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PORZIO, BROMBERG & NEWMAN, P.C.
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*Counsel for the Official Equity Security Holders’
 Committee*

**IN THE UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF TEXAS
 DALLAS DIVISION**

	§	Chapter 11
In re:	§	
EIGER BIOPHARMACEUTICALS, INC.,	§	Case No. 24-80040 (SGJ)
<i>et al.</i> , ¹	§	(Jointly Administered)
Debtors.	§	
	§	

**COVER SHEET
 FOR THE THIRD MONTHLY FEE STATEMENT OF PORZIO, BROMBERG &
 NEWMAN, P.C. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
 OF EXPENSES FOR THE PERIOD FROM
AUGUST 1, 2024 THROUGH AND INCLUDING AUGUST 31, 2024**

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); EigerBio Europe Limited (N/A). The Debtors’ service address is 2100 Ross Ave., Dallas, Texas 75201.



Name of Applicant:	Porzio, Bromberg & Newman, P.C.
Authorized to Provide Professional Services to:	Co-Counsel to the Official Equity Security Holders' Committee
Date of Retention:	June 26, 2024, by order entered on August 26, 2024, at Docket No. 565
Period for which Compensation and Reimbursement is Sought:	August 1, 2024 through and including August 31, 2024
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$344,466.80 (80% of \$430,583.50)
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$6,759.95
Total Compensation and Expenses Requested in this Fee Statement (exclusive of 20% holdback):	\$351,226.75

This is a: monthly interim final application.

This is Porzio's third monthly fee statement.

PRIOR MONTHLY FEE STATEMENTS

Period Covered	Requested		Payments Received		Outstanding	
	Fees (\$)	Expenses (\$)	Fees (\$)	Expenses (\$)	Fees (\$)	Expenses (\$)
June 26, 2024 – June 30, 2024	\$11,036.00 (80% of \$13,795.00)	\$0.00	\$11,036.00	N/A	\$2,759.00	\$0.00
July 1, 2024 – July 31, 2024	\$238,168.80 (80% of \$297,711.00)	\$2,621.51	\$238,168.80	\$2,621.51	\$59,542.20	\$0.00

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*Counsel for the Official Equity Security Holders’
Committee*

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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
EIGER BIOPHARMACEUTICALS, INC.,	§	Case No. 24-80040 (SGJ)
<i>et al.</i> , ²	§	
Debtors.	§	(Jointly Administered)
	§	
	§	

**THIRD MONTHLY FEE STATEMENT OF PORZIO, BROMBERG & NEWMAN, P.C.
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM
AUGUST 1, 2024 THROUGH AND INCLUDING AUGUST 31, 2024**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “**Local Rules**”), and this Court’s *Order Establishing Procedures for Interim*

² The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); EigerBio Europe Limited (N/A). The Debtors’ service address is 2100 Ross Ave., Dallas, Texas 75201.

Compensation and Reimbursement of Expenses for Retained Professionals, entered on May 13, 2024 [Docket No. 259] (the “**Interim Compensation Procedures Order**”), Porzio, Bromberg & Newman, P.C. (“**Porzio**”), attorneys for the Official Equity Security Holders’ Committee (the “**Equity Committee**”) in the above-captioned chapter 11 cases, hereby submits its third monthly fee statement (this “**Monthly Fee Statement**”) for interim allowance and (a) payment of compensation for professional services to the Equity Committee during the period from August 1, 2024 through and including August 31, 2024 (the “**Fee Period**”) in the amount of \$344,466.80 representing 80% of the \$430,583.50 of fees owed to Porzio for professional services to the Equity Committee during the Fee Period and (b) reimbursement of 100% of the actual and necessary expenses incurred by Porzio during the Fee Period in connection with such services in the amount of \$6,759.95. In support of this Application, Porzio respectfully represents as follows:

BACKGROUND

1. On April 1, 2024 (the “**Petition Date**”), each of the Debtors filed a voluntary petition with this Court under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On June 25, 2024, the United States Trustee appointed the Equity Committee [Docket No. 359]. The members appointed at that time were: (1) Adam Gui, individually; (2) Gary C. Ribe, individually; and (3) Foxhill Capital Management For Foxhill Family Partnership, LP. On July 23, 2024, the United States Trustee filed an Amended Appointment of the Official Equity Security Holders’ Committee, adding Kenneth S. Grossman as the replacement Equity Committee member for Foxhill [Docket No. 438].

3. The Equity Committee selected Porzio as its lead counsel and McKool Smith, PC as co-counsel, subject to Court approval. Porzio was retained on June 26, 2024. Both have since been actively advising the Equity Committee.

4. On May 13, 2024, this Court entered the Interim Compensation Procedures Order [Docket No. 259], authorizing certain estate professionals (“**Professionals**”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to procedures specified therein. If no objections are made within ten (10) days after service of a monthly fee statement (the “**Objection Deadline**”), the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. All fees and expenses paid are on an interim basis until final allowance by the Court.

5. The Equity Committee retained Porzio as its co-counsel effective as of the June 26, 2024, pursuant to the *Order Authorizing and Approving the Employment and Retention of Porzio, Bromberg & Newman, P.C. as Co-Counsel for the Official Equity Security Holders' Committee, Effective as of June 26, 2024* [Docket No. 565] (the “**Retention Order**”). The Retention Order authorizes the Debtors’ estates to compensate and reimburse Porzio subject to allowance of such compensation and reimbursement by the Court.

6. In support of the Monthly Fee Statement, Porzio submits the following exhibits which are attached hereto:

a) **Exhibit A** is a schedule of hours billed by Porzio attorneys and paraprofessionals during the Fee Period. Porzio attorneys expended a total of 649.20 hours in connection with these chapter 11 cases during the Fee Period. All services for which Porzio is requesting compensation were performed for or on behalf of the Equity Committee.

b) **Exhibit B** is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Porzio attorneys during the Fee Period with respect to each of the subject matter categories Porzio established in accordance with its internal billing procedures.

c) **Exhibit C** is a detailed statement of the time expended and compensation earned as well as Porzio's out-of-pocket expenses during the Fee Period.

FEES AND EXPENSES

7. Porzio has continuously rendered services to the Equity Committee during the Fee Period, totaling 649.20 hours of professional services. The services of Porzio are necessary to enable the Equity Committee to execute faithfully its duties. Porzio has provided, and will continue to provide, to the extent necessary, services to the Equity Committee including the following:

a) To give advice to the Equity Committee with respect to its rights, powers and duties as the Equity Committee in these Cases;

b) To assist and advise the Equity Committee in its consultations with the Debtors relative to the administration of these Cases;

c) To assist with the Equity Committee's investigation of the acts, conduct, assets, liabilities, and financial condition of the Debtors and of the operation of the Debtors' business and any other matters relevant to these Cases;

d) To assist the Equity Committee in its analysis of and negotiations with the Debtors or any third-party concerning matters related to, among other things, the terms of sales, a plan of reorganization or liquidation, or other conclusion of these Cases;

e) To assist the Equity Committee in requesting the appointment of a trustee or examiner, should such action become necessary;

f) To represent the Equity Committee at all hearings and other proceedings;

g) To review and analyze all applications, orders, statements of operations and schedules filed with the Court and advise the Equity Committee accordingly;

h) To assist the Equity Committee in preparing agreements, motions, applications, orders, complaints, answers, briefs and pleadings as may be necessary in furtherance of the Equity Committee's interests and objectives; and

i) To perform such other legal services as may be required under the circumstances of these Cases and are deemed to be in the interests of the Equity Committee in accordance with the Equity Committee's powers and duties as set forth in the Bankruptcy Code.

8. The total sum due to Porzio for professional services rendered on behalf of the Equity Committee for the Fee Period is \$430,583.50, of which 80% will be due and payable

immediately upon expiration of the Objection Deadline. Porzio submits that the professional services it rendered on behalf of the Equity Committee during this time were reasonable and necessary under the circumstances.

9. Porzio also expended costs on behalf of the Equity Committee during the Fee Period in the sum of \$6,759.95, of which 100% will be due and payable immediately upon expiration of the Objection Deadline.

10. Although Porzio has made every effort to include all fees and expenses incurred during the Fee Period in this Monthly Fee Statement, some fees and expenses might have been omitted from this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Porzio reserves the right to submit further applications to the Court for allowance of such fees and expenses not included herein. Subsequent monthly fee statements and/or fee applications will be filed in accordance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Interim Compensation Procedures Order.

WHEREFORE, Porzio requests (a) interim allowance and payment of compensation for professional services to the Equity Committee during the Fee Period in the amount of \$344,466.80, representing 80% of the \$430,583.50 of fees owed to Porzio for professional services to the Equity Committee during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by Porzio during the Fee Period in connection with such services in the amount of \$6,759.95 for a total interim award amount of \$351,226.75.

Dated: September 17, 2024

Respectfully submitted,

/s/ Warren J. Martin Jr.

PORZIO, BROMBERG & NEWMAN, P.C.

Warren J. Martin Jr. (admitted pro hac vice)

Rachel A. Parisi (admitted pro hac vice)

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-and-

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mvenus@mckoolsmith.com

*Counsel to the Official Committee of Equity
Security Holders of Eiger BioPharmaceuticals,
Inc., et al.*

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2024, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases, and on the following Application Recipients via electronic mail.

Eiger BioPharmaceuticals,
Inc. Attn: Douglas Staut
dstaut@alvarezandmarsal.com

Sidley Austin LLP
Attn: William E. Curtin
wcurtin@sidley.com
Attn: Anne G. Wallice
Anne.wallice@sidley.com

Innovatus Life Sciences Lending Fund I, LP
Attn: Claes Eckstrom
ceckstrom@innovatuscp.com

Bradley Arant Boult Cummings LLP
Attn: Roger G. Jones
rjones@bradley.com

U.S. Trustee
Attn: Elizabeth A. Young
elizabeth.a.young@usdoj.gov

Meland Budwick, P.A.
Attn: Michael S. Budwick
mbudwick@melandbudwick.com

Munsch Hardt Kopf & Harr, P.C.
Attn: Garrick C. Smith
gsmith@munsch.com

/s/ S. Margie Venus
S. Margie Venus

EXHIBIT A

Summary of Hours Billed by Porzio Attorneys for the Fee Period

Name	Position	Year of Bar Admission	Hourly Rate	Hours	Total Compensation
Warren J. Martin, Jr.	Principal	1986	\$1,200.00	105.7	\$126,840.00
Charlie J. Stoia	Principal	1988	\$770.00	5.00	\$3,850.00
Brett S. Moore	Principal	2000	\$835.00	64.50	\$53,857.50
Rachel A. Parisi	Principal	2011	\$770.00	69.20	\$53,284.00
Cheryl A. Santaniello	Principal	2007	\$770.00	6.50	\$5,005.00
Christopher P. Mazza	Counsel	2017	\$655.00	16.10	\$10,545.50
David E. Sklar	Associate	2013	\$625.00	85.50	\$53,437.50
Paris Gyparakis	Associate	2019	\$580.00	67.50	\$39,150.00
Dean M. Oswald	Associate	2022	\$460.00	15.80	\$7,268.00
Paul C. Wittekind	IT Department	N/A	\$420.00	37.10	\$15,582.00
Jenny Zhou	Law Clerk	N/A	\$400.00	42.10	\$16,840.00
Maria P. Dermatis	Paralegal	N/A	\$370.00	39.60	\$14,652.00
Stuart J. Backer	Law Clerk	N/A	\$320.00	93.10	\$29,792.00
Perle R. Desir	Law Clerk	N/A	\$320.00	1.5	\$480.00
Total Attorney Blended Rate			\$810.55		
Total				649.20	\$430,583.50

EXHIBIT B

Summary of Legal Fees and Expenses by Category for the Fee Period.

Task Description	Total Hours	Total Fees Requested
Asset Analysis and Recovery	5.90	\$4,930.00
Asset Disposition	2.90	\$1,626.00
Assumption and Rejection of Leases and Contracts	0.00	\$0.00
Avoidance Action Litigation	0.00	\$0.00
Budgeting (Case)	.70	\$840.00
Business Operations	2.30	\$2,545.00
Case Administration	.60	\$348.00
Claims Administration and Objections	28.00	\$23,217.50
Corporate Governance and Board Matters	3.00	\$3,104.00
Employee Benefits and Pensions	4.10	\$2,700.00
Employment and Fee Applications	19.10	\$8,543.00
Employment and Fee Application Objections	.30	\$162.00
Financing and Cash Collateral	.60	\$547.50
Litigation	35.40	\$29,459.00
Meetings and Communications with Creditors	21.40	\$21,515.00
Non-Working Travel³	0.00	\$0.00
Plan and Disclosure Statement	523.60	\$329,486.50
Real Estate	0.00	\$0.00
Relief from Stay and Adequate Protection	0.00	\$0.00
Reporting	0.00	\$0.00
Tax Issues	1.30	\$1,560.00
Valuation	0.00	\$0.00
TOTALS:	649.20	\$430,583.50

³ Non-working travel will be billed at a 50% discount.

Category (Expense)	Total Fees Requested
Filing/Court Fees	\$0.00
Computer Assisted Legal Research	\$5,773.00
Pacer Fees	\$0.00
Fax (with rates)	\$0.00
Case Specific Telephone / Conference Call Charges	\$0.00
In-House Reproduction Services	\$0.00
Outside Reproduction Services	\$0.00
Other Research	\$0.00
Court Reporting / Deposition Services	\$0.00
Travel	\$986.95
Courier & Express Carriers	\$0.00
Postage	\$0.00
Other (specify)	\$0.00
TOTAL:	\$6,759.95

EXHIBIT C

Porzio's Invoice



100 SOUTHGATE PARKWAY, PO BOX 1997
MORRISTOWN, NJ 07962-1997
TEL (973) 538-4006
FAX (973) 538-5146
TAX ID: 22-2005150

September 17, 2024

Porzio Bromberg & Newman, P.C.
100 Southgate Parkway
Morristown, NJ 07962

Invoice # 3321861

Re: *Representation of Equity Security Holders' Committee of Eiger BioPharmaceuticals, et al.*
Our Matter # 026841.100434
Billing Attorney: Warren Martin

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 08/31/24

Professional Services	430,583.50
Disbursements	6,759.95
TOTAL CURRENT INVOICE	\$437,343.45
Previous Balance Due	62,301.20
TOTAL BALANCE DUE	\$499,644.65

Please make check payable to Porzio, Bromberg & Newman, P.C.

REMITTANCE PAGE



100 SOUTHGATE PARKWAY, PO BOX 1997
 MORRISTOWN, NJ 07962-1997
 TEL (973) 538-4006
 FAX (973) 538-5146
 TAX ID: 22-2005150

September 17, 2024

Porzio Bromberg & Newman, P.C.
 100 Southgate Parkway
 Morristown, NJ 07962

Invoice # 3321861

Re: *Representation of Equity Security Holders' Committee of Eiger BioPharmaceuticals, et al.*
 Our Matter # 026841.100434
 Billing Attorney: Warren Martin

AGGREGATE TIME SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Task Description</u>	<u>Total Hours</u>	<u>Total Amount</u>
ASSTANAL	Asset Analysis and Recovery	5.90	4,930.00
ASSTDISP	Asset Disposition	2.90	1,626.00
BUDGTNG	Budgeting (Case)	0.70	840.00
BUSOPS	Business Operations	2.30	2,545.00
CASEADMN	Case Administration	0.60	348.00
CLAIMS	Claims Administration and Objections	28.00	23,217.50
CORPGOV	Corporate Governance and Board Matters	3.00	3,104.00
EMPLOYEE	Employee Benefits/Pensions	4.10	2,700.00
FEEAPPS	Fee/Employment Applications	19.10	8,543.00
FEEOBS	Fee/Employment Objections	0.30	162.00
FINANCE	Financing	0.60	547.50
LITIGATE	Litigation (other than Avoidance Action Litigation)	35.40	29,459.00
MEETCOM	Meetings and Communications with Creditors	21.40	21,515.00
PLANDSCL	Plan and Disclosure Statement	523.60	329,486.50
TAX	Tax Issues	1.30	1,560.00
Total		<u>649.20</u>	<u>430,583.50</u>

AGGREGATE TIME SUMMARY BY TASK CODE BY TIMEKEEPER

<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Asset Analysis and Recovery					
ASSTANAL	Martin, W.	Principal	0.90	1,200.00	1,080.00
	Stoia, C. J.	Principal	3.30	770.00	2,541.00
	Parisi, R. A.	Principal	1.70	770.00	1,309.00

<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Asset Analysis and Recovery					
Total			5.90		4,930.00
Asset Disposition					
ASSTDISP	Dermatis, M. P.	Paralegal - 2 - Senior Level	1.30	370.00	481.00
	Parisi, R. A.	Principal	1.00	770.00	770.00
	Sklar, D. E.	Associate 1	0.60	625.00	375.00
Asset Disposition					
Total			2.90		1,626.00
Budgeting (Case)					
BUDGTNG	Martin, W.	Principal	0.70	1,200.00	840.00
Budgeting (Case)					
Total			0.70		840.00
Business Operations					
BUSOPS	Martin, W.	Principal	1.80	1,200.00	2,160.00
	Parisi, R. A.	Principal	0.50	770.00	385.00
Business Operations					
Total			2.30		2,545.00
Case Administration					
CASEADMN	Gyparakis, P.	Associate 1	0.60	580.00	348.00
Case Administration					
Total			0.60		348.00
Claims Administration and Objections					
CLAIMS	Martin, W.	Principal	8.10	1,200.00	9,720.00
	Moore, B. S.	Principal	2.50	835.00	2,087.50
	Dermatis, M. P.	Paralegal - 2 - Senior Level	0.70	370.00	259.00
	Parisi, R. A.	Principal	6.10	770.00	4,697.00
	Sklar, D. E.	Associate 1	6.80	625.00	4,250.00
	Gyparakis, P.	Associate 1	3.80	580.00	2,204.00
Claims Administration and Objections					
Total			28.00		23,217.50
Corporate Governance and Board Matters					

Our Matter # 026841.100434
 Invoice #3321861

September 17, 2024
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<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
CORPGOV	Martin, W.	Principal	2.20	1,200.00	2,640.00
	Gyparakis, P.	Associate 1	0.80	580.00	464.00
Corporate Governance and Board Matters					
Total			3.00		3,104.00
Employee Benefits/Pensions					
EMPLOYEE	Martin, W.	Principal	1.10	1,200.00	1,320.00
	Oswald, D. M.	Associate 3	3.00	460.00	1,380.00
Employee Benefits/Pensions					
Total			4.10		2,700.00
Fee/Employment Applications					
FEEAPPS	Martin, W.	Principal	1.20	1,200.00	1,440.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level	16.70	370.00	6,179.00
	Parisi, R. A.	Principal	1.20	770.00	924.00
Fee/Employment Applications					
Total			19.10		8,543.00
Fee/Employment Objections					
FEEOBJS	Dermatis, M. P.	Paralegal - 2 - Senior Level	0.10	370.00	37.00
	Sklar, D. E.	Associate 1	0.20	625.00	125.00
Fee/Employment Objections					
Total			0.30		162.00
Financing					
FINANCE	Martin, W.	Principal	0.30	1,200.00	360.00
	Sklar, D. E.	Associate 1	0.30	625.00	187.50
Financing					
Total			0.60		547.50
Litigation (other than Avoidance Action Litigation)					
LITIGATE	Martin, W.	Principal	9.60	1,200.00	11,520.00
	Moore, B. S.	Principal	11.60	835.00	9,686.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level	2.40	370.00	888.00
	Sklar, D. E.	Associate 1	0.60	625.00	375.00
	Santaniello, C. A.	Principal	2.60	770.00	2,002.00
	Gyparakis, P.	Associate 1	8.60	580.00	4,988.00

Our Matter # 026841.100434
 Invoice #3321861

September 17, 2024
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<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Litigation (other than Avoidance Action Litigation)					
Total			35.40		29,459.00

Meetings and Communications with Creditors

MEETCOM	Martin, W.	Principal	12.30	1,200.00	14,760.00
	Moore, B. S.	Principal	1.70	835.00	1,419.50
	Parisi, R. A.	Principal	4.90	770.00	3,773.00
	Sklar, D. E.	Associate 1	2.50	625.00	1,562.50

Meetings and Communications with Creditors

Total			21.40		21,515.00
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Plan and Disclosure Statement

PLANDSCL	Martin, W.	Principal	66.20	1,200.00	79,440.00
	Stoia, C. J.	Principal	1.70	770.00	1,309.00
	Moore, B. S.	Principal	48.70	835.00	40,664.50
	Wittekind, P. C.	IT Department	37.10	420.00	15,582.00
	Mazza, C. P.	Counsel	16.10	655.00	10,545.50
	Dermatis, M. P.	Paralegal - 2 - Senior Level	18.40	370.00	6,808.00
	Parisi, R. A.	Principal	53.80	770.00	41,426.00
	Sklar, D. E.	Associate 1	74.50	625.00	46,562.50
	Santaniello, C. A.	Principal	3.90	770.00	3,003.00
	Oswald, D. M.	Associate 3	12.80	460.00	5,888.00
	Backer, S. J.	Law Clerk	93.10	320.00	29,792.00
	Gyparakis, P.	Associate 1	53.70	580.00	31,146.00
	Zhou, J.	Associate 4	42.10	400.00	16,840.00
	Desir, P. R.	Law Clerk	1.50	320.00	480.00

Plan and Disclosure Statement

Total			523.60		329,486.50
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Tax Issues

TAX	Martin, W.	Principal	1.30	1,200.00	1,560.00
Tax Issues					
Total			1.30		1,560.00

Total			649.20		430,583.50
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AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

0080	Martin, W.	Principal	105.70	1,200.00	126,840.00
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<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
0290	Stoia, C. J.	Principal	5.00	770.00	3,850.00
0345	Moore, B. S.	Principal	64.50	835.00	53,857.50
0460	Wittekind, P. C.	IT Department	37.10	420.00	15,582.00
1982	Mazza, C. P.	Counsel	16.10	655.00	10,545.50
2002	Dermatis, M. P.	Paralegal - 2 - Senior Level	39.60	370.00	14,652.00
2268	Parisi, R. A.	Principal	69.20	770.00	53,284.00
2616	Sklar, D. E.	Associate 1	85.50	625.00	53,437.50
2625	Santaniello, C. A.	Principal	6.50	770.00	5,005.00
2658	Oswald, D. M.	Associate 3	15.80	460.00	7,268.00
2700	Backer, S. J.	Law Clerk	93.10	320.00	29,792.00
2767	Gyparakis, P.	Associate 1	67.50	580.00	39,150.00
2798	Zhou, J.	Associate 4	42.10	400.00	16,840.00
2816	Desir, P. R.	Law Clerk	1.50	320.00	480.00
	Total		649.20		430,583.50

Time Detail

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/01/24	Correspond with team regarding theories of recovery.	RAP	ASSTANAL	0.30	231.00
08/01/24	Provide certain non-PEO discovery to committee members, emails regarding same.	RAP	ASSTANAL	0.40	308.00
08/02/24	Review D&O insurance policies and evaluate tail issues	CJS	ASSTANAL	0.90	693.00
08/02/24	Emails regarding insurance policies.	RAP	ASSTANAL	0.30	231.00
08/26/24	Address issues regarding D&O coverage and possible refund of tail premium	CJS	ASSTANAL	1.20	924.00
08/26/24	Meet with W. Martin, Jr. and C. Stoia regarding insurance coverage issues (0.4); review insurance policies and relevant discovery (0.3).	RAP	ASSTANAL	0.70	539.00
08/26/24	Meet with C. Stoia regarding insurance premium and refund to obtain (.4); telephone conference with C. Stoia, R. Parisi and D. Staut regarding same (.5).	WJM	ASSTANAL	0.90	1,080.00
08/30/24	Review D&O insurance issues: prepare correspondence	CJS	ASSTANAL	1.20	924.00
			ASSTANAL Total	5.90	4,930.00
08/01/24	Speak with Debtor team regarding sale status and related update.	RAP	ASSTDISP	0.30	231.00
08/02/24	Review of designation of winning bidder and cancellation of auction.	DES	ASSTDISP	0.10	62.50
08/02/24	Prepare (0.2) and circulate (0.1) update to committee regarding same.	RAP	ASSTDISP	0.30	231.00
08/02/24	Update from Debtors regarding sale (Lonafarnib / Lambda) (0.4).	RAP	ASSTDISP	0.40	308.00
08/05/24	Review of filings by Debtors (.4); discussion with Committee concerning same (.1).	DES	ASSTDISP	0.50	312.50
08/19/24	Download of all pleadings regarding Sale Motion to NDrive.	MPD	ASSTDISP	0.50	185.00
08/20/24	Review supplemental filings and download same prior to hearing.	MPD	ASSTDISP	0.80	296.00
			ASSTDISP Total	2.90	1,626.00
08/16/24	Review cash flow budget through confirmation sent over by P. Coloma (.4)	WJM	BUDGTNG	0.70	840.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	as well as updated proposed wind-down (post-effective date) budget (.3).				
			BUDGTNG Total	0.70	840.00
08/06/24	Emails regarding status of Bank Account Transition.	RAP	BUSOPS	0.20	154.00
08/06/24	Continued work on getting Debtor funds moved to better investment vehicle including email exchanges R. Parisi and A. Wallice.	WJM	BUSOPS	0.30	360.00
08/12/24	Download from J. Nahas regarding meet with A&M (.3); emails to and from J. Nahas regarding same (.2).	WJM	BUSOPS	0.50	600.00
08/20/24	Emails regarding bank account issue; review with Committee.	RAP	BUSOPS	0.30	231.00
08/25/24	Telephone message from D. Staut (.1) and compose email to D. Staut regarding functions and compensation for plan administrator in connection with transition services (.2).	WJM	BUSOPS	0.30	360.00
08/26/24	Conference with D. Staut and R. Parisi regarding role of PA, budget, caps and funding of same.	WJM	BUSOPS	0.70	840.00
			BUSOPS Total	2.30	2,545.00
08/14/24	Review data room for bylaws as per C. Santaniello.	PG	CASEADMN	0.60	348.00
			CASEADMN Total	0.60	348.00
08/01/24	Emails regarding potential claims.	BSM	CLAIMS	0.20	167.00
08/02/24	Review of correspondence from Innovatus concerning claim amount.	DES	CLAIMS	0.10	62.50
08/02/24	Review of motion to estimate claims.	DES	CLAIMS	0.40	250.00
08/06/24	Calendaring regarding Innovatus claim objection motion.	MPD	CLAIMS	0.20	74.00
08/08/24	Discussion with R. Parisi concerning claim estimation motion.	DES	CLAIMS	0.10	62.50
08/09/24	Review of Innovatus claim estimation motion.	DES	CLAIMS	0.50	312.50
08/09/24	Phone call with R. Parisi concerning Innovatus estimation motion.	DES	CLAIMS	0.10	62.50
08/11/24	Review and analyze Innovatus Claim assertions and debtor push back.	WJM	CLAIMS	0.60	720.00
08/13/24	Research related to Innovatus claim objection for Committee strategy.	DES	CLAIMS	1.30	812.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/14/24	Review of draft claim objection to Innovatus's claim (.8); draft write up concerning same (.2).	DES	CLAIMS	0.90	562.50
08/14/24	Call with Debtors regarding Innovatus claim (0.3); call with UCC / Debtors regarding same (0.3).	RAP	CLAIMS	0.60	462.00
08/14/24	Telephone conference with Debtor team regarding Innovatus Claim amount and upcoming estimation hearing on same (.3); review Debtor draft objection to Innovatus claim (.3); telephone conference with UCC team and Debtor team regarding same (.5).	WJM	CLAIMS	1.10	1,320.00
08/15/24	Finalize research concerning alleged default to lender (1.4); draft analysis concerning same (1.9).	DES	CLAIMS	3.30	2,062.50
08/15/24	Discussion with W. Martin concerning Innovatus claim amount.	DES	CLAIMS	0.10	62.50
08/15/24	Read objection to Innovatus proof of claim (1) and e-mail team regarding same (.4).	PG	CLAIMS	1.40	812.00
08/15/24	Call with Debtors counsel regarding Innovatus claim.	RAP	CLAIMS	0.40	308.00
08/15/24	Call with Innovatus counsel to discuss claim; caucus with W. Martin, Jr. regarding same; emails with committee regarding same.	RAP	CLAIMS	0.50	385.00
08/15/24	Review Innovatus claim estimation motion and edit same(.5); email to A. Townsell regarding committee changes (.4); telephone conference with Debtor team regarding same (.5).	WJM	CLAIMS	1.40	1,680.00
08/16/24	Review Debtors' revised notice to estimate claim of Innovatus (.1).	BSM	CLAIMS	0.10	83.50
08/18/24	Speak with debtor team regarding Innovatus issues (0.4); follow up with W. Martin, Jr. regarding same (0.2).	RAP	CLAIMS	0.60	462.00
08/18/24	Communications with Committee regarding Innovatus settlement discussions and Innovatus claim objection.	RAP	CLAIMS	0.30	231.00
08/19/24	Download of all pleadings regarding Estimation Motion to NDrive.	MPD	CLAIMS	0.50	185.00
08/19/24	Coordination regarding hearing attendance and prep.	RAP	CLAIMS	0.40	308.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/20/24	Attend (virtual) hearing regarding debtors' estimation motion.	PG	CLAIMS	0.90	522.00
08/20/24	Prepare for hearing regarding: Innovatus claim and Sale Motion.	RAP	CLAIMS	0.80	616.00
08/20/24	Attend hearing regarding Innovatus claim / sale motion.	RAP	CLAIMS	2.50	1,925.00
08/20/24	Review motion papers and opposition papers regarding estimation and objection to claim in preparation for today's Innovatus claim estimation hearing (1.2); telephone conference with M. Venus and R. Parisi in preparation for hearing and regarding strategy to be employed at same (.5); attend court hearing before Judge Jernigen on Innovatus Claim estimation (2.1); conference with R. Parisi regarding ruling reached by the Judge (.2); review M Venus draft communique regarding same to committee and R. Parisi comments to same (.2).	WJM	CLAIMS	4.20	5,040.00
08/21/24	Review objection to Innovatus claim and pleadings relating to motion to estimate Innovatus claim, objection to same, related pleadings.	BSM	CLAIMS	1.80	1,503.00
08/27/24	Begin drafting assessment memo regarding Innovatus claims.	PG	CLAIMS	1.50	870.00
08/28/24	Telephone conferences with A. Rogoff regarding settlement discussions on Innovatus claim (.5); emails to and from R. Parisi regarding same and next steps (.3).	WJM	CLAIMS	0.80	960.00
08/31/24	Review Innovatus notice to appeal and motion for stay pending appeal in connection with order estimating Innovatus claim (.4).	BSM	CLAIMS	0.40	334.00
			CLAIMS Total	28.00	23,217.50
08/16/24	Telephone conferences with T. Califano regarding committee suggestion on governance and PA vs LT (.3); emails to and from Committee regarding same (.5); telephone conferences with J. Nahas and K. Grossman regarding same (.3); meet with Porzio team and discuss	WJM	CORPGOV	1.60	1,920.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	options alternatives for resolution of governance issues (.5).				
08/27/24	Continued work on PA functions and budgeting and communicate with D. Staut and committee members regarding same.	WJM	CORPGOV	0.60	720.00
08/30/24	Review data room for certificates of incorporation, bylaws and all amendments thereto, copy to N drive & email same to C. Santaniello for review.	PG	CORPGOV	0.80	464.00
		CORPGOV Total		3.00	3,104.00
08/20/24	Work on letter to T. Califano regarding employee severance claim withdrawal demand (.2); email exchange with R. Parisi regarding same (.2).	WJM	EMPLOYEE	0.40	480.00
08/21/24	Review R. Parisi presentation regarding KERP/KEIP, stay bonuses and large bonuses paid to senior management immediately prepetition (.5); conference with R. Parisi regarding same (.2).	WJM	EMPLOYEE	0.70	840.00
08/28/24	Research issues with validity of timing of KEIP/KERP immediately before petition date.	DMO	EMPLOYEE	1.80	828.00
08/29/24	Research caselaw regarding executive bonuses subject to claw back.	DMO	EMPLOYEE	1.20	552.00
		EMPLOYEE Total		4.10	2,700.00
08/01/24	Prepare information for supplemental declaration of W. Martin, Jr.	MPD	FEEAPPS	1.30	481.00
08/01/24	Attend to retention of Josh Nahas, Dundon Advisors, in accordance with Committee vote today.	WJM	FEEAPPS	0.40	480.00
08/02/24	Coordination regarding Dundon retention app.	RAP	FEEAPPS	0.30	231.00
08/05/24	Prepare Supplemental Declaration for Porzio's Retention.	MPD	FEEAPPS	1.10	407.00
08/05/24	Continued review of information to compile supplemental declaration of Porzio.	MPD	FEEAPPS	1.50	555.00
08/05/24	Review of information to compile supplemental declaration of Porzio.	MPD	FEEAPPS	3.50	1,295.00
08/06/24	Prepare Supplemental retention edits.	MPD	FEEAPPS	0.80	296.00
08/07/24	Review revised Dundon Application.	MPD	FEEAPPS	0.40	148.00
08/07/24	Revise supplemental declaration and	MPD	FEEAPPS	0.20	74.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/07/24	forward to R. Parisi. Review and edit Supplemental Declaration for Porzio.	RAP	FEEAPPS	0.30	231.00
08/09/24	Review and provide comments to Dundon Retention Application.	MPD	FEEAPPS	0.50	185.00
08/12/24	Additional edits to Dundon application.	MPD	FEEAPPS	0.50	185.00
08/12/24	Forward e-mail with revised Dundon application and redline for review.	MPD	FEEAPPS	0.20	74.00
08/13/24	Correspond regarding Dundon retention app and supplemental retention papers for PBN.	RAP	FEEAPPS	0.40	308.00
08/13/24	Email exchanges with team regarding supplemental retention application (.1); review same and edit for filing (.3).	WJM	FEEAPPS	0.40	480.00
08/14/24	Calendar of deadlines relating to Dundon Retention Application.	MPD	FEEAPPS	0.20	74.00
08/20/24	Review CNO and approve for filing.	RAP	FEEAPPS	0.20	154.00
08/21/24	Meet with team regarding filing first monthly and first and final fee application.	WJM	FEEAPPS	0.20	240.00
08/28/24	Review of invoice for monthly fee statement.	MPD	FEEAPPS	2.20	814.00
08/28/24	Conference with M. Dermatis regarding monthly fee statement finalizing and filing Friday.	WJM	FEEAPPS	0.20	240.00
08/29/24	Prepare pro hac papers for B. Moore and send to co-counsel for filing.	MPD	FEEAPPS	0.50	185.00
08/29/24	Finalize first drafts of Porzio's First (1.1) and Second Monthly Fee Statements (1.1) and send to W. Martin, Jr. for review (.3).	MPD	FEEAPPS	2.50	925.00
08/30/24	Receive e-mail from W. Martin, Jr. regarding edits to Porzio's Second Monthly Fee Statement (.5); Finalize (.2) and forward to local counsel for filing (.2).	MPD	FEEAPPS	0.90	333.00
08/30/24	Finalize and forward Porzio's First Monthly Fee Statement to co-counsel for filing.	MPD	FEEAPPS	0.40	148.00
			FEEAPPS Total	19.10	8,543.00
08/01/24	Discussion concerning Equity Committee's response to fee statements and review of case documentation concerning same.	DES	FEEOBS	0.20	125.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/06/24	Download and circulate First Monthly Fee Statement for Munsch Hardt.	MPD	FEEOBS	0.10	37.00
			FEEOBS Total	0.30	162.00
08/09/24	Review of docket to answer client question on cash collateral appeal (.1); discussion concerning same (.1).	DES	FINANCE	0.20	125.00
08/12/24	Discussion with W. Martin concerning dismissal of cash collateral appeal.	DES	FINANCE	0.10	62.50
08/21/24	Call with T. Califano regarding committee negotiations with Lender and next steps - suggestion of mediation.	WJM	FINANCE	0.30	360.00
			FINANCE Total	0.60	547.50
08/01/24	Review and revise proposed notice of withdrawal and discussion concerning same.	DES	LITIGATE	0.30	187.50
08/01/24	Review e-mail (.2) regarding preparation of document for withdrawal of Standing Motion and prepare (.4).	MPD	LITIGATE	0.60	222.00
08/05/24	Discussion with team concerning notice of withdrawal.	DES	LITIGATE	0.10	62.50
08/05/24	Review docket and send follow up e-mail to team regarding filing of Withdrawal Notice.	MPD	LITIGATE	0.20	74.00
08/06/24	Locate all available transcripts from case and download for team use.	MPD	LITIGATE	0.30	111.00
08/06/24	Draft Notice of Submission of Stipulated Confidentiality Agreement and Protective Order and forward to D. Sklar for review.	MPD	LITIGATE	0.40	148.00
08/06/24	Review e-mail from D. Sklar regarding preparation of draft Notice regarding submission of Stipulated Confidentiality Agreement and Protective Order with Debtors.	MPD	LITIGATE	0.10	37.00
08/07/24	Review of filed Notice of Stipulated Confidentiality Agreement and Protective Order.	MPD	LITIGATE	0.10	37.00
08/07/24	Review R. Parisi draft interview outline and add comments and revise (.5); conference with R. Parisi in preparation for Apelian interview (.3); attend Apelian interview (1.0).	WJM	LITIGATE	1.80	2,160.00
08/09/24	Review filed Protective Order (.5).	BSM	LITIGATE	0.50	417.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/12/24	Research regarding affirmative defense under NJ law for insider loans (.8); and e-mail J. Mairo regarding same (.2).	PG	LITIGATE	1.00	580.00
08/13/24	Review research memorandum regarding derivative versus direct claims and conduct additional research under 8-K disclosure requirements (1.5).	BSM	LITIGATE	1.50	1,252.50
08/13/24	Compare 10-Q language for 2 years and create spreadsheet of same.	PG	LITIGATE	2.90	1,682.00
08/13/24	Review 10K and 10Q 9/23 and Innovatus default letter 1/17/2024 and propriety of MAC default.	WJM	LITIGATE	0.90	1,080.00
08/14/24	Download and circulate agenda for hearing on 8/20.	MPD	LITIGATE	0.20	74.00
08/14/24	Review native file issue with R. Parisi (.3); emails to and from A. Citron (.3) and telephone conference with A. Citron regarding review of same and demand for same (.3).	WJM	LITIGATE	0.90	1,080.00
08/15/24	Review D. Sklar analysis regarding MAC provision and related (.2). Review P. Gyparakis emails regarding discovery review status (.2).	BSM	LITIGATE	0.40	334.00
08/15/24	Discussion with FA concerning NDA to be executed.	DES	LITIGATE	0.10	62.50
08/15/24	Discussion with Debtors' counsel concerning countersigned NDA.	DES	LITIGATE	0.10	62.50
08/16/24	Research additional 8-K requirements in connection with Termination of a Material Definitive Agreement, review of loan agreement.	BSM	LITIGATE	2.70	2,254.50
08/19/24	Download of all pleadings regarding Motion for Protective Order to NDrive.	MPD	LITIGATE	0.50	185.00
08/20/24	Review discovery platform for VIR transaction term sheet (.5) and e-mail R. Parisi regarding same (.2).	PG	LITIGATE	1.40	812.00
08/20/24	Email R. Parisi regarding VIR term sheet.	PG	LITIGATE	0.20	116.00
08/21/24	Revise deficiency letter as per Debtor's motion for protective order and e-mail same to W. Martin and R. Parisi.	PG	LITIGATE	1.20	696.00
08/23/24	Review file and loan documents regarding availability of additional tranches of loans from Innovatus and any SEC reporting requirements in	BSM	LITIGATE	5.60	4,676.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/26/24	connection with Notice of Default and prepare analysis of same (5.4); emails regarding same (.2). Emails with C. Santaniello regarding SEC regulations, Notice of Default and 8-K disclosure requirements (.3). Call with C. Santaniello to discuss same (.6).	BSM	LITIGATE	0.90	751.50
08/26/24	Exchange of emails with B. Moore regarding 8-K trigger and reporting requirements	CAS	LITIGATE	0.40	308.00
08/26/24	Review of Notice of Default and Loan Agreement regarding termination of line of credit access	CAS	LITIGATE	0.50	385.00
08/26/24	Research regarding 8-K report duties and report triggers	CAS	LITIGATE	1.20	924.00
08/26/24	Call with B. Moore regarding memo regarding 8-K reporting triggers; need for additional research	CAS	LITIGATE	0.50	385.00
08/27/24	Research regarding enforcement of MAC's in loan agreements.	PG	LITIGATE	1.90	1,102.00
08/28/24	Meeting with M. Venus and R. Parisi regarding preparation for evidentiary hearing.	WJM	LITIGATE	0.30	360.00
08/31/24	Reading documents in preparation for depositions and trial (3.5); lengthy telephone conference with potential witness (1.1); meeting with team regarding trial preparation workstreams (.8); emails to and from local counsel regarding procedures (.3).	WJM	LITIGATE	5.70	6,840.00
			LITIGATE Total	35.40	29,459.00
08/01/24	Conference call with Committee Members concerning case updates.	DES	MEETCOM	1.00	625.00
08/01/24	Attend part of Committee meeting.	RAP	MEETCOM	0.50	385.00
08/01/24	Draft Agenda for this morning's Eiger Committee Meeting (.4); circulate same for comment internally and revise same accordingly (.1); email to committee and circulate same (.1); conduct Committee Meeting regarding disclosure statement objection, leverage and next steps.(1.0).	WJM	MEETCOM	1.60	1,920.00
08/02/24	Draft report to committee on Eiger D & O Insurance (.2); review R. Parisi inquiry to Debtors following up on same	WJM	MEETCOM	0.40	480.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/05/24	(.2). Review of protective order and discussion with committee concerning same.	DES	MEETCOM	0.20	125.00
08/09/24	Telephone conference with G. Ribe regarding Innovatus settlement docket entry (.1); review email correspondence from two other equity holders regarding same (.1); review workstream R. Parisi to D. Sklar concerning response to committee and interested equity security holders on same (.1).	WJM	MEETCOM	0.30	360.00
08/11/24	Correspondence to and from committee in connection with upcoming meeting Tuesday to address Innovatus Claim.	WJM	MEETCOM	0.30	360.00
08/12/24	Draft agenda for EC meeting, circulate to W. Martin, Jr.	RAP	MEETCOM	0.40	308.00
08/12/24	Prepare for committee meeting tomorrow including review Innovatus bid and ask (.3); draft agenda for committee meeting (.3); conference with R. Parisi regarding same and edit agenda for circulation (.3).	WJM	MEETCOM	0.90	1,080.00
08/13/24	Attendance at call for Committee and financial advisor.	DES	MEETCOM	1.00	625.00
08/13/24	Prep for (0.5) and attend Committee call (0.9).	RAP	MEETCOM	1.40	1,078.00
08/13/24	Prepare agenda for committee meeting and circulate (.3); pre-meeting with professionals team and walk through agenda for committee meeting (.5); conduct committee meeting (1.0).	WJM	MEETCOM	1.80	2,160.00
08/13/24	Draft memo to committee regarding claims against Innovatus.	WJM	MEETCOM	0.30	360.00
08/14/24	Review R. Parisi email to committee regarding decision points relative to settlement discussions and plan (.1); draft follow-up email to committee regarding same (.2); email from G. Ribe regarding settlement approaches with Innovatus (.1); email to committee reaffirming decision point as to same (.2).	WJM	MEETCOM	0.60	720.00
08/15/24	Review B. Moore and C. Santaniello analysis on 8K reportable events per	WJM	MEETCOM	1.00	1,200.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	committee inquiry (.3); dig into same and share additional thoughts on second avenue of inquiry (.4); meet with C. Santaniello and B. Moore regarding same (.3).				
08/15/24	Telephone conference with committee member regarding post-effective date governance structure.	WJM	MEETCOM	0.30	360.00
08/16/24	Meetings with committee members regarding governance issues and approach (.5); telephone conference with M. Dundon regarding same (.2).	WJM	MEETCOM	0.70	840.00
08/22/24	Attend Committee call (left early).	RAP	MEETCOM	0.80	616.00
08/22/24	Meet with R. Parisi to create agenda for committee meeting (.3); create and revise agenda for committee meeting and distribute (.3); committee meeting (.9).	WJM	MEETCOM	1.50	1,800.00
08/23/24	Speak with shareholder regarding case status.	RAP	MEETCOM	0.70	539.00
08/25/24	Emails with Committee regarding documents provided from Debtors regarding informal discovery pursuant to specific requests.	RAP	MEETCOM	0.30	231.00
08/27/24	Emails with the Equity Committee on status and potential adjournment of confirmation to seek settlements regarding D&O's and potentially insurer (.2).	BSM	MEETCOM	0.20	167.00
08/27/24	Draft and revise communication with committee regarding possible adjournment of confirmation hearing (.4); email exchanges with committee members regarding same (.3).	WJM	MEETCOM	0.70	840.00
08/28/24	Emails with Committee regarding status and settlement discussions (.2).	BSM	MEETCOM	0.20	167.00
08/28/24	Prepare update email to committee scheduling committee meeting for Friday (.5); revise and send (.2); review debtor's brief and letter and forward each separately to committee with additional commentary (.3).	WJM	MEETCOM	1.00	1,200.00
08/29/24	Emails with Committee regarding Plan, proposed releases, voting and related (.3).	BSM	MEETCOM	0.30	250.50
08/29/24	Draft email to shareholder concerning	DES	MEETCOM	0.30	187.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/30/24	Equity Committee's investigation. Teams call with Equity Committee to discuss case status, objection and confirmation hearing next week (.7).	BSM	MEETCOM	0.70	584.50
08/30/24	Committee call.	RAP	MEETCOM	0.80	616.00
08/31/24	Emails with Committee regarding settlement negotiations and status in connection with confirmation hearing next week (.3).	BSM	MEETCOM	0.30	250.50
08/31/24	Numerous conversations and email exchanges with committee members regarding prosecution of strategy of objecting to D & O releases in connection with confirmation hearing Thursday.	WJM	MEETCOM	0.90	1,080.00
MEETCOM Total				21.40	21,515.00
08/01/24	Discussion with W. Martin in advance of Committee call.	DES	PLANDSCL	0.10	62.50
08/01/24	Discussion with P. Gyparakis concerning discovery review.	DES	PLANDSCL	0.10	62.50
08/01/24	Review of Debtors filings to extend plan exclusivity and deadline to assume or reject leases.	DES	PLANDSCL	0.50	312.50
08/01/24	Review of e-mails from P. Wittekind regarding status of discovery for client review.	MPD	PLANDSCL	0.20	74.00
08/01/24	Continue discovery review.	MPD	PLANDSCL	1.50	555.00
08/01/24	Finalize conversion of non-confidential and confidential-only items in Innovatus production sets 1 through 9 into searchable PDF format for provision to client; finalize spreadsheet correlating Bates numbers of PDFs to original document filenames and email metadata to facilitate client review of items; upload PDFs and spreadsheet to secure site for client download; multiple communications with client representatives and Porzio team regarding production items provided to client	PCW	PLANDSCL	0.70	294.00
08/01/24	Review Innovatus production sets 1 through 9 to extract all email history and other document information included in	PCW	PLANDSCL	1.50	630.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	load files provided with productions; extract all data fields and generate spreadsheet to be used by bankruptcy team to assess extent of Innovatus's compliance with OESHC's discovery requests; communications with team members regarding use of spreadsheet to streamline document review and identify deficiencies in Innovatus's productions				
08/01/24	Continue preparation of index of discovery.	SJB	PLANDSCL	4.30	1,376.00
08/02/24	Review and respond to correspondence related to document productions, coordinate access to EPIQ systems with team. Initial review of documents.	CPM	PLANDSCL	1.50	982.50
08/02/24	Review of correspondence and discussion amongst team concerning document review.	DES	PLANDSCL	0.20	125.00
08/02/24	Discussion concerning Innovatus discovery review.	DES	PLANDSCL	0.20	125.00
08/02/24	Prepare e-mail to C. Mazza and S. Backer with draft complaint and information relevant for discovery review.	MPD	PLANDSCL	0.50	185.00
08/02/24	Coordinate access for additional reviewers to e-discovery platform.	MPD	PLANDSCL	0.50	185.00
08/02/24	Further revision and refining of classification tags and coding form in master e-discovery database to facilitate attorney review of Innovatus production sets 1 through 9; multiple communications with review team regarding classification of items for use in support of Committee's Complaint against Innovatus				
08/02/24	Attend tax call with Debtor team (0.8).	RAP	PLANDSCL	0.80	616.00
08/02/24	Coordination regarding Innovatus production.	RAP	PLANDSCL	0.30	231.00
08/02/24	Coordinate third party access letter (0.2).	RAP	PLANDSCL	0.20	154.00
08/02/24	Initial review and analysis of Innovatus discovery (.9); telephone conference with team members regarding workload and staffing on same (.3).	WJM	PLANDSCL	1.20	1,440.00
08/03/24	Check in with team regarding status of document production and completion of	CPM	PLANDSCL	0.20	131.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/03/24	review. Review of various e-mails regarding discovery review.	MPD	PLANDSCL	1.00	370.00
08/03/24	Review and process document production via Epiq.	PG	PLANDSCL	6.30	3,654.00
08/04/24	Communications with team regarding division of labor for document review (0.3). Review batching and tagging to date and send communication with suggestions for next round of review.	CPM	PLANDSCL	0.80	524.00
08/04/24	Discussion concerning D&O investigation and upcoming interview.	DES	PLANDSCL	0.10	62.50
08/04/24	Review of various e-mails regarding discovery; Enter database to review; e- mail to team regarding issue with images,	MPD	PLANDSCL	1.20	444.00
08/05/24	Call with Porzio team to discuss discovery review status and related (.6).	BSM	PLANDSCL	0.60	501.00
08/05/24	Emails regarding discovery status and assignments (.6).	BSM	PLANDSCL	0.60	501.00
08/05/24	Initial review of protective order for D&O discovery.	DES	PLANDSCL	0.90	562.50
08/05/24	Meeting concerning strategy for Debtors' CEO interview and D&O discovery.	DES	PLANDSCL	0.70	437.50
08/05/24	Discussion with litigation team concerning impact of protective orders.	DES	PLANDSCL	0.10	62.50
08/05/24	Teams discussion concerning Innovatus discovery review.	DES	PLANDSCL	0.70	437.50
08/05/24	Discussion concerning finalizing protective order.	DES	PLANDSCL	0.10	62.50
08/05/24	Discussion with S. Backer concerning investigation into SEC filings.	DES	PLANDSCL	0.10	62.50
08/05/24	Discussion concerning strategy for interview with Debtors' CEO.	DES	PLANDSCL	0.10	62.50
08/05/24	Discussion with Debtors' counsel concerning upcoming interview of CEO.	DES	PLANDSCL	0.10	62.50
08/05/24	Final review and revisions of protective order before submission to Debtors.	DES	PLANDSCL	0.90	562.50
08/05/24	Discussion with Debtors concerning finalizing protective order.	DES	PLANDSCL	0.10	62.50
08/05/24	Discussion concerning initial review of protective order.	DES	PLANDSCL	0.10	62.50
08/05/24	Initial download and configuration of Innovatus production sets 10 and 11 for incorporation into master e-discovery	PCW	PLANDSCL	2.70	1,134.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/05/24	database (1.8); identify issues with various images produced by Innovatus in sets 6 through 9 and resolve to enable attorney review (0.9)				
08/05/24	Meeting (internal) regarding status of first round of document production review and timing of remaining documents, logistics regarding same.	PG	PLANDSCL	0.90	522.00
08/05/24	Continue to review and process document production via Epiq.	PG	PLANDSCL	3.20	1,856.00
08/05/24	Review Withdrawal of standing motion, emails regarding same.	RAP	PLANDSCL	0.30	231.00
08/05/24	Outline of David Apelian Interview.	RAP	PLANDSCL	5.00	3,850.00
08/05/24	Call regarding Innovatus production with team.	RAP	PLANDSCL	0.70	539.00
08/05/24	Continue preparation of index of discovery.	SJB	PLANDSCL	6.30	2,016.00
08/05/24	Meeting with R. Parisi and D. Sklar in preparation for D. Apelian interview scheduled for Thursday (.6); meet with R. Parisi regarding same (.3); emails to and from P. Gyparakis regarding Innovatus discovery (.2); meeting with discovery team regarding Innovatus discovery (.8); review and analyze specific tagged documents potentially helpful to strategy (1.6).	WJM	PLANDSCL	3.50	4,200.00
08/06/24	Review emails regarding discovery productions and review status (.3).	BSM	PLANDSCL	0.30	250.50
08/06/24	Review of documents in EPIQ database.	CPM	PLANDSCL	2.00	1,310.00
08/06/24	Review and revise protective order for discovery.	DES	PLANDSCL	0.80	500.00
08/06/24	Discussion concerning strategy for interview.	DES	PLANDSCL	0.20	125.00
08/06/24	Review of outline for interview with Debtors' CEO (.4); discussion concerning same (.1).	DES	PLANDSCL	0.50	312.50
08/06/24	Review of correspondence concerning upcoming interview.	DES	PLANDSCL	0.10	62.50
08/06/24	Review of correspondence from Debtors concerning protective order.	DES	PLANDSCL	0.10	62.50
08/06/24	Discussion with Debtors concerning finalizing protective order.	DES	PLANDSCL	0.10	62.50
08/06/24	Review of documents for the upcoming interview particularly earlier hearing	DES	PLANDSCL	1.40	875.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/06/24	transcript. Discussion with R. Parisi concerning protective order issues.	DES	PLANDSCL	0.10	62.50
08/06/24	Discussion with adversary concerning drafting protective order.	DES	PLANDSCL	0.10	62.50
08/06/24	Discussion with M. Dermatis concerning drafting of notice for protective order.	DES	PLANDSCL	0.10	62.50
08/06/24	Review of Notice of Combined Hearing on Disclosure Statement and Plan and update of calendars as needed.	MPD	PLANDSCL	0.50	185.00
08/06/24	Prepare documents for interview with Debtors' CEO.	MPD	PLANDSCL	2.60	962.00
08/06/24	Finalize import of Innovatus production sets 10 and 11 into master e-discovery database, including extraction of full text from produced images (1.7); review all items to identify highly-confidential items not to be provided to clients (1.4); export into PDF format all non-highly confidential items for provision to clients (0.8); convert all highly-confidential items in sets 1 through 11 into PDF format to facilitate internal Porzio review regarding propriety of highly-confidential designations (0.3)	PCW	PLANDSCL	4.20	1,764.00
08/06/24	Continue to review and process document production via Epiq.	PG	PLANDSCL	4.10	2,378.00
08/06/24	Finalize Apelian outline (2.4); discuss with D. Sklar and W. Martin, Jr. (0.4); implement changes from D. Sklar and W. Martin, Jr. (0.4); circulate to committee (0.1) and abbreviated outline to debtors (0.3); review first day transcript (1.3).	RAP	PLANDSCL	4.90	3,773.00
08/06/24	Continue preparation of index of discovery.	SJB	PLANDSCL	3.10	992.00
08/06/24	Review Eiger public filings for information for interview of Dr. Apelian	SJB	PLANDSCL	4.20	1,344.00
08/06/24	Work up outline for Dr. Apelian Interview (.8); revise same (.5); meeting with R. Parisi in preparation for same (.7); review agreement reached with Debtor on custodians and production of 24,000 documents (.8); review email correspondence D. Sklar and J. Munz	WJM	PLANDSCL	3.30	3,960.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/06/24	regarding same (.2); conference with D. Sklar regarding next steps on confidentiality and production (.3). Review DS Order and scheduling (.3); email to M. Dermatis regarding same (.2).	WJM	PLANDSCL	0.50	600.00
08/07/24	Informal interview with Dr. Apelian (1.1).	BSM	PLANDSCL	1.10	918.50
08/07/24	Review of documents in EPIQ discovery database for responsiveness and content, and tagging of same.	CPM	PLANDSCL	1.20	786.00
08/07/24	Discussion concerning protective order and filing issues.	DES	PLANDSCL	0.10	62.50
08/07/24	Discussion with R. Parisi concerning strategy for Debtors' CEO interview.	DES	PLANDSCL	0.10	62.50
08/07/24	Preparation for interview of Debtors' CEO.	DES	PLANDSCL	0.10	62.50
08/07/24	Attendance at interview with Debtors' CEO.	DES	PLANDSCL	1.20	750.00
08/07/24	Follow-up from interview with Debtors' CEO.	DES	PLANDSCL	0.20	125.00
08/07/24	Review of draft protective order (.3); review of correspondence from local counsel on same (.1); discussion with debtors' counsel concerning same (.1).	DES	PLANDSCL	0.50	312.50
08/07/24	Discussion with Debtors' counsel concerning filing of protective order.	DES	PLANDSCL	0.10	62.50
08/07/24	Begin preparation of first draft of Liquidating trust agreement.	MPD	PLANDSCL	0.30	111.00
08/07/24	Review e-mail regarding preparation of first draft of Liquidating trust agreement.	MPD	PLANDSCL	0.10	37.00
08/07/24	Continued identification and resolution of issues with various images produced by Innovatus in sets 6 through 9 in order to enable attorney review	PCW	PLANDSCL	0.80	336.00
08/07/24	Continue to review and process Innovatus document production via Epiq.	PG	PLANDSCL	2.90	1,682.00
08/07/24	Continue updating David Apelian Interview Outline (1.7); correspond with team and committee members regarding same (0.4).	RAP	PLANDSCL	2.10	1,617.00
08/07/24	Attend Dr. Apelian Interview.	RAP	PLANDSCL	1.20	924.00
08/07/24	Emails with Innovatus counsel regarding discovery issues.	RAP	PLANDSCL	0.20	154.00
08/07/24	Look through Eiger Public filings for	SJB	PLANDSCL	2.40	768.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/07/24	information for interview				
08/07/24	Review/Index Eiger Discovery	SJB	PLANDSCL	2.10	672.00
08/07/24	Telephone conference with Kizzy Jarashow regarding Glenn purchase and possible alternate plan transaction (.3); email communique to committee regarding same (.3).	WJM	PLANDSCL	0.60	720.00
08/08/24	Emails regarding discovery production to date and call with Debtors (.3). Conference with P. Gyparakis regarding discovery status review and related (.4).	BSM	PLANDSCL	0.70	584.50
08/08/24	Porzio internal call regarding discovery status and strategy (.5). Call with Debtors' counsel to discuss discovery related issues (.2).	BSM	PLANDSCL	0.90	751.50
08/08/24	Conference call with S. Backer and P. Gyparakis to discuss document review and procedure for tagging documents, breakup of work, and reporting (1.2). Review of document production (2.9).	CPM	PLANDSCL	4.10	2,685.50
08/08/24	Conference call with team regarding status of document review. Call with Sidley team regarding document production.	CPM	PLANDSCL	0.90	589.50
08/08/24	Draft summary of Dr. CEO interview for client.	DES	PLANDSCL	1.30	812.50
08/08/24	Discussion with S. Backer concerning document review and upcoming call.	DES	PLANDSCL	0.20	125.00
08/08/24	Call with team concerning discovery production issues.	DES	PLANDSCL	0.60	375.00
08/08/24	Review of recap from meeting.	DES	PLANDSCL	0.10	62.50
08/08/24	Review of case correspondence for issues related to J. Glenn (.5); draft outline for call with J. Glenn (.5).	DES	PLANDSCL	1.00	625.00
08/08/24	Continued configuration of Innovatus sets 10 and 11 imported into e-discovery database, including resolution of issue with format of 6,000-page document that Innovatus redacted and that prevented attorney review	PCW	PLANDSCL	0.60	252.00
08/08/24	Meeting (internal) regarding document production and call with debtors' counsel to discuss next steps.	PG	PLANDSCL	0.70	406.00
08/08/24	Telephone conference with debtors' counsel to discuss Innovatus document	PG	PLANDSCL	0.20	116.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/08/24	production next steps. Prepare for meeting (internal): goals for call, reason for call and status of review of production (.6); confer with B. Moore regarding same (.4).	PG	PLANDSCL	1.00	580.00
08/08/24	Call with W. Martin, Jr. regarding internal Eiger discovery meetings and next steps; coordinate call with Debtor team.	RAP	PLANDSCL	0.80	616.00
08/08/24	Call with A. Wallice regarding LT Agreement and related issues.	RAP	PLANDSCL	0.30	231.00
08/08/24	Work on discovery approach and document review.	WJM	PLANDSCL	0.80	960.00
08/08/24	Internal call with document review team regarding workstreams and status of productions (.7); meeting with Debtor team and PBN team regarding same (.3).	WJM	PLANDSCL	1.00	1,200.00
08/08/24	Meet with R. Parisi regarding committee's interest in Jeffrey Glenn plan strategy.	WJM	PLANDSCL	0.30	360.00
08/09/24	Continued review and tagging of documents in discovery database.	CPM	PLANDSCL	0.50	327.50
08/09/24	Continue to review and process document production via Epiq.	PG	PLANDSCL	2.20	1,276.00
08/09/24	Meeting (internal) to discuss Innovatus document production review assignments.	PG	PLANDSCL	0.60	348.00
08/09/24	Work on document review/discovery project concerning claims against Innovatus (1.2); telephone conference with C. Mazza regarding workstreams and deliverables relating to same (.6).	WJM	PLANDSCL	1.80	2,160.00
08/10/24	Telephone conference with C. Mazza with detailed report regarding status of document discovery and analysis as to claims against Innovatus (.4); brief conference with R. Parisi regarding same (.1).	WJM	PLANDSCL	0.50	600.00
08/11/24	Review R. Parisi email exchange with Anne Wallace (.1); review R. Parisi summary of discussion regarding motions to quash (.1) and objections to claims (.2); emails to and from document discovery team regarding progress and deliverable (.2).	WJM	PLANDSCL	0.50	600.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/12/24	Teams call to discuss discovery status and related (.3).	BSM	PLANDSCL	0.30	250.50
08/12/24	Continued review and tagging of documents in discovery database.	CPM	PLANDSCL	3.10	2,030.50
08/12/24	Discussion concerning discovery production.	DES	PLANDSCL	0.10	62.50
08/12/24	Conference call with team concerning status of document review.	DES	PLANDSCL	0.40	250.00
08/12/24	Draft liquidating trust agreement.	DES	PLANDSCL	2.60	1,625.00
08/12/24	Review of letter concerning notice of default and provide analysis of same.	DES	PLANDSCL	0.20	125.00
08/12/24	Review of case law concerning plan confirmation issues.	DES	PLANDSCL	1.20	750.00
08/12/24	Review of discovery production letter.	DES	PLANDSCL	0.10	62.50
08/12/24	Respond to e-mail from R. Parisi regarding Liquidating Trustee Agreement draft.	MPD	PLANDSCL	0.10	37.00
08/12/24	Follow up e-mail to D. Sklar regarding preparation of liquidating trust agreement.	MPD	PLANDSCL	0.10	37.00
08/12/24	Download, assess, configure, and import Innovatus production sets 12 and 13 into master e-discovery database	PCW	PLANDSCL	1.40	588.00
08/12/24	Initial download and assessment of Equity Committee / D&O production set 1	PCW	PLANDSCL	0.40	168.00
08/12/24	Conference call (internal) regarding 2004 discovery.	PG	PLANDSCL	0.50	290.00
08/12/24	Discovery call with team.	RAP	PLANDSCL	0.20	154.00
08/12/24	Emails and coordination regarding Apelian interview.	RAP	PLANDSCL	0.30	231.00
08/12/24	Review/index of Eiger discovery.	SJB	PLANDSCL	7.60	2,432.00
08/12/24	Meet with Porzio team regarding status of document review (.5); review additional production received from Innovatus today (.2); emails from P. Gyparakis with default notice and deficiency letter draft (.1); revise deficiency letter (.3); conference with R. Parisi regarding next steps on discovery (.2).	WJM	PLANDSCL	1.00	1,200.00
08/13/24	Porzio Teams call to discuss discovery status and related (.8).	BSM	PLANDSCL	0.80	668.00
08/13/24	Conference call with team regarding document review in advance of call with	CPM	PLANDSCL	1.60	1,048.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	Innovatus counsel (0.8). Continued document review (0.8).				
08/13/24	Conference call concerning Innovatus discovery.	DES	PLANDSCL	0.80	500.00
08/13/24	Discussion with P. Wittekind concerning discovery production.	DES	PLANDSCL	0.10	62.50
08/13/24	Follow-up after meeting with FA and Committee concerning case issues.	DES	PLANDSCL	0.20	125.00
08/13/24	Work on finalizing NDAs for discovery review.	DES	PLANDSCL	0.30	187.50
08/13/24	Discussion with R. Parisi concerning D&O investigation.	DES	PLANDSCL	0.10	62.50
08/13/24	Review of notes and revise outline for discussion with Jeffrey Glenn.	DES	PLANDSCL	0.70	437.50
08/13/24	Final configuration and importing of Equity Committee / D&O set 1 into e-discovery database	PCW	PLANDSCL	1.30	546.00
08/13/24	Review Innovatus production sets 12 and 13 to isolate highly-confidential items to be excluded from provision to clients	PCW	PLANDSCL	0.70	294.00
08/13/24	Conference call (internal) regarding 2004 discovery.	PG	PLANDSCL	0.90	522.00
08/13/24	Discovery update meeting.	RAP	PLANDSCL	0.80	616.00
08/13/24	Quick review of plan supplement material (0.3); circulate to committee (0.1).	RAP	PLANDSCL	0.40	308.00
08/13/24	Review Jeffrey Glenn outline and committee markup.	RAP	PLANDSCL	0.30	231.00
08/13/24	Review and index of Eiger D&O discovery	SJB	PLANDSCL	6.40	2,048.00
08/13/24	Work with R. Parisi on committee request for Agenda for J. Glenn discussion (.6); telephone conference with K. Jarashow regarding same (.4).	WJM	PLANDSCL	1.00	1,200.00
08/14/24	Participate in second interview with Dr. Apelian (1.9).	BSM	PLANDSCL	1.90	1,586.50
08/14/24	Review and revise NDA to be executed by financial advisor.	DES	PLANDSCL	0.50	312.50
08/14/24	Meeting with Debtors' CEO.	DES	PLANDSCL	2.00	1,250.00
08/14/24	Discussion with P. Wittekind concerning document production.	DES	PLANDSCL	0.10	62.50
08/14/24	Draft correspondence to Debtors' counsel concerning NDA for financial advisor.	DES	PLANDSCL	0.30	187.50
08/14/24	Review and revise liquidation trust agreement to finalize draft.	DES	PLANDSCL	2.10	1,312.50

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/14/24	Discussion concerning review of document production.	DES	PLANDSCL	0.10	62.50
08/14/24	Telephone call with P. Wittekind regarding assistance on tagging of Innovatus discovery for confidential (.5); Begin review (4).	MPD	PLANDSCL	4.50	1,665.00
08/14/24	Initial review of Equity Committee / D&O set 1 to isolate highly-confidential items (0.5); multiple communications with team members regarding highly-confidential and redacted items	PCW	PLANDSCL	0.80	336.00
08/14/24	Multiple communications with team members regarding review and classification of items in Innovatus production sets 12 and 13 (0.6); identify and resolve issues with production format of certain items in sets 12 and 13 that impeded attorney review (0.9)	PCW	PLANDSCL	1.50	630.00
08/14/24	Prep for Apelian interview (1.1); conduct Apelian informal deposition (1.8).	RAP	PLANDSCL	2.90	2,233.00
08/14/24	Continue preparation of index of discovery.	SJB	PLANDSCL	3.50	1,120.00
08/14/24	Summarize Highland and Ebix cases for Eiger plan	SJB	PLANDSCL	2.30	736.00
08/14/24	Meet with team in preparation for interview of D. Apelian (.2); meet with R. Parisi in preparation for same (.3); attend informal interview of Apelian (2.5).	WJM	PLANDSCL	3.00	3,600.00
08/15/24	Discussion concerning liquidating trust agreement.	DES	PLANDSCL	0.10	62.50
08/15/24	Discussion with J. Zhou concerning document review.	DES	PLANDSCL	0.30	187.50
08/15/24	Update team on status of document review.	DES	PLANDSCL	0.10	62.50
08/15/24	Review of documents for D&O discovery.	DES	PLANDSCL	1.00	625.00
08/15/24	Review of discovery and apply tagging for confidential documents.	MPD	PLANDSCL	0.50	185.00
08/15/24	Review of discovery and apply tagging for confidential documents.	MPD	PLANDSCL	3.60	1,332.00
08/15/24	Convert D&O production set 1 into PDF format to facilitate attorney review and assessment (0.8); communications with team members regarding protocol for	PCW	PLANDSCL	1.10	462.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/15/24	review of native and redacted files in D&O production set 1 (0.3)				
08/15/24	Prepare report of 2004 discovery review and e-mail team regarding same.	PG	PLANDSCL	1.30	754.00
08/15/24	Finalize liquidating trust agreement (1.4); circulate to committee (0.1); review of bylaws (0.5) and recirculation with updated membership and Dundon retention (0.1).	RAP	PLANDSCL	2.10	1,617.00
08/15/24	Committee emails regarding plan structure; discussion with W. Martin, Jr. regarding same.	RAP	PLANDSCL	0.40	308.00
08/15/24	Chart of D&O retention payments made by Eiger	SJB	PLANDSCL	2.20	704.00
08/15/24	Finish listening to Ebix hearing and finish summary of Ebix case	SJB	PLANDSCL	1.20	384.00
08/16/24	Review Debtors Second Amended Plan, draft Plan Administrator Agreement, Retained Cause of Action Exhibit and emails regarding same (1.5).	BSM	PLANDSCL	1.50	1,252.50
08/16/24	Emails regarding Debtors' Plan and Disclosure statement and Liquidating Trust Agreement (.3).	BSM	PLANDSCL	0.30	250.50
08/16/24	Discussion with S. Backer concerning document production.	DES	PLANDSCL	0.10	62.50
08/16/24	Document review of production by Debtors.	DES	PLANDSCL	5.80	3,625.00
08/16/24	Discussion with P. Desir concerning Eiger document review.	DES	PLANDSCL	0.20	125.00
08/16/24	Process batch 11 & 12 of Innovatus production.	PG	PLANDSCL	3.70	2,146.00
08/16/24	Review PA agreement redline and emails regarding same.	RAP	PLANDSCL	0.50	385.00
08/16/24	Call with Committee member and W. Martin, Jr. regarding bifurcated plan structure (0.8); emails regarding same (0.2).	RAP	PLANDSCL	1.00	770.00
08/16/24	Review plan supplement materials including retained causes of action list; plan administrator agreement and liquidating trust agreement and provide comments on same (1.5); emails to and from Debtor team regarding wind -down budget updated (.2).	WJM	PLANDSCL	1.70	2,040.00
08/18/24	Continued review of Equity Committee /	PCW	PLANDSCL	3.30	1,386.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	D&O set 1 to isolate highly-confidential items				
08/18/24	Review and Index Eiger discovery	SJB	PLANDSCL	3.20	1,024.00
08/18/24	Zoom meeting with T. Califano and team regarding steps moving towards confirmation.	WJM	PLANDSCL	0.50	600.00
08/19/24	D&O investigation document review.	DES	PLANDSCL	3.90	2,437.50
08/19/24	Review document production and flag for further review for director and officer liability.	JZ	PLANDSCL	2.10	840.00
08/19/24	Export D&O Equity Committee set 1 non-highly confidential documents and convert into PDF format for clients' review; generate spreadsheet for clients of all metadata for items in D&O set 1	PCW	PLANDSCL	1.20	504.00
08/19/24	Initial download, assessment, and configuration of D&O production set 2 for importing into e-discovery database	PCW	PLANDSCL	0.70	294.00
08/19/24	Extract documents identified as supportive of Committee's D&O claims for review by principal W. Martin	PCW	PLANDSCL	0.20	84.00
08/19/24	Supplement master spreadsheet of all items produced by Innovatus with metadata for items in Innovatus production sets 12-13	PCW	PLANDSCL	0.40	168.00
08/19/24	E-mail team regarding status of 2004 documents (batches 11 & 12).	PG	PLANDSCL	0.70	406.00
08/19/24	Process batch 11 & 12 of Innovatus production.	PG	PLANDSCL	3.70	2,146.00
08/19/24	Review insider payment spreadsheet; discuss with S. Backer.	RAP	PLANDSCL	0.40	308.00
08/19/24	Review of Eiger D&O Discovery	SJB	PLANDSCL	7.70	2,464.00
08/19/24	Document review and analysis in connection with continuing D&O discovery and in preparation for committee call tomorrow.	WJM	PLANDSCL	3.00	3,600.00
08/20/24	Review emails regarding discovery productions and status, review documents tabbed as potentially important (1.6).	BSM	PLANDSCL	1.60	1,336.00
08/20/24	Review of discovery production for D&O investigation.	DES	PLANDSCL	2.10	1,312.50
08/20/24	Meeting with R. Parisi and P. Gyparakis concerning discovery.	DES	PLANDSCL	0.30	187.50
08/20/24	Meeting with team concerning Eiger	DES	PLANDSCL	0.20	125.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/20/24	document review. Phone call with J. Zhou concerning discovery production.	DES	PLANDSCL	0.10	62.50
08/20/24	Review document production and flag for further review.	JZ	PLANDSCL	2.80	1,120.00
08/20/24	Identify documents in Innovatus sets 12 and 13 that were produced in non-standard format; exclude, convert, and replace problematic items to enable attorney review	PCW	PLANDSCL	1.30	546.00
08/20/24	Complete configuration and importing of D&O production set 2 into e-discovery database (2.2); run processes to identify items endorsed as confidential and highly confidential (1.3); export and convert non-highly confidential items into PDF for provision to clients (0.7); communications with team members regarding review of D&O set 2 (0.3)	PCW	PLANDSCL	4.50	1,890.00
08/20/24	Eiger Discovery Meeting with R. Parisi and D. Sklar.	PG	PLANDSCL	0.50	290.00
08/20/24	Review of VIR documents and communications with Committee regarding same.	RAP	PLANDSCL	0.40	308.00
08/20/24	Review of Eiger D&O Discovery	SJB	PLANDSCL	7.30	2,336.00
08/21/24	Discuss discovery status with Porzio discovery team.	BSM	PLANDSCL	0.30	250.50
08/21/24	Emails regarding discovery production updates and status, emails involving request for transparency by investor.	BSM	PLANDSCL	0.50	417.50
08/21/24	Review of documents for D&O investigation.	DES	PLANDSCL	2.80	1,750.00
08/21/24	Review document production for director and officer liability.	JZ	PLANDSCL	3.20	1,280.00
08/21/24	Complete review of discovery documents.	PRD	PLANDSCL	1.50	480.00
08/21/24	Review emails with Committee regarding LT / PA roles, budget, and related issues, discuss with W. Martin, Jr.	RAP	PLANDSCL	0.40	308.00
08/21/24	Review of Eiger D&O Discovery	SJB	PLANDSCL	5.80	1,856.00
08/21/24	Emails to and from Committee regarding PA/LT structure (.4); emails to and from Committee regarding releases for Ds & Os and possible resolution of same (.4);	WJM	PLANDSCL	2.50	3,000.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	telephone conference with G. Ribe (.3); telephone conference with K. Grossman (.3); telephone conference with Debtor team and R. Parisi regarding plan structure and changes to same (.1.1).				
08/21/24	Continued work on/review Eiger Debtor document production on Ds & Os.	WJM	PLANDSCL	1.90	2,280.00
08/22/24	Review of documents for D&O investigation.	DES	PLANDSCL	3.10	1,937.50
08/22/24	Coordinate meeting for D&O discovery issues.	DES	PLANDSCL	0.10	62.50
08/22/24	Review document production for director and officer liability.	JZ	PLANDSCL	2.80	1,120.00
08/22/24	Discussions regarding plan administrator issues with W. Martin, Jr.	RAP	PLANDSCL	0.70	539.00
08/22/24	Prepare D&O letter outline (0.8); discuss with W. Martin, Jr. (0.2).	RAP	PLANDSCL	1.00	770.00
08/22/24	Index of Eiger D&O discovery	SJB	PLANDSCL	5.10	1,632.00
08/22/24	Work on edits to plan and disclosure statement focused on plan administrator and Liquidating Trustee roles (1.3); telephone conference with D. Staut and R. Parisi regarding same (.6); telephone conference with D. Staut, R. Parisi and G. Broadbent regarding same (.6); emails from and to D. Staut and G. Broadbent regarding same (.4).	WJM	PLANDSCL	2.90	3,480.00
08/22/24	Review hot documents in preparation for letter regarding D&O claims, as authorized and directed by the Committee (.9); meetings with R. Parisi and D. Sklar regarding same (.4).	WJM	PLANDSCL	1.30	1,560.00
08/23/24	Call with P. Gyparakis to discuss discovery review and potential claims involving Innovatus (.3).	BSM	PLANDSCL	0.30	250.50
08/23/24	Emails regarding proposed releases in the Plan, recent case in Texas limiting releases in light of Purdue, orders regarding same in connection with potential plan objection (.6).	BSM	PLANDSCL	0.60	501.00
08/23/24	Teams call with W. Martin and R. Parisi regarding issues for inclusion in Plan objection as to releases for the directors and officers (.5). Email with D. Sklar to coordinate drafting of objection (.2).	BSM	PLANDSCL	0.70	584.50

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/23/24	Review D&O insurance policies: prepare correspondence	CJS	PLANDSCL	1.10	847.00
08/23/24	Meeting concerning Eiger document review.	DES	PLANDSCL	0.50	312.50
08/23/24	Discussion concerning D&O discovery issues.	DES	PLANDSCL	0.20	125.00
08/23/24	Begin drafting D&O letter (2.5) and review of case documentation concerning same from D&O production (5).	DES	PLANDSCL	7.50	4,687.50
08/23/24	Phone call with D. Oswald concerning Eiger document review.	DES	PLANDSCL	0.20	125.00
08/23/24	Discussion with local counsel concerning Eiger document review.	DES	PLANDSCL	0.10	62.50
08/23/24	Conference call with McKool Smith concerning document review.	DES	PLANDSCL	0.40	250.00
08/23/24	Discussion internally concerning discovery review with P. Wittekind.	DES	PLANDSCL	0.10	62.50
08/23/24	Discussion with co-counsel concerning discovery review.	DES	PLANDSCL	0.10	62.50
08/23/24	Review of documents to respond to co-counsel document review question.	DES	PLANDSCL	0.30	187.50
08/23/24	Call with D. Sklar regarding discovery assignment.	DMO	PLANDSCL	0.20	92.00
08/23/24	Review document production for director and officer liability.	JZ	PLANDSCL	6.40	2,560.00
08/23/24	Attend conference call with discovery review team to facilitate review of recent D&O productions	PCW	PLANDSCL	0.30	126.00
08/23/24	Download, assess, and configure D&O production set 3 for importing into e-discovery database (1.9); create classification tags and coding forms to facilitate efficient attorney review (0.8); communications with team members regarding protocols for classification of documents (0.3)	PCW	PLANDSCL	3.00	1,260.00
08/23/24	Discussion regarding progress of D&O discovery review.	RAP	PLANDSCL	0.50	385.00
08/23/24	Review and index of Eiger discovery	SJB	PLANDSCL	7.20	2,304.00
08/23/24	Meet with document review team in preparation for D&O letter (.5); meet with R. Parisi and B. Moore to outline objection to Plan to be filed next week focused upon D&O releases (.5).	WJM	PLANDSCL	1.00	1,200.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/23/24	Review and work with extensive discovery materials in connection with evidentiary basis for letter and objection to D&O releases (3.0); emails to and from Debtor team regarding insurance company notices (.3); telephone conference with C. Stoia regarding effort for refund of premium (.2); emails from and to C. Stoia regarding same (.1).	WJM	PLANDSCL	3.60	4,320.00
08/24/24	Finalize drafting of initial draft of D&O letter.	DES	PLANDSCL	2.60	1,625.00
08/24/24	Discussion concerning D&O investigation.	DES	PLANDSCL	0.30	187.50
08/24/24	Discovery analysis related to document production.	DMO	PLANDSCL	3.60	1,656.00
08/24/24	Review document production for director and officer liability.	JZ	PLANDSCL	3.80	1,520.00
08/24/24	Continue index of Eiger D&O discovery	SJB	PLANDSCL	3.80	1,216.00
08/24/24	Continued review and analysis of discovery production regarding D&O claims (.2.5); telephone conference with C. Stoia regarding approach on same (.3); telephone conference with R. Parisi regarding same (.2).	WJM	PLANDSCL	3.00	3,600.00
08/25/24	Review documents tagged for review in connection with potential D&O claims to be included in Plan release objection (1.8).	BSM	PLANDSCL	1.80	1,503.00
08/25/24	Continue discovery analysis of document production.	DMO	PLANDSCL	4.70	2,162.00
08/25/24	Review D&O discovery.	RAP	PLANDSCL	1.80	1,386.00
08/25/24	Continue review of discovery production regarding D&O (1.8); telephone conference with R. Parisi regarding same (.4); mark-up D. Sklar draft demand letter (.4).	WJM	PLANDSCL	2.60	3,120.00
08/26/24	Review documents tagged for review in connection with potential D&O claims to be included in Plan release objection (2.5).	BSM	PLANDSCL	2.50	2,087.50
08/26/24	Call with D. Sklar to discuss objection plan releases and strategy for same (.3).	BSM	PLANDSCL	0.30	250.50
08/26/24	Prepare demand letter to D&Os	CJS	PLANDSCL	0.60	462.00
08/26/24	Discussion with debtors concerning future productions.	DES	PLANDSCL	0.10	62.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/26/24	Review of documents from D&O investigation for drafting of objection to plan.	DES	PLANDSCL	1.10	687.50
08/26/24	Discussion with R. Parisi concerning Eiger D&O issues.	DES	PLANDSCL	0.20	125.00
08/26/24	Discussion with co-counsel concerning document review.	DES	PLANDSCL	0.10	62.50
08/26/24	Discussion with B. Moore concerning plan objection.	DES	PLANDSCL	0.40	250.00
08/26/24	Begin drafting objection to plan.	DES	PLANDSCL	3.30	2,062.50
08/26/24	Finalize discovery review and abstract.	DMO	PLANDSCL	4.30	1,978.00
08/26/24	Review document production for director and officer liability.	JZ	PLANDSCL	1.60	640.00
08/26/24	Review correspondence regarding discovery deficiencies, emails with team regarding same.	RAP	PLANDSCL	0.30	231.00
08/26/24	Call to discuss Gary Broadbent / PA proposal, emails regarding same.	RAP	PLANDSCL	0.40	308.00
08/26/24	Review of discovery in anticipation of inclusion in D&O settlement proposal / letter (1.8); discuss structure of letter with D. Sklar and W. Martin, Jr. (0.5); prepare letter (1.4); finalize with Committee edits (0.3) and W. Martin, Jr. final comments (0.4) and circulate to Debtors (0.1).	RAP	PLANDSCL	4.50	3,465.00
08/26/24	Index of Eiger D&O discovery	SJB	PLANDSCL	2.10	672.00
08/26/24	Finish Eiger D&O chart	SJB	PLANDSCL	1.20	384.00
08/26/24	Work on letter to Debtor regarding D&O claims (.9); review additional supportive discovery documents (.9); conference with R. Parisi regarding edits to letter (.4).	WJM	PLANDSCL	2.20	2,640.00
08/27/24	Review emails and letter in connection with potential settlement of D&O releases included in the Plan (.3).	BSM	PLANDSCL	0.30	250.50
08/27/24	Continue to review discovery production regarding potential D&O claims (2.6).	BSM	PLANDSCL	2.60	2,171.00
08/27/24	Review of correspondence concerning doc review and discussion concerning same.	DES	PLANDSCL	0.20	125.00
08/27/24	Discussion with P. Gyparakis concerning document review and necessary tasks.	DES	PLANDSCL	0.10	62.50
08/27/24	Draft objection to confirmation of Debtors' amended plan.	DES	PLANDSCL	6.10	3,812.50

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/27/24	Review document production for director and officer liability.	JZ	PLANDSCL	7.10	2,840.00
08/27/24	Extract all documents identified as supportive of Committee's D&O claims for review by principal W. Martin; convert items into PDF format to facilitate W. Martin's review	PCW	PLANDSCL	0.70	294.00
08/27/24	Review debtors email to Innovatus regarding discovery and deposition dates (.4) and e-mail R. Parisi and W. Martin regarding our position vis-À -vis same (.4).	PG	PLANDSCL	0.80	464.00
08/27/24	Export "hot" documents from discovery portal per D. Sklar and R. Parisi (.8) and e-mail group regarding same (.3).	PG	PLANDSCL	1.10	638.00
08/27/24	Speak with A. Wallice regarding plan issues (0.5); follow up with W. Martin, Jr. regarding same (0.3).	RAP	PLANDSCL	0.80	616.00
08/27/24	Begin preparing Plan objection outline (0.7); circulate to team (0.1); related research (1.1) and correspond regarding same (0.1).	RAP	PLANDSCL	2.00	1,540.00
08/27/24	Revise letter for purposes of circulating draft to insurers, discuss with W. Martin, Jr.	RAP	PLANDSCL	0.30	231.00
08/27/24	Continue working on Eiger Index	SJB	PLANDSCL	2.30	736.00
08/27/24	Emails to and from T. Califano regarding release dispute and D&O contributions (.3); conference with R. Parisi regarding same and strategy on same (.3); revise R. Parisi draft of proposed letter to insurers (.5); work with C. Stoia on finalizing same (.3); email to Debtors regarding claims against insurers/broker for return of premium (.3); telephone conference with R. Parisi and D. Staut regarding releases issue (.4).	WJM	PLANDSCL	1.70	2,040.00
08/28/24	Conference with Porzio team regarding plan objection issues and related (.7).	BSM	PLANDSCL	0.70	584.50
08/28/24	Emails regarding settlement discussions with counsel for Innovatus (.2). Discovery related emails with Porzio review team (.2).	BSM	PLANDSCL	0.40	334.00
08/28/24	Review Debtors' brief in support of confirmation and related certification in	BSM	PLANDSCL	1.40	1,169.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	support of confirmation, and letter from Debtors' in support of D&O releases (1.4).				
08/28/24	Edit draft brief in support of objection to confirmation (3.2).	BSM	PLANDSCL	3.20	2,672.00
08/28/24	Call with W. Martin, R. Parisi and M. Venus regarding confirmation hearing next week and related evidentiary issues (.6).	BSM	PLANDSCL	0.60	501.00
08/28/24	Call with W. Martin and potential witness to support objection to confirmation as to D&O releases (.2).	BSM	PLANDSCL	0.20	167.00
08/28/24	Review of documents for exhibits to be attached to objection to plan.	DES	PLANDSCL	1.00	625.00
08/28/24	Discussion with B. Moore concerning objection to plan.	DES	PLANDSCL	0.10	62.50
08/28/24	Research legal authority for third party release.	JZ	PLANDSCL	0.70	280.00
08/28/24	Review and flag document production for potential director and officer liability issues.	JZ	PLANDSCL	7.30	2,920.00
08/28/24	Draft Motion to Seal regarding Exhibits Attached to Limited Plan Objection.	MPD	PLANDSCL	1.00	370.00
08/28/24	Prepare e-mail to B. Moore with draft Motion to Seal regarding Exhibits Attached to Limited Plan Objection.	MPD	PLANDSCL	0.20	74.00
08/28/24	Read SDNY case regarding D&O releases in chapter 11 plans.	PG	PLANDSCL	1.40	812.00
08/28/24	Research regarding consideration for D&O releases in chapter 11 plans and outline case notes regarding same.	PG	PLANDSCL	2.90	1,682.00
08/28/24	Review all cases cited by debtors in response letter and update case notes regarding same.	PG	PLANDSCL	1.70	986.00
08/28/24	Coordination with Eiger team in anticipation of contested confirmation hearing and preparation of objection.	RAP	PLANDSCL	0.50	385.00
08/28/24	Evidentiary hearing prep call with team.	RAP	PLANDSCL	0.60	462.00
08/28/24	Review debtors brief and declaration of D. Staut in support of confirmation (1.3); review and analyze debtors' letter regarding debtor releases (.8); conference with P. Gyparakis regarding distinguishing cases set forth in same and email regarding same (.7); meet with	WJM	PLANDSCL	4.30	5,160.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	team regarding brief to be filed Friday and workstreams/division of labor on same (.7); draft inserts to brief and circulate to team (.8).				
08/29/24	Emails with Porzio team regarding brief in opposition to D&O releases (.3).	BSM	PLANDSCL	0.30	250.50
08/29/24	Continue to draft opposition brief to proposed D&O releases (8.5).	BSM	PLANDSCL	8.50	7,097.50
08/29/24	Review relevant caselaw in connection with release related arguments for confirmation opposition brief (.6).	BSM	PLANDSCL	0.60	501.00
08/29/24	Update objection to plan with direct quotes from relevant documents from Debtors' production.	DES	PLANDSCL	2.70	1,687.50
08/29/24	Review of amended plan for class treatment changes.	DES	PLANDSCL	0.10	62.50
08/29/24	Discussion concerning document review and steps forward.	DES	PLANDSCL	0.10	62.50
08/29/24	Discussion concerning D&O investigation issues.	DES	PLANDSCL	0.30	187.50
08/29/24	Correspondence with P. Wittekind to discuss issue with document review platform to facilitate review.	JZ	PLANDSCL	1.20	480.00
08/29/24	Review document production for director and officer liability.	JZ	PLANDSCL	3.10	1,240.00
08/29/24	Initial download and assessment of D&O production set 4 (1.1); detailed conference call with J. Zhou regarding review and classification of items in D&O production set 3 for potential use as exhibits at 9/5/2024 hearing (0.9); multiple communications to team regarding protocol for review and classification of items in D&O production set 3 and applicability to review of production set 4 (0.3)	PCW	PLANDSCL	2.30	966.00
08/29/24	Draft plan objection (D&O releases).	PG	PLANDSCL	2.90	1,682.00
08/29/24	Research regarding standard for third party releases in 5th circuit.	PG	PLANDSCL	3.40	1,972.00
08/29/24	Read plan of reorganization and the accompanying affidavit.	PG	PLANDSCL	1.20	696.00
08/29/24	Investigation regarding insider payments (3.5); draft brief insert regarding same (2.2).	RAP	PLANDSCL	5.70	4,389.00
08/29/24	Work on Objection to confirmation	WJM	PLANDSCL	8.00	9,600.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/30/24	(6.0); discussions with D. Sklar, P. Gyparakis, R. Parisi and B. Moore regarding beefing up respective sections (1.0); review revised sections and further editing and improving (1.0).				
08/30/24	Continue to draft opposition brief to confirmation based on release of D&O claims (7.2).	BSM	PLANDSCL	7.20	6,012.00
08/30/24	Calls and emails with Porzio team regarding objection to confirmation and related (.9).	BSM	PLANDSCL	0.90	751.50
08/30/24	Review corporate organizational and governance documents; review corporate history; exchange of emails with P. Gyparakis and W. Martin ; review emails regarding director meeting dates; review DGCL regarding foregoing	CAS	PLANDSCL	3.20	2,464.00
08/30/24	Review correspondence related to 4th production of document and upload to discovery database.	CPM	PLANDSCL	0.20	131.00
08/30/24	Review of dates related to timeline for objection to confirmation.	DES	PLANDSCL	0.10	62.50
08/30/24	Initial download and assessment of D&O production set 5	PCW	PLANDSCL	0.60	252.00
08/30/24	Review and revise certification in support of plan objection.	PG	PLANDSCL	1.60	928.00
08/30/24	Review citations in plan objection papers per R. Parisi.	PG	PLANDSCL	1.50	870.00
08/30/24	Assemble exhibits to certification in support of plan objection (.7) and prepare for filing (.2).	PG	PLANDSCL	0.90	522.00
08/30/24	Review draft plan objection, update exhibits and make other misc. edits per group.	PG	PLANDSCL	0.90	522.00
08/30/24	Initial turn of objection and edits to same (2.2); work through seal / confidentiality issues with team and McKool (0.8); revise certification (0.5) and discuss same with W. Martin, Jr. (0.3); work through case citation issues with team (0.4); finalize brief (0.8) and certification (0.3); work through filing tech snafus with McKool (0.5).	RAP	PLANDSCL	5.80	4,466.00
08/30/24	Work through ballot and voting issues.	RAP	PLANDSCL	0.50	385.00
08/30/24	Finish index of Eiger discovery	SJB	PLANDSCL	1.80	576.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
08/30/24	Continued turns of objection to confirmation (4.3); meetings with B. Moore and R. Parisi regarding order of arguments, preliminary statement and redactions required (.8); meetings with local counsel and email exchanges with local counsel regarding same (.7); review WJM cert an analyze documents attached to same (1.2).	WJM	PLANDSCL	7.00	8,400.00
08/31/24	Review Innovatus and UST objections to plan and release provisions, including attached transcripts (1.8).	BSM	PLANDSCL	1.80	1,503.00
08/31/24	Calls with W. Martin and R. Parisi to coordinate for confirmation hearing next week.	BSM	PLANDSCL	0.80	668.00
08/31/24	Review privilege log provided by Debtors (.5); email to P. Gyparakis regarding same and to prepare deficiency letter (.1).	BSM	PLANDSCL	0.60	501.00
08/31/24	Emails with Debtors' counsel regarding deposition logistics and related in connection with confirmation hearing next week.	BSM	PLANDSCL	0.20	167.00
08/31/24	Review file to prepare for confirmation hearing next week (.8).	BSM	PLANDSCL	0.80	668.00
08/31/24	Review emails from client regarding settlement discussions (.2); review email from K. Grossman regarding Shareholders meetings and DGCL (.3); review emails from A. Gui and J. Nahas regarding settlement discussions (.2).	CAS	PLANDSCL	0.70	539.00
08/31/24	Coordinate preparation of subpoenas with W. Martin, Jr. (0.4); prepare subpoena for Kawas (0.3); Hua (0.3) and Kayne (0.3); correspond regarding same (0.2).	RAP	PLANDSCL	1.50	1,155.00
PLANDSCL Total				523.60	329,486.50
08/01/24	Telephone conference with team regarding tax meeting with E&Y (.2); review tax research in preparation for same (.2).	WJM	TAX	0.40	480.00
08/02/24	Tax discussion with Deloitte team (.6); Follow up discussions with team (.3); conference with R. Parisi regarding	WJM	TAX	0.90	1,080.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	report to client (.2).				
			TAX Total	<u>1.30</u>	<u>1,560.00</u>
			Fees Total	<u>649.20</u>	<u>430,583.50</u>

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Disbursement Summary	Total
Airfare	986.95
Westlaw	5,773.00
Total Disbursements	6,759.95

Disbursement Detail

Date	Description	Amount
08/06/24	Westlaw electronic research expense	251.00
08/06/24	Westlaw electronic research expense	251.00
08/06/24	Westlaw electronic research expense	251.00
08/15/24	Westlaw electronic research expense	2,510.00
08/15/24	Westlaw electronic research expense	251.00
08/15/24	Westlaw electronic research expense	251.00
08/29/24	Westlaw electronic research expense	251.00
08/29/24	Westlaw electronic research expense	251.00
08/31/24	Westlaw electronic research expense	251.00
08/31/24	Westlaw electronic research expense	251.00
08/31/24	Westlaw electronic research expense	502.00
08/31/24	Westlaw electronic research expense	502.00
08/31/24	VENDOR: Moore, Brett S. INVOICE#: 6905849809061502 DATE: 9/6/2024 Expense Reimbursement - Airfare to fly to Dallas, TX to prepare for and attend Court hearing.	986.95
TOTAL DISBURSEMENTS		\$6,759.95

TOTALS FOR THIS MATTER

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Professional Services	430,583.50
Disbursements	6,759.95
Total Professional Services & Disbursements	437,343.45

BALANCE DUE THIS INVOICE	\$ 437,343.45
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Previous Balance Due	62,301.20
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	\$ 499,644.65
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ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
08/29/24	3321260	300,332.51	59,542.20
08/29/24	3321253	13,795.00	2,759.00
	CURRENT BALANCE DUE	\$314,127.51	\$62,301.20