: CASES CITED IN REPLY; REVIEW EMAILS FROM/SEND EMAILS TO E. ABRAMS (0.1) RE: COMMENTS | 0.40 | \$404.00 |
| 05/15/25 | 09935 | M. BAUER | ATTEND WEEKLY CONFERENCE CALL (MSB JOINED LATE) RE: DISCUSS ON-GOING INVESTIGATION | 0.40 | \$404.00 |
| 05/15/25 | 09935 | M. BAUER | REVIEW EMAIL FROM/SEND EMAIL TO E. ABRAMS (0.2) RE: COMMENTS ON REPLY; SEND EMAIL TO COLE (0.2) RE: PROPOSED REPLY, COMMENTS | 0.40 | \$404.00 |
| 05/16/25 | 09935 | M. BAUER | REVIEW COURT NOTICE RE: COLE RESPONSE ON EXAMINER SCOPE, REVIEW SAME AND PROVIDE TO CLIENT | 0.50 | \$505.00 |
| 05/16/25 | 09935 | M. BAUER | REVIEW EMAIL EXCHANGE BETWEEN M. SIROTA AND T. HARRISON RE: DISCLOSURE ISSUE | 0.10 | \$101.00 |
| 05/16/25 | 09935 | M. BAUER | REVIEW EMAIL FROM COLE RE: MINOR COMMENTS TO REPLY; FORWARD TO CLIENT WITH COMMENT; REVIEW CLIENT RESPONSE; SEND EMAIL TO COLE ON TIMING OF FILING | 0.50 | \$505.00 |
| 05/17/25 | 09935 | M. BAUER | REVIEWING PRIOR EMAILS, COURT NOTICE OF HARRISON DECLARATION, REVIEW DECLARATION AND SEND TO CLIENT | 0.20 | \$202.00 |
| 05/17/25 | 09935 | M. BAUER | COMMENCE REVIEW OF EXAMINER'S STATEMENT AND BML POSITION ON SCOPE OF EXAMINER | 0.50 | \$505.00 |
| 05/18/25 | 09935 | M. BAUER | CONTINUED REVIEW OF BML AND EXAMINER SUBMISSIONS ON SCOPE AND BML OBJECTION TO EXCLUSIVITY | 0.50 | \$505.00 |
| 05/18/25 | 09935 | M. BAUER | REVIEW AND REVISE REPLY TO BML LIMITED OBJECTION TO DM RETENTION AND SEND EMAIL TO LEGAL ASSISTANT FOR FILING | 0.30 | \$303.00 |
| 05/19/25 | 09935 | M. BAUER | REVIEW EMAIL FROM J. CALANDRA AND M. SIROTA RE: CONTINUED BACK AND FORTH; FORWARD TO CLIENT | 0.20 | \$202.00 |

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 CCA CONSTRUCTION, INC.

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|----------|-------|------------|---|-------|------------|
| 05/19/25 | 09935 | M. BAUER | COORDINATE FILING OF REPLY AND PREPARATION OF CERTIFICATE OF SERVICE | 0.30 | \$303.00 |
| 05/20/25 | 09935 | M. BAUER | MEETING WITH COLE ON INVESTIGATION | 0.70 | \$707.00 |
| 05/20/25 | 09935 | M. BAUER | REVIEW COURT NOTICES ON SUPPLEMENTAL FILINGS | 0.10 | \$101.00 |
| 05/20/25 | 09935 | M. BAUER | REVIEW SPECIAL COMMITTEE DOCUMENTS | 0.20 | \$202.00 |
| 05/20/25 | 09935 | M. BAUER | SEND EMAIL TO/FROM F. YUDKIN RE: CONFIRM IN PERSON HEARINGS | 0.10 | \$101.00 |
| 05/21/25 | 09935 | M. BAUER | REVIEW OF FILE IN PREPARATION FOR HEARING (0.5); SEND DETAILED EMAIL TO CLIENT WITH SERIES OF QUESTIONS/COMMENTS (0.5); TELEPHONE CALL FROM CLIENT (0.6) RE: DISCUSS QUESTIONS, PREPARE FOR HEARING; TELEPHONE CALL FROM W. USATINE (0.2) RE: DISCUSS HEARING | 1.80 | \$1,818.00 |
| 05/22/25 | 09935 | M. BAUER | REVIEW EMAIL FROM/SEND EMAIL TO E. ABRAMS (0.2) RE: ADDRESS ISSUE; REVIEW VARIOUS PLEADINGS IN PREPARATION FOR UPCOMING HEARINGS ON EXAMINER SCOPE, DM RETENTION (0.8) | 1.00 | \$1,010.00 |
| 05/22/25 | 09935 | M. BAUER | ATTEND HEARING, MEETINGS, SETTLEMENT DISCUSSIONS RE: EXAMINER SCOPE MOTION, DM RETENTION, EXCLUSIVITY EXTENSION, INCLUDING DEBRIEFING | 6.00 | \$6,060.00 |
| 05/22/25 | 09935 | M. BAUER | TRAVEL TO/FROM COURT (1/2 TIME) RE: EXAMINER SCOPE HEARING, DM RETENTION HEARING | 1.50 | \$1,515.00 |
| 05/23/25 | 09935 | M. BAUER | SEND EMAILS TO/REVIEW EMAILS FROM MULTIPLE PERSONS RE: DM RETENTION, ETC. | 0.30 | \$303.00 |
| 05/27/25 | 09935 | M. BAUER | CONFERENCE CALL ON INVESTIGATION | 0.90 | \$909.00 |
| 05/28/25 | 09935 | M. BAUER | PREPARE DM RETENTION ORDER IN FINAL (0.2); SEND EMAIL TO JUDGE GRAVELLE (0.2); REVIEW ENTERED ORDER (0.1) | 0.50 | \$505.00 |
| 05/28/25 | 09935 | M. BAUER | REVIEW EMAIL FROM/SEND EMAIL TO E. ABRAMS RE: EXAMINER UPDATE | 0.20 | \$202.00 |
| 05/29/25 | 09935 | M. BAUER | REVIEW EMAILS AND SEND EMAIL RESPONSE RE: RESCHEDULING CONFERENCE CALL, INTERVIEW STATUS | 0.10 | \$101.00 |

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 CCA CONSTRUCTION, INC.

| Date | ID# | Timekeeper | Narrative | Hours | Amount |
|------|-----|------------|-----------|-------|--------|
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Total Services: 34.20 \$34,542.00

DISBURSEMENTS

| | | | | | |
|------------|------|--|---------------------------------------|--|----------|
| 05/22/2025 | 0038 | | PACER FEDERAL DOCKET COSTS | | \$17.30 |
| 05/12/2025 | 0016 | | LEXIS LEGAL RESEARCH HEATON, GEOFFREY | | \$0.00 |
| 05/12/2025 | 0016 | | LEXIS LEGAL RESEARCH HEATON, GEOFFREY | | \$554.40 |
| 05/12/2025 | 0016 | | LEXIS LEGAL RESEARCH HEATON, GEOFFREY | | \$0.00 |

Total Disbursements: \$571.70

| Timekeeper No. | Name | Hours | Amount |
|----------------|-----------|--------------|--------------------|
| 04332 | G. HEATON | 7.50 | \$7,575.00 |
| 09935 | M. BAUER | 26.70 | \$26,967.00 |
| | | <u>34.20</u> | <u>\$34,542.00</u> |

| | |
|------------------------------|--------------------|
| TOTAL FEES | \$34,542.00 |
| TOTAL DISBURSEMENTS | \$571.70 |
| TOTAL FEES AND DISBURSEMENTS | <u>\$35,113.70</u> |

CURRENT INVOICE \$35,113.70

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