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*Counsel for the Official Equity Security Holders’
Committee*

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

<p>In re:</p> <p>EIGER BIOPHARMACEUTICALS, INC., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 24-80040 (SGJ)</p> <p>(Jointly Administered)</p>
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**SUMMARY COVER SHEET FOR
THE FIRST INTERIM AND FINAL FEE APPLICATION OF
PORZIO, BROMBERG & NEWMAN, P.C. AS CO-COUNSEL TO THE OFFICIAL
EQUITY SECURITY HOLDERS’ COMMITTEE FROM
JUNE 26, 2024 THROUGH AND INCLUDING SEPTEMBER 27, 2024**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txnb.uscourts.gov> no more than twenty-four (24) days after the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk and filed on the docket no more than twenty-four (24) days after the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

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.



A hearing will be conducted on the matters set forth in this motion on October 24, 2024 at 9:30 a.m. (prevailing Central Time) in Courtroom #1, 14th Floor, Earle Cabell Federal Building, 1100 Commerce Street, Suite 1254, Dallas, Texas 75242.

You may participate in the hearing either in person or by an audio and video connection. Audio communication will be by use of the Court's dial-in facility. You may access the facility at 650.479.3207. Video communication will be by the use of the Cisco WebEx platform. Connect via the Cisco WebEx application or click the link on Judge Jernigan's home page. The meeting code is 2304-154-2638. Click the settings icon in the upper right corner and enter your name under the personal information setting. WebEx hearing instructions may be obtained from Judge Jernigan's hearing/calendar site: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/chief-judge-jernigans-hearing-dates> .

Hearing appearances must be made electronically in advance of electronic hearings. To make your appearance, click the "Electronic Appearance" link on Judge Jernigan's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

First Interim and Final Fee Application of: Porzio, Bromberg & Newman, P.C.

Capacity: Co-Counsel to the Official Equity Security Holders' Committee

Time Period: June 26, 2024 - September 27, 2024

Bankruptcy Petition Filed on: April 1, 2024

Date of Entry of Retention Order: August 26, 2024 [Docket No. 449]

Fee Period: June 26, 2024 – September 27, 2024

Status of Case: Plan confirmed on September 5, 2024

Amount Requested:

Fees: \$960,890.75
Expenses: \$17,376.09
Other: \$0.00
Total \$978,266.84

Reductions:

Voluntary Fee Reductions: \$0.00
Expense Reductions: \$0.00
Total Reductions: \$0.00

Draw Down Request: N/A

Expense Detail:

Copies – per page cost and total: \$0.00
Fax – per page cost and total: \$0.00
Computer Research: \$6,275.00
Other (Pacer): \$0.00

Hourly Rates

	Attorney	Paralegal
Highest Billed Rate:	\$1,200.00	\$370.00
Total Hours Billed:	1,009	364
Blended Rate:	\$823.10	\$359.15

PRIOR MONTHLY FEE STATEMENTS FILED

Date Filed; Docket No.	Period Covered	Requested		Payments Received		Outstanding	
		Fees	Expenses	Fees	Expenses	Fees	Expenses
08/30/2024; Dkt. No. 579	06/26/2024 - 06/30/2024	\$11,036.00 (80% of \$13,795.00)	\$0.00	\$11,036.00	\$0.00	\$2,759.00	\$0.00
08/30/2024; Dkt. No. 580	07/01/2024 – 07/31/2024	\$238,168.80 (80% of \$297,711.00)	\$2,621.51	\$238,168.80	\$2,621.51	\$59,542.20	\$0.00
09/17/2024; Dkt. No. 669	08/01/2024 - 08/31/2024	\$344,466.80 (80% of \$430,583.50)	\$6,759.95	\$344,466.80	\$6,759.95	\$86,16.70	\$0.00
Total		\$593,671.60	\$9,381.46	\$593,671.60	\$9,381.46	\$148,417.90	\$0.00

**SUMMARY OF TOTAL FEES AND HOURS BY
ATTORNEYS AND PARAPROFESSIONALS FOR THE FINAL
FEE PERIOD JUNE 26, 2024 THROUGH SEPTEMBER 27, 2024**

Name	Position; Area of Expertise	Year of Admission/Years of Experience	Hourly Billing Rate	Total Hours Billed	Total Compensation
Warren J. Martin Jr.	Principal, Bankruptcy	1986, NJ	\$1,200.00	268.9	\$322,680.00
Warren J. Martin Jr. (NWT)	Principal, Bankruptcy	1986, NJ	\$600.00	11	\$6,600.00
Brett S. Moore	Principal, Bankruptcy	2000, NJ	\$835.00	147.2	\$122,912.00
Brett S. Moore (NWT)	Principal, Bankruptcy	2000, NJ	\$417.50	10.7	\$4,467.25
Rachel A. Parisi	Principal, Bankruptcy	2011, NJ	\$770.00	192.2	\$147,994.00
Rachel A. Parisi (NWT)	Principal, Bankruptcy	2011, NJ	\$385.00	17	\$6,545.00
Cheryl A. Santaniello	Principal, Bankruptcy	2007, DE	\$770.00	10.1	\$7,777.00
Charlie J. Stoia	Principal, Litigation	1988, NJ	\$770.00	5	\$3,850.00
Ched E. Falk	Of Counsel, Tax	1980, NJ	\$800.00	2.7	\$2,160.00
Christopher P. Mazza	Counsel, Bankruptcy	2017, NJ	\$655.00	25.3	\$16,571.50

Name	Position; Area of Expertise	Year of Admission/Years of Experience	Hourly Billing Rate	Total Hours Billed	Total Compensation
David E. Sklar	Associate, Bankruptcy	2013, NJ	\$625.00	136.8	\$85,500.00
Paris Gyparakis	Associate, Bankruptcy	2019, NY	\$580.00	163.4	\$94,772.00
Dean M. Oswald	Associate, Bankruptcy	2022, NY	\$460.00	18.5	\$8,510.00
Jenny Zhou	Law Clerk, Bankruptcy	N/A	\$400.00	46.4	\$18,560.00
Perle R. Desir	Summer Associate, Bankruptcy	N/A	\$320.00	30.2	\$9,664.00
Stuart J. Backer	Summer Associate, Bankruptcy	N/A	\$320.00	145.6	\$46,592.00
Maria P. Dermatis	Paralegal, Bankruptcy	N/A	\$370.00	72.2	\$26,714.00
Paul C. Wittekind	IT Specialist	N/A	\$420.00	69.1	\$29,022.00
Total				1,372.3	\$960,890.75
Total Attorney Blended Rate					\$823.10
Total All Timekeepers Blended Rate					\$700.20

**STATEMENT OF FEES BY PROJECT CATEGORY FOR THE FINAL FEE PERIOD
COVERING JUNE 26, 2024 THROUGH SEPTEMBER 27, 2024**

Task Description	Total Hours	Total Fees
a) Asset Analysis and Recovery	160.4	\$91,123.00
b) Asset Disposition	14.5	\$11,213.50
c) Assumption and Rejection of Leases and Contracts	0.1	\$37.00
d) Avoidance Action Litigation	0	\$0.00
e) Budgeting (Case)	0.7	\$840.00
f) Business Operations	3.3	\$3,115.00
g) Case Administration	10	\$6,766.50
h) Claims Administration and Objections	30.9	\$26,299.50
i) Corporate Governance and Board Matters	6.2	\$6,656.50
j) Employee Benefits and Pensions	4.1	\$2,700.00
k) Employment and Fee Applications	51.9	\$26,966.50
l) Employment and Fee Application Objections	2.1	\$1,696.50
m) Financing and Cash Collateral	26.4	\$24,296.50
n) Litigation	119.8	\$87,243.50
o) Meetings and Communications with Creditors	60.6	\$59,528.50
p) Non-Working Travel²	38.7	\$17,612.25
q) Plan and Disclosure Statement	838.9	\$590,356.00
r) Real Estate	0	\$0.00
s) Relief from Stay and Adequate Protection	0	\$0.00
t) Reporting	0	\$0.00
u) Tax Issues	3.7	\$4,440.00
v) Valuation	0	\$0.00
Total	1,372.3	\$960,890.75

**EXPENSE SUMMARY FOR THE FINAL
FEE PERIOD JUNE 26, 2024 THROUGH SEPTEMBER 27, 2024**

Category	Amount
a) Filing/Court Fees	\$0.00
b) Computer Assisted Legal Research	\$6,275.00
c) Pacer Fees	\$0.00
d) Fax (with rates)	\$0.00
e) Case Specific Telephone / Conference Call Charges	\$0.00
f) In-House Reproduction Services	\$0.00

² Non-working travel has been billed at 50%.

Category	Amount
g) Outside Reproduction Services	\$0.00
h) Other Research	\$0.00
i) Court Reporting / Deposition Services	\$5,732.97
j) Travel	\$5,037.09
k) Courier & Express Carriers	\$0.00
l) Postage	\$0.00
m) Other (specify) - Meals	\$331.03
Total:	\$17,376.09

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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> , ³	§	(Jointly Administered)
Debtors.	§	
	§	

**FIRST INTERIM AND FINAL FEE APPLICATION OF
PORZIO, BROMBERG & NEWMAN, P.C. AS CO-COUNSEL TO THE OFFICIAL
EQUITY SECURITY HOLDERS' COMMITTEE FROM
JUNE 26, 2024 THROUGH AND INCLUDING SEPTEMBER 27, 2024**

³ 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.

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txnb.uscourts.gov> no more than twenty-four (24) days after the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk and filed on the docket no more than twenty-four (24) days after the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on the matters set forth in this motion on October 24, 2024 at 9:30 a.m. (prevailing Central Time) in Courtroom #1, 14th Floor, Earle Cabell Federal Building, 1100 Commerce Street, Suite 1254, Dallas, Texas 75242.

You may participate in the hearing either in person or by an audio and video connection. Audio communication will be by use of the Court’s dial-in facility. You may access the facility at 650.479.3207. Video communication will be by the use of the Cisco WebEx platform. Connect via the Cisco WebEx application or click the link on Judge Jernigan’s home page. The meeting code is 2304-154-2638. Click the settings icon in the upper right corner and enter your name under the personal information setting. WebEx hearing instructions may be obtained from Judge Jernigan’s hearing/calendar site: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/chief-judge-jernigans-hearing-dates>.

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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**”), Section F of the Procedures for Complex Cases in the Northern District of Texas (the “**Complex Case Procedures**”), and this Court’s *Order Establishing Procedures for Interim 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 case (the “**Chapter 11 Case**”), hereby files this first interim and final fee application (this “**Application**”) for entry of an order, substantially in the form attached to this Application as

Exhibit A (the “**Proposed Order**”) (i) granting final allowance and approval of (a) compensation for professional services Porzio rendered to the Equity Committee during the period June 26, 2024 through and including September 27, 2024⁴ (the “**Final Fee Period**”) in the amount of \$960,890.75, and (b) reimbursement of 100% of the actual and necessary expenses incurred by Porzio during the Final Fee Period, in the amount of \$17,376.09; (ii) authorizing and directing payment of the foregoing fees and expenses, less any amounts the Debtors previously paid to Porzio on account of such amounts, and (iii) granting such other and further relief this Court deems just and proper. In support of this Application, Porzio respectfully represents as follows:

JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2).
2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory and other bases for the relief requested herein are Bankruptcy Code sections 105(a), 330, and 331. Bankruptcy Rule 2016, Local Rule 2016-1, Section F of the Complex Case Procedures, and the Interim Compensation Procedures Order.

BACKGROUND

4. 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. These chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered.

⁴ Pursuant to the Plan (defined herein) any reasonable fees and expenses accrued from and after the Confirmation Date, may be submitted for payment in the ordinary course. To the extent Porzio incurs any fees and expenses subsequent to September 27, 2024, those invoices will be submitted pursuant to such provision.

5. 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.

6. 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; (3) Gary C. Ribe, individually; and (3) Foxhill Capital Management For Foxhill Family Partnership, LP (“**Foxhill**”). 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].

7. 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.

8. 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 of Porzio, PC as Co-Counsel for the Official Committee of Equity Security Holders Effective as of June 26, 2024 [Docket No. 449] (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.

9. On September 5, 2024, the Court entered the *Order Approving the Debtors' Amended Disclosure Statement and Confirming the Fifth Amended Joint Plan of Liquidation of Eiger Biopharmaceuticals, Inc. and Its Debtor Affiliates* [Docket No. 639] (the “**Confirmation Order**”) confirming the Fifth Amended Joint Plan of Liquidation of Eiger Biopharmaceuticals, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 639-1] (as may be amended, supplemented, or modified, the “**Plan**”).

10. The Effective Date of the Plan is expected to occur on or about September 30, 2024.

PORZIO'S PRIOR MONTHLY FEE STATEMENTS

11. Prior to this Application and pursuant to the procedures set forth in the Interim Compensation Procedures, Porzio filed with the Court and served upon the appropriate notice parties three separate monthly fee statements (the “**Monthly Fee Statements**”) together covering the period from June 26, 2024 through August 31, 2024. Each of Porzio's Monthly Fee Statements contain detailed time and expense records which relate to the periods covered by each Monthly Fee Statement and each is incorporated herein by reference. Additionally, the detailed records of time expended and out-of-pocket expenses incurred providing professional services to the Equity Committee covered by the Final Fee Period are attached hereto as **Exhibit C**.

12. A summary of the Monthly Fee Statements previously filed in this Chapter 11 Case is set forth in the chart below:

Date Filed; Docket No.	Period Covered	Requested		Payments Received		Outstanding	
		Fees	Expenses	Fees	Expenses	Fees	Expenses
1 st Monthly 08/30/2024; Dkt. No. 579	06/26/2024 - 06/30/2024	\$11,036.00 (80% of \$13,795.00)	\$0.00	\$11,036.00	\$0.00	\$2,759.00	\$0.00
2 nd Monthly 08/30/2024; Dkt. No. 580	07/01/2024 – 07/31/2024	\$238,168.80 (80% of \$297,711.00)	\$2,621.51	\$238,168.80	\$2,621.51	\$59,542.20	\$0.00
3 rd Monthly 09/17/2024; Dkt. No. 669	08/01/2024 - 08/31/2024	\$344,466.80 (80% of \$430,583.50)	\$6,759.95	\$344,466.80	\$6,759.95	\$86,16.70	\$0.00
Total		\$593,671.60	\$9,381.46	\$593,671.60	\$9,381.46	\$148,417.90	\$0.00

RELIEF REQUESTED

13. By this Application, Porzio respectfully requests entry of an order (i) granting final allowance and approval of (a) compensation for professional services Porzio rendered to the Equity Committee during the Final Fee Period in the amount of \$960,890.75, and (b) reimbursement of 100% of the actual and necessary expenses incurred by Porzio during the Final Fee Period, in the amount of \$17,376.09; (ii) authorizing and directing payment of the foregoing fees and expenses, less any amounts the Debtors previously paid to Porzio on account of such amounts, and (iii) granting such other and further relief this Court deems just and proper.

FEES EARNED DURING THE FINAL FEE PERIOD

I. Customary Billing Disclosures

14. Porzio’s hourly rates are set at a level designed to compensate Porzio fairly for the work of its attorneys and paraprofessionals and to cover fixed and routine expenses. The hourly rates charged by Porzio in this Chapter 11 Case were billed in accordance with Porzio’s rates and procedures in effect during the Final Fee Period and in accordance with the Retention Order. As described in the Equity Committee’s retention application of Porzio, the rates Porzio charges

for the services of its attorneys and paraprofessionals in this Chapter 11 Case are consistent with the rates Porzio charges other comparable chapter 11 clients, regardless of the location of the case. Moreover, Porzio's rate structure is appropriate and not significantly different from the rates that Porzio charges for non-bankruptcy representations or the rates that other comparable counsel would charge to perform substantially similar services.

15. Porzio has received no payment or promises of payment from any source other than the Debtors in this Chapter 11 Case. There is no agreement or understanding between Porzio and any other entity or person, other than members of the Firm, for the sharing of compensation to be received for services rendered in or in connection with this Chapter 11 Case. All professional and paraprofessional services for which Porzio is requesting compensation were rendered solely on behalf of the Equity Committee.

II. Supporting Documentation

16. For the convenience of the Court and parties in interest, the following information is prefixed to this Application:

- (a) a cover sheet summarizing the contents of this Application;
- (b) schedules identifying all Porzio attorneys and paraprofessionals who provided services to the Equity Committee during the Final Fee Period, including, with respect to each attorney and paraprofessional, as applicable, his or her position and area of expertise, date of admission or years of experience, hourly rate, hours billed and total fees charged;
- (c) a summary of Porzio's compensation by project matter category for services provided to the Equity Committee during the Final Fee Period; and
- (d) a summary of the actual and necessary expenses that Porzio incurred during the Final Fee Period in connection with its professional services to the Equity Committee.

17. In addition: (a) the Declaration of Warren J. Martin Jr., which includes, among other things, a statement under paragraph C.5 of the U.S. Trustee Guidelines, is attached hereto as **Exhibit B**; and (b) Porzio's disclosures of customary and comparable compensation, including

blended hourly rates for the period of September 1, 2023 through August 1, 2024 and the Final Fee Period, is attached hereto as **Exhibit D**.

SUMMARY OF SERVICES

18. During the Final Fee Period, Porzio vigorously prosecuted the claims and rights of Equity Committee in order to enhance its constituency's opportunity for a meaningful recovery. During the Final Fee Period, the Equity Committee: (a) diligently prosecuted discovery against both the secured lender and the Debtors, in order to understand what leverage was present to enhance an equity recovery; (b) negotiated extensively with the secured lender, ultimately resulting in both (c) an interim settlement providing for standing for the Equity Committee to pursue certain claims held by the Debtors' estate, and (d) a final settlement resolving all outstanding appeals, fixing the amount of the secured lender's claim, and setting the stage for confirmation of a consensual plan. The Equity Committee also (e) filed objections to the disclosure statement and plan (f) took discovery with respect to Debtor releases, which the Committee objected to, ultimately resulting in (g) a settlement pursuant to which only those officers and directors who were with the Debtors post-petition would obtain such releases, thereby maintaining access to the Debtors \$20 million in D&O coverage, and (h) monitored and/or participated in various litigation proceedings, including depositions, and district court appeals. The advice and assistance of Porzio in connection with these and all other facets of the Equity Committee's oversight of the Debtors' liquidation serves as the basis for the compensation requested in this Application.

19. The following paragraphs summarize the most significant professional services rendered by Porzio on behalf of the Equity Committee during the period of June 26, 2024 through September 27, 2024, grouped into the categories set forth below. Porzio attempted to place the services provided in the category that best relates to such services. However, because certain

services may relate to one or more categories, services pertaining to one category may in fact be included in another category. As noted above, detailed time entries for the Final Fee Period are attached hereto at **Exhibit C**.

(a) **Asset Analysis and Recovery**

Final Fee Period: 160.4 hours; \$91,123.00

20. This matter category includes time spent by Porzio professionals investigating potential claims and causes of action against the Debtors' prepetition lender, creditors and insiders, interviews with the Debtors investment bankers concerning the values of assets, analysis of the Debtors \$20 million in D&O coverage and, via document requests and witness interviews, ascertaining and analyzing potential causes of actions in respect thereof.

(b) **Asset Disposition**

Final Fee Period: 14.5 hours; \$11,213.50

21. This matter category includes time spent by Porzio professionals reviewing and analyzing sales of the Debtors' assets, including the business and financial terms of those sales, particularly related to the Lambda and Lonafarnib assets, insofar as the other major asset sales were approved prior to the Equity Committee's appointment herein. The Equity Committee attended hearings on sales of the Debtors' assets, and conferred with the Debtors and the selected Plan Administrator regarding transition services related to multiple asset purchase agreements.

(c) **Case Administration**

Final Fee Period: 10 hours; \$6,766.50

22. This matter category includes time spent by Porzio professionals (i) analyzing case pleadings and background documents; (ii) preparing contact and distribution lists; (iii) maintaining

critical dates; (iv) maintaining and updating task lists; and (v) conferring and corresponding regarding case status, pending motions, and other case administration issues.

(d) Claims Administration and Objections

Final Fee Period: 30.9 hours; \$26,299.50

23. This matter category includes time spent by Porzio professionals reviewing and participating in the objection and estimation of the Innovatus claim, negotiations with Innovatus regarding same, as well as the appeal process related to the estimation.

(e) Fee/Employment Applications

Final Fee Period: 51.9 hours; \$26,966.50

24. This matter category includes time spent by Porzio professionals preparing its retention application and monthly fee statements, as well as communications related to payment of same. This matter category also includes time spent by Porzio's professionals engaging a financial advisor for the Equity Committee.

(f) Financing and Cash Collateral

Final Fee Period: 26.4 hours; \$24,296.50

25. When Porzio was initially retained, Innovatus had multiple appeals pending, including an appeal of the Court's final cash collateral order. Porzio stepped in and negotiated a global resolution between the Debtors, Innovatus, the Equity Committee, and the Official Committee of Unsecured Creditors that led to a withdrawal of the pending appeal, and saved the estate significant monies in professional fees that will inure directly to the benefit of equity holders.

(g) Meetings and Communications with Creditors

Final Fee Period: 60.0 hours; \$59,528.50

26. This matter category includes full Equity Committee meetings, as well as time spent by Porzio professionals communicating with the Equity Committee to apprise of case developments and to get the Equity Committee's position on various legal issues, and email correspondence regarding case strategy and the various motions and pleadings filed in the chapter 11 cases.

(h) Non-Working Travel

Final Fee Period: 38.7 hours; \$17,612.25

27. This category includes time spent by Porzio professionals traveling to and from Dallas, TX to attend hearings and depositions on behalf of the Equity Committee.

(i) Plan and Disclosure Statement

Final Fee Period: 838.9 hours; \$590,356.00

28. This matter category includes time spent by Porzio professionals related to the review, analysis and negotiation surrounding the terms of the Debtors' Plan and related issues, as well as investigating potential claims and causes of action held by the Debtors' estate and being released under the Plan. Specifically, Porzio attorneys spent time: (i) negotiating revising the plan structure to include both Plan Administrator and Liquidating Trustee roles, and ultimately preparing the Liquidating Trust Agreement and related documentation; (ii) investigating proposed releases, which included depositions of multiple individuals and other discovery to assess the propriety of same; (iii) researching and analyzing various discovery-related issues and pleadings; (iv) analyzing and advising the Equity Committee on the merits of the release and exculpation provisions contained in the Plan; and (v) participating in negotiations for resolution of disputes and pending litigation, including with both the Debtors and Innovatus. This matter category also

includes time spent preparing, reviewing and analyzing pleadings relating to confirmation, as well as time spent researching and drafting responses to same.

ACTUAL AND NECESSARY EXPENSES

29. Included in **Exhibit C** are detailed statements of Porzio’s total out-of-pocket expenses incurred during the Final Fee Period totaling \$17,376.09. These expenses include, but are not limited to, court fees, out-of-town travel expenses, and litigation support vendors.

**PORZIO’S REQUESTED COMPENSATION AND
EXPENSE REIMBURSEMENT SHOULD BE ALLOWED**

30. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 also establishes the following non-exclusive criteria to determine the amount of reasonable compensation to be awarded:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including—

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered towards the completion of, a case under this title;
- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and expertise in the bankruptcy field; and

- (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

31. Porzio respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, necessary for and beneficial to the Equity Committee and its constituency, and were rendered to assist the Equity Committee in discharging its statutory duties during the pendency of this Chapter 11 Case. Porzio further believes that its services to the Equity Committee during the Final Fee Period were performed efficiently and in an expert manner and ultimately benefitted the Equity Committee, their constituents, the Debtors, and their estate. Porzio submits that the compensation requested herein is reasonable in light of the nature, extent, and value of Porzio's services to the Equity Committee. Accordingly, the Application should be approved.

RESERVATION OF RIGHTS

32. Porzio reserves the right to modify, amend, or supplement this Application at any time before the hearing on this Application.

NOTICE

33. Pursuant to the Interim Compensation Order, the Application is being served upon the Application Recipients (as defined in the Interim Compensation Procedures Order) and all parties that have requested notice in this Chapter 11 Case pursuant to Bankruptcy Rule 2002. Porzio submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, Porzio respectfully requests that the Court enter the Proposed Order, attached hereto as **Exhibit A**, (i) granting final allowance and approval of (a) compensation for

professional services to the Equity Committee during the Final Fee Period in the amount of \$960,890.75, and (b) reimbursement of 100% expenses that Porzio incurred during the Final Fee Period in the amount of \$17,376.09; (ii) authorizing and directing payment of the foregoing fees and expenses, less any amounts the Debtors previously paid to Porzio on account of such amounts, and (iii) granting such other and further relief this Court deems just and proper.

[Remainder of page intentionally left blank.]

Dated: September 30, 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*)

David E. Sklar (admitted *pro hac vice*)

Brett S. Moore (admitted *pro hac vice*)

100 Southgate Parkway

P.O. Box 1997

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WJMartin@pbnlaw.com

RAParisi@pbnlaw.com

DEsklar@pbnlaw.com

BSMoore@pbnlaw.com

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

CERTIFICATE OF SERVICE

I certify that on September 30, 2024, I caused a copy of the foregoing document to be served by (i) the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas, and (ii) via email on the Application Recipients.

/s/ S. Margie Venus
S. Margie Venus

Exhibit A

Proposed Order

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

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

**ORDER GRANTING THE FIRST INTERIM AND FINAL FEE APPLICATION OF
PORZIO, BROMBERG & NEWMAN, P.C. AS CO-COUNSEL TO THE OFFICIAL
EQUITY SECURITY HOLDERS' COMMITTEE FROM
JUNE 26, 2024 THROUGH AND INCLUDING SEPTEMBER 27, 2024**

Upon consideration of the application (“**Application**”)² of Porzio, Bromberg & Newman, P.C. (“**Porzio**”) for final allowance of compensation for professional services rendered in the

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.

² Each capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Application.

above captioned Chapter 11 Case during the period from June 26, 2024 through and including September 27, 2024 (the “**Final Fee Period**”), it is HEREBY ORDERED THAT:

1. Porzio is granted final allowance and approval for compensation in the amount of \$960,890.75 for the Final Fee Period.

2. Porzio is granted final allowance and approval for reimbursement of expenses in the amount of \$17,376.09 for the Final Fee Period.

3. The Debtors, Wind-Down Debtors, Plan Administrator, and/or Liquidation Trustee, as applicable, are authorized and directed to remit payment to Porzio of such allowed compensation and expense reimbursement amounts, less any and all amounts previously paid on account of such fees and expenses.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

End of Order

Submitted by:

PORZIO, BROMBERG & NEWMAN, P.C.

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

Rachel A. Parisi (admitted *pro hac vice*)

Brett S. Moore (admitted *pro hac vice*)

100 Southgate Parkway

P.O. Box 1997

Morristown, NJ 07962-1997

Telephone: (973) 538-4006

Facsimile: (973) 538-5146

WJMartin@pbnlaw.com

RAParisi@pbnlaw.com

BSMoore@pbnlaw.com

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

Exhibit B

Martin Declaration

**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> , ¹	§	(Jointly Administered)
Debtors.	§	
	§	

**DECLARATION OF WARREN J. MARTIN JR. IN SUPPORT OF
THE FIRST INTERIM AND FINAL FEE APPLICATION OF
PORZIO, BROMBERG & NEWMAN, P.C., AS CO-COUNSEL TO THE OFFICIAL
EQUITY SECURITY HOLDERS' COMMITTEE FROM
JUNE 26, 2024 THROUGH AND INCLUDING SEPTEMBER 27, 2024**

I, Warren J. Martin Jr., being duly sworn, state the following under penalty of perjury:

1. I am a partner of the law firm Porzio, Bromberg & Newman, P.C. (“**Porzio**” or the “**Firm**”) with offices located at 100 Southgate Parkway, Morristown, New Jersey 07962-1997, among other locations

2. I have reviewed the foregoing first interim and final fee application of Porzio for compensation as attorneys for the Official Equity Security Holders’ Committee (the “**Application**”).² To the best of my knowledge, information and belief, the statements contained in the Application are true and correct.

3. The following statement is provided in response to the questions set forth in paragraph C.5 of the U.S. Trustee Guidelines:

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the Final Fee Period? If so, please explain.

Response: Yes. At the request of the Committee, and upon the approval of the Court, Porzio agreed to the following special terms of retention:

- i. To the extent that holders of Allowed Existing Equity Interests receive a \$10 or less per share recovery, Porzio shall receive 80% of its Allowed fees;
- ii. To the extent that holders of Allowed Existing Equity Interests receive a per share recovery from \$10.01-\$12.50, Porzio shall receive 90% of its Allowed fees;
- iii. To the extent that holders of Allowed Existing Equity Interests receive a per share recovery between \$12.51-\$15.00, Porzio shall receive 100% of its Allowed fees;
- iv. To the extent that holders of Allowed Existing Equity Interests receive a per share recovery between \$15.01-\$18.00 by no later than March 31, 2025, Porzio shall receive 125% of its Allowed fees;
- v. To the extent that holders of Allowed Existing Equity Interests receive a per share recovery greater than \$18.00 by no later than March 31, 2025, Porzio shall receive 150% of its Allowed fees.³

Question: If the fees sought in this Final Application as compared to the fees budgeted for the time period covered by this Final Application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: N/A

Question: Have any of the professionals included in this Final Application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the Final Application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.

Response: No.

³ If the milestone dates in (iv) and (v) are not met, Porzio shall receive 100% of its Allowed fees and 100% of its Allowed disbursements.

Question: Does this Final Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

If the Final Application includes any rate increases since retention:

Question: Did your client review and approve those rate increases in advance?

Response: N/A.

Question: Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

Response: N/A. However, the Equity Committee's retention application for Porzio sets forth that the Firm may periodically adjust its billing rates.

4. Pursuant to section I.G of the Court's *Guidelines for Compensation and Expense Reimbursement of Professionals* (the "**Guidelines**"), I hereby certify to the best of my knowledge, information, and belief, formed after reasonable inquiry, that (a) the compensation and expense reimbursement sought in the Application substantially conforms with the Guidelines, except as noted otherwise in the Application and (b) the compensation and expense reimbursement requested in the Application are billed at rates in accordance with practices no less favorable than those customarily employed by Porzio and generally accepted by Porzio's clients

5. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between Porzio and any other entity or person, other than members of the Firm, for the sharing of compensation received or to be received for services rendered in or in connection with this Chapter 11 Case.

6. All professional and paraprofessional services for which Porzio is requesting compensation were rendered solely on behalf of the Official Equity Security Holders' Committee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 30, 2024
Morristown, New Jersey

/s/ Warren J. Martin Jr.
Warren J. Martin Jr.

Exhibit C

Time Records and Expense Detail



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

August 29, 2024

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

Invoice # 3321253

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 06/30/24

Professional Services	13,795.00
Disbursements	0.00
TOTAL CURRENT INVOICE	\$13,795.00
TOTAL BALANCE DUE	\$13,795.00

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

REMITTANCE PAGE



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

August 29, 2024

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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	1.90	1,274.50
ASSTDISP	Asset Disposition	3.20	2,805.00
CASEADMN	Case Administration	4.70	3,455.50
CORPGOV	Corporate Governance and Board Matters	1.20	1,440.00
FINANCE	Financing	2.20	2,640.00
MEETCOM	Meetings and Communications with Creditors	1.60	1,575.00
PLANDSCL	Plan and Disclosure Statement	0.60	605.00
Total		<u>15.40</u>	<u>13,795.00</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	Parisi, R. A.	Principal	0.60	770.00	462.00
	Sklar, D. E.	Associate 1	1.30	625.00	812.50
Asset Analysis and Recovery					
Total			1.90		1,274.50
Asset Disposition					
ASSTDISP	Martin, W.	Principal	1.40	1,200.00	1,680.00
	Sklar, D. E.	Associate 1	1.80	625.00	1,125.00
Asset Disposition					
Total			3.20		2,805.00

Our Matter # 026841.100434
 Invoice #3321253

August 29, 2024
 Page:2

<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Case Administration					
CASEADMN	Martin, W.	Principal	0.80	1,200.00	960.00
	Parisi, R. A.	Principal	0.40	770.00	308.00
	Sklar, D. E.	Associate 1	3.50	625.00	2,187.50
Case Administration					
Total			4.70		3,455.50
Corporate Governance and Board Matters					
CORPGOV	Martin, W.	Principal	1.20	1,200.00	1,440.00
Corporate Governance and Board Matters					
Total			1.20		1,440.00
Financing					
FINANCE	Martin, W.	Principal	2.20	1,200.00	2,640.00
Financing					
Total			2.20		2,640.00
Meetings and Communications with Creditors					
MEETCOM	Martin, W.	Principal	1.00	1,200.00	1,200.00
	Sklar, D. E.	Associate 1	0.60	625.00	375.00
Meetings and Communications with Creditors					
Total			1.60		1,575.00
Plan and Disclosure Statement					
PLANDSCL	Martin, W.	Principal	0.40	1,200.00	480.00
	Sklar, D. E.	Associate 1	0.20	625.00	125.00
Plan and Disclosure Statement					
Total			0.60		605.00
Total			15.40		13,795.00

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

0080	Martin, W.	Principal	7.00	1,200.00	8,400.00
2268	Parisi, R. A.	Principal	1.00	770.00	770.00
2616	Sklar, D. E.	Associate 1	7.40	625.00	4,625.00
	Total		15.40		13,795.00

Our Matter # 026841.100434
Invoice #3321253August 29, 2024
Page:3**Time Detail**

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
06/26/24	Follow-up from hearing with W. Martin and local counsel	DES	ASSTANAL	0.30	187.50
06/28/24	Discussion in advance of call with W. Martin concerning strategy	DES	ASSTANAL	0.10	62.50
06/28/24	Conference call with Debtors' counsel concerning case issues	DES	ASSTANAL	0.70	437.50
06/28/24	Follow-up with W. Martin and R. Parisi following call	DES	ASSTANAL	0.20	125.00
06/28/24	Equity Committee / Debtor professional call to discuss Innovatus issues	RAP	ASSTANAL	0.60	462.00
			ASSTANAL Total	1.90	1,274.50
06/26/24	Preparation for hearing before the Court on sale of assets (.8); appearance at hearing for sale of assets (1)	DES	ASSTDISP	1.80	1,125.00
06/26/24	Review motion papers regarding bid procedures and sale approval in preparation for hearing (.8); conference with D. Sklar regarding coverage at same (.3); attend small portion of hearing with D. Sklar (.1); download from D. Sklar on hearing results (.2)	WJM	ASSTDISP	1.40	1,680.00
			ASSTDISP Total	3.20	2,805.00
06/26/24	Attend to Notice of appearance filings (.3); including telephone conferences with M. Venus regarding same (.2) and email exchanges with client and M. Venus (.3).	WJM	CASEADMN	0.80	960.00
06/27/24	Organize strategy for initial case matters and items needed to be completed	DES	CASEADMN	1.30	812.50
06/27/24	Review correspondence concerning initial case issues	DES	CASEADMN	0.10	62.50
06/27/24	Discussion with parties concerning initial case steps and related issues	DES	CASEADMN	0.10	62.50
06/27/24	Review of correspondence between parties concerning initial steps and draft email to debtors' counsel concerning same	DES	CASEADMN	0.30	187.50
06/27/24	Review of non disclosure agreement and other applicable agreements for revisions	DES	CASEADMN	1.00	625.00

Our Matter # 026841.100434
Invoice #3321253August 29, 2024
Page:4

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
06/27/24	to same Emails re coordination of UCC / Equity committee call with Debtors	RAP	CASEADMN	0.20	154.00
06/27/24	Emails re NDA	RAP	CASEADMN	0.20	154.00
06/28/24	Finalize revisions to NDAs	DES	CASEADMN	0.70	437.50
		CASEADMN Total		4.70	3,455.50
06/27/24	Attend to unusual committee structural issues including email exchanges with UST and Committee members concerning one committee members abrupt resignation from the committee.	WJM	CORPGOV	1.20	1,440.00
		CORPGOV Total		1.20	1,440.00
06/28/24	Review pleadings and prospective FA analytics in preparation for call with Debtor team (1.0); call with Equity Committee Team and Debtor team regarding background of case and next steps (.7); download on workload and staffing on same with R. Parisi and D. Sklar (.3); conference with S. Backer regarding results of research and review NYC case on indemnity (.2).	WJM	FINANCE	2.20	2,640.00
		FINANCE Total		2.20	2,640.00
06/26/24	Discussion concerning Eiger equity committee issues	DES	MEETCOM	0.10	62.50
06/26/24	Telephone conference with R. Parisi and C. Mazza in preparation for committee meeting (.3); meeting with C. Paryse in preparation for court hearings today (.6); email exchange with committee (.1).	WJM	MEETCOM	1.00	1,200.00
06/27/24	Phone call with Committee member (.4); follow-up with W. Martin and R. Parisi concerning same (.1)	DES	MEETCOM	0.50	312.50
		MEETCOM Total		1.60	1,575.00
06/26/24	Discussion with Paris concerning research and strategy for equity committee and plan structure	DES	PLANDSCL	0.20	125.00
06/27/24	Preparation for calls tomorrow and Monday with Debtor team to discuss POR and next steps.	WJM	PLANDSCL	0.40	480.00
		PLANDSCL Total		0.60	605.00

Our Matter # 026841.100434
 Invoice #3321253

August 29, 2024
 Page:6

Disbursement Summary

Total Disbursements

Total

0.00

Disbursement Detail

Date	Description	Amount
TOTAL DISBURSEMENTS		\$0.00

TOTALS FOR THIS MATTER

Professional Services	13,795.00
Disbursements	0.00
Total Professional Services & Disbursements	13,795.00

BALANCE DUE THIS INVOICE	\$ 13,795.00
---------------------------------	---------------------

Previous Balance Due 0.00

TOTAL AMOUNT DUE INCLUDING THIS INVOICE **\$ 13,795.00**



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

August 29, 2024

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

Invoice # 3321260

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 07/31/24

Professional Services	297,711.00
Disbursements	2,621.51
TOTAL CURRENT INVOICE	\$300,332.51
TOTAL BALANCE DUE	\$300,332.51

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

REMITTANCE PAGE



100 SOUTHGATE PARKWAY, PO BOX 1997
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August 29, 2024

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

Invoice # 3321260

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	97.80	50,991.50
ASSTDISP	Asset Disposition	8.40	6,782.50
BUSOPS	Business Operations	1.00	570.00
CASEADMN	Case Administration	4.40	2,732.00
CLAIMS	Claims Administration and Objections	2.30	2,674.00
CORPGOV	Corporate Governance and Board Matters	2.00	2,112.50
FEEAPPS	Fee/Employment Applications	25.00	14,062.00
FEEOBS	Fee/Employment Objections	0.20	154.00
FINANCE	Financing	23.60	21,109.00
LITIGATE	Litigation (other than Avoidance Action Litigation)	83.50	57,072.00
MEETCOM	Meetings and Communications with Creditors	21.70	21,549.00
NONWKGTV	Non-Working Travel	14.50	6,872.50
PLANDSCL	Plan and Disclosure Statement	139.50	108,150.00
TAX	Tax Issues	2.40	2,880.00
Total		<u>426.30</u>	<u>297,711.00</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	Moore, B. S.	Principal	1.00	835.00	835.00
	Wittekind, P. C.	IT Department	18.50	420.00	7,770.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level	10.70	370.00	3,959.00

Case 24-80040-sgj11 Doc 686-3 Filed 09/30/24 Entered 09/30/24 22:05:23 Desc

Task Code	Timekeeper	Exhibit	Page 11 of 107	Hours	Hourly Rate	Desc	Total
	Parisi, R. A.	Principal		17.60	770.00		13,552.00
	Sklar, D. E.	Associate 1		29.10	625.00		18,187.50
	Backer, S. J.	Law Clerk		8.60	320.00		2,752.00
	Desir, P. R.	Law Clerk		12.30	320.00		3,936.00
Asset Analysis and Recovery							
Total				97.80			50,991.50

Asset Disposition

ASSTDISP	Martin, W.	Principal		2.30	1,200.00		2,760.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level		0.20	370.00		74.00
	Parisi, R. A.	Principal		2.70	770.00		2,079.00
	Sklar, D. E.	Associate 1		0.30	625.00		187.50
	Gyparakis, P.	Associate 1		2.90	580.00		1,682.00
Asset Disposition							
Total				8.40			6,782.50

Business Operations

BUSOPS	Dermatis, M. P.	Paralegal - 2 - Senior Level		0.50	370.00		185.00
	Parisi, R. A.	Principal		0.50	770.00		385.00
Business Operations							
Total				1.00			570.00

Case Administration

CASEADMN	Martin, W.	Principal		0.80	1,200.00		960.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level		2.50	370.00		925.00
	Parisi, R. A.	Principal		1.10	770.00		847.00
Case Administration							
Total				4.40			2,732.00

Claims Administration and Objections

CLAIMS	Martin, W.	Principal		2.10	1,200.00		2,520.00
	Parisi, R. A.	Principal		0.20	770.00		154.00
Claims Administration and Objections							
Total				2.30			2,674.00

Corporate Governance and Board Matters

CORPGOV	Martin, W.	Principal		1.50	1,200.00		1,800.00
	Sklar, D. E.	Associate 1		0.50	625.00		312.50
Corporate Governance and Board Matters							
Total				2.00			2,112.50

Fee/Employment Applications

FEEAPPS	Martin, W.	Principal	2.60	1,200.00	3,120.00
	Falk, C. E.	Of Counsel 1	2.70	800.00	2,160.00
	Mazza, C. P.	Counsel	0.80	655.00	524.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level	8.40	370.00	3,108.00
	Parisi, R. A.	Principal	3.30	770.00	2,541.00
	Sklar, D. E.	Associate 1	1.00	625.00	625.00
	Backer, S. J.	Law Clerk	6.20	320.00	1,984.00
Fee/Employment Applications					
Total			25.00		14,062.00

Fee/Employment Objections

FEEOBJS	Parisi, R. A.	Principal	0.20	770.00	154.00
Fee/Employment Objections					
Total			0.20		154.00

Financing

FINANCE	Martin, W.	Principal	6.80	1,200.00	8,160.00
	Moore, B. S.	Principal	0.20	835.00	167.00
	Parisi, R. A.	Principal	16.60	770.00	12,782.00
Financing					
Total			23.60		21,109.00

Litigation (other than Avoidance Action Litigation)

LITIGATE	Martin, W.	Principal	15.00	1,200.00	18,000.00
	Moore, B. S.	Principal	9.10	835.00	7,598.50
	Dermatis, M. P.	Paralegal - 2 - Senior Level	0.20	370.00	74.00
	Parisi, R. A.	Principal	2.00	770.00	1,540.00
	Sklar, D. E.	Associate 1	4.30	625.00	2,687.50
	Backer, S. J.	Law Clerk	13.50	320.00	4,320.00
	Gyparakis, P.	Associate 1	39.40	580.00	22,852.00
Litigation (other than Avoidance Action Litigation)					
Total			83.50		57,072.00

Meetings and Communications with Creditors

MEETCOM	Martin, W.	Principal	12.10	1,200.00	14,520.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level	0.40	370.00	148.00
	Parisi, R. A.	Principal	7.80	770.00	6,006.00
	Sklar, D. E.	Associate 1	1.40	625.00	875.00
Meetings and Communications with Creditors					
Total			21.70		21,549.00

Non-Working Travel

NONWKGTV	Martin, W.	Principal	6.00	600.00	3,600.00
	Parisi, R. A.	Principal	8.50	385.00	3,272.50
Non-Working Travel					
Total			14.50		6,872.50

Plan and Disclosure Statement

PLANDSCL	Martin, W.	Principal	45.20	1,200.00	54,240.00
	Moore, B. S.	Principal	20.30	835.00	16,950.50
	Mazza, C. P.	Counsel	6.00	655.00	3,930.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level	3.90	370.00	1,443.00
	Parisi, R. A.	Principal	18.20	770.00	14,014.00
	Sklar, D. E.	Associate 1	7.30	625.00	4,562.50
	Oswald, D. M.	Associate 3	2.70	460.00	1,242.00
	Backer, S. J.	Law Clerk	24.20	320.00	7,744.00
	Zhou, J.	Law Clerk	3.50	400.00	1,400.00
	Desir, P. R.	Law Clerk	8.20	320.00	2,624.00

Plan and Disclosure Statement					
Total			139.50		108,150.00

Tax Issues

TAX	Martin, W.	Principal	2.40	1,200.00	2,880.00
Tax Issues					
Total			2.40		2,880.00

Total			426.30		297,711.00
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AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

0080	Martin, W.	Principal	6.00	600.00	3,600.00
0080	Martin, W.	Principal	90.80	1,200.00	108,960.00
0345	Moore, B. S.	Principal	30.60	835.00	25,551.00
0460	Wittekind, P. C.	IT Department	18.50	420.00	7,770.00
1967	Falk, C. E.	Of Counsel 1	2.70	800.00	2,160.00
1982	Mazza, C. P.	Counsel	6.00	655.00	3,930.00
1982	Mazza, C. P.	Counsel	0.80	655.00	524.00
2002	Dermatis, M. P.	Paralegal - 2 - Senior Level	26.80	370.00	9,916.00
2268	Parisi, R. A.	Principal	8.50	385.00	3,272.50
2268	Parisi, R. A.	Principal	70.20	770.00	54,054.00
2616	Sklar, D. E.	Associate 1	43.90	625.00	27,437.50
2658	Oswald, D. M.	Associate 3	2.70	460.00	1,242.00
2700	Backer, S. J.	Law Clerk	52.50	320.00	16,800.00
2767	Gyparakis, P.	Associate 1	42.30	580.00	24,534.00
2798	Zhou, J.	Law Clerk	3.50	400.00	1,400.00

Task Code

Timekeeper

Exhibit

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Hours

Hourly Rate

Total

2816

Desir, P. R.

Law Clerk

20.50

320.00

6,560.00

Total

426.30

297,711.00

Time Detail

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/01/24	Conference call with parties concerning case litigation issues	DES	ASSTANAL	0.70	437.50
07/01/24	Follow-up after call with parties concerning case strategy	DES	ASSTANAL	0.20	125.00
07/01/24	Conference call with lender's counsel concerning initial case issues	DES	ASSTANAL	0.80	500.00
07/01/24	Follow-up discussion with team following call with Debtors	DES	ASSTANAL	0.10	62.50
07/01/24	Review e-mail from R. Parisi regarding Derivative Standing Motion Sample (.1); Locate files and forward (.2).	MPD	ASSTANAL	0.30	111.00
07/01/24	Review Order re Motion re Transfers and Declaration of Worthlessness - ECF No. 82.pdf (0.5); emails with Committee re same (0.2)	RAP	ASSTANAL	0.70	539.00
07/01/24	Eiger Intro - Equity Committee / Innovatus call	RAP	ASSTANAL	0.80	616.00
07/02/24	Draft follow up email to Debtors' counsel re equity committee issues / concerns following committee meeting	RAP	ASSTANAL	0.30	231.00
07/02/24	Review Edgar and trading issues; emails with Debtors' counsel re trading in contravention of NOLs	RAP	ASSTANAL	0.40	308.00
07/03/24	Phone call with lender's counsel concerning litigation issues	DES	ASSTANAL	0.20	125.00
07/03/24	Conference call with UCC concerning case issues	DES	ASSTANAL	0.70	437.50
07/03/24	Discussion with team concerning committee issues and initial case steps	DES	ASSTANAL	0.20	125.00
07/03/24	Update of case tracking chart with Standing Motion assignment.	MPD	ASSTANAL	0.20	74.00
07/03/24	Debtor / UCC / Equity committee call	RAP	ASSTANAL	1.00	770.00
07/03/24	Finalize with W. Martin, Jr. and circulate Equity Committee follow up inquiries via email to Debtors	RAP	ASSTANAL	0.30	231.00
07/04/24	Download document productions received from Debtors' and Lender's counsel.	MPD	ASSTANAL	0.50	185.00
07/05/24	Discussion concerning shareholder inquiry	DES	ASSTANAL	0.10	62.50
07/08/24	Preparation for equity committee call	DES	ASSTANAL	0.10	62.50
07/08/24	Conference call with equity Committee (1.1) and follow-up with team concerning same (.3)	DES	ASSTANAL	1.30	812.50
07/09/24	Conference call with Debtors' counsel concerning ongoing case issues	DES	ASSTANAL	0.70	437.50

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/09/24	Review of document production and coordinate indexing of information with S. Backer.		MPD	ASSTANAL	0.50	185.00
07/09/24	Review of discovery information with P. Wittekind and request information on available review platforms.		MPD	ASSTANAL	0.20	74.00
07/09/24	Initial review of seven productions produced by Innovatus with documents related to Kramer Levin and Sidley Austin (to assess for importing into e-discovery database to eliminate duplicate items and to facilitate attorney review and analysis)		PCW	ASSTANAL	0.50	210.00
07/09/24	Review back and forth re 2004 requests and discuss with team		RAP	ASSTANAL	0.50	385.00
07/09/24	Prepare for meeting with Debtors by discussion with W. Martin, Jr. (0.3); reviewing and revising agenda (0.2); circulating same (0.1) and attending call (0.7)		RAP	ASSTANAL	1.30	1,001.00
07/09/24	Review email from local counsel re standing research		RAP	ASSTANAL	0.20	154.00
07/10/24	Research on impaired and unimpaired		PRD	ASSTANAL	2.60	832.00
07/10/24	Budget and waterfall meeting (left early)		RAP	ASSTANAL	0.60	462.00
07/11/24	Research what constitutes "impairment and unimpairment" for a class of equity holder for W. Martin, Jr.		PRD	ASSTANAL	4.00	1,280.00
07/12/24	Discussion concerning discovery management		DES	ASSTANAL	0.10	62.50
07/12/24	Discussion concerning discovery to be done on directors and officers		DES	ASSTANAL	0.10	62.50
07/12/24	Review and respond to various e-mails regarding processing of productions from Debtors' and Lender's counsel.		MPD	ASSTANAL	0.90	333.00
07/14/24	Continued review of seven productions produced by Innovatus with documents related to Kramer Levin and Sidley Austin (to assess for importing into e-discovery database to facilitate attorney review and analysis); identify extensive duplicate items and remove prior to importing into e-discovery database; communications with M. Dermatis regarding extent of duplicated items and need to remove prior to importing		PCW	ASSTANAL	1.50	630.00
07/15/24	Preparation of 2004 examination		DES	ASSTANAL	1.20	750.00
07/15/24	Conference call with Debtors' counsel and SSG concerning case issues		DES	ASSTANAL	0.80	500.00
07/15/24	Review follow up questions from P. Wittekind regarding discovery and		MPD	ASSTANAL	0.40	148.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Projects</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	forward to team.						
07/15/24	Communications with M. Dermatis regarding identification and removal of duplicated items in Innovatus productions (prior to importing into e-discovery database to facilitate attorney review and analysis)		PCW	ASSTANAL	0.20		84.00
07/15/24	Continuing edits to standing motion (0.5); call with UCC counsel re same (0.3); review detailed email from UCC with suggested changes (0.2); speak with Innovatus re motion (0.2); implement changes based on UCC comments (0.8); discuss with Debtors counsel (0.3) and local counsel (0.4); oversee filing (0.4).		RAP	ASSTANAL	3.10		2,387.00
07/16/24	Draft discovery requests to the Debtors including review of case documentation to analyze for appropriate strategy		DES	ASSTANAL	3.30		2,062.50
07/16/24	Discussion with R. Parisi concerning 2004 requests		DES	ASSTANAL	0.10		62.50
07/16/24	Discussion with P. Gyparakis concerning discovery issues		DES	ASSTANAL	0.10		62.50
07/16/24	Import deduplicated Innovatus production sets 1 through 4 into e-discovery database; multiple communications with M. Dermatis regarding importing of Innovatus productions and development of coding forms to be used by attorney reviewers		PCW	ASSTANAL	0.80		336.00
07/16/24	NOL research for R. Parisi		PRD	ASSTANAL	1.30		416.00
07/16/24	Meet with Perle re NOL order and NOL issues		RAP	ASSTANAL	0.40		308.00
07/17/24	Review and revise discovery requests to be sent to the Debtors		DES	ASSTANAL	1.50		937.50
07/17/24	NOL research.		PRD	ASSTANAL	1.40		448.00
07/18/24	Phone call with R. Parisi concerning 2004 examination		DES	ASSTANAL	0.10		62.50
07/18/24	Research Debtors' background to aid in discovery to be sought		DES	ASSTANAL	1.00		625.00
07/18/24	Discussion with R. Parisi concerning strategy for discovery		DES	ASSTANAL	0.10		62.50
07/18/24	Discussion concerning discovery strategy		DES	ASSTANAL	0.20		125.00
07/18/24	Review e-mails regarding status of importing files to discovery review platform.		MPD	ASSTANAL	0.10		37.00
07/18/24	Download, review, configure, and import Innovatus production set 5 into master e-discovery database; extract full-text from non-native documents and incorporate		PCW	ASSTANAL	1.40		588.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page(s)</u>	<u>Project</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	into database (to facilitate searching and review); multiple communications with M. Dermatis regarding native format files included in production set 5							
07/18/24	NOL research			PRD	ASSTANAL	1.50		480.00
07/18/24	Emails with local team re 2004 subpoenas			RAP	ASSTANAL	0.40		308.00
07/18/24	Review and revise D&O 2004 subpoena (0.8); discuss with team (0.3); circulate to client for sign off (0.1)			RAP	ASSTANAL	1.20		924.00
07/18/24	Edits to 2004 motion (1.3); emails with local counsel re same (0.2)			RAP	ASSTANAL	1.50		1,155.00
07/19/24	2004 motion including research and strategy discussions			DES	ASSTANAL	4.20		2,625.00
07/19/24	Call re NOL limitations with C. Falk (0.7); follow up call with W. Martin, Jr. re same (0.4)			RAP	ASSTANAL	1.10		847.00
07/19/24	Speak with team and correspond re D&O requests			RAP	ASSTANAL	0.30		231.00
07/22/24	Discussion concerning research related to potential D&O claims			DES	ASSTANAL	0.10		62.50
07/22/24	Discussion concerning discovery requests with W. Martin			DES	ASSTANAL	0.10		62.50
07/22/24	Conference call with the Debtors concerning 2004 examination			DES	ASSTANAL	0.50		312.50
07/22/24	Follow-up from Equity Committee call			DES	ASSTANAL	0.10		62.50
07/22/24	Review of notes and case documentation to finalize list of documents requested and draft proposed correspondence to Debtors			DES	ASSTANAL	1.70		1,062.50
07/22/24	Conference call with lender's counsel concerning investigation issues			DES	ASSTANAL	0.60		375.00
07/22/24	Research "Fraudulent Transfers" for R. Parisi			PRD	ASSTANAL	1.50		480.00
07/22/24	Eiger - Equity Committee D&O Request meet and confer with Debtors' counsel			RAP	ASSTANAL	0.70		539.00
07/22/24	Communicate with D. Sklar re updates to D&O 2004 requests based on today's calls			RAP	ASSTANAL	0.30		231.00
07/22/24	Microsoft Teams Meeting re: Equity Committee D & O Investigation with Kramer Levin			RAP	ASSTANAL	0.50		385.00
07/22/24	Work on index of Eiger discovery			SJB	ASSTANAL	1.70		544.00
07/23/24	Review and edit draft discovery demands prepared by D. Sklar (.8). Emails with D. Sklar regarding same (.2).			BSM	ASSTANAL	1.00		835.00
07/23/24	Review of client case file and correspondences to draft revisions to discovery requests			DES	ASSTANAL	1.30		812.50
07/23/24	Initial review of D&O policies, forward			RAP	ASSTANAL	0.30		231.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages</u>	<u>of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	to team for review							
07/23/24	Finalize D&O subpoena requests (0.8); emails with Committee re same (0.2)		RAP		ASSTANAL	1.00		770.00
07/23/24	Work on Index of Eiger discovery		SJB		ASSTANAL	1.40		448.00
07/24/24	Revise document requests and discussion with client concerning same		DES		ASSTANAL	0.20		125.00
07/24/24	Multiple communications with P. Gyparakis and B. Moore regarding review of five Innovatus productions imported into master e-discovery database; configure productions to enable review by P. Gyparakis		PCW		ASSTANAL	0.70		294.00
07/25/24	Finalize correspondence to Debtors concerning 2004 requests		DES		ASSTANAL	0.30		187.50
07/25/24	Follow-up from call with Committee		DES		ASSTANAL	0.30		187.50
07/25/24	Continued supplementation of master e-discovery database with additional coding forms and tags to be used during attorney review of Innovatus productions		PCW		ASSTANAL	0.20		84.00
07/26/24	Discussion internally concerning D&O discovery		DES		ASSTANAL	0.10		62.50
07/26/24	Discussion concerning produced discovery		DES		ASSTANAL	0.30		187.50
07/26/24	Discussion with Debtors' counsel concerning D&O discovery production		DES		ASSTANAL	0.10		62.50
07/26/24	Download, review, and configure Innovatus production sets 6 and 7; assess for deduplication of item from prior productions; import into master e-discovery database; communications with attorney review team regarding addition of sets 6 and 7		PCW		ASSTANAL	1.70		714.00
07/26/24	Work on Index of Eiger Discovery		SJB		ASSTANAL	3.40		1,088.00
07/27/24	Supplement e-discovery database coding forms and tag to enable access by additional reviewers; communications with attorney review team regarding expanded access		PCW		ASSTANAL	0.40		168.00
07/29/24	Discussion with summer associate concerning research issues for litigation investigation		DES		ASSTANAL	0.10		62.50
07/29/24	Conference call with Debtors concerning D&O discovery		DES		ASSTANAL	0.30		187.50
07/29/24	Draft correspondence to team concerning D&O investigation		DES		ASSTANAL	0.30		187.50
07/29/24	Review additional custodians to be added for D&O discovery requests		DES		ASSTANAL	0.70		437.50
07/29/24	Discussion with Debtors' counsel concerning review of proposed custodians		DES		ASSTANAL	0.10		62.50

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page 20 of 207</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/29/24	Discussion with W. Martin concerning outstanding discovery			DES ASSTANAL	0.10	62.50
07/29/24	Discussion concerning proceeds of sales of Debtors' assets			DES ASSTANAL	0.10	62.50
07/29/24	Confer with P. Gyparakis to develop additional coding fields and tags to be used by attorney reviewers to classify Innovatus's document production and to identify gaps in production; update e-discovery database with additional fields and provide supplemented coding form to all reviewers			PCW ASSTANAL	0.90	378.00
07/30/24	Discussion with R. Parisi concerning D&O investigation			DES ASSTANAL	0.10	62.50
07/30/24	Conference call with team concerning D&O investigation			DES ASSTANAL	1.00	625.00
07/30/24	Research background concerning Debtor for D&O investigation and to set search custodians			DES ASSTANAL	0.40	250.00
07/30/24	Draft email to Debtors concerning D&O discovery; review of background concerning same			DES ASSTANAL	0.40	250.00
07/30/24	Conference Call with Team to discuss outstanding discovery assignments.			MPD ASSTANAL	1.00	370.00
07/30/24	Review of discovery database			MPD ASSTANAL	1.10	407.00
07/30/24	Review of potential claims against lender to better understand scope of document review.			MPD ASSTANAL	0.40	148.00
07/30/24	Download, review, configure, and import Innovatus document production sets 8 and 9 into master e-discovery database; communications with review team regarding addition of production sets to database			PCW ASSTANAL	1.30	546.00
07/30/24	Review and refine coding fields and tags to be used by attorney reviewers to classify Innovatus productions imported into e-discovery database; multiple communications with P. Gyparakis regarding revisions to coding fields			PCW ASSTANAL	0.60	252.00
07/30/24	D&O discovery conference with PBN team			RAP ASSTANAL	0.70	539.00
07/30/24	Work on Eiger discovery index			SJB ASSTANAL	2.10	672.00
07/31/24	Discussion with P. Gyparakis concerning discovery review			DES ASSTANAL	0.20	125.00
07/31/24	Meeting concerning discovery review strategy			DES ASSTANAL	0.80	500.00
07/31/24	Discussion with M. Dermatis concerning preparation of documents for client			DES ASSTANAL	0.10	62.50
07/31/24	Eiger review of case documentation and			DES ASSTANAL	0.60	375.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages</u>	<u>of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	discovery requests to guide request to Debtors for expedited production							
07/31/24	Discussion internally concerning proposed meet and confer for Dr. Apelian		DES		ASSTANAL	0.10		62.50
07/31/24	Discussion with Debtors concerning interview with Debtors' CEO		DES		ASSTANAL	0.10		62.50
07/31/24	Meet with team to discuss specifics for data review.		MPD		ASSTANAL	0.80		296.00
07/31/24	Review of discovery to identify any information relating to potential claims against Innovatus or D&Os.		MPD		ASSTANAL	4.30		1,591.00
07/31/24	Complete import of Innovatus production sets 8 and 9 into master e-discovery database; extract full-text from all items in production sets 1 through 9 to facilitate identification of items Innovatus has classified as Confidential, Highly Confidential, or Professionals' Eyes Only; review all items following automated classification to confirm accuracy of designations; extract non-confidential and confidential-only items and convert into searchable PDF format for provision to client; generate spreadsheet correlating Bates numbers to original document filenames to facilitate client review of items; multiple communications with team members and client representatives regarding extraction of items		PCW		ASSTANAL	8.30		3,486.00
					ASSTANAL Total	97.80		50,991.50
07/01/24	Review memo from P. Desir regarding motion to make distributions outside of chapter 11 plan (.9); and draft follow-up email regarding same (.3).		PG		ASSTDISP	1.20		696.00
07/01/24	Review and revise memo regarding motion to make distributions under 105 and critical vendor doctrine.		PG		ASSTDISP	1.70		986.00
07/02/24	Review Dundon deck, circulate to F. Fazio to coordinate and schedule call		RAP		ASSTDISP	0.30		231.00
07/03/24	Call with F. Fazio re lambda drug and commercialization of same; discuss with W. Martin, Jr.		RAP		ASSTDISP	0.50		385.00
07/05/24	Preparation for call with CRO (.3); call with R. Parisi and D. Staut regarding next steps (.7); emails from and to committee members regarding same (.2).		WJM		ASSTDISP	1.20		1,440.00
07/12/24	Communicate with Debtors' team re		RAP		ASSTDISP	0.30		231.00

Case 24-80040-sgj11 Doc 686-3 Filed 09/30/24 Entered 09/30/24 22:05:23 Desc							
<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>	
07/12/24	Zokinvy escrow Review Zokinvy sources and uses analysis			RAP ASSTDISP	0.30	231.00	
07/12/24	Communications with equity committee re remaining asset sales (0.2); emails with Debtors' team re same (0.2).			RAP ASSTDISP	0.40	308.00	
07/15/24	Coordinate (0.2) and attend sale process call with SSG (0.7)			RAP ASSTDISP	0.90	693.00	
07/15/24	Preparation for committee meeting tonight with SSG (.3); meeting with Debtor professionals, SSG and Committee members and professionals regarding download on both past and upcoming sales processes (.8).			WJM ASSTDISP	1.10	1,320.00	
07/19/24	Review of revised stipulation concerning cash collateral			DES ASSTDISP	0.30	187.50	
07/26/24	Update of data room with template schedules to APA.			MPD ASSTDISP	0.20	74.00	
				ASSTDISP Total	8.40	6,782.50	
07/01/24	Review e-mail from W. Martin, Jr. regarding pleadings relating to stock transfers (.1); Review of docket to locate Debtors' Motion and entered Order relating to stock transfers (.1); Forward Motion and entered Order relating to stock transfers to W. Martin, Jr. (.1).			MPD BUSOPS	0.30	111.00	
07/24/24	Follow up call with A. Wallice re various open items, including NOL issues, bank account, Innovatus claim (0.3); follow up email with Committee re same (0.2)			RAP BUSOPS	0.50	385.00	
07/25/24	Review docket and prepare materials for hearing on July 29, 2024 regarding Motion to Modify NOL Order.			MPD BUSOPS	0.20	74.00	
				BUSOPS Total	1.00	570.00	
07/01/24	Attend to docket review and getting up to speed on new case.			WJM CASEADMN	0.30	360.00	
07/02/24	Prepare draft Committee Bylaws for attorney review.			MPD CASEADMN	1.50	555.00	
07/02/24	Emails to and from R. Parisi and D. Sklar with workstreams coming off of committee meeting and division of labor (.4); attend to scheduling for follow up meeting for tomorrow requested by UCC (.1).			WJM CASEADMN	0.50	600.00	
07/05/24	Catch up with W. Martin, Jr.			RAP CASEADMN	0.80	616.00	
07/16/24	Review of Pacer and update of information for team access in light of			MPD CASEADMN	0.20	74.00	

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<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page(s) of Total</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	entry of pro hac orders.						
07/23/24	Review and calendaring of case deadlines.			MPD CASEADMN	0.60		222.00
07/24/24	Review and respond to e-mails from B. Moore regarding noticing in case.			MPD CASEADMN	0.20		74.00
07/25/24	Catch up call with A. Wallice			RAP CASEADMN	0.30		231.00
				CASEADMN Total	4.40		2,732.00
07/01/24	Portion of meeting with Debtor's counsel and UCC counsel discussing claims against Innovatus and background of same (.4); portion of meeting with Innovatus counsel discussing claims against Innovatus and claims against Ds & Os (.4).			WJM CLAIMS	0.80		960.00
07/23/24	Review breakdown of Innovatus claim			RAP CLAIMS	0.20		154.00
07/28/24	Telephone conference with T. Califano regarding Innovatus claim objection to be filed and regarding committee's consent to timeline on same (.4); conference with R. Parisi regarding same (.3).			WJM CLAIMS	0.70		840.00
07/29/24	Meet with T. Califano regarding claims objection hearing to be set for Innovatus claim in the nature of estimation (.3); portion of court hearing before Judge Jernigan addressing pre-confirmation estimation of Innovatus claim (.3).			WJM CLAIMS	0.60		720.00
				CLAIMS Total	2.30		2,674.00
07/09/24	Governance Multiple communications from interested equityholders regarding committee membership (.4); telephone conference with prospective committee member regarding same (.4); email exchanges with UST regarding same (.2).			WJM CORPGOV	1.00		1,200.00
07/23/24	Discussion with R. Parisi and W. Martin concerning case filings (.2); phone calls to the UST concerning same (.2)			DES CORPGOV	0.40		250.00
07/23/24	Review UST appointment of additional equity committee member (.1); conference with R. Parisi regarding same (.2); reach out for Ken and emails to and from in preparation for jumping in to ongoing committee business (.2).			WJM CORPGOV	0.50		600.00
07/25/24	Discussion with Equity Committee members concerning updated NDA			DES CORPGOV	0.10		62.50
				CORPGOV Total	2.00		2,112.50

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page(s) of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/01/24	Confer with W. Martin, Jr. and discuss assignment of legal research related to fee arrangements under 328 with S. Bakker.		CPM	FEEAPPS	0.80	524.00
07/01/24	Preparation of Porzio's Retention Application.		MPD	FEEAPPS	1.50	555.00
07/01/24	Research for memo on whether counsel to a committee may be paid based on a percentage of recovery.		SJB	FEEAPPS	3.50	1,120.00
07/01/24	Meet with C. Mazza regarding disinterestedness issue when a percentage of recovery is taken as a fee arrangement under 11 USC Section 328.		WJM	FEEAPPS	0.40	480.00
07/02/24	Prepare certification of W. Martin, Jr. in support of retention.		MPD	FEEAPPS	1.80	666.00
07/02/24	Forward e-mail to team regarding pro hac drafts prepared and request final approval.		MPD	FEEAPPS	0.20	74.00
07/02/24	Review pro hac applications (x3) (0.4); correspond with M. Dermatis re same (0.2)		RAP	FEEAPPS	0.60	462.00
07/02/24	Write memo on whether committee may be paid based on percentage of recovery		SJB	FEEAPPS	2.70	864.00
07/02/24	Review memo from S. Backer regarding whether a 328(a) partially contingent fee arrangement as has been requested by the client here, might raise disinterestedness concerns.		WJM	FEEAPPS	0.50	600.00
07/03/24	Various e-mails with D. Sklar regarding information for pro hac admission.		MPD	FEEAPPS	0.10	37.00
07/03/24	Various e-mails with R. Parisi regarding information for pro hac admission.		MPD	FEEAPPS	0.20	74.00
07/03/24	Various e-mails with W. Martin, Jr. regarding information for pro hac admission.		MPD	FEEAPPS	0.10	37.00
07/08/24	Draft Porzio's Retention Application.		MPD	FEEAPPS	1.20	444.00
07/08/24	Communications re retention application and admin fee order, emails re same		RAP	FEEAPPS	0.30	231.00
07/16/24	Negotiate with committee over Porzio Fee Retention Proposal - section 328 type success fee based retention including emails to and from committee members (.5); discussions with R. Parisi regarding same (.2) and review section 328 caselaw and background (.4).		WJM	FEEAPPS	1.10	1,320.00
07/18/24	Preparation for Zoom Call on 7/19/24		CEF	FEEAPPS	1.00	800.00
07/18/24	Update of Porzio Retention with signatories and committee co-chair information.		MPD	FEEAPPS	0.60	222.00
07/19/24	Zoom Call with W. Martin, R. Parisi; D.		CEF	FEEAPPS	1.00	800.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page 25 of 107</u>	<u>Filed 09/30/24</u>	<u>Entered 09/30/24 22:05:23</u>	<u>Desc</u>	<u>Value</u>
07/22/24	Review and respond to e-mail from co-counsel regarding status of retention application.			MPD	FEEAPPS		74.00
07/22/24	Update of Retention Application and forward to R. Parisi for review.			MPD	FEEAPPS		185.00
07/23/24	Final changes to PBN retention application (1.6) and circulate to local counsel for review and comment (0.1)			RAP	FEEAPPS		1,309.00
07/24/24	Emails and correspondence re retention applications			RAP	FEEAPPS		154.00
07/25/24	Review and revise retention application			DES	FEEAPPS		437.50
07/25/24	Work to finalize retention application			DES	FEEAPPS		187.50
07/25/24	Finalization of retention application			RAP	FEEAPPS		385.00
07/26/24	Telephone Call with Warren Martin Regarding Sec. 382			CEF	FEEAPPS		320.00
07/26/24	Review and Comment on R. Parisi's proposed language			CEF	FEEAPPS		240.00
07/26/24	Review Porzio's Retention app and work with Committee (.4) and local counsel (.2) to get timely filed.			WJM	FEEAPPS		720.00
07/29/24	E-mail exchange with R. Parisi regarding preparation of supplemental declaration (.3); Review of other professionals retention applications and Schedule 2 information and provide comments (.5).			MPD	FEEAPPS		296.00
07/31/24	Prepare Supplemental Declaration ISO Retention and forward to R. Parisi for review.			MPD	FEEAPPS		444.00
					FEEAPPS Total	25.00	14,062.00
07/26/24	Review KL invoice and attached correspondence			RAP	FEEOBS		154.00
					FEEOBS Total	0.20	154.00
07/08/24	PBN / McKool catch up to discuss Innovatus and related case issues, including status of cash collateral stipulation and joint motion			RAP	FINANCE		847.00
07/09/24	Prepare consensual modified cash collateral stip (2.9); speak with W. Martin, Jr. re same (0.3); circulate (0.1)			RAP	FINANCE		2,541.00
07/10/24	Final edits to: (i) cc stipulation (0.4); standing motion (0.6); standing order (0.2); stipulation exhibit to motion (0.3); draft complaint exhibit (0.8); communications with KL team re same (0.3) and Debtors team re same (0.3)			RAP	FINANCE		2,233.00
07/10/24	Emails to and from committee members in preparation for budgeting and			WJM	FINANCE		3,480.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page 26 of 107</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	waterfall discussion with CRO (.4); emails to and from CRO in preparation for same (.4); attend meeting with CRO and committee regarding budgeting and Waterfall and walk through questions and concerns (1.1); download with R. Parisi regarding same (.4); crunch waterfall numbers for client download (.7).						
07/10/24	Emails to and from A. Rogoff regarding cash collateral stipulation (.3); conference with R. Parisi regarding same and edits to same (.3).			WJM FINANCE	0.60		720.00
07/11/24	Call with R. Parisi to discuss motion for standing and potential stipulation to resolve cash collateral issues (.2).			BSM FINANCE	0.20		167.00
07/11/24	Call with A. Citron re cash collateral order (0.3); call with W. Martin, Jr. re same and proposed edits to order (0.5); prepare changes (0.8) and circulate to Debtors, UCC and Innovatus (0.3); call with Anne Wallice re remaining concerns (0.3); discuss with W. Martin, Jr. (0.4)			RAP FINANCE	2.60		2,002.00
07/11/24	Call with UCC re cash collateral stip issues			RAP FINANCE	0.30		231.00
07/12/24	Another round of edits to cash collateral stipulation based upon conversation with various constituents (0.5); review comments from W. Martin, Jr. (0.2); discuss with W. Martin, Jr. (0.3); draft email to Innovatus counsel re same (0.4); circulate (0.1)			RAP FINANCE	1.50		1,155.00
07/12/24	Edits to derivative standing motion (0.2) and ancillary documents (0.4) based upon comments from Debtors and UCC; circulate same (0.1)			RAP FINANCE	0.70		539.00
07/12/24	Conference with R. Parisi regarding current form of cash collateral stipulation (.2); review and revise/edit same (.7); review email correspondence with Innovatus (.2); conference with R. Parisi regarding additional edits (.1).			WJM FINANCE	1.20		1,440.00
07/13/24	Speak with Innovatus counsel re stipulation (0.6); follow up call with W. Martin, Jr. re same (0.3)			RAP FINANCE	0.90		693.00
07/15/24	Emails and calls with Innovatus re CC stip; correspond with committee re same			RAP FINANCE	0.40		308.00
07/15/24	Meet with R. Parisi regarding finalizing cash collateral stipulation (.4); email			WJM FINANCE	1.50		1,800.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	exchanges with UCC counsel regarding problems with same and negotiating acceptable changes (.7); finalize same and communicate with local counsel re filing (.4).						
07/19/24	Call with Innovatus counsel re cc stipulation (0.3); review updated stip and consider remaining issues with W. Martin, Jr. (0.4); emails with Innovatus counsel re same (0.2)			RAP FINANCE	0.90		693.00
07/21/24	Call with A. Citron re stipulation (0.3); redline to same and back and forth correspondence re same (0.3); review email to Debtors / UCC / equity teams (0.2); review and respond to same (0.2)			RAP FINANCE	1.00		770.00
07/22/24	Discussions re cash collateral stipulation; emails re UCC changes; review draft			RAP FINANCE	0.50		385.00
07/23/24	Reviewing continuing edits to CC stipulation, emails re same; provide final comments			RAP FINANCE	0.50		385.00
07/28/24	Meet with R. Parisi and review presentation on cash collateral stipulation.			WJM FINANCE	0.40		480.00
07/29/24	Portion of court hearing today addressing Cash collateral stipulation entered by court on Friday.			WJM FINANCE	0.20		240.00
				FINANCE Total	23.60		21,109.00
07/01/24	Review of protective order and provide commentary on same for team			DES LITIGATE	0.50		312.50
07/01/24	Review NDA (0.8) and protective order (0.6); discuss with W. Martin, Jr. (0.2); back and forth with Debtor team re same (0.2); obtain and circulate signatures (0.2).			RAP LITIGATE	2.00		1,540.00
07/01/24	Review and revise NDA proposed by Debtors and with changes by D. Sklar (.3); go through same with R. Parisi and also discuss protective order inconsistency with R. Parisi (.3).			WJM LITIGATE	0.60		720.00
07/02/24	Review complaint received from Debtors (.5); review discovery received from lender (.5).			WJM LITIGATE	1.00		1,200.00
07/03/24	Conference with P. Gyparakis regarding drafting standing motion (.1); gather documents needed for same and forward to P. Gyparakis (.2).			WJM LITIGATE	0.30		360.00
07/05/24	Research regarding debtors consent to derivative standing motions and/or stipulations regarding same.			PG LITIGATE	1.80		1,044.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page(s) of Pleadings</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/05/24	Draft motion for derivative standing.			PG LITIGATE	1.90	1,102.00
07/05/24	Research regarding standard for derivative standing motions in 5th circuit.			PG LITIGATE	2.90	1,682.00
07/07/24	Review and revise motion for derivative standing.			PG LITIGATE	2.90	1,682.00
07/08/24	Review and discuss discovery received from parties			DES LITIGATE	0.30	187.50
07/08/24	Draft proposed complaint as exhibit to derivative standing motion.			PG LITIGATE	6.50	3,770.00
07/08/24	Revise derivative standing motion and all accompanying pleadings to joint motion.			PG LITIGATE	1.20	696.00
07/08/24	Email exchanges with Debtors counsel and Lenders counsel regarding discovery and compliance with Court Order.			WJM LITIGATE	0.30	360.00
07/09/24	Review emails and materials forwarded by W. Martin in connection with drafting standing motion and existing draft complaint prepared by the Debtors (1.7); review and edit draft standing motion (3.6); conference with P. Gyparakis regarding motion for standing and draft complaint (.5); edit draft complaint (.7).			BSM LITIGATE	6.50	5,427.50
07/09/24	Review and revise motion for derivative standing and all accompanying pleadings thereto.			PG LITIGATE	7.40	4,292.00
07/09/24	Work on index of Eiger discovery			SJB LITIGATE	2.90	928.00
07/10/24	Review and revise motion for derivative standing and all accompanying pleadings thereto.			PG LITIGATE	3.20	1,856.00
07/12/24	Emails to and from B. Moore and P. Gyparakis; regarding changes to standing motion (.4); review draft of same and edit (.4).			WJM LITIGATE	0.80	960.00
07/15/24	Review and revise DS objection (.8); conference with R. Parisi regarding same (.4); telephone conference with Debtors' team re same (.3); work with local counsel to perfect filing (.4); final edits and authorize filing (.5); Meet with Eiger internal team regarding workstreams including discovery issues (.4)			WJM LITIGATE	2.80	3,360.00
07/16/24	Conference with D. Sklar regarding workstreams on 2004 document production.			WJM LITIGATE	0.30	360.00
07/17/24	Conference with B. Moore regarding disclosure statement objection (.2); emails to and from local counsel regarding same and timing (.2); consider			WJM LITIGATE	0.90	1,080.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page(s) of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	outline of objection - 3 issues - and draft (.5).						
07/18/24	Compose email to T. Califano regarding kicking off 2004 discovery (.4); review response (.2) and telephone conference with T. Califano re same (.2).			WJM LITIGATE	0.80		960.00
07/18/24	Review-2004 Requests for Debtors / Ds and Os (.2); emails to and from R. Parisi regarding same (.2); telephone conference with A. Rogoff re informal interview with KL team to obtain download on thoughts on same (.2).			WJM LITIGATE	0.60		720.00
07/19/24	Review motion for derivative standing as filed and update casenotes accordingly.			PG LITIGATE	0.70		406.00
07/19/24	Review motion to transfer venue, responses and related appeal; first-day declaration and other first-day filings.			PG LITIGATE	2.10		1,218.00
07/19/24	Emails to and from T. Califano regarding discussion required on releases and D&O discovery (.2); telephone conference with R. Parisi regarding same (.1).			WJM LITIGATE	0.30		360.00
07/19/24	Review draft Equity Committee D&O Discovery demands prepared by D. Sklar and edit same.			WJM LITIGATE	0.60		720.00
07/22/24	Teams call with Porzio and counsel for lender to discuss potential D&O related claims and background on certain pre-petition transactions (.5).			BSM LITIGATE	0.50		417.50
07/22/24	Emails to and from B. Moore and R. Parisi regarding objection to be filed (.1); meeting with R. Parisi and B. Moore regarding same (.4); telephone conference with Innovatus Team regarding litigation claims (.6); review, edit and forward to Debtor team informal outline of discovery demands to be made formal (.9); telephone conference with Debtor team regarding scope and outline of D&O discovery (.6).			WJM LITIGATE	2.60		3,120.00
07/24/24	Review and revise NDA			DES LITIGATE	1.00		625.00
07/24/24	Phone call with equity Committee member getting him up to speed on case issues and re NDA			DES LITIGATE	0.30		187.50
07/24/24	Discussion with R. Parisi concerning call with Committee member and changes to NDA			DES LITIGATE	0.10		62.50
07/24/24	Draft revisions to the NDA (.2); Communication with Committee concerning same			DES LITIGATE	0.30		187.50
07/25/24	Conference call with Equity Committee			DES LITIGATE	1.00		625.00

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<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page(s) of Total</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	concerning case strategy					
07/25/24	Update NDAs for new Committee members signature			DES LITIGATE	0.30	187.50
07/25/24	Work with Debtors and committee members for finalizing updated NDA			DES LITIGATE	0.30	187.50
07/25/24	Review docket and prepare materials for hearing on July 29, 2024 regarding Standing Motion and Joint Stip Filed.			MPD LITIGATE	0.20	74.00
07/26/24	Emails regarding informal discovery demands sent to Debtors and call next week (.2).			BSM LITIGATE	0.20	167.00
07/26/24	Emails with the Committee regarding claims and potential complaint (.3).			BSM LITIGATE	0.30	250.50
07/26/24	Discussion with Debtors' team concerning NDA			DES LITIGATE	0.10	62.50
07/26/24	Discussion with Committee members concerning revised NDA			DES LITIGATE	0.10	62.50
07/26/24	Telephone conference with S. Backer regarding index of documents and document production review.			PG LITIGATE	0.70	406.00
07/26/24	Review complaint and outline issues for document production review.			PG LITIGATE	0.70	406.00
07/26/24	Research for memo on direct and derivative litigation in Delaware			SJB LITIGATE	0.80	256.00
07/26/24	Internal team correspondence regarding Two Additional Productions Received 07/26/2024 and meeting to break down/discuss division of labor for prompt analysis for Committee.			WJM LITIGATE	0.50	600.00
07/26/24	Correspondence with Committee members about producing discovery (.1); emails to and from team and discussions with team about additional document productions received today, confidentiality agreements and concerns, and putting together a production complying with same (.5).			WJM LITIGATE	0.60	720.00
07/29/24	Emails regarding D&O discovery and related, including recap of meet and confer (.4).			BSM LITIGATE	0.40	334.00
07/29/24	Epiq discovery training and project setup w/ P. Wittekind.			PG LITIGATE	1.20	696.00
07/29/24	Work on memo on direct and derivative litigation in Delaware			SJB LITIGATE	6.70	2,144.00
07/29/24	Emails to and from D. Sklar regarding discovery call with Debtors on D&O investigation (.2); telephone conference with P. Gyparakis regarding meeting tomorrow with team on discovery against Innovatus (.3); meet with R.			WJM LITIGATE	0.50	600.00

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07/30/24	Parisi regarding strategy on same (.2). Emails to coordinate call today to discuss D&O claims/discovery (.2).			BSM LITIGATE	0.20	167.00
07/30/24	Call with Porzio team to discuss discovery and related issues (.8).			BSM LITIGATE	0.80	668.00
07/30/24	Review 2004 motion, Innovatus objection and related order (1.3) and update casenotes regarding same (.6).			PG LITIGATE	1.90	1,102.00
07/30/24	Meeting (internal) regarding discovery production review and timing of same in light of challenge deadline.			PG LITIGATE	0.80	464.00
07/30/24	Write memo on direct and derivative standing under Delaware law			SJB LITIGATE	3.10	992.00
07/30/24	Attend to discovery issues (.2); meeting with Team regarding same			WJM LITIGATE	0.40	480.00
07/30/24	Internal Porzio work session regarding discovery evaluation and (.6), getting link to NDA permissible documents to committee members (.2) and including preliminary analysis of Innovatus data dump and division of labor for review of same, including D. Sklar, B. Moore; R. Parisi, P. Gyparakis (.4).			WJM LITIGATE	1.10	1,320.00
07/31/24	Emails regarding discovery production status and related (.2).			BSM LITIGATE	0.20	167.00
07/31/24	Telephone conference with Paul Wittekind regarding client access to discovery (.4) and follow-up e-mail regarding same (.3).			PG LITIGATE	0.70	406.00
07/31/24	Assemble tags and classifications on Epiq vis-à-vis document production review.			PG LITIGATE	1.20	696.00
07/31/24	Begin document production review.			PG LITIGATE	1.60	928.00
				LITIGATE Total	83.50	57,072.00
07/01/24	E-mail to team regarding preparation of Committee bylaws.			MPD MEETCOM	0.10	37.00
07/01/24	Emails with Committee members re same (0.2).			RAP MEETCOM	0.20	154.00
07/02/24	Conference call with clients concerning case issues			DES MEETCOM	1.20	750.00
07/02/24	Review complaint and documents circulated from Debtors in preparation for committee call (0.9); review and amend agenda and discussions with W. Martin, Jr. re same (0.3); attend committee call (1.2)			RAP MEETCOM	2.40	1,848.00
07/02/24	Prepare agenda for Equity Committee meeting (.3); vet same with R. Parisi and add two additional items for discussion			WJM MEETCOM	1.50	1,800.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	and circulate (.2); conduct Equity Committee meeting and discuss workstreams and next steps (1.0).						
07/03/24	Combined meeting of UCC and Equity Committee to catch up on case and next steps - Zoom video between D. Gonzalez, M. Budwick, M. Warren, R. Parisi, D. Sklar, G. Smith and J. Feldman.			WJM MEETCOM	1.00		1,200.00
07/06/24	Call from equity investor regarding possible equity committee seat (.2); telephone conference with R. Parisi regarding same (.1).			WJM MEETCOM	0.30		360.00
07/08/24	Equity committee call			RAP MEETCOM	1.10		847.00
07/08/24	Meetcom Meet with Local Counsel and update on all facets of proceeding and in preparation for committee call later today (.5); prepare Agenda for Committee meeting, revise, conference with R. Parisi regarding same, and circulate (.4); Committee meeting (1.1); conference with D. Sklar and R. Parisi regarding next steps and in preparation for call with Debtor tomorrow (.2).			WJM MEETCOM	2.30		2,760.00
07/11/24	Conference with equity committee regarding request to speak mano a mano with Innovatus (.2); emails to and from A. Rogoff setting up same (.2).			WJM MEETCOM	0.40		480.00
07/15/24	Attend equity Committee call			RAP MEETCOM	0.90		693.00
07/15/24	Prepare agenda for Equity committee meeting today, revise and circulate (.4); conduct Equity Committee meeting along with R. Parisi (.9).			WJM MEETCOM	0.90		1,080.00
07/17/24	Compose email to committee members regarding plan structure and our counter-structure to be proposed (.6); email exchange with committee member regarding same (.2).			WJM MEETCOM	0.80		960.00
07/24/24	Tax call with equity committee and Deloitte (.8); brief call with committee member thereafter regarding problems (.2); email correspondence with committee member regarding same (.1).			WJM MEETCOM	1.10		1,320.00
07/25/24	Equity committee meeting			RAP MEETCOM	0.90		693.00
07/25/24	Draft Agenda for today's committee meeting and circulate (.3); meet with R. Parisi in preparation for same (.3); attend and assist R. Parisi in conducting committee meeting (.9).			WJM MEETCOM	1.00		1,200.00
07/26/24	Review and respond to various e-mails			MPD MEETCOM	0.30		111.00

Date	Description	Exhibit C	Pages of Task	Code	Hours	Desc	Value
	regarding committee access to document productions.						
07/26/24	Prepare and circulate Committee call summary and minutes			RAP MEETCOM	0.40		308.00
07/26/24	Correspondence with K. Grossman and forward Draft Innovatus Complaint.			WJM MEETCOM	0.20		240.00
07/27/24	Forward plan and DS with latest Debtor round of edits to full committee.			WJM MEETCOM	0.20		240.00
07/29/24	Email to committee reporting on today's hearing and regarding upcoming committee meeting (.2); emails from and to K. Grossman regarding scheduling same (.1).			WJM MEETCOM	0.30		360.00
07/30/24	Review of correspondence prior to call to equity holder			DES MEETCOM	0.10		62.50
07/30/24	Return phone call to equity holder			DES MEETCOM	0.10		62.50
07/30/24	Meeting with shareholder to discuss case status			RAP MEETCOM	0.80		616.00
07/30/24	Call with K. Grossman and W. Martin, Jr. to discuss case updates			RAP MEETCOM	1.10		847.00
07/30/24	Meeting with interested shareholder regarding public status (.6); telephone conference with R. Parisi and K. Grossman strategizing on all issues facing the Committee and bringing the newest committee member up to speed on all issues (1.0).			WJM MEETCOM	1.60		1,920.00
07/30/24	Call with interest equity security holder - update to the extent of publicly available information.			WJM MEETCOM	0.50		600.00
				MEETCOM Total	21.70		21,549.00
07/28/24	Travel to Dallas for DS hearing.			RAP NONWKGTV	3.50		1,347.50
07/28/24	Portion of travel time to Dallas bankruptcy court for disclosure statement hearing.			WJM NONWKGTV	2.00		1,200.00
07/29/24	Travel back from DS hearing			RAP NONWKGTV	5.00		1,925.00
07/29/24	Travel return from court hearing in Dallas on Disclosure Statement and Cash Collateral Stipulation, and Claims estimation scheduling.			WJM NONWKGTV	4.00		2,400.00
				NONWKGTV Total	14.50		6,872.50
07/01/24	Portion of call with Debtor counsel and committee counsel discussing plan of reorganization (.4); meet with R. Parisi and D. Sklar; regarding same (.4); portion of call with Innovatus counsel discussing POR (.3); review issues on liquidating trust for Equity Committee			WJM PLANDSCL	1.50		1,800.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages</u>	<u>of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	and standing issues (.4).							
07/03/24	Draft and revise correspondence with debtor team regarding, among other things, opposition to Debtor plan (.2); conference with R. Parisi regarding same (.3); review debtor and R. Parisi exchanges regarding same (.2).		WJM		PLANDSCL	0.70		840.00
07/06/24	Conference with R. Parisi regarding follow up on information received yesterday on Plan and DS.		WJM		PLANDSCL	0.20		240.00
07/07/24	Call with W. Martin to discuss case background and next steps (.4).		BSM		PLANDSCL	0.40		334.00
07/09/24	Email exchanges with equity Committee members regarding waterfall analysis and getting to the bottom of discrepancies (.4); telephone conference with T. Califano and team regarding same (.4); conference with D. Staut on plan distribution waterfall discrepancy (.4); review FA competing analysis (.3).		WJM		PLANDSCL	1.50		1,800.00
07/10/24	Review and edit updated drafts of motion for standing and draft complaint (.4); emails with P. Gyparakis regarding same (.2).		BSM		PLANDSCL	0.60		501.00
07/10/24	Conferences with W. Martin and R. Parisi regarding case status and plan related issues (.3).		BSM		PLANDSCL	0.30		250.50
07/10/24	Confer with team regarding assignment on confirmation and possible cramdown of plan without impaired accepting class.		CPM		PLANDSCL	0.70		458.50
07/11/24	Confer with P. Desir regarding research into impaired classes (0.2). Review memorandum on same (0.3). Conduct legal research related to impairment of equity committee and plans with no impaired classes (0.7).		CPM		PLANDSCL	1.20		786.00
07/11/24	Emails to and from Debtor team regarding long-awaited plan and disclosure statement drafts (.2); receive and review plan and disclosure statement (1.1); forward to team for review and analysis (.1).		WJM		PLANDSCL	1.40		1,680.00
07/12/24	Emails regarding motion for equity committee standing, issues relating to attaching complaint and related with Porzio team (.8).		BSM		PLANDSCL	0.80		668.00
07/12/24	Legal research related to impairment of equity classes and cramdown of plan in case where all classes listed as unimpaired and objection filed.		CPM		PLANDSCL	0.60		393.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page 35 of 107</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/13/24	Research related to impairment of equity class and requirements of impaired classes in Ch. 11 plan.			CPM PLANDSCL	0.70	458.50
07/14/24	Review of draft plan and provide comments for team			DES PLANDSCL	1.90	1,187.50
07/14/24	Review draft plan (2.6); and emails re same (0.3)			RAP PLANDSCL	2.90	2,233.00
07/14/24	Further review and analysis of plan an disclosure statement draft.			WJM PLANDSCL	0.60	720.00
07/15/24	Prepare for and attend meeting with internal team to go over Plan and Disclosure Statement provisions (1.6). Conference call with Debtors' counsel and internal team to discuss Plan and Disclosure Statement language and revisions (0.4).			CPM PLANDSCL	2.00	1,310.00
07/15/24	Teams call concerning plan and proposed revisions			DES PLANDSCL	1.00	625.00
07/15/24	Conference call with the Debtors concerning plan issues			DES PLANDSCL	0.70	437.50
07/15/24	Team caucus to discuss outstanding projects related to Plan / DS considerations			RAP PLANDSCL	0.80	616.00
07/15/24	Plan / DS call with Debtor team			RAP PLANDSCL	0.70	539.00
07/15/24	Research on 1129 impairment			SJB PLANDSCL	4.00	1,280.00
07/15/24	Meeting with Debtor professional team regarding plan and disclosure statement structure and comments.			WJM PLANDSCL	0.80	960.00
07/16/24	Research on 1129 impairment			SJB PLANDSCL	1.20	384.00
07/17/24	Emails with Committee regarding disclosure statement objection deadline and related (.2). Emails with committee regarding form of post-confirmation plan/trust structure (.2).			BSM PLANDSCL	0.40	334.00
07/19/24	Review draft Disclosure Statement and Plan (1.3).			BSM PLANDSCL	1.30	1,085.50
07/19/24	Review impairment research; speak with S. Backer re same			RAP PLANDSCL	0.40	308.00
07/19/24	Review proposed plan and forward to EC for comment.			WJM PLANDSCL	0.40	480.00
07/20/24	Read and analyze plan and DS in preparation for digging in on edits (1.2); read sample plans from two prior cases with dual Plan Administrator and Liquidating Trustee structure for additional provisions desired (.8); work up changes to Plan for sharing with Debtor (4.0); telephone conference with R. Parisi regarding same (.4).			WJM PLANDSCL	6.40	7,680.00
07/21/24	Call with R. Parisi regarding edits to			MPD PLANDSCL	0.10	37.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page 36 of 107</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	plan.					
07/21/24	Review e-mail from W. Martin, Jr. with edits to plan and incorporate.			MPD PLANDSCL	1.00	370.00
07/21/24	Edits to plan			RAP PLANDSCL	1.60	1,232.00
07/21/24	Work on edits/redline to Plan and DS (4.2); telephone conference with R. Parisi regarding same and working through further changes (.8).			WJM PLANDSCL	5.00	6,000.00
07/22/24	Call with W. Martin and R. Parisi to discuss status and potential disclosure statement objection (.4). Continue to review plan and disclosure statement, and equity committee redline to plan (2.5).			BSM PLANDSCL	2.90	2,421.50
07/22/24	Catch Up/Status of Preparation of Eiger Plan Objection with B. Moore and W. Martin, Jr.			RAP PLANDSCL	0.30	231.00
07/22/24	Work through continued redlines with W. Martin, Jr. and team re plan and DS			RAP PLANDSCL	1.20	924.00
07/22/24	Research for memo on impairment of creditors			SJB PLANDSCL	1.30	416.00
07/22/24	Finalize committee edits to plan and ds and forward same to Debtor team.			WJM PLANDSCL	2.40	2,880.00
07/23/24	Emails regarding Debtors' comments in response to E Committee proposed redline changes (.2).			BSM PLANDSCL	0.20	167.00
07/23/24	Continue to review Disclosure Statement and redline of Plan with Porzio comments to prepare objection to Disclosure Statement (.9); emails with R. Parisi and W. Martin regarding potential Disclosure Statement objection (.3).			BSM PLANDSCL	1.20	1,002.00
07/23/24	Begin to prepare draft objection to Disclosure Statement (3.1).			BSM PLANDSCL	3.10	2,588.50
07/23/24	Emails with R. LeHane regarding Liquidating Trust and related (.2).			BSM PLANDSCL	0.20	167.00
07/23/24	Discussion with W. Martin and R. Parisi concerning plan and disclosure statement issues			DES PLANDSCL	0.10	62.50
07/23/24	Research on debtor's release			JZ PLANDSCL	3.50	1,400.00
07/23/24	NOL report for R. Parisi			PRD PLANDSCL	2.50	800.00
07/23/24	Finalize initial markup to the Plan (0.8) and circulate to Debtors for review and comment (0.1)			RAP PLANDSCL	0.90	693.00
07/23/24	Work on impairment memo for Eiger (first draft)			SJB PLANDSCL	2.20	704.00
07/23/24	Work on impairment memo for Eiger (draft 2)			SJB PLANDSCL	4.30	1,376.00
07/23/24	Review Debtor redline of implemented committee edits to Plan and disclosure			WJM PLANDSCL	2.20	2,640.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Pages</u>	<u>of</u>	<u>Total</u>	<u>Code</u>	<u>Hours</u>	<u>Desc</u>	<u>Value</u>
	statement (1.5); forward to Committee; email to R. Parisi regarding changes made and limited changes as to releases not accepted by Debtors (.4); review next steps with R. Parisi (.3).								
07/24/24	Review Debtors' comments in response to Equity Committee proposed redline changes to Plan (.7).	BSM	PLANDSCL				0.70		584.50
07/24/24	Continue to draft limited objection to Disclosure Statement (4.5).	BSM	PLANDSCL				4.50		3,757.50
07/24/24	Call with Debtors' counsel to discuss Plan/Disclosure Statement (.6).	BSM	PLANDSCL				0.60		501.00
07/24/24	Review of revised draft Plan w/ redlines to prior versions. Circulate language regarding post-Effective Date access to, and transfer of, books and records to liquidating entity.	CPM	PLANDSCL				0.80		524.00
07/24/24	Conference call with Debtors concerning plan issues	DES	PLANDSCL				0.60		375.00
07/24/24	Review Debtor redline (0.5); communicate with W. Martin, Jr. re same (0.2)	RAP	PLANDSCL				0.70		539.00
07/24/24	NOL call	RAP	PLANDSCL				0.50		385.00
07/24/24	Page turn of plan with Sidley team (0.5); prepare and send email on additional plan comments (0.3)	RAP	PLANDSCL				0.80		616.00
07/24/24	Memo on impairment of creditors for Eiger	SJB	PLANDSCL				5.00		1,600.00
07/24/24	Edits to latest round of plan and disclosure statement and back and forth with Debtor team on committee required edits to same (1.9); telephone conference with Debtor team and R. Parisi to walk through committee latest round of edits (.6); email correspondence regarding same (.3).	WJM	PLANDSCL				2.80		3,360.00
07/25/24	Continue to draft Limited Objection to Disclosure Statement (2.5).	BSM	PLANDSCL				2.50		2,087.50
07/25/24	Zoom call with UCC and Debtors regarding the Plan (.6).	BSM	PLANDSCL				0.60		501.00
07/25/24	Review of case correspondence in advance of call with the UCC	DES	PLANDSCL				0.10		62.50
07/25/24	Conference call with UCC and Debtors' professionals concerning plan issues	DES	PLANDSCL				0.60		375.00
07/25/24	Draft recap from call with UCC and Debtors	DES	PLANDSCL				0.40		250.00
07/25/24	Review docket and prepare materials for hearing on July 29, 2024 regarding combined disclosure statement and confirmation hearing.	MPD	PLANDSCL				0.20		74.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page 38 of 107</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/25/24	Work impairment memo for Eiger	SJB		PLANDSCL	3.00	960.00
07/25/24	Work on plan and Disclosure Statement	WJM		PLANDSCL	3.00	3,600.00
07/26/24	Discussion with Committee concerning limited objection to disclosure statement filing	DES		PLANDSCL	0.10	62.50
07/26/24	Discussion with M. Dermatis concerning filing of Eiger disclosure statement	DES		PLANDSCL	0.10	62.50
07/26/24	Review of changes to objection to disclosure statement before filing	DES		PLANDSCL	0.10	62.50
07/26/24	Discussion concerning disclosure statement issues	DES		PLANDSCL	0.10	62.50
07/26/24	Telephone call with D. Sklar regarding approval for filing Limited Plan Objection (.1); E-mail to co-counsel requesting filing of Limited Plan Objection (.1).	MPD		PLANDSCL	0.20	74.00
07/26/24	Review of filings and prepare materials for W. Martin, Jr. and R. Parisi for hearing on 7.29.24.	MPD		PLANDSCL	1.00	370.00
07/26/24	E-mail to office services regarding preparation of binders for hearing.	MPD		PLANDSCL	0.10	37.00
07/26/24	Work through tax attribute language, propose changes to Debtor team (0.5); work through issue with W. Martin, Jr. (0.2)	RAP		PLANDSCL	0.70	539.00
07/26/24	Emails with Committee re DS hearing and related strategy	RAP		PLANDSCL	0.20	154.00
07/26/24	Revisions to limited DS objection (0.8); circulate to team (0.1)	RAP		PLANDSCL	0.90	693.00
07/26/24	Finish impairment memo	SJB		PLANDSCL	3.20	1,024.00
07/26/24	Review and revise draft of limited Objection to Disclosure Statement (.9); forward draft to committee for review (.3); conference with R. Parisi regarding same (.2); attend to working with local counsel to effect filing of same (.3).	WJM		PLANDSCL	1.70	2,040.00
07/26/24	Review latest plan and disclosure redlines and continuing negotiations with Debtor team concerning same (2.3); meet with R. Parisi regarding three remaining issues that must change (.3); correspondence with Committee members re same (.2); attend to review of witness and Exhibit List for 7.29.24 hearings and authorize local counsel filing of same (.2).	WJM		PLANDSCL	3.10	3,720.00
07/27/24	Emails to and from R. Parisi and Debtor team regarding Plan and Disclosure Statement Comments (.3) review same in preparation for Monday Hearings.	WJM		PLANDSCL	0.60	720.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page(s) of</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
07/28/24	Review of correspondence concerning plan changes	DES	PLANDSCL		0.20	125.00
07/28/24	Research deathtrap provisions and coercive acceptance of plans under the 5th Cir.	DMO	PLANDSCL		2.70	1,242.00
07/28/24	Telephone call with W. Martin, Jr. regarding additional materials needed for hearing on July 29, 2024.	MPD	PLANDSCL		0.20	74.00
07/28/24	Review of e-mail from W. Martin, Jr. regarding supplemental plan filings.	MPD	PLANDSCL		0.10	37.00
07/28/24	Prep materials for hearing with W. Martin, Jr. (0.5); prep for hearing (1.0)	RAP	PLANDSCL		1.50	1,155.00
07/28/24	Redline of DS for purposes of resolving limited objection (0.8); prepare email to Debtors re same (0.3); circulate (0.1)	RAP	PLANDSCL		1.20	924.00
07/28/24	Review multiple communications from R. Parisi regarding unimpairment of Innovatus in revised plan (.3); review and edit revised DS and plan received from Debtors yesterday (1.6); review R. Parisi revisions to same as communicated to Debtors counsel (.6); compose emails to Debtors and to R. Parisi regarding working through remaining issues (.3); compose draft email to committee regarding same (.2); email to T. Califano and team regarding impairment issue (.2); telephone conference with T. Califano regarding same (.3); meet with R. Parisi on same (.7); full read and study of latest version of plan and disclosure statement with redlines against last round of committee comments and against filed version (1.8); email to committee regarding status of remaining issue (.2).	WJM	PLANDSCL		6.30	7,560.00
07/29/24	Listening in to the Plan and Disclosure statement hearing	DES	PLANDSCL		1.30	812.50
07/29/24	Start research on IRS 26 U.S.C. for W. Martin, Jr.	PRD	PLANDSCL		0.90	288.00
07/29/24	Finalize resolution of limited objection with Debtors team (0.4); emails with UCC re same (0.2); prep summary of hearing for committee (0.2); confer with W. Martin, Jr. re same (0.1)	RAP	PLANDSCL		0.90	693.00
07/29/24	Attend DS hearing	RAP	PLANDSCL		2.00	1,540.00
07/29/24	Reviewed new DS and Plan redlines filed this morning (2.0); meet with R. Parisi and M. Venus in preparation for hearing (.6); meetings at courthouse with	WJM	PLANDSCL		4.60	5,520.00

<u>Date</u>	<u>Description</u>	<u>Exhibit C</u>	<u>Page 40 of 107</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	parties in preparation for DS hearing (.5); court hearing before Judge Jernigan and obtain order approving D.S. (1.5).					
07/30/24	Review of Order Scheduling Combined DS and Plan Hearing for relevant calendar deadlines.	MPD		PLANDSCL	0.50	185.00
07/30/24	Review of entered order regarding hearing on Combined Plan and DS and update of calendars.	MPD		PLANDSCL	0.50	185.00
07/30/24	Research on 382(L)(5) for W. Martin, Jr.	PRD		PLANDSCL	2.50	800.00
07/31/24	Draft 26 U.S.C Section 382 (L)(5) memo	PRD		PLANDSCL	2.30	736.00
		PLANDSCL Total			139.50	108,150.00
07/16/24	Telephone conference with C. Falk regarding shift rules (.2); email to and from C. Falk re same (.1).	WJM		TAX	0.30	360.00
07/18/24	Review section 382 and shift rules in preparation for meeting tomorrow on IRC Section 382 (.3); emails to and from participants in preparation for same (.3).	WJM		TAX	0.60	720.00
07/18/24	Email to Committee re shift rules meeting and background of same.	WJM		TAX	0.20	240.00
07/19/24	Emails to and from C. Falk and R. Parisi in preparation for discussion of shift rules and 382 (.3); meeting with C. Falk, R. Parisi and committee regarding same (.5); follow up discussion with C. Falk (.2).	WJM		TAX	1.00	1,200.00
07/22/24	Email correspondence with Debtor team regarding proposed Moshe Arkin solve (.2); email to committee regarding same (.1).	WJM		TAX	0.30	360.00
		TAX Total			2.40	2,880.00
		Fees Total			426.30	297,711.00

Disbursement Summary	Total
Airfare	1,605.85
Business Meals	266.50
Ground Transportation	168.54
Lodging	450.62
Parking	130.00
Total Disbursements	2,621.51

Disbursement Detail

Date	Description	Amount
07/22/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - Working lunch	125.14
07/22/24	VENDOR: American Express INVOICE#: PARISI082724 DATE: 8/28/2024 Expense Reimbursement - Roundtrip Flight re: Hearing on Derivative Standing (RAP)	751.96
07/22/24	VENDOR: American Express INVOICE#: PARISI082724 DATE: 8/28/2024 Expense Reimbursement - Roundtrip Flight re: Hearing on Derivative Standing (WJM)	751.96
07/27/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - wifi (phone)	29.93
07/28/24	VENDOR: American Express INVOICE#: PARISI082724 DATE: 8/28/2024 Expense Reimbursement - Food before Roundtrip Flight re: Hearing on Derivative Standing (WJM/RAP)	70.64
07/29/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - Uber - tip - Dallas Airport to Aloft Hotel	22.20
07/29/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - Uber fee from Dallas Airport to Aloft Hotel	88.80
07/29/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - Wi Fi	19.00
07/29/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - Wi Fi	19.00
07/29/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - Wi Fi	15.00
07/29/24	VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024 Expense Reimbursement - uber tip	6.19
07/29/24	VENDOR: American Express INVOICE#: PARISI082724 DATE: 8/28/2024	130.00

Date	Description	Amount
07/29/24	Expense Reimbursement - Airport Parking for Roundtrip Flight re: Hearing on Derivative Standing VENDOR: American Express INVOICE#: PARISI082724 DATE: 8/28/2024	70.72
07/29/24	Expense Reimbursement - Food before Roundtrip Flight re: Hearing on Derivative Standing (WJM/RAP) VENDOR: American Express INVOICE#: PARISI082724 DATE: 8/28/2024	19.00
07/30/24	Expense Reimbursement - Airplane WiFi for Roundtrip Flight re: Hearing on Derivative Standing (RAP) VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024	175.00
07/30/24	Expense Reimbursement - Hotel Stay while Attending Confirmation Hearing VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024	31.71
07/30/24	Expense Reimbursement - Tax on Hotel Stay while Attending Confirmation Hearing VENDOR: American Express INVOICE#: MARTIN081224 DATE: 8/22/2024	51.35
07/30/24	Expense Reimbursement - Uber fee from Aloft Hotel to Dallas Airport VENDOR: American Express INVOICE#: PARISI082724 DATE: 8/28/2024	243.91
	Expense Reimbursement - Hotel re: Hearing on Derivative Standing (RAP)	
	TOTAL DISBURSEMENTS	\$2,621.51

TOTALS FOR THIS MATTER

Professional Services	297,711.00
Disbursements	2,621.51
Total Professional Services & Disbursements	300,332.51

BALANCE DUE THIS INVOICE	\$ 300,332.51
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Previous Balance Due	0.00
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	\$ 300,332.51
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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					

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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

<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

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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	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

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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

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<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

<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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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)	PG	PLANDSCL	0.90	522.00
08/05/24	Meeting (internal) regarding status of first round of document production review and timing of remaining documents, logistics regarding same.	PG	PLANDSCL	3.20	1,856.00
08/05/24	Continue to review and process document production via Epiq.	RAP	PLANDSCL	0.30	231.00
08/05/24	Review Withdrawal of standing motion, emails regarding same.	RAP	PLANDSCL	5.00	3,850.00
08/05/24	Outline of David Apelian Interview.	RAP	PLANDSCL	0.70	539.00
08/05/24	Call regarding Innovatus production with team.	SJB	PLANDSCL	6.30	2,016.00
08/05/24	Continue preparation of index of discovery.	WJM	PLANDSCL	3.50	4,200.00
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).	BSM	PLANDSCL	0.30	250.50
08/06/24	Review emails regarding discovery productions and review status (.3).	CPM	PLANDSCL	2.00	1,310.00
08/06/24	Review of documents in EPIQ database.	DES	PLANDSCL	0.80	500.00
08/06/24	Review and revise protective order for discovery.	DES	PLANDSCL	0.20	125.00
08/06/24	Discussion concerning strategy for interview.	DES	PLANDSCL	0.50	312.50
08/06/24	Review of outline for interview with Debtors' CEO (.4); discussion concerning same (.1).	DES	PLANDSCL	0.10	62.50
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	1.40	875.00
08/06/24	Review of documents for the upcoming interview particularly earlier hearing				

<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>
	regarding same (.2); conference with D. Sklar regarding next steps on confidentiality and production (.3).				
08/06/24	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

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	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

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<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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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

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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	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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	document review.				
08/20/24	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

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<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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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

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<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>
	(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				<u>523.60</u>	<u>329,486.50</u>
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



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

September 30, 2024

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

Invoice # 3322763

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 09/27/24

Professional Services	218,801.25
Disbursements	7,994.64
TOTAL CURRENT INVOICE	\$226,795.89
Previous Balance Due	148,417.90
TOTAL BALANCE DUE	\$375,213.79

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 30, 2024

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

Invoice # 3322763

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>
ASSMPTN	Assumption and rejection of Leases and Contracts	0.10	37.00
ASSTANAL	Asset Analysis and Recovery	54.80	33,927.00
CASEADMN	Case Administration	0.30	231.00
CLAIMS	Claims Administration and Objections	0.60	408.00
FEEAPPS	Fee/Employment Applications	7.80	4,361.50
FEEOBJS	Fee/Employment Objections	1.60	1,380.50
LITIGATE	Litigation (other than Avoidance Action Litigation)	0.90	712.50
MEETCOM	Meetings and Communications with Creditors	15.90	14,889.50
NONWKGTV	Non-Working Travel	24.20	10,739.75
PLANDSCL	Plan and Disclosure Statement	175.20	152,114.50
Total		<u>281.40</u>	<u>218,801.25</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>
Assumption and rejection of Leases and Contracts					
ASSMPTN	Dermatis, M. P.	Paralegal - 2 - Senior Level	0.10	370.00	37.00
Assumption and rejection of Leases and Contracts					
Total			0.10		37.00

Asset Analysis and Recovery

Our Matter # 026841.100434
 Invoice #3322763

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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>
ASSTANAL	Martin, W.	Principal	2.60	1,200.00	3,120.00
	Moore, B. S.	Principal	1.70	835.00	1,419.50
	Wittekind, P. C.	IT Department	7.30	420.00	3,066.00
	Mazza, C. P.	Counsel	0.30	655.00	196.50
	Parisi, R. A.	Principal	3.70	770.00	2,849.00
	Santaniello, C. A.	Principal	3.60	770.00	2,772.00
	Gyparakis, P.	Associate 1	34.80	580.00	20,184.00
	Zhou, J.	Law Clerk	0.80	400.00	320.00

Asset Analysis and Recovery

Total **54.80** **33,927.00**

Case Administration

CASEADMN	Parisi, R. A.	Principal	0.30	770.00	231.00
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Case Administration

Total **0.30** **231.00**

Claims Administration and Objections

CLAIMS	Moore, B. S.	Principal	0.40	835.00	334.00
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	Dermatis, M. P.	Paralegal - 2 - Senior Level	0.20	370.00	74.00
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Claims Administration and Objections

Total **0.60** **408.00**

Fee/Employment Applications

FEEAPPS	Martin, W.	Principal	0.80	1,200.00	960.00
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	Moore, B. S.	Principal	0.20	835.00	167.00
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	Mazza, C. P.	Counsel	2.10	655.00	1,375.50
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	Dermatis, M. P.	Paralegal - 2 - Senior Level	4.40	370.00	1,628.00
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	Parisi, R. A.	Principal	0.30	770.00	231.00
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Fee/Employment Applications

Total **7.80** **4,361.50**

Fee/Employment Objections

FEEOBJS	Martin, W.	Principal	0.30	1,200.00	360.00
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	Moore, B. S.	Principal	0.30	835.00	250.50
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	Parisi, R. A.	Principal	1.00	770.00	770.00
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Fee/Employment Objections

Total **1.60** **1,380.50**

Litigation (other than Avoidance Action Litigation)

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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>
LITIGATE	Moore, B. S.	Principal	0.30	835.00	250.50
	Parisi, R. A.	Principal	0.60	770.00	462.00
Litigation (other than Avoidance Action Litigation Total			0.90		712.50
Meetings and Communications with Creditors					
MEETCOM	Martin, W.	Principal	7.70	1,200.00	9,240.00
	Moore, B. S.	Principal	0.30	835.00	250.50
	Parisi, R. A.	Principal	4.30	770.00	3,311.00
	Gyparakis, P.	Associate 1	3.60	580.00	2,088.00
Meetings and Communications with Creditors Total			15.90		14,889.50
Non-Working Travel					
NONWKGTV	Martin, W.	Principal	5.00	600.00	3,000.00
	Moore, B. S.	Principal	10.70	417.50	4,467.25
	Parisi, R. A.	Principal	8.50	385.00	3,272.50
Non-Working Travel Total			24.20		10,739.75
Plan and Disclosure Statement					
PLANDSCL	Martin, W.	Principal	54.00	1,200.00	64,800.00
	Moore, B. S.	Principal	48.90	835.00	40,831.50
	Wittekind, P. C.	IT Department	6.20	420.00	2,604.00
	Dermatis, M. P.	Paralegal - 2 - Senior Level	1.10	370.00	407.00
	Parisi, R. A.	Principal	41.60	770.00	32,032.00
	Gyparakis, P.	Associate 1	15.20	580.00	8,816.00
	Desir, P. R.	Law Clerk	8.20	320.00	2,624.00
Plan and Disclosure Statement Total			175.20		152,114.50
Total			281.40		218,801.25

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

0080	Martin, W.	Principal	5.00	600.00	3,000.00
0080	Martin, W.	Principal	65.40	1,200.00	78,480.00
0345	Moore, B. S.	Principal	10.70	417.50	4,467.25

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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>
0345	Moore, B. S.	Principal	52.10	835.00	43,503.50
0460	Wittekind, P. C.	IT Department	13.50	420.00	5,670.00
1982	Mazza, C. P.	Counsel	2.40	655.00	1,572.00
2002	Dermatis, M. P.	Paralegal - 2 - Senior Level	5.80	370.00	2,146.00
2268	Parisi, R. A.	Principal	8.50	385.00	3,272.50
2268	Parisi, R. A.	Principal	51.80	770.00	39,886.00
2625	Santaniello, C. A.	Principal	3.60	770.00	2,772.00
2767	Gyparakis, P.	Associate 1	53.60	580.00	31,088.00
2798	Zhou, J.	Law Clerk	0.80	400.00	320.00
2816	Desir, P. R.	Law Clerk	8.20	320.00	2,624.00
	Total		281.40		218,801.25

Time Detail

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>	
09/05/24	Review of entered order extending assumption/rejection deadlines and update of calendars.	MPD	ASSMPTN	0.10	37.00	
				ASSMPTN Total	0.10	37.00
09/01/24	Review proposed amendment to the Certificate of Incorporation and provide feedback to W. Martin regarding stock issuance and compliance with DGCL	CAS	ASSTANAL	0.20	154.00	
09/02/24	Correspondence with team regarding standing motion; source and send examples of prior motions and complaints to team.	CPM	ASSTANAL	0.30	196.50	
09/02/24	Research regarding attorney-client privilege issues in relation to discovery designations.	PG	ASSTANAL	3.20	1,856.00	
09/02/24	Review debtors' privilege log and begin categorizing entries for purpose of analyzing discovery designations.	PG	ASSTANAL	3.50	2,030.00	
09/03/24	Conduct detailed searches in master e-discovery database to locate documents needed for WJ Martin to use during court hearing (0.5); compile relevant documents for WJ Martin review (0.2).	PCW	ASSTANAL	0.70	294.00	
09/03/24	Draft deficiency letter regarding debtors' privilege log.	PG	ASSTANAL	1.50	870.00	
09/03/24	Review debtors' privilege log and continue categorizing entries.	PG	ASSTANAL	5.50	3,190.00	
09/04/24	Calls with L. Hornblower (2x) regarding DGCL and board of directors meetings, resignations and powers during pendency of bankruptcy proceeding.	CAS	ASSTANAL	0.50	385.00	
09/04/24	Additional research regarding DGCL and Board of Directors	CAS	ASSTANAL	1.50	1,155.00	
09/04/24	Review corporate governance documents regarding board of directors power and authority	CAS	ASSTANAL	0.50	385.00	
09/04/24	Call with L. Hornblower and K. Grossman regarding corporate governance of Debtor	CAS	ASSTANAL	0.50	385.00	
09/04/24	Exchange of emails with L. Hornblower	CAS	ASSTANAL	0.40	308.00	

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
09/04/24	regarding board of directors Review document production to supplement court filing.	JZ	ASSTANAL	0.80	320.00
09/04/24	Conduct detailed searches in master e- discovery database to identify documents to be used by WJ Martin at depositions (1.2); extract identified documents into Bates-endorsed PDF format for use at depositions (1.1); multiple communications with team members regarding additional items needed from database (0.9); identify and extract from e-discovery database multiple SEC and other governmental filings produced by Innovatus and debtors to be used by WJ Martin at depositions (0.7)	PCW	ASSTANAL	3.90	1,638.00
09/04/24	Attend portion of Leen Kawas deposition (1.1)	RAP	ASSTANAL	1.10	847.00
09/04/24	Discuss potential settlement proposal with team (0.4); review back and forth email correspondence re same (0.2)	RAP	ASSTANAL	0.60	462.00
09/04/24	Multiple calls with A. Rogoff re Innovatus settlement (0.5); continue to keep Committee apprised of updates (0.2); confer with W. Martin, Jr. re same (0.3)	RAP	ASSTANAL	0.90	693.00
09/04/24	Discuss settlement parameters with A. Wallace; communicate with team re same	RAP	ASSTANAL	0.20	154.00
09/06/24	Review, configure and import additional items from Debtor's Production Sets 4 and 5 into master e-discovery database (for use in pursuing D&O claims against individuals as permitted in court's order) (2.1); multiple communications with P. Gyparakis and R. Parisi regarding information in sets 4 and 5 potentially useful in pursuing D&O claims (0.6)	PCW	ASSTANAL	2.70	1,134.00
09/06/24	Telephone conference with W. Martin regarding preserved causes of action under settlement agreement.	PG	ASSTANAL	0.50	290.00
09/06/24	Review document production regarding Hepatitis Delta Virus drug study and related events.	PG	ASSTANAL	4.20	2,436.00
09/06/24	Draft master chronology regarding preserved causes of action (Hepatitis	PG	ASSTANAL	0.90	522.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
09/09/24	Delta Virus drug study and related events). Review document production regarding Hepatitis Delta Virus drug study and related events.	PG	ASSTANAL	4.50	2,610.00
09/09/24	Emails with team re D&O investigation	RAP	ASSTANAL	0.30	231.00
09/09/24	Work with P. Gyparakis regarding D&O claim discovery analysis.	WJM	ASSTANAL	0.50	600.00
09/17/24	Call with P. Gyparakis regarding potential D&O claims.	BSM	ASSTANAL	0.40	334.00
09/17/24	Review file to send certain documents and notes regarding D&O claims to P. Gyparakis.	BSM	ASSTANAL	0.30	250.50
09/17/24	Catch up call re D&O discovery and investigation	RAP	ASSTANAL	0.60	462.00
09/17/24	Telephone conference with P. Gyparakis regarding discovery workup on D&O claims and claims objections required for committee meeting Friday.	WJM	ASSTANAL	0.70	840.00
09/18/24	Review D&O claims retention bonuses (2.0) and create spreadsheet of potential set-off amounts (2.5).	PG	ASSTANAL	4.50	2,610.00
09/19/24	Call with W. Martin, R. Parisi and P. Gyparakis regarding potential D&O claims (.7). Follow-up emails regarding potential targets, claims and related (.3).	BSM	ASSTANAL	1.00	835.00
09/19/24	Prepare for Meeting with Equity Committee (review potential D&O claims (2.3), documents in support of same (.2) and outline preserved causes of action (1.0)).	PG	ASSTANAL	6.50	3,770.00
09/19/24	Meet with R. Parisi and P. Gyparakis regarding claims/causes of action as against D&Os (.6); review hot documents in order to assess strengths of litigation claims (.8).	WJM	ASSTANAL	1.40	1,680.00
			ASSTANAL Total	54.80	33,927.00
09/01/24	Review Debtor emails re Equity Committee appointment, draft email response and circulate	RAP	CASEADMN	0.30	231.00
			CASEADMN Total	0.30	231.00
09/05/24	Review and download filings in preparation of hearing on Innovatus	MPD	CLAIMS	0.20	74.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
09/09/24	Claim Estimation. Emails with counsel for Innovatus regarding challenge period, invoices and related.	BSM	CLAIMS	0.40	334.00
			CLAIMS Total	0.60	408.00
09/01/24	Email from A. Wallice regarding fee estimates required for confirmation (.1); email to Dundon advisors regarding pulling up same (.1).	WJM	FEEAPPS	0.20	240.00
09/11/24	Emails regarding omnibus hearing and final fee applications and related issues.	BSM	FEEAPPS	0.20	167.00
09/11/24	Communications with local counsel regarding filing final statements in anticipation of confirmation and effective date.	WJM	FEEAPPS	0.20	240.00
09/16/24	Prepare exhibits to monthly fee statement.	CPM	FEEAPPS	2.10	1,375.50
09/16/24	Review of invoice for preparation of monthly fee statement (1.3) and prepare third monthly fee statement (.7).	MPD	FEEAPPS	2.00	740.00
09/17/24	Finalize Porzio's August Monthly Fee Statement (1.0); Provide copy to R. Parisi and W. Martin, Jr. for review (.2); Incorporate edits provided by R. Parisi (.5); Forward to co-counsel for filing (.1).	MPD	FEEAPPS	1.80	666.00
09/17/24	Download and calendar objection deadline for August Monthly Fee Statement for Dundon and McKool.	MPD	FEEAPPS	0.20	74.00
09/17/24	Calendar of objection deadline to Porzio's August Monthly Fee Statement.	MPD	FEEAPPS	0.10	37.00
09/17/24	Final review of monthly and oversee filing of same	RAP	FEEAPPS	0.30	231.00
09/17/24	Emails from M. Dermatis and R. Parisi regarding monthly fee statement (.2); Attend to review and filing monthly fee statement (.2).	WJM	FEEAPPS	0.40	480.00
09/24/24	Review and respond to e-mail from W. Martin, Jr. regarding end date for final fee application.	MPD	FEEAPPS	0.10	37.00
09/25/24	Prepare e-mail to co-counsel regarding form for final fee application.	MPD	FEEAPPS	0.10	37.00
09/26/24	Review e-mail regarding estimated fees and discuss same with W. Martin, Jr.	MPD	FEEAPPS	0.10	37.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
			FEEAPPS Total	7.80	4,361.50
09/10/24	Emails regarding Kramer Levin invoices and related issues.	BSM	FEEOBJS	0.20	167.00
09/10/24	Emails re lender invoices	RAP	FEEOBJS	0.30	231.00
09/10/24	Review Kramer Levin fee statements and conference with R. Parisi regarding Equity Committee objection rights.	WJM	FEEOBJS	0.30	360.00
09/17/24	Review outstanding invoices; review confirmation order re same; email Kramer Levin team re same	RAP	FEEOBJS	0.50	385.00
09/18/24	Emails regarding Innovatus related fees.	BSM	FEEOBJS	0.10	83.50
09/20/24	Emails re lender fees and expenses	RAP	FEEOBJS	0.20	154.00
			FEEOBJS Total	1.60	1,380.50
09/09/24	Emails re stips of dismissal for appeals	RAP	LITIGATE	0.30	231.00
09/10/24	Emails regarding dismissal of pending appeals and stipulations for same.	BSM	LITIGATE	0.30	250.50
09/10/24	Review emails re dismissal of appeals	RAP	LITIGATE	0.30	231.00
			LITIGATE Total	0.90	712.50
09/04/24	Email to committee members regarding agenda for emergency committee meeting to address settlement offer just proposed by Debtors (.3); conduct committee meeting and obtain settlement authority with certain conditions (1.0).	WJM	MEETCOM	1.30	1,560.00
09/05/24	Emails exchanges with committee members for continuing authority on settlement proposals given certain changes and tweaks (.9); advise R. Parisi and B. Moore regarding same (.3).	WJM	MEETCOM	1.20	1,440.00
09/06/24	Speak with Committee member re hearing update (0.2); prepare draft update for Committee (0.4); speak with W. Martin, Jr. re same and review revised update prior to circulation (0.2)	RAP	MEETCOM	0.80	616.00
09/09/24	Emails with Equity Committee regarding status report, effective date and related.	BSM	MEETCOM	0.30	250.50
09/11/24	Email exchange with committee member regarding update (.2); telephone conference with committee member regarding same and looking towards liquidating trust and advisory committee at effective date (.3); conference with R.	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>
09/16/24	Parisi regarding next steps and upcoming committee meeting (.3); review R. Parisi communication with full committee (.2). Confer with R. Parisi regarding committee meeting needed (.2); review R. Parisi draft email to Committee with Agenda and email exchange with Josh Nahas re same (.2); review R. Parisi email to committee and reply to same (.1).	WJM	MEETCOM	0.50	600.00
09/17/24	Call with R. Parisi and W. Martin regarding Equity Committee meeting.	PG	MEETCOM	0.80	464.00
09/17/24	Coordination of Committee call	RAP	MEETCOM	0.20	154.00
09/19/24	Prep call with R. Parisi and W. Martin regarding Equity Committee meeting.	PG	MEETCOM	0.80	464.00
09/19/24	Eiger prep call for Committee meeting	RAP	MEETCOM	1.00	770.00
09/19/24	Review J. Nahas draft report for tomorrow's committee meeting and edit same (.3); conference with R. Parisi regarding additional edits (.2); email to J. Nahas with suggested edits (.1); receive and review revised report (.2); conference with R. Parisi on Agenda for meeting and on circulating revised Dundon report to Committee in preparation for same (.3).	WJM	MEETCOM	1.10	1,320.00
09/20/24	Telephone conference with Equity Committee regarding post confirmation matters.	PG	MEETCOM	1.10	638.00
09/20/24	Prep call with R. Parisi and W. Martin regarding Equity Committee meeting.	PG	MEETCOM	0.90	522.00
09/20/24	Committee Call and Update	RAP	MEETCOM	1.10	847.00
09/20/24	Prep call for committee meeting	RAP	MEETCOM	0.90	693.00
09/20/24	Follow up email to Committee re post-effective date service	RAP	MEETCOM	0.30	231.00
09/20/24	Meeting with P. Gyparakis and R. Parisi in preparation for committee meeting today in review of claims against D & Os and claim objections (.9); refine agenda, conference with R. Parisi regarding same, and circulate edited agenda to Committee (.4); conduct committee meeting on Liquidating Trust, transition issues, claim objections, etc. (1.1); review email from R. Parisi with	WJM	MEETCOM	2.60	3,120.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	follow-up items required (.2).				
		MEETCOM Total		15.90	14,889.50
09/03/24	Travel to Texas for contested confirmation hearing on Thursday.	BSM	NONWKGTV	4.50	1,878.75
09/04/24	Non working travel to Dallas	RAP	NONWKGTV	3.50	1,347.50
09/05/24	Travel back from Texas.	BSM	NONWKGTV	6.20	2,588.50
09/05/24	Non working portion of travel to Dallas airport and flight to Newark	RAP	NONWKGTV	5.00	1,925.00
09/05/24	Travel return from confirmation hearing.	WJM	NONWKGTV	5.00	3,000.00
		NONWKGTV Total		24.20	10,739.75
08/16/24	Discovery Research on EPIQ.	PRD	PLANDSCL	2.40	768.00
08/18/24	Continue Discovery Research on EPIQ.	PRD	PLANDSCL	2.00	640.00
08/19/24	Continue Discovery Research on EPIQ.	PRD	PLANDSCL	3.80	1,216.00
09/01/24	Review internal file memoranda (1.7), witness and exhibit list (0.5), Debtors' plan pleadings (1.6) and UCC filings (0.8) and prepare outline/argument for contested confirmation hearing next week (3.9); emails with Porzio and local counsel team regarding additional exhibits for depositions and hearing (.3).	BSM	PLANDSCL	8.80	7,348.00
09/01/24	Review emails re Dundon testimony (0.3); review and circulate Avexitide APA (0.2); review and circulate Zokinvy APA (0.2)	RAP	PLANDSCL	0.70	539.00
09/01/24	Coordinate Innovatus call in advance of hearing	RAP	PLANDSCL	0.20	154.00
09/01/24	Correspond with FA re finalizing PA budget	RAP	PLANDSCL	0.20	154.00
09/01/24	Speak with W. Martin, Jr. re voting issues and related research in advance of hearing	RAP	PLANDSCL	0.30	231.00
09/01/24	Review of discovery database for further "hot" documents in advance of hearing	RAP	PLANDSCL	1.10	847.00
09/01/24	Review McKool research re subpoena service (.3); Review emails re same (.1).	RAP	PLANDSCL	0.40	308.00
09/01/24	Edit Kayne subpoena (0.2); Kawas subpoena (0.2); Hua subpoena (0.2)	RAP	PLANDSCL	0.60	462.00
09/01/24	Update and (1.0) finalize exhibit list (0.2).	RAP	PLANDSCL	1.20	924.00
09/01/24	Prepare for depositions Wednesday and a contested evidentiary confirmation hearing on Thursday including: review,	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>
09/02/24	analyze and outline exhibits to be used during testimony (2.7); email correspondence with witnesses in preparation for same (.8); telephone conferences with B. Moore and R. Parisi regarding workstreams and testimony outlines (.8); reading pleadings and briefs in preparation for same (3.7).	BSM	PLANDSCL	1.60	1,336.00
09/02/24	Call with Porzio team in connection with preparing for contested confirmation hearing on Thursday (0.9); continue outlining arguments (0.7).	BSM	PLANDSCL	5.60	4,676.00
09/02/24	Review documents produced in discovery to identify potential exhibits for use at contested confirmation hearing on Thursday.	BSM	PLANDSCL	5.60	4,676.00
09/02/24	Allocate items in D&O production sets 4 and 5 for review by attorneys in preparation for 9/5/2024 hearing.	PCW	PLANDSCL	0.20	84.00
09/02/24	Extract documents from D&O production sets 1-5 needed by R. Parisi for review and use as exhibits at 9/5/2024 hearing; convert into PDF format with confidentiality and Bates number endorsements required for use as exhibits at hearing	PCW	PLANDSCL	0.40	168.00
09/02/24	Extract all updated documents identified as supportive of Committee's D&O claims for review by principal W. Martin (0.5); convert items into PDF format to facilitate W. Martin's review in preparation for 9/5/2024 hearing (0.2).	PCW	PLANDSCL	0.70	294.00
09/02/24	Final review, configuration, and importing of D&O production sets 4 and 5 into e-discovery database (4.4); communications with team members regarding protocol for review and classification of items in sets 4 and 5 (0.5).	PCW	PLANDSCL	4.90	2,058.00
09/02/24	Call with Innovatus in preparation for hearing	RAP	PLANDSCL	0.60	462.00
09/02/24	Speak with A. Wallice re upcoming hearing	RAP	PLANDSCL	0.50	385.00
09/02/24	Review database to update witness / exhibit list (0.8); update document for	RAP	PLANDSCL	2.10	1,617.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	filing (0.8); create sharefile link with exhibits (0.2); and coordinate with McKool re filing (0.3)				
09/02/24	Search database for insurance related exhibits (0.7); emails re same (0.2)	RAP	PLANDSCL	0.90	693.00
09/02/24	Review updated waterfall (0.3); discuss with team (0.3)	RAP	PLANDSCL	0.60	462.00
09/02/24	Review voting issues with team (0.3); review 3018 standard (0.3); discuss as related to confirmation hearing (0.3)	RAP	PLANDSCL	0.90	693.00
09/02/24	Coordinate with A. Murphy re preparation of certain exhibits and material for trial	RAP	PLANDSCL	0.40	308.00
09/02/24	Preparation of outline for hearing arguments	RAP	PLANDSCL	0.80	616.00
09/02/24	Trial preparation for contested confirmation hearing including witness outlines (1.0); reading all pertinent briefs and pleadings (1.8); meetings with R. Parisi and B. Moore (.9); email exchanges with Debtors counsel regarding trial testimony, depositions and witnesses (.7); work with C. Stoia on insurance issues and possible settlement formulations (.7); emails to and from Debtors regarding same (.3); emails to committee members regarding status of trial preparation and settlement strategies (.6); meeting with pbn team and Kramer Levin team regarding coordinating trial strategy (.7); calls with witness (.5); reading law on debtor releases and outline same (.9); continued refinement of testimony outlines (1.9).	WJM	PLANDSCL	10.00	12,000.00
09/03/24	Witness outlines for depositions (2.6); continue to review documentation in support of deposition testimony (2.7); review relevant case law (1.6); outline of legal argument (0.9).	BSM	PLANDSCL	7.80	6,513.00
09/03/24	Continue deposition preparation (1.8); meeting with W. Martin and R. Parisi regarding same (0.6).	BSM	PLANDSCL	2.40	2,004.00
09/03/24	Download pleadings for 9.5.24 hearing.	MPD	PLANDSCL	0.40	148.00
09/03/24	Assemble all caselaw cited in objection to plan as per W. Martin (0.5) and email	PG	PLANDSCL	0.60	348.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	same to group (0.1).				
09/03/24	Deposition / hearing prep meeting with Warren and Brett	RAP	PLANDSCL	0.60	462.00
09/03/24	Dundon hearing prep session	RAP	PLANDSCL	0.90	693.00
09/03/24	L. Kawas discussion	RAP	PLANDSCL	1.10	847.00
09/03/24	Finalize witness list (0.9) coordinate with McKool Smith (0.4); pull Bates Label exhibits (0.4); oversee filing (0.2)	RAP	PLANDSCL	1.90	1,463.00
09/03/24	Coordination re deposition scheduling with PBN team (0.3); McKool (0.2); Leen and Dundon (0.2); speak with UCC, Innovatus and Debtors re same (0.4); finalize schedule (0.2)	RAP	PLANDSCL	1.30	1,001.00
09/03/24	Settlement communications and discussions with Innovatus (0.5); update Committee re same (0.2)	RAP	PLANDSCL	0.70	539.00
09/03/24	Speak with UST re Committee member holdings; correspond with Committee re same	RAP	PLANDSCL	0.50	385.00
09/03/24	Correspond with local counsel re confidentiality designations; discuss same with Debtors' counsel	RAP	PLANDSCL	0.50	385.00
09/03/24	Prepare sensitivity analysis re potential Innovatus settlement amounts; discuss with W. Martin, Jr.	RAP	PLANDSCL	0.40	308.00
09/03/24	Review Avexitide sale agreement (0.8); emails with team re same in relation to Dundon testimony (0.2)	RAP	PLANDSCL	1.00	770.00
09/03/24	Speak with Debtor team re hearing and Innovatus discussions and counterproposal re Ds and Os (0.3); prepare communication for Committee re same (0.3) and circulate (0.1)	RAP	PLANDSCL	0.70	539.00
09/03/24	Update and discussion with Committee counsel	RAP	PLANDSCL	0.80	616.00
09/03/24	Emails to and from T. Califano regarding witness procedures, depositions, and contested confirmation trial Thursday (.8); efforts to settle including concepts of canceling tail, or portion of tail to obtain substantial premium refund (.7); telephone conference with C. Stoia regarding same (.3); work with B. Moore on document review, preparation and outlines of witness testimony (2.9);	WJM	PLANDSCL	10.60	12,720.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
09/04/24	preparation sessions with Matt Dundon (1.0) and Leen Kawas (2.0); continue to refine trial and deposition outlines (2.0); review and refine legal argument (.9).				
09/04/24	Continue to review documents (2.8) and prepare for depositions today (1.0).	BSM	PLANDSCL	3.80	3,173.00
09/04/24	Prepare for depositions (4.8); take Apelian deposition (3.2); attend other Debtor depositions (Shanahah - 2.0 and Kawas - 1.5) at Sidley offices in Dallas.	BSM	PLANDSCL	11.50	9,602.50
09/04/24	Read debtors' response to plan objections and update case notes accordingly.	PG	PLANDSCL	1.50	870.00
09/04/24	Research caselaw cited in debtors' response to plan objections.	PG	PLANDSCL	1.10	638.00
09/04/24	Telephone conference with R. Parisi regarding declarations of equity holders (ballots and plan solicitation).	PG	PLANDSCL	0.30	174.00
09/04/24	Telephone conference with K. Grossman regarding receipt of ballot and declaration regarding same.	PG	PLANDSCL	0.50	290.00
09/04/24	Draft declaration regarding receipt of ballot and ability to vote on plan.	PG	PLANDSCL	1.30	754.00
09/04/24	Draft outline of reply to debtors' response to plan objections.	PG	PLANDSCL	0.90	522.00
09/04/24	Draft reply to debtors' response to plan objections.	PG	PLANDSCL	1.50	870.00
09/04/24	Research Delaware business judgment standard.	PG	PLANDSCL	1.10	638.00
09/04/24	Prepare notice of deposition for Staut(0.3); Gorman(0.3); and Shanahan (0.3)	RAP	PLANDSCL	0.90	693.00
09/04/24	Attend portion of Shanahan deposition	RAP	PLANDSCL	1.60	1,232.00
09/04/24	Attend Staut deposition	RAP	PLANDSCL	0.60	462.00
09/04/24	Call with Kawas re coordination for deposition (0.3); follow up call prior to deposition (0.6)	RAP	PLANDSCL	0.90	693.00
09/04/24	Working travel -- Leen Kawas trial testimony outline	RAP	PLANDSCL	3.20	2,464.00
09/04/24	Prepare for (2.0) and take deposition of M. Shanahan (2.0); prepare for and defend deposition of Matt Dundon (1.6); prepare for (0.5) and defend deposition of Leen Kawas (1.5); prepare for hearing tomorrow including review of reply memorandum of law filed by Debtors	WJM	PLANDSCL	15.40	18,480.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	(0.7) and reading caselaw cited therein (1.0) and outlining argument (1.8); work on settlement with Debtors counsel (.5); communications with team, B. Moore and R. Parisi regarding strategies on both settlement and litigation (1.8).				
09/05/24	Meetings with Porzio team and Debtors' counsel to discuss settlement terms and global settlement (3.0), review updated plan (1.2) and confirmation order in advance of confirmation hearing (1.3).	BSM	PLANDSCL	5.50	4,592.50
09/05/24	Attend confirmation hearing and follow-up discussions to finalize terms of confirmation order.	BSM	PLANDSCL	1.90	1,586.50
09/05/24	Review order extending plan filing and solicitation deadlines and update of calendaring.	MPD	PLANDSCL	0.20	74.00
09/05/24	Review and download filings in preparation of hearing on 4th Amended Plan.	MPD	PLANDSCL	0.20	74.00
09/05/24	Draft reply to debtors' response to plan objections.	PG	PLANDSCL	2.90	1,682.00
09/05/24	Review and revise reply to debtors' response to plan objections.	PG	PLANDSCL	3.50	2,030.00
09/05/24	Continuation of Kawas direct prep	RAP	PLANDSCL	1.00	770.00
09/05/24	Discuss modification to settlement with W. Martin, Jr. (0.4); and review proposed Committee communication re same (0.3); multiple calls with A. Wallice to resolve final issues (0.5)	RAP	PLANDSCL	1.20	924.00
09/05/24	Working travel with team to Sidley offices prior to hearing to work on revised confirmation order and revised plan	RAP	PLANDSCL	0.40	308.00
09/05/24	Work through language issues in confirmation order / plan with Sidley and Innovatus teams prior to hearing	RAP	PLANDSCL	2.90	2,233.00
09/05/24	Working travel to hearing from Sidley office	RAP	PLANDSCL	0.30	231.00
09/05/24	Continue discussions during confirmation hearing with team to finalize outstanding fee issue with Innovatus (0.3); discuss issue with Sidley (0.3); negotiations with A. Rogoff while in Court re same issue (0.4)	RAP	PLANDSCL	1.00	770.00

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
09/05/24	Working travel back to Sidley office to work through final confirmation order / plan docs	RAP	PLANDSCL	0.30	231.00
09/05/24	Work through fee issue with team and A. Rogoff (0.5); prepare and circulate proposed language (0.2); modifications from Innovatus (0.1) and sign off (0.1)	RAP	PLANDSCL	0.90	693.00
09/05/24	Final discussions with Sidley and KL teams on confirmation order changes and plan changes (0.5); review redlines of confirmation order circulated (0.4); review redlines of plan circulated (0.4); review changes with W. Martin, Jr. (0.3); final changes re early payoff for Innovatus and discussions re same (0.4); final sign off (0.2)	RAP	PLANDSCL	2.20	1,694.00
09/05/24	Meet with team regarding settlement parameters and marching orders from Committee and strategy on continued negotiations with Debtors (.9); email exchanges with T. Califano confirming terms of revised settlement proposal on D&O releases (.8); telephone conference with R. Parisi regarding discussions with A. Wallace and proposed pushback/changes (.4); draft communique to committee regarding same (.4); simultaneously continue preparations for contested hearing including reading deposition transcripts of Shanahan and Dundon in preparation for first part of hearing today (2.2); negotiations with Sidley team and Innovatus team over plan amendatory language and final edits to same (1.0); work up plan change language (1.3) as well as confirmation order change language (1.2); appear in court on same (.4).	WJM	PLANDSCL	8.60	10,320.00
09/09/24	Emails and discussion with W. Martin, Jr. and Kramer Levin team re challenge deadline and necessity (or not) of extension	RAP	PLANDSCL	0.50	385.00
09/09/24	Review outstanding Innovatus fees (0.4); emails with team re same (0.2)	RAP	PLANDSCL	0.60	462.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
09/09/24	Work with R. Parisi on 9019 aspect of plan, challenge deadline and effective date issues (.4); email exchanges with A. Rogoff regarding same (.3); email to R. Parisi regarding same (.1)	WJM	PLANDSCL	0.80	960.00
09/11/24	Emails re Effective Date process and procedures; discuss call with Committee member re same	RAP	PLANDSCL	0.40	308.00
09/16/24	Conference with R. Parisi regarding transition issues from PA to LT (.1); telephone conference with D. Staut regarding same (.2); email to J. Nahas regarding conversations with D. Staut and moving forward on transition (.3).	WJM	PLANDSCL	0.60	720.00
09/18/24	Outline outstanding Eiger transition items in anticipation of team meeting, emails with W. Martin, Jr. re same	RAP	PLANDSCL	0.30	231.00
09/19/24	Prepare redline of Liquidating Trustee Agreement for R. Parisi.	MPD	PLANDSCL	0.20	74.00
09/19/24	Review Dundon presentation for the UCC; W. Martin edits to same; emails re same	RAP	PLANDSCL	0.50	385.00
09/25/24	Forward redline comparison of liquidating trust agreement to W. Martin, Jr.	MPD	PLANDSCL	0.10	37.00
PLANDSCL Total				<u>175.20</u>	<u>152,114.50</u>
Fees Total				<u>281.40</u>	<u>218,801.25</u>

Disbursement Summary	Total
Airfare	1,306.88
Business Meals	64.53
Court Reporting	4,271.77
Deposition Services	1,461.20
Ground Transportation	258.26
Parking	130.00
Westlaw	502.00
Total Disbursements	7,994.64

Disbursement Detail

Date	Description	Amount
08/27/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Airfare to Dallas	473.95
08/28/24	VENDOR: American Express INVOICE#: PARISI091824 DATE: 9/23/2024 Expense Reimbursement - Roundtrip Flight to Dallas for Hearing on (i) Combined Plan and Disclosure Statement and (ii) Exclusivity & Deadline to Assume and Reject Leases (RAP)	478.95
08/28/24	VENDOR: American Express INVOICE#: PARISI091824 DATE: 9/23/2024 Expense Reimbursement – Expense Related To Flight to Dallas for Hearing on (i) Combined Plan and Disclosure Statement and (ii) Exclusivity & Deadline to Assume and Reject Leases (RAP)	40.99
08/28/24	VENDOR: American Express INVOICE#: PARISI091824 DATE: 9/23/2024 Expense Reimbursement - Expense Related To Flight to Dallas for Hearing on (i) Combined Plan and Disclosure Statement and (ii) Exclusivity & Deadline to Assume and Reject Leases (RAP)	40.99
09/01/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Flight change for Eiger Hearing	264.00
09/03/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Wifi on flight to Dallas for Eiger	8.00
09/03/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Hotel fees and charges	46.99
09/03/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Lunch at airport for flight to Dallas for Eiger Hearing	17.54

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Disbursement Detail

Date	Description	Amount
09/03/24	VENDOR: American Express INVOICE#: MOORE092324 DATE: 9/24/2024 Expense Reimbursement - Uber to airport	66.72
09/03/24	VENDOR: American Express INVOICE#: MOORE092324 DATE: 9/24/2024 Expense Reimbursement - Court Solutions Fee to attend court hearing.	81.58
09/04/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Transportation from Dallas Airport	78.60
09/04/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Transportation for Eiger Hearing	15.64
09/04/24	VENDOR: American Express INVOICE#: MARTIN091724 DATE: 9/23/2024 Expense Reimbursement - Transportation for Eiger Hearing, uber tip.	15.72
09/05/24	VENDOR: Rachel A Parisi INVOICE#: 6923358309182003 DATE: 9/18/2024 Expense Reimbursement - Parking at Airport re: Hearing on September 6, 2024 (RAP)	130.00
09/11/24	VENDOR: Veritext Legal Solutions INVOICE#: 7690960 DATE: 9/5/2024 Veritext Legal Solutions 7690960 09/05/24 Depositions re: Eiger on Sep 4	1461.20
09/12/24	VENDOR: Veritext Legal Solutions INVOICE#: 7690748 DATE: 9/5/2024 Veritext Legal Solutions 7690748 09/05/24 Transcript fees and court reporting services	4271.77
09/25/24	Westlaw.	502.00
TOTAL DISBURSEMENTS		\$7,994.64

TOTALS FOR THIS MATTER

Professional Services	218,801.25
Disbursements	7,994.64
Total Professional Services & Disbursements	<u>226,795.89</u>

BALANCE DUE THIS INVOICE	\$ 226,795.89
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Previous Balance Due	148,417.90
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	<u>\$ 375,213.79</u>
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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
09/17/24	3321861	437,343.45	86,116.70
	CURRENT BALANCE DUE	\$751,470.96	\$148,417.90

Exhibit D

Customary and Comparable Compensation Disclosure

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURE

The blended hourly rate of the Porzio timekeepers (including both professionals and paraprofessionals) who provided services to the Equity Committee for the Final Fee Period (June 26, 2024 through September 27, 2024) was \$700.20 per hour (the “Equity Committee Blended Rate”).¹

The blended hourly standard rate for all of Porzio’s domestic, non-bankruptcy timekeepers on non-bankruptcy matters during the twelve-month period from September 1, 2023 to and including August 31, 2024 (the “Comparable Period”) was, in the aggregate, approximately \$358.36 (the “Non-Bankruptcy Blended Rate”).²

A detailed comparison of the Equity Committee Blended Rate, and the Non-Bankruptcy Blended Rate is set forth in the chart below.

Category of Timekeeper	Equity Committee Blended Rate	Non-Bankruptcy Blended Rate
Principal	\$940.68	\$514.73
Counsel	\$668.98	\$426.11
Associate	\$592.35	\$367.86
Paraprofessional	\$359.15	\$214.06

Case Name: Eiger BioPharmaceuticals, Inc., *et al.*

Case Number: Case No. 24-80040 (SGJ)

Applicant’s Name: Porzio, Bromberg & Newman, P.C.

Date of Application: September 30, 2024

Interim or Final: Final

¹ Porzio calculated the Equity Committee Blended Rate by dividing the dollar value of billable hours worked by Porzio timekeepers by the number of hours worked by such timekeepers on behalf of the Equity Committee during the Final Fee Period.

² Porzio calculated the Non-Bankruptcy Blended Rate by dividing the dollar value of billable hours worked by Porzio timekeepers by the number of hours worked for the relevant matters during the Comparable Period. All categories of Porzio professional and paraprofessional timekeepers are included with the exception of bankruptcy attorneys. Additionally, all bankruptcy matters have been removed from this calculation. The Non-Bankruptcy Blended Rate also reflects Firm-wide increases that took effect across all of the Firm’s practice groups on January 1, 2024.