

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

F21 OPCO, LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

**Objection Deadline: August 6, 2025 at 4:00 p.m. (ET)**  
**Hearing Date: *Only if objections are filed***

**SUMMARY OF THIRD MONTHLY FEE APPLICATION OF  
COLE SCHOTZ P.C. AS DELAWARE CO-COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE  
PERIOD FROM JUNE 1, 2025 THROUGH JUNE 24, 2025**

Name of Applicant:

Cole Schotz P.C.

Authorized to provide professional  
services to:

Official Committee of Unsecured Creditors of  
F21 OpCo, LLC, *et al.*

Date of retention:

May 13, 2025, effective as of March 27, 2025

Period for which compensation  
and reimbursement is sought:

June 1, 2025 through June 24, 2025

Amount of compensation sought as  
actual, reasonable and necessary:

\$115,917.20 (80% of \$144,896.50)

Amount of expense reimbursement  
sought as actual, reasonable and necessary: \$473.66

This is a:

  X   monthly      interim      final application

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: F21 OpCo, LLC (8773); F21 Puerto Rico, LLC (5906); and F21 GiftCo Management, LLC (6412). The Debtors' address for purposes of service in these Chapter 11 Cases is 110 East 9th Street, Suite A500, Los Angeles, CA 90079.



2510469250723000000000005

Prior Applications:

Monthly Application		Requested Fees and Expenses		Approved Fees and Expenses		Holdback
Monthly Fee Period, Application Docket No., and Date Filed	CNO Docket No. and Date Filed	Total Fees Requested	Total Expenses Requested	Total Fees Approved	Total Expenses Approved	Fees Holdback (20%)
3/27/25 – 4/30/25  D.I. 395  5/28/25	D.I. 439  6/13/25	\$597,604.50	\$2,948.61	\$478,083.60	\$2,948.61	\$119,520.90
5/1/25 – 5/31/25  D.I. 505  6/27/25	D.I. 541  7/14/25	\$461,449.50	\$6,784.10	\$369,159.60	\$6,784.10	\$92,289.90

**F21 OPCO, LLC, *et al.*****SUMMARY OF BILLING BY PROFESSIONAL  
JUNE 1, 2025 THROUGH JUNE 24, 2025**

<b>Attorney Name</b>	<b>Year Admitted</b>	<b>Position (Department)</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy)	\$925.00	30.4	\$28,120.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$800.00	20.7	\$16,560.00
Sarah A. Carnes	2015	Member (Bankruptcy)	\$900.00	74.9	\$67,410.00
Amanda A. Tersigni	2019	Associate (Bankruptcy)	\$630.00	26.0	\$16,380.00
Jack M. Dougherty	2021	Associate (Bankruptcy)	\$575.00	0.9	\$517.50
Elazar A. Kosman	2022	Associate (Bankruptcy)	\$430.00	2.8	\$1,204.00
Michael A. Solimani	2024	Associate (Bankruptcy)	\$405.00	28.8	\$11,664.00
Pauline Z. Ratkowiak	N/A	Paralegal	\$405.00	0.2	\$81.00
Larry S. Morton	N/A	Paralegal	\$400.00	7.4	\$2,960.00
<b>Blended Rate: \$754.28</b>			<b>TOTALS:</b>	<b>192.1</b>	<b>\$144,896.50</b>

<sup>1</sup> This rate is Cole Schotz P.C.'s regular hourly rate for legal services. All hourly rates are adjusted by Cole Schotz P.C. on a periodic basis (the last such adjustment occurred on September 1, 2024).

**F21 OPCO, LLC, *et al.*****COMPENSATION BY PROJECT CATEGORY  
JUNE 1, 2025 THROUGH JUNE 24, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Automatic Stay Matters/Litigation	1.9	\$1,379.50
Case Administration	5.4	\$2,886.00
Cash Collateral and DIP Financing	1.1	\$799.00
Claims Analysis, Administration and Objections	16.2	\$12,586.50
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Vendor Matters	0.3	\$121.50
<b>Total:</b>	<b>192.1</b>	<b>\$144,896.50</b>

**F21 OPCO, LLC, *et al.*****EXPENSE SUMMARY  
JUNE 1, 2025 THROUGH JUNE 24, 2025**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Online Research	Westlaw/LexisNexis	\$73.36
Filing Fees	U.S. Bankruptcy Court	\$50.00
Court Fees	PACER Service Center	\$32.90
Outside Printing and Service	Reliable	\$317.40
<b>TOTAL</b>		<b>\$473.66</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

F21 OPCO, LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

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(Jointly Administered)

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**THIRD MONTHLY FEE APPLICATION OF  
COLE SCHOTZ P.C. AS DELAWARE CO-COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH JUNE 24, 2025**

Cole Schotz P.C. (the “Applicant” or “Cole Schotz”), as Delaware co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) of F21 OpCo, LLC and its affiliated debtors and debtors in possession (collectively, the “Debtors”) in the above captioned chapter 11 cases (the “Chapter 11 Cases”), hereby applies (the “Application”), pursuant to (i) sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 193] (the “Interim Compensation Order”),<sup>2</sup> for allowance of compensation for

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: F21 OpCo, LLC (8773); F21 Puerto Rico, LLC (5906); and F21 GiftCo Management, LLC (6412). The Debtors’ address for purposes of service in these Chapter 11 Cases is 110 East 9th Street, Suite A500, Los Angeles, CA 90079.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Interim Compensation Order.

services rendered and reimbursement of expenses for the period from June 1, 2025 through June 24, 2025 (the “Application Period”), and respectfully represents as follows:

### **Jurisdiction and Venue**

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. The Committee confirms its consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1.

### **Background**

#### **A. The Chapter 11 Cases**

4. On March 16, 2025 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Since the Petition Date, the Debtors have remained in possession of their assets and have continued to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On March 26, 2025, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) appointed a seven-member Committee consisting of: (i) Hangzhou Qidi

Fashion Apparel Co Ltd; (ii) C&C Nantong Cathay Clothing Co, Ltd; (iii) Shanghai Toex International Trading Co Ltd; (iv) Grand Apparels Designs Limited; (v) Guang Zhou Hong Ying Da Clothing Co. Ltd; (vi) Denim & Beyond LLC; and (vii) Urban Nation Apparel, Inc. *See* Docket No. 115. C&C Nantong Cathay Clothing Co, Ltd and Hangzhou Qidi Fashion Apparel Co Ltd serve as the co-chairs of the Committee.

**B. The Retention of Cole Schotz**

6. On April 24, 2025, the Committee applied to the Court for an order authorizing the retention and employment of Cole Schotz as Delaware co-counsel to the Committee, effective as of March 27, 2025. *See* Docket No. 269.

7. On May 13, 2025, the Court entered the *Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of March 27, 2025* [Docket No. 341] authorizing the retention and employment of Cole Schotz as Delaware co-counsel to the Committee.

**C. The Interim Compensation Order**

8. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases. Specifically, the Interim Compensation Order provides that on or after the tenth day of each month following the month for which compensation is sought, each Professional seeking compensation may file a monthly fee application (each, a “Monthly Fee Application”) for interim allowance of compensation for services rendered and reimbursement of expenses incurred during the preceding month and serve such Monthly Fee Application on the Notice Parties. Provided that there are no objections to the Monthly Fee Application filed within fourteen (14) days after service of a Monthly Fee Application, a Professional may file a certificate of no objection with



the Court with respect to the unopposed portion of the compensation and expenses requested in its Monthly Fee Application, after which the Debtors are authorized to pay such Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Application.

### **Relief Requested**

9. Pursuant to the Interim Compensation Order and section 331 of the Bankruptcy Code, Cole Schotz is seeking compensation in the amount of \$115,917.20, which is equal to eighty percent (80%) of the \$144,896.50 in fees for professional services rendered by Cole Schotz during the Application Period. This amount is derived solely from the applicable hourly billing rates of Cole Schotz personnel who rendered such services to the Committee. In addition, Cole Schotz is seeking reimbursement of expenses incurred during the Application Period in the amount of \$473.66.

#### **A. Compensation Requested**

10. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by Cole Schotz with respect to the Chapter 11 Cases during the Application Period. This detailed itemization complies with Local Rule 2016-1(d) in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories and all meetings or hearings are individually identified. *See* DEL. BANKR. L.R. 2016-1(d).

11. The attorneys and professionals who rendered services related to each category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought for each category.

**B. Expense Reimbursement Requested**

12. Cole Schotz incurred out-of-pocket expenses during the Application Period in the amount of \$473.66. Attached hereto as **Exhibit B** is a description of the expenses actually incurred by Cole Schotz in the performance of services rendered as Delaware co-counsel to the Committee. The expenses are broken down into categories of charges, including among other things, the following charges: photocopying, scanning and printing, Court fees, filing fees, legal research and other non-ordinary expenses. *See* DEL. BANKR. L.R. 2016-1(e).<sup>3</sup>

**Valuation of Services**

13. Attorneys and professionals of Cole Schotz have expended a total of 192.1 hours in connection with this matter during the Application Period.

14. The amount of time spent by each of the Cole Schotz professionals providing services to the Committee for the Application Period is set forth in **Exhibit A**. The rates are Cole Schotz's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Cole Schotz for the Application Period as Delaware co-counsel to the Committee in these Chapter 11 Cases is \$144,896.50.

15. Cole Schotz believes that the time entries included in **Exhibit A** attached hereto and the expense breakdown set forth in **Exhibit B** attached hereto are in compliance with the requirements of Local Rule 2016-1.

16. Cole Schotz's itemized time records for professionals performing services for the Committee during the Application Period are attached hereto as **Exhibit C**.

17. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (a) the complexity of these Chapter 11 Cases,

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<sup>3</sup> In accordance with Local Rule 2016-1(e)(iii), Cole Schotz does not charge more than \$0.10 per page for photocopies. Applicant does not surcharge for computerized research. DEL. BANKR. L.R. 2016-1(e)(iii).

(b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

**No Prior Request**

18. No prior request for the relief sought in the Application has been made to this or any other court.

**Certificate of Compliance and Waiver**

19. The undersigned representative of Cole Schotz certifies that he has reviewed the requirements of Local Rule 2016-1, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-1, Cole Schotz believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Notice**

20. Cole Schotz will provide notice and serve this Application on the Notice Parties. In light of the nature of the relief requested in this Application, Cole Schotz submits that no other or further notice is required.

*[Remainder of Page Intentionally Left Blank]*

**Conclusion**

**WHEREFORE**, Cole Schotz respectfully requests (i) interim allowance of (a) compensation in the amount of \$115,917.20 (80% of \$144,896.50) for professional services rendered and (b) reimbursement for actual and necessary costs in the amount of \$473.66; (ii) payment by the Debtors of the foregoing amounts; and (iii) such other and further relief as the Court deems just and proper.

Dated: July 23, 2025  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

*/s/ Justin R. Alberto*

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Justin R. Alberto (No. 5126)  
Stacy L. Newman (No. 5044)  
500 Delaware Avenue, Suite 600  
Wilmington, DE 19801  
Tel: (302) 652-3131  
Fax: (302) 652-3117  
Email: jalberto@coleschotz.com  
snewman@coleschotz.com

*Counsel to the Official Committee of  
Unsecured Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

F21 OPCO, LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

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**Objection Deadline: August 6, 2025 at 4:00 p.m. (ET)**

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**NOTICE OF THIRD MONTHLY FEE APPLICATION OF  
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COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE  
PERIOD FROM JUNE 1, 2025 THROUGH JUNE 24, 2025**

**PLEASE TAKE NOTICE** that on July 23, 2025, the Official Committee of Unsecured Creditors (the “Committee”) of F21 OpCo, LLC and its affiliated debtors and debtors in possession (collectively, the “Debtors”) in the above captioned chapter 11 cases, by and through its undersigned counsel, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Third Monthly Fee Application of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2025 Through June 24, 2025* (the “Application”), which seeks approval of professional services rendered to the Committee in the amount of \$115,917.20 (80% of \$144,896.50), together with reimbursement of expenses in the amount of \$473.66.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be **received no later than 4:00 p.m. (ET) on August 6, 2025 (the “Objection Deadline”)**: (i) the Debtors, 110 East 9th Street, Suite A500, Los Angeles, CA 90079, Attn: Michael Brown (mbrown@thinkbrg.com); (ii) the Debtors’ counsel, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn: Andrew L. Magaziner, Esq. (amagaziner@ycst.com) and S. Alexander Faris (afaris@ycst.com); (iii) counsel to Wells Fargo Bank, N.A. in its capacity as Prepetition ABL Administrative Agent, (a) Otterbourg P.C., 230 Park Avenue, New York, NY 10169, Attn: Chad Simon, Esq. (csimon@otterbourg.com) and Daniel Fiorillo, Esq. (dfiorillo@otterbourg.com); and (b) Richards, Layton, and Finger, P.A., One Rodney Square, 920 North King Street,

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: F21 OpCo, LLC (8773); F21 Puerto Rico, LLC (5906); and F21 GiftCo Management, LLC (6412). The Debtors’ address for purposes of service in these Chapter 11 Cases is 110 East 9th Street, Suite A500, Los Angeles, CA 90079.

Wilmington, Delaware 19801, Attn.: John H. Knight, Esq. (knight@rlf.com); (iv) counsel to Pathlight Capital LP in its capacity as Prepetition Term Loan Agent, (a) Riemer & Braunstein LLP, Times Square Tower, Suite 2506, Seven Times Square, New York, NY 10036, Attn: Steven E. Fox, Esq. (sfox@riemerlaw.com) and Paul D. Bekker, Esq. (pbekker@riemerlaw.com); and (b) Ashby & Geddes, P.A., 500 Delaware Avenue, 8th Floor, Wilmington, Delaware, 19801, Attn.: Gregory A. Taylor, Esq. (GTaylor@ashbygeddes.com); (v) counsel to Simon Blackjack Consolidated Holdings, LLC in its capacity as Prepetition Subordinated Loan Agent, (a) Choate Hall & Stewart LLP, Two International Place, Boston, MA 02110, Attn: Mark D. Silva, Esq. (msilva@choate.com), Rick Thide, Esq. (rthide@choate.com), and Hampton Foushee, Esq. (hfoushee@choate.com); and (b) Pashman Stein Walder Hayden, P.C., 824 North Market Street, Suite 800, Wilmington, DE 19801, Attn: Joseph C. Barsalona, Esq. (jbarsalona@pashmanstein.com); (vi) the U.S. Trustee, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Jane M. Leamy, Esq. (jane.m.leafy@usdoj.gov); (vii) and counsel for the Committee (a) McDermott Will & Emery, One Vanderbilt Avenue, New York, NY 10017, Attn: Darren Azman, Esq. (dazman@mwe.com) and Kristin K. Going, Esq. (kgoing@mwe.com); and (b) Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, DE 19801, Attn: Justin R. Alberto, Esq. (jalberto@coleschotz.com) and Stacy L. Newman, Esq. (snewman@coleschotz.com).

**PLEASE TAKE FURTHER NOTICE** that pursuant to the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 193], if no objections are filed and served in accordance with the above procedures, the Debtors will be authorized to pay 80% of the requested fees and 100% of the requested expenses, without further order of the Court.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE APPLICATION WILL BE HELD ONLY IF AN OBJECTION IS TIMELY FILED OR THE COURT DIRECTS OTHERWISE AT A DATE AND TIME TO BE SCHEDULED BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM NUMBER 4, WILMINGTON, DELAWARE 19801.**

*[Remainder of Page Intentionally Left Blank]*

Dated: July 23, 2025  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

/s/ Justin R. Alberto

---

Justin R. Alberto (No. 5126)  
Stacy L. Newman (No. 5044)  
500 Delaware Avenue, Suite 600  
Wilmington, DE 19801  
Tel: (302) 652-3131  
Fax: (302) 652-3117  
Email: jalberto@coleschotz.com  
snewman@coleschotz.com

-and-

**McDERMOTT WILL & EMERY LLP**

Darren Azman (admitted *pro hac vice*)  
Kristin K. Going (admitted *pro hac vice*)  
One Vanderbilt Avenue  
New York, NY 10017  
Tel: (212) 547-5400  
Fax: (212) 547-5444  
Email: dazman@mwe.com  
kgoing@mwe.com

*Counsel to the Official Committee of  
Unsecured Creditors*

**EXHIBIT A****F21 OPCO, LLC, *et al.*****COMPENSATION BY PROJECT CATEGORY  
JUNE 1, 2025 THROUGH JUNE 24, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
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**F21 OPCO, LLC, *et al.*****SUMMARY OF BILLING BY PROFESSIONAL  
JUNE 1, 2025 THROUGH JUNE 24, 2025**

<b>Attorney Name</b>	<b>Year Admitted</b>	<b>Position (Department)</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy)	\$925.00	30.4	\$28,120.00
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<sup>1</sup> This rate is Cole Schotz P.C.'s regular hourly rate for legal services. All hourly rates are adjusted by Cole Schotz P.C. on a periodic basis (the last such adjustment occurred on September 1, 2024).

**EXHIBIT B**

**F21 OPCO, LLC, *et al.***

**EXPENSE SUMMARY  
JUNE 1, 2025 THROUGH JUNE 24, 2025**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
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<b>TOTAL</b>		<b>\$473.66</b>

**EXHIBIT C**

**F21 OPCO, LLC, *et al.***

**ITEMIZED TIME RECORDS  
JUNE 1, 2025 THROUGH JUNE 24, 2025**



F21 OPCO LLC  
C/O STEPHEN COULOMBE, CRO  
110 EAST 9TH STREET, SUITE A500  
LOS ANGELES, CA 90079

Invoice Date: July 18, 2025  
Invoice Number: 1011751  
Matter Number: 69444-0001

**Re:** OFFICIAL COMMITTEE OF UNSECURED CREDITORS

FOR PROFESSIONAL SERVICES THROUGH JUNE 24, 2025

**AUTOMATIC STAY MATTERS/LITIGATION** **1.90** **1,379.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/25	SLN	REVIEW DENAUD STAY RELIEF MOTION (.2); CORRESPONDENCE WITH UCC PROFESSIONALS (.1);	0.30	240.00
06/02/25	AAT	DRAFT EMAIL TO DEBTORS COUNSEL RE: ANIE DENAUD STAY RELIEF MOTION UPDATE	0.40	252.00
06/03/25	SLN	CORRESPONDENCE WITH DEBTORS REGARDING STAY RELIEF MOTION (.1);	0.10	80.00
06/03/25	AAT	EMAIL WITH DEBTORS COUNSEL RE: STAY RELIEF MOTION (0.2); REVIEW ENTERED STAY RELIEF ORDERS IN LIGHT OF SAME (0.2); EMAIL TO CS AND MWE TEAM RE: SAME (0.1)	0.50	315.00
06/03/25	JRA	EMAILS WITH A. TERSIGNI RE STAY RELIEF	0.10	92.50
06/10/25	SLN	REVIEW KAKAR STAY RELIEF MOTION (.3);	0.30	240.00
06/12/25	SLN	REVIEW ADAMS STAY RELIEF MOTION (.2);	0.20	160.00

**CASE ADMINISTRATION** **5.40** **2,886.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/25	AAT	CALL WITH S. CARNES RE: PLAN ADMINISTRATOR PROPOSAL	0.20	126.00
06/03/25	AAT	DRAFT EMAIL TO UCC MEMBERS RE: PLAN ADMINISTRATOR PROPOSAL AND RELEVANT MATERIALS (0.5); DISCUSS SAME WITH CS, MWE AND PROVINCE (0.1)	0.60	378.00
06/03/25	LSM	REVIEW BANKRUPTCY COURT DOCKET FOR CRITICAL DATES	0.20	80.00
06/03/25	LSM	REVIEW EMAILS REGARDING PLAN ADMINISTRATOR RECOMMENDATIONS	0.20	80.00
06/06/25	AAT	REVIEW EMAILS WITH UCC MEMBERS RE: PLAN ADMINISTRATOR	0.20	126.00
06/06/25	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION/FILING DEADLINES AND CHALLENGE PERIOD DEADLINE	0.30	120.00

**COLE SCHOTZ P.C.**

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/09/25	AAT	REVIEW SERIES OF EMAILS WITH UCC MEMBERS RE: PLAN ADMINISTRATOR APPOINTMENT (0.7); EMAILS WITH CS AND MWE RE: SAME (0.2)	0.90	567.00
06/09/25	LSM	REVIEW EMAILS REGARDING UCC VOTE	0.30	120.00
06/10/25	LSM	DRAFT PRO HAC VICE MOTION FOR M. SOLIMANI	0.30	120.00
06/10/25	LSM	REVISE, FILE AND UPLOAD ORDER TO PRO HAC VICE MOTION FOR M. SOLIMANI	0.40	160.00
06/10/25	LSM	PROCESS PAYMENT FOR FILING FEES FOR PRO HAC VICE MOTION FOR M. SOLIMANI	0.30	120.00
06/10/25	LSM	COMPILE AND FORWARD TO M. SOLIMANI THE SIGNED ORDER GRANTING PRO HAC VICE MOTION	0.10	40.00
06/13/25	SLN	REVIEW CORRESPONDENCE WITH UST (.1);	0.10	80.00
06/13/25	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH HEARING DATES	0.20	80.00
06/17/25	LSM	REVIEW BANKRUPTCY COURT DOCKET FOR CRITICAL DATES	0.20	80.00
06/20/25	SLN	REVIEW 6/24 HEARING AGENDA (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING HEARING (.2);	0.30	240.00
06/23/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING HEARING (.1); TELEPHONE CALL WITH S. CARNES REGARDING HEARING (.1); REVIEW AMENDED AGENDA FOR 6/24 HEARING (.1);	0.30	240.00
06/24/25	EAK	CORRESPONDENCE WITH CS TEAM RE HEARING (.2) AND EMAIL CS TEAM AGENDA (.1)	0.30	129.00

**CASH COLLATERAL AND DIP FINANCING****1.10 799.00**

<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/04/25	MAS	EMAILS WITH CS TEAM AND H. CONGLETON RE: CASH COLLATERAL REQUIREMENTS	0.10	40.50
06/04/25	JRA	EMAILS WITH M. SOLIMANI RE BUDGET ISSUES	0.10	92.50
06/05/25	SLN	CORRESPONDENCE WITH DEBTORS AND LENDERS REGARDING CHALLENGE DEADLINE (.1);	0.10	80.00
06/06/25	SLN	CORRESPONDENCE WITH LENDERS AND DEBTORS REGARDING CHALLENGE PERIOD (.2);	0.20	160.00
06/11/25	MAS	EMAILS WITH CS TEAM AND H. CONGLETON RE: CASH COLLATERAL REQUIREMENTS	0.10	40.50
06/11/25	JRA	EMAILS WITH M. SOLIMANI RE BUDGET ISSUES	0.20	185.00
06/18/25	MAS	EMAILS WITH CS TEAM AND H. CONGLETON RE: CASH COLLATERAL REQUIREMENTS	0.10	40.50
06/19/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING BUDGET (.1);	0.10	80.00

**COLE SCHOTZ P.C.**

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING BUDGET (.1);	0.10	80.00

<b>CLAIMS ANALYSIS, ADMINISTRATION AND OBJECTIONS</b>			<b>16.20</b>	<b>12,586.50</b>
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/25	SLN	CORRESPONDENCE WITH COUNSEL REGARDING PUTATIVE DATA BREACH CLASS CLAIM (.1);	0.10	80.00
06/02/25	JRA	REVIEW CORRESPONDENCE REGARDING DATA BREACH CLASS CLAIM ISSUES	0.30	277.50
06/03/25	SLN	CORRESPONDENCE WITH M. SOLIMANI REGARDING CLAIM OBJECTIONS (.1);	0.10	80.00
06/03/25	JRA	REVIEW EMAILS WITH S. CARNES RE CLASS PROOF OF CLAIM (.1); BRIEF RESEARCH RE SAME (.1)	0.20	185.00
06/04/25	SLN	CORRESPONDENCE WITH COUNSEL REGARDING DATA BREACH CLASS STIPULATION (.1);	0.10	80.00
06/05/25	SLN	CORRESPONDENCE WITH DEBTORS REGARDING CLAIM OBJECTIONS (.2); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING CLAIM OBJECTIONS (.2);	0.40	320.00
06/05/25	AAT	EMAILS WITH DEBTORS COUNSEL RE: SECOND CLAIMS OBJECTIONS (0.2); EMAIL WITH PROVINCE AND CS TEAM RE: SAME (0.4); TELEPHONE CALL WITH H. CONGLETON (PROVINCE) RE: SAME (0.1) ; EMAIL WITH UCC MEMBER COUNSEL RE: SAME (0.2)	0.90	567.00
06/05/25	SYC	EMAILS TO A. TERSIGNI RE: CLAIMS OBJECTIONS	0.30	270.00
06/09/25	SLN	CORRESPONDENCE WITH DEBTORS REGARDING CLAIM OBJECTIONS (.1);	0.10	80.00
06/09/25	JRA	EMAILS WITH YCST AND CS RE CLAIM OBJECTIONS	0.30	277.50
06/09/25	SYC	EMAILS WITH DEBTORS/PROVINCE RE: CLAIMS OBJECTIONS	0.30	270.00
06/10/25	SLN	CORRESPONDENCE WITH COUNSEL REGARDING STIPULATION RE CLASS PROOF OF CLAIM (.1);	0.10	80.00
06/10/25	AAT	REVIEW EMAILS WITH UCC MEMBER REPRESENTATION RE: SECOND OMNIBUS CLAIMS OBJECTION (0.1); REVIEW CERTIFICATION OF COUNSEL FILED BY DEBTORS ON SECOND OMNIBUS CLAIMS OBJECTION (0.1); EMAIL WITH CS TEAM RE: SAME (0.1); DRAFT EMAIL TO DEBTORS COUNSEL RE: EXTENSION OF OBJECTION DEADLINE TO SECOND OMNIBUS CLAIMS OBJECTION (0.4)	0.70	441.00
06/10/25	JRA	EMAILS WITH UCC MEMBER RE CLAIMS OBJECTION	0.10	92.50
06/10/25	JRA	FURTHER CORRESPONDENCE WITH CS, YCST AND UCC MEMBER RE CLAIM OBJECTION	0.40	370.00
06/10/25	SYC	REVIEW EMAILS FROM UCC MEMBERS, PROVINCE, AND DEBTORS RE: CLAIMS OBJECTIONS	0.40	360.00

**COLE SCHOTZ P.C.**

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/11/25	SLN	CORRESPONDENCE WITH CS TEAM REGARDING CLAIM OBJECTIONS (.1); CORRESPONDENCE WITH DEBTORS (.1); REVIEW EMERALD SQUARE ADMIN MOTION (.1);	0.30	240.00
06/11/25	AAT	EMAIL WITH J. ALBERTO RE: ADJOURNMENT REQUEST OF SECOND OMNIBUS CLAIMS OBJECTION (0.1); EMAIL WITH DEBTORS COUNSEL RE: SAME (0.1); REVIEW EMAILS WITH PROVINCE RE: SAME (0.1)	0.30	189.00
06/11/25	JRA	EMAILS WITH A. TERSIGNI RE CLAIMS OBJECTIONS AND UCC MEMBER REQUEST FOR EXTENSION	0.20	185.00
06/11/25	JRA	CORRESPOND WITH S. CARNES RE CLASS PROOF OF CLAIM STIP	0.30	277.50
06/11/25	SYC	REVIEW DRAFT STIPULATINO RE: CLASS CLAIM (.3); RESEARCH RE: SAME (.8); CALL WITH J. ALBERTO RE: SAME (.4); EMAILS WITH DEBTORS AND WAGE COUNSEL RE: SAME (.6)	2.10	1,890.00
06/11/25	SYC	REVIEW CORRES FROM PROVINCE AND DEBTORS RE: CLAIMS OBJECTIONS	0.50	450.00
06/12/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING GUC RECOVERY (.1);	0.10	80.00
06/12/25	SLN	CORRESPONDENCE WITH COUNSEL REGARDING CLASS CLAIM (.1); REVIEW STIPULATION REGARDING CLASS PROOF OF CLAIM AND COMMENTS THERETO (.2); CORRESPONDENCE WITH DEBTORS REGARDING CLAIM OBJECTIONS (.2);	0.50	400.00
06/12/25	AAT	REVIEW EMAILS WITH YCST RE: EXTENSION OF TIME TO RESPOND TO SECOND OMNIBUS CLAIMS OBJECTION (0.2); EMAILS WITH UCC MEMBER RE: SAME (0.2)	0.40	252.00
06/12/25	MAS	CALL WITH S. CARNES RE: CLASS PROOF OF CLAIM (.2); RESEARCH RE: SAME (.8); DRAFT UPDATE TO UCC RE: SAME (1.0); EMAILS WITH S. CARNES RE: SAME (.3); EMAILS WITH MWE AND PROVINCE TEAM RE: SAME (.2)	2.50	1,012.50
06/12/25	JRA	T/C WITH D. MAGAZINER RE CLAIM OBJECTIONS	0.10	92.50
06/12/25	JRA	FURTHER EMAILS WITH CS RE CLASS PROOF OF CLAIM	0.40	370.00
06/12/25	JRA	T/C WITH S. CARNES RE ADMIN CLAIMS	0.30	277.50
06/12/25	JRA	REVIEW DRAFT CLAIMS RECOVERY ANALYSIS	0.20	185.00
06/12/25	SYC	EMAILS WITH DEBTORS, UCC MEMBER RE: CLAIMS OBJECTION (.5); CALL WITH J. ALBERTO RE: SAME (.2)	0.70	630.00
06/12/25	SYC	REVIEW CLASS CLAIM STIP AND EMAIL TO PLAINTIFFS COUNSEL RE: SAME	0.60	540.00
06/12/25	SYC	CALL WITH M. SOLIMANI RE: UPDATE TO UCC RE: CLASS PROOF OF CLAIM (.2); REVIEW AND REVISE UCC EMAIL RE: SAME (.7)	0.90	810.00
06/14/25	JRA	REVIEW SUPPLEMENTAL CLAIMS OBJECTION ORDER FOR FIRST OMNI CLAIMS OBJECTION	0.10	92.50

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/14/25	JRA	REVIEW SECOND OMNI CLAIMS ORDER	0.10	92.50
06/18/25	JRA	EMAILS WITH YCST AND CS RE 503(B)(9) CLAIM	0.20	185.00
06/20/25	SLN	CORRESPONDENCE WITH COUNSEL REGARDING STIPULATION RE DATA BREACH CLASS CLAIM AND REVIEW DRAFT COC (.2);	0.20	160.00
06/20/25	SLN	CORRESPONDENCE WITH UCC MEMBER REGARDING CLAIM OBJECTION (.1); CORRESPONDENCE WITH DEBTORS (.1);	0.20	160.00
06/20/25	JRA	EMAILS WITH S. CARNES RE CLASS PROOF OF CLAIM	0.20	185.00
<b>COMMITTEE MATTERS AND CREDITOR MEETINGS</b>			<b>16.70</b>	<b>12,353.50</b>

<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/02/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.2);	0.20	160.00
06/02/25	MAS	EMAILS WITH J. LEE RE: PROFESSIONALS CALL AND UCC MEETING	0.10	40.50
06/02/25	MAS	CALL WITH S. CARNES RE: UCC MEETING CANCELLATION AND UPDATES (.2); DRAFT EMAIL TO UCC RE: SAME (.6); EMAILS WITH MWE AND PROVINCE TEAM RE: SAME (.1)	0.90	364.50
06/02/25	JRA	CORRESPOND WITH CS AND MWE TEAMS RE UCC CALL	0.20	185.00
06/03/25	SLN	EMAIL TO UCC REGARDING WEEKLY CALL AND UPDATE (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1);	0.20	160.00
06/03/25	JMD	REVIEW EMAIL FROM M. SOLIMANI TO UCC MEMBERS RE: CASE STATUS	0.10	57.50
06/03/25	MAS	EMAILS WITH J. LEE RE: COMMITTEE UPDATE	0.10	40.50
06/03/25	JRA	CORRESPOND WITH UCC MEMBER RE SETTLEMENT TERMS	0.20	185.00
06/04/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1); EMAIL TO UCC REGARDING PLAN ADMINISTRATOR (.1);	0.20	160.00
06/05/25	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.1);	0.10	80.00
06/06/25	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.1);	0.10	80.00
06/07/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1); CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.2);	0.30	240.00
06/08/25	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.4);	0.40	320.00
06/08/25	JRA	EMAILS WITH UCC MEMBERS AND MWE RE PLAN ADMINISTRATOR	0.80	740.00



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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/09/25	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.4); TELEPHONE CALL WITH J. ALBERTO (.1); REVIEW BYLAWS AND EMAIL TO UCC PROFESSIONALS (.3); TELEPHONE CALL WITH S. CARNES (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAILS TO UCC (.2); CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR AND CONFLICT VOTE (.2); CORRESPONDENCE WITH UCC MEMBER REGARDING CLAIM OBJECTION (.3);	1.60	1,280.00
06/09/25	JMD	PARTICIPATE IN VIRTUAL UCC PROFESSIONALS WEEKLY CALL	0.30	172.50
06/09/25	AAT	ATTEND WEEKLY PROFESSIONALS CALL	0.30	189.00
06/09/25	MAS	CALL WITH S. CARNES RE: UCC DISTRIBUTION LIST (.1); EMAILS WITH J. LEE RE: SAME (.2)	0.30	121.50
06/09/25	JRA	EMAILS WITH CS AND MWE RE UCC UPDATE EMAIL	0.40	370.00
06/09/25	JRA	PREPARE FOR WEEKLY ALL HANDS PROFESSIONALS CALL	0.40	370.00
06/09/25	JRA	PARTICIPATE IN WEEKLY ALL HANDS PROFESSIONALS' CALL	0.30	277.50
06/09/25	JRA	CORRESPOND WITH D. AZMAN AND UST RE UCC ISSUES	0.30	277.50
06/09/25	JRA	T/C WITH UST RE UCC ISSUES	0.30	277.50
06/09/25	SYC	REVIEW UCC BYLAWS AND CALLS/EMAILS WITH S. NEWMAN RE: SAME	1.20	1,080.00
06/09/25	SYC	WEEKLY PROFESSIONALS CALL	0.30	270.00
06/10/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1); CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.3); CORRESPONDENCE WITH UCC REGARDING WEEKLY COMMITTEE CALL (.1); CORRESPONDENCE WITH UCC MEMBER REGARDING CLAIM OBJECTION (.2);	0.70	560.00
06/10/25	JMD	REVIEW EMAILS RE: UCC VOTE ON PLAN ADMINISTRATOR	0.20	115.00
06/10/25	MAS	EMAILS WITH L. MORTON RE: PRO HAC (.1); REVIEW L. MORTON DRAFT RE: SAME (.1)	0.20	81.00
06/10/25	MAS	CALL WITH S. CARNES RE: COMMITTEE UPDATE (.1); EMAILS WITH H. LEE AND N. ALLARD RE: SAME (.2); DRAFT EMAIL TO UCC RE: SAME (.5)	0.80	324.00
06/10/25	JRA	T/C WITH UST RE UCC GOVERNANCE MATTERS	0.20	185.00
06/11/25	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.2); CORRESPONDENCE WITH UCC MEMBER REGARDING CLAIM OBJECTIONS (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1);	0.40	320.00

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/12/25	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.1); CORRESPONDENCE WITH UCC MEMBER REGARDING CLAIM OBJECTION (.2); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1); CORRESPONDENCE WITH UCC REGARDING UPDATES AND REVIEW SAME (.2); CORRESPONDENCE WITH CS TEAM REGARDING UCC BYLAWS (.1);	0.70	560.00
06/12/25	JRA	REVIEW PROVINCE UCC UPDATE MATERIALS	0.10	92.50
06/13/25	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN ADMINISTRATOR (.1); CORRESPONDENCE WITH UCC REGARDING CONFIRMATION ORDER (.1);	0.20	160.00
06/16/25	SLN	CORRESPONDENCE WITH DEBTOR PROFESSIONALS REGARDING UCC CALL (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1);	0.20	160.00
06/16/25	AAT	WEEKLY PROFESSIONALS CALL	0.10	63.00
06/16/25	MAS	CALL WITH MWE, PROVINCE, AND CS TEAMS RE: STRATEGY AND UPDATES (.1); DRAFT EMAIL TO UCC RE: SAME (.9)	1.00	405.00
06/16/25	SYC	CALL WITH MWE TEAM RE: NEXT STEPS AND REVIEW UCC RE: SAME	0.20	180.00
06/17/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING UCC CALL AND EMAIL (.2); EMAIL TO UCC (.1);	0.30	240.00
06/17/25	MAS	REVIEW EMAILS FROM AND PREPARE EMAILS TO J. ALBERTO, N. ALLARD, AND J. LEE RE: UCC UPDATE	0.30	121.50
06/17/25	JRA	EMAILS WITH M. SOLIMANI RE UCC UPDATE EMAIL AND REVISIONS TO SAME	0.20	185.00
06/18/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1); EMAIL TO UCC (.1);	0.20	160.00
06/23/25	AAT	WEEKLY PROFESSIONALS CALL	0.10	63.00
06/24/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EMAIL TO UCC (.1); EMAIL TO UCC (.1);	0.20	160.00
06/24/25	SYC	REVIEW AND REVISE DRAFT UCC EMAIL	0.80	720.00

**CREDITOR INQUIRIES**

**1.60 1,417.50**

<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/06/25	SLN	CORRESPONDENCE WITH CREDITOR AND UCC PROFESSIONALS REGARDING PLAN (.2);	0.20	160.00
06/13/25	SYC	RESPOND TO CREDITOR INQUIRIES RE: PLAN	0.50	450.00
06/16/25	JRA	T/C WITH UCC MEMBER RE CLAIMS	0.30	277.50
06/23/25	JRA	EMAIL WITH CS TEAM RE CREDITOR INQUIRY	0.10	92.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/24/25	SLN	TELEPHONE CALL AND CORRESPONDENCE WITH CREDITOR REGARDING GUC RECOVERIES (.2);	0.20	160.00
06/24/25	JRA	CORRESPOND WITH CREDITOR RE CLAIMS ISSUE	0.30	277.50
<b>DISCLOSURE STATEMENT/VOTING ISSUES</b>			<b>0.30</b>	<b>240.00</b>

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/25	SLN	REVIEW VOTING CERTIFICATION (.2); CORRESPONDENCE WITH UCC PROFESSIONALS (.1);	0.30	240.00
<b>DOCUMENT REVIEW/COMMITTEE INVESTIGATION</b>			<b>2.80</b>	<b>2,512.50</b>

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/25	JRA	REVIEW CORRESPONDENCE WITH UCC MEMBERS RE SETTLEMENT AND NEXT STEPS	0.40	370.00
06/05/25	SYC	EMAIL TO ABL LENDERS RE: CHALLENGE DEADLINE	0.20	180.00
06/06/25	SYC	CALLS AND EMAILS WITH ABL LENDERS RE: CHALLENGE DEADLINE EXTENSION (.5); EMAILS TO CS TEAM RE SAME (.1)	0.60	540.00
06/06/25	JMD	REVIEW EMAILS FROM S. CARNES RE: CHALLENGE DEADLINE EXTENSION	0.10	57.50
06/10/25	SYC	CALLS/EMAILS WITH J. ALBERTO RE: CHALLENGE DEADLINE DISPUTE (.5); EMAILS AND CALLS WITH DEBTORS/LENDERS RE: SAME (.4)	0.90	810.00
06/10/25	JRA	FURTHER CORRESPONDENCE WITH S. CARNES AND C. SIMON RE CHALLENGE PERIOD EXTENSION	0.40	370.00
06/10/25	JRA	T/C WITH C. SIMON RE CHALLENGE PERIOD EXTENSION	0.20	185.00
<b>EXECUTORY CONTRACTS</b>			<b>0.60</b>	<b>361.50</b>

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/25	SLN	CORRESPONDENCE WITH CS TEAM REGARDING REJECTION MOTION (.1);	0.10	80.00
06/01/25	MAS	EMAILS WITH S. NEWMAN RE: SEVENTH REJECTION MOTION	0.10	40.50
06/03/25	MAS	REVIEW NOTICE RE: ASSUMPTION OF CONTRACTS (.1); EMAILS WITH S. NEWMAN RE: SAME (.1)	0.20	81.00
06/15/25	SLN	CORRESPONDENCE WITH CS TEAM REGARDING ASSUMPTION MOTION (.1);	0.10	80.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/16/25	SLN	CORRESPONDENCE WITH M. SOLIMANI REGARDING ASSUMPTION MOTION (.1);	0.10	80.00

<b>FEE APPLICATION MATTERS/OBJECTIONS</b>			<b>5.90</b>	<b>2,556.00</b>
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/25	SLN	CORRESPONDENCE WITH CS TEAM REGARDING FEE APPS (.1);	0.10	80.00
06/02/25	MAS	EMAILS WITH S. NEWMAN AND CS TEAM RE: FIRST MONTHLY FEE APP (.1); EMAILS WITH UST RE: SAME (.1)	0.20	81.00
06/12/25	MAS	DRAFT CNOS RE: UCC PROFESSIONAL FEE APPLICATIONS	0.70	283.50
06/13/25	MAS	EMAILS WITH CS, MWE, AND PROVINCE TEAMS RE: FIRST FEE APPLICATIONS (.2); FINAL REVIEW OF CNOS RE: SAME (.2); EMAILS WITH L. MORTON RE: SAME (.1)	0.50	202.50
06/13/25	JRA	EMAILS WITH M. SOLIMANI RE FEE APPS	0.10	92.50
06/13/25	LSM	REVISE, FINALIZE AND FORWARD TO M. SOLIMANI THE THREE CERTIFICATES OF NO OBJECTION REGARDING FIRST MONTHLY FEE APPLICATIONS FOR MWE, COLE SCHOTZ AND PROVINCE	0.30	120.00
06/13/25	LSM	FILE AND FORWARD TO M. SOLIMANI THE THREE CERTIFICATES OF NO OBJECTION REGARDING FIRST MONTHLY FEE APPLICATIONS FOR MWE, COLE SCHOTZ AND PROVINCE	0.50	200.00
06/19/25	MAS	DRAFT CS MONTHLY FEE APPLICATION RE: MAY FEES	2.30	931.50
06/20/25	MAS	EMAILS WITH CS TEAM RE: MAY FEE APPLICATION	0.20	81.00
06/23/25	MAS	EMAILS WITH CS TEAM RE: MAY FEE APPLICATION (.1); EDITS RE: SAME (.4)	0.50	202.50
06/24/25	SLN	REVIEW OF AND COMMENTS TO CS SECOND MONTHLY FEE APPLICATION (.2);	0.20	160.00
06/24/25	MAS	EMAILS WITH S. NEWMAN RE: MAY FEE APPLICATIONS (.1); EMAILS WITH MWE AND PROVINCE TEAM RE: SAME (.2)	0.30	121.50

<b>LEASES (REAL PROPERTY)</b>			<b>1.20</b>	<b>850.00</b>
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/13/25	JRA	EMAILS WITH D. MAGAZINER RE HQ LEASE	0.10	92.50
06/13/25	JRA	FURTHER EMAILS WITH CS AND YCST RE HQ LEASE	0.20	185.00
06/14/25	JRA	REVIEW 365(D)(4) EXTENSION MOTION	0.20	185.00
06/14/25	JRA	REVIEW MARKET CENTER LEASE ASSUMPTION MOTION	0.20	185.00

**COLE SCHOTZ P.C.**

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/16/25	MAS	REVIEW MOTION RE: HEADQUARTERS LEASE (.3); REVIEW MOTION AND ORDER TO SHORTEN RE: SAME (.1); EMAILS WITH S. NEWMAN RE: SAME (.1)	0.50	202.50

**LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF)** **0.20** **185.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/14/25	JRA	REVIEW REMOVAL EXTENSION MOTION	0.20	185.00

**PREPARATION FOR AND ATTENDANCE AT HEARINGS** **12.20** **7,078.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/25	MAS	EMAILS WITH S. NEWMAN AND E. KOSMAN RE: CONFIRMATION HEARING	0.20	81.00
06/20/25	EAK	REVIEW F21 AGENDA AND CIRCULATE TO TEAM THE SAME (.3) CORRESPONDENCE WITH CS TEAM RE F21 HEARING (.4) AND PREPARATION FOR THE SAME (.1)	0.80	344.00
06/20/25	PVR	EMAIL TO COLE SCHOTZ TEAM AND RETRIEVE AGENDA FOR JUNE 24, 2025 ZOOM HEARING	0.20	81.00
06/20/25	JRA	REVIEW AGENDA AND CORRESPOND WITH CS AND MWE TEAMS RE SAME	0.20	185.00
06/23/25	JMD	REVIEW AGENDA FOR 6/24 CONFIRMATION HEARING	0.10	57.50
06/23/25	JMD	REVIEW AMENDED AGENDA RE: 6/24 CONFIRMATION HEARING	0.10	57.50
06/23/25	EAK	CORRESPONDENCE WITH CS TEAM RE HEARING PREPARATION (.4) CORRESPONDENCE WITH K&E RE THE SAME (.3) PREPARE BINDERS FOR HEARING (.7) CORRESPONDENCE WITH L. MORTON (.1) AND S. NEWMAN RE THE SAME (.2)	1.70	731.00
06/23/25	JRA	CORRESPOND WITH CS, MWE AND UCC MEMBERS RE CONFIRMATION HEARING	0.40	370.00
06/23/25	LSM	ASSIST WITH HEARING PREPARATIONS AND HEARING BINDER ASSEMBLE FOR JUNE 24, 2025 CONFIRMATION HEARING	2.60	1,040.00
06/24/25	SLN	PREPARE FOR AND ATTENDANCE AT CONFIRMATION HEARING (1.2);	1.20	960.00
06/24/25	AAT	REVIEW HEARING AGENDA	0.10	63.00
06/24/25	AAT	ATTEND VIRTUAL CONFIRMATION HEARING	0.50	315.00
06/24/25	MAS	VIRTUALLY ATTEND AND RUN DIAL IN RE: CONFIRMATION HEARING	0.70	283.50
06/24/25	LSM	COMPILE, REVIEW AND CIRCULATE SECOND AMENDED AGENDA FOR JUNE 24, 2025 CONFIRMATION HEARING TO CS TEAM	0.20	80.00

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/24/25	LSM	UPDATE EBINDER FOR JUNE 24, 2025 CONFIRMATION HEARING AND FORWARD SAME TO S. NEWMAN AND E. KOSMAN	0.90	360.00
06/24/25	SYC	PREPARATION FOR AND ATTENDANCE AT CONFIRMATION HEARING	2.30	2,070.00

**REORGANIZATION PLAN**

**125.70 99,569.50**

<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/02/25	SLN	CORRESPONDENCE WITH DEBTORS REGARDING REVISED PLAN (.1);	0.10	80.00
06/02/25	MAS	DRAFT STATEMENT IN SUPPORT RE: PLAN (3.2); CALL WITH S. CARNES RE: (.2); EMAILS WITH A. MAGAZINER RE: SAME (.1)	3.50	1,417.50
06/02/25	JRA	T/C WITH S. NEWMAN RE UCC LETTER IN SUPPORT OF PLAN	0.20	185.00
06/02/25	JRA	CORRESPOND WITH YCST, CS AND MWE TEAMS RE REVISED PLAN	0.50	462.50
06/02/25	SYC	REVIEW CURRENT VERSION OF PLAN AND CORRES WITH DEBTORS/LENDERS RE: SETTLEMENT	2.10	1,890.00
06/03/25	SLN	CORRESPONDENCE WITH DEBTORS REGARDING PLAN ADMINISTRATOR AGREEMENT (.1); FOLLOW UP WITH CS TEAM (.1);	0.20	160.00
06/03/25	JRA	CORRESPOND WITH YCST, OTTERBOURG AND CS RE SETTLEMENT TERMS	0.50	462.50
06/03/25	SYC	CALLS/EMAILS WITH A. TERSIGNI RE: PLAN ADMIN AGREEMENT (1.1); REVIEW FORM PLAN ADMIN AGREEMENT (.9); EMAILS WITH DEBTORS RE: SAME (.5); EMAILS TO POTENTIAL PA (.2); REVIEW AND REVISE DRAFT EMAIL TO UCC: (.6)	3.30	2,970.00
06/03/25	JRA	CORRESPOND WITH CS AND MWE RE PLAN ADMINISTRATOR	0.70	647.50
06/04/25	AAT	REVISE DRAFT EMAIL TO UCC RE: PLAN ADMINISTRATOR (0.1); EMAIL WITH UCC MEMBERS RE: SAME (0.1)	0.20	126.00
06/04/25	AAT	EMAIL WITH CS TEAM RE: PROPOSED LANGUAGE FOR PLAN SUPPLEMENT	0.60	378.00
06/04/25	AAT	PREPARE PLAN ADMINISTRATOR AGREEMENT	2.90	1,827.00
06/04/25	MAS	EDITS RE: STATEMENT IN SUPPORT OF PLAN	0.70	283.50
06/04/25	MAS	RESEARCH RE: PLAN ADMINISTRATOR LANGUAGE	2.10	850.50
06/04/25	JRA	CORRESPOND WITH YCST, MWE AND CS TEAMS RE PLAN MODIFICATIONS AND PLAN ADMINISTRATOR AGREEMENT	1.40	1,295.00
06/04/25	SYC	CALL WITH A. MAGAZINER RE: PLAN DOCUMENTS	0.30	270.00
06/04/25	SYC	REVIEW DRAFT PLAN ADMINISTRATOR AGREEMENT	2.10	1,890.00

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/05/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING PLAN LANGUAGE (.1); REVIEW REVISED PLAN (.2); REVIEW DRAFT PLAN ADMINISTRATOR AGREEMENT AND COMMENTS THERETO (.8); CORRESPONDENCE WITH DEBTORS REGARDING PLAN ADMINISTRATOR AGREEMENT (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING PLAN SUPPLEMENT LANGUAGE (.1);	1.30	1,040.00
06/05/25	AAT	PREPARE AND REVIEW LANGUAGE RE: PLAN SUPPLEMENT PROVISIONS	0.90	567.00
06/05/25	AAT	REVISIONS TO PLAN ADMINISTRATOR AGREEMENT IN LIGHT OF S. CARNES COMMENTS (2.1); EMAILS WITH CS AND MWE TEAMS RE: SAME (0.4); EMAILS WITH S. BALASIANO RE: SAME (0.1); EMAIL WITH DEBTORS, SPARC AND WELLS FARGO COUNSEL RE: DRAFT PLAN ADMINISTRATOR AGREEMENT (0.2)	2.80	1,764.00
06/05/25	SYC	REVIEW SAMPLE PLAN ADMINISTRATION AGREEMENTS (.9) AND REVISE DRAFT PA AGREEMENT RE: SAME (1.8); EMAILS TO A. TERSIGNI RE: SAME (.6)	3.30	2,970.00
06/05/25	SYC	DRAFT LANGUAGE FOR PLAN SUPPLEMENT RE: RETAINED CAUSES OF ACTION (.8); AND EMAILS WITH N. ALLARD (.6); AND DEBTORS/SPARC (.5) RE: SAME	1.90	1,710.00
06/05/25	SYC	BRIEF REVIEW OF PLAN DOCUMENTS AND EMAILS FROM DEBTORS RE: SAME	1.30	1,170.00
06/06/25	AAT	CALL WITH S. CARNES RE: PLAN AND PLAN SUPPLEMENT REVISIONS	0.10	63.00
06/06/25	AAT	REVIEW REVISED PLAN AND COMMENT ON SAME	2.40	1,512.00
06/06/25	MAS	EMAILS WITH CAB COLLECTS RE: PLAN RELEASES (.5); CALLS WITH S. CARNES RE: SAME (.2); FURTHER REVIEW OF PLAN RE: SAME (.6)	1.30	526.50
06/06/25	SYC	CALLS AND EMAILS WITH M. SOLIMANI RE: UCC INQUIRY RE: PLAN VOTING	0.90	810.00
06/06/25	SYC	REVIEW OF AVOIDANCE ACTION LANGAUGE IN PLAN DOCUMENTS (.6); MULTIPLE CALLS/EMAILS WITH CS, MWE, AND YCST RE: SAME (1.9); RESEARCH RE: RESOLICITATION (.6)	3.10	2,790.00
06/06/25	SYC	REVIEW PLAN DOCUMENTS AND CORRES WITH DEBTORS RE: SAME	2.80	2,520.00
06/06/25	SYC	CALL WITH A. PARLEN RE: PLAN SUPPLEMENT LANGUAGE	0.30	270.00
06/07/25	SLN	REVIEW REVISED PLAN AND COMMENTS THERETO (.2); CORRESPONDENCE WITH DEBTORS (.1);	0.30	240.00
06/07/25	AAT	EMAIL WITH S. CARNES RE: REVISIONS TO AMENDED PLAN (0.1); REVISIONS TO AMENDED PLAN DRAFT (0.1); EMAIL WITH DEBTORS, LATHAM AND WELLS FARGO RE: SAME (0.3)	0.50	315.00

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06/07/25	SYC	REVIEW DRAFT EMAIL FROM MWE RE: PLAN ADMINISTRATOR SELECTION	0.30	270.00
06/07/25	SYC	REVIEW AND RESPOND TO EMAIL RE: PLAN MARK-UP FROM A. TERSIGNI	0.50	450.00
06/07/25	SYC	REVIEW AND RESPOND TO SPARC COMMENTS TO PLAN AND PLAN SUPPLEMENT	1.60	1,440.00
06/07/25	JRA	CORRESPOND WITH MWE, CS AND UCC MEMBERS RE PLAN ISSUES AND PLAN ADMINISTRATOR VOTE	0.60	555.00
06/07/25	JRA	FURTHER CORRESPONDENCE WITH LATHAM, YCST AND CS RE PLAN REVISIONS	0.30	277.50
06/08/25	SLN	CORRESPONDENCE WITH DEBTORS REGARDING COMMENTS TO PLAN (.1);	0.10	80.00
06/08/25	AAT	REVIEW AND RESPOND TO EMAILS WITH DEBTORS COUNSEL AND SPARC COUNSEL RE: AMENDED PLAN REVISIONS	0.40	252.00
06/08/25	MAS	EDITS RE: STATEMENT IN SUPPORT OF PLAN (1.6); GENERATE REDLINE RE: SAME (.1); EMAILS WITH S. CARNES RE: SAME (.1)	1.80	729.00
06/08/25	JRA	CORRESPONDENCE WITH YCST AND CS TEAMS RE PLAN SUPPLEMENT	0.50	462.50
06/08/25	JRA	FURTHER CORRESPONDENCE WITH UCC MEMBERS AND MWE RE PLAN ISSUES	0.60	555.00
06/08/25	SYC	EMAILS WITH SPARC (LATHAM) RE: PLAN SUPPLEMENT REVISIONS	0.30	270.00
06/08/25	SYC	REVISIONS TO DRAFT STATEMENT IN SUPPORT OF PLAN	2.80	2,520.00
06/09/25	SLN	REVIEW DEBTORS COMMENTS TO PLAN ADMINISTRATOR AGREEMENT AND CORRESPONDENCE WITH DEBTORS (.2); CORRESPONDENCE WITH DEBTORS REGARDING PLAN SUPPLEMENT (.1); REVIEW REDLINE PLAN SUPPLEMENT (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING UCC STATEMENT IN SUPPORT AND REVIEW SAME (.4); CORRESPONDENCE WITH DEBTORS (.2); REVIEW CHUBB COMMENTS TO PLAN AND CORRESPONDENCE WITH DEBTORS (.2);	1.20	960.00
06/09/25	AAT	REVIEW EMAILS RE: UCC LETTER IN SUPPORT OF PLAN	0.20	126.00
06/09/25	AAT	EMAILS WITH DEBTORS' COUNSEL RE: PLAN SUPPLEMENT AND PLAN ADMINISTRATION AGREEMENT	0.30	189.00
06/09/25	AAT	REVIEW SCHEDULE OF RETAINED CAUSES OF ACTION DRAFT FROM DEBTORS' COUNSEL RE: PLAN SUPPLEMENT	0.20	126.00
06/09/25	AAT	REVIEW EMAIL FROM DEBTORS COUNSEL ENCLOSING REVISIONS TO PLAN ADMINISTRATION AGREEMENT (0.1); REVIEW EDITS TO PLAN ADMINISTRATION AGREEMENT AND INCORPORATE REVISIONS THERETO (0.4)	0.50	315.00



**COLE SCHOTZ P.C.**

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06/09/25	AAT	REVIEW EMAIL WITH S. BALASIANO RE: PLAN ADMINISTRATOR COMPENSATION SCHEDULE	0.20	126.00
06/09/25	MAS	FURTHER EDITS RE: STATEMENT IN SUPPORT OF PLAN (.8); EMAILS WITH S. CARNES RE: SAME (.1); EMAILS WITH MWE TEAM RE: SAME (.1); EMAILS WITH SETTLEMENT PARTIES RE: SAME (.2)	1.20	486.00
06/09/25	JRA	T/C'S WITH A. MAGAZINER AND S. CARNES RE PLAN SUPPLEMENT	0.20	185.00
06/09/25	JRA	T/C (.1) AND EMAIL (.1) WITH S. NEWMAN RE PLAN SUPPLEMENT	0.20	185.00
06/09/25	JRA	FURTHER CORRESPONDENCE WITH D. AZMAN, AND S. CARNES RE PLAN SUPPLEMENT (1.0); RESEARCH RE SAME (.4)	1.40	1,295.00
06/09/25	JRA	FURTHER T/C WITH A. PARLAN RE PLAN SUPPLEMENT	0.10	92.50
06/09/25	JRA	CORRESPOND WITH MWE, CS AND UCC MEMBERS RE PLAN ADMINISTRATOR AND OPEN PLAN ISSUES	0.70	647.50
06/09/25	SYC	CALL WITH JRA AND LATHAM RE: PLAN SUPPLEMENT LANGUAGE	0.30	270.00
06/09/25	SYC	REVIEW COMMENTS FROM DEBTOR/SPARC ON UCC STATEMENT IN SUPPORT OF PLAN	0.90	810.00
06/09/25	SYC	FURTHER REVISIONS TO UCC STATEMENT IN SUPPORT OF PLAN AND CORRES WITH M. SOLIMANI RE: SAME	1.10	990.00
06/09/25	SYC	REVIEW DEBTOR/KDW/CHUBB COMMENTS TO PLAN AND RESPOND TO SAME	2.50	2,250.00
06/09/25	SYC	EMAIL TRAFFIC RE: UCC GOVERNANCE ISSUES AND SELECTION OF PA ADMINISTRATOR	2.30	2,070.00
06/09/25	SYC	CALLS WITH JRA RE: PLAN ISSUES	0.50	450.00
06/09/25	JRA	T/C'S WITH S. CARNES RE PLAN COMMENTS	0.20	185.00
06/09/25	JRA	T/C WITH A. PARLAN AND J. GOTT RE PLAN SUPPLEMENT ISSUES	0.30	277.50
06/10/25	SLN	CORRESPONDENCE WITH DEBTORS AND UCC REGARDING UCC STATEMENT IN SUPPORT OF PLAN AND PLAN ADMINISTRATOR (.2); CORRESPONDENCE WITH DEBTORS REGARDING CONFIRMATION ORDER (.1); REVIEW AMENDED PLAN (.2);	0.50	400.00
06/10/25	MAS	EMAILS WITH S. CARNES RE: PLAN ADMINISTRATOR ISSUES	0.20	81.00
06/10/25	MAS	CALL WITH S. CARNES RE: PLAN AND CHALLENGES (.1); EMAILS WITH DEBTORS, SPARC, AND ABL LENDERS RE: SAME (.5)	0.60	243.00
06/10/25	JRA	CORRESPOND WITH S. CARNES, MWE AND YCST RE PLAN SUPPLEMENT AND LETTER IN SUPPORT OF CONFIRMATION	0.70	647.50

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06/10/25	JRA	T/C WITH S. CARNES RE PLAN ISSUES	0.20	185.00
06/10/25	JRA	CORRESPOND WITH MWE AND CS TEAMS RE PLAN ISSUES	0.80	740.00
06/10/25	SYC	REVISIONS TO STATEMENT IN SUPPORT OF PLAN (.4); EMAILS WITH DEBTORS RE: NET PROCEEDS REP IN SAME (.3); REVISE UCC EMAIL FROM M. SOLIMANI (.5) RE: STATEMENT IN SUPPORT	1.20	1,080.00
06/10/25	SYC	REVIEW AND COMMENT ON REVISED PLAN DOCUMENTS AND EMAILS WITH LENDERS/DEBTORS RE: SAME	2.90	2,610.00
06/10/25	SYC	REVIEW UCC CORESSPONDENCE RE: PLAN ADMINISTRATOR AND EMAIL TO UCC RE: SAME	1.50	1,350.00
06/10/25	JRA	FURTHER CORRESPONDENCE WITH YCST AND OTTERBOURG RE PLAN REVISIONS	0.40	370.00
06/10/25	JRA	REVIEW PLAN REVISIONS	0.70	647.50
06/11/25	SLN	REVIEW OF AND REVISIONS TO UCC STATEMENT IN SUPPORT OF AMENDED PLAN (.2); CORRESPONDENCE WITH UCC PROFESSIONALS (.1); REVIEW COMMENTS TO CONFIRMATION ORDER AND CORRESPONDENCE WITH CS TEAM (.2);	0.50	400.00
06/11/25	AAT	REVIEW DRAFT UCC LETTER IN SUPPORT OF PLAN	0.20	126.00
06/11/25	AAT	REVIEW AND ANALYZE DRAFT CONFIRMATION ORDER	2.90	1,827.00
06/11/25	MAS	EMAILS WITH PROVINCE AND MWE TEAMS RE: STATEMENT IN SUPPORT (.2); EMAILS WITH S. NEWMAN RE: SAME (.1); EMAILS WITH L. MORTON RE: SAME (.1); FINAL REVIEW RE: SAME (.7)	1.10	445.50
06/11/25	MAS	DRAFT UCC UPDATE RE: PLAN DOCUMENTS AND OTHER CASE UPDATES (1.0); EMAILS WITH H. CONGLETON RE: SAME (.1)	1.10	445.50
06/11/25	JRA	EMAILS WITH CS TEAM RE CONFIRMATION ORDER	0.10	92.50
06/11/25	JRA	REVIEW FINAL STATEMENT IN SUPPORT	0.10	92.50
06/11/25	JRA	REVIEW PROPOSED CHANGES TO CONFIRMATION ORDER	0.20	185.00
06/11/25	SYC	REVIEW EMAILS RE: NET PROCEEDS/DISTRIBUTABLE PLAN VALUE	0.40	360.00
06/11/25	SYC	CALL WITH J. ALBERTO RE: PLAN FILING AND NEXT STEPS	0.30	270.00
06/11/25	SYC	REVIEW REVISED PLAN DOCUMENTS AND EMAILS FROM DEBTORS/LENDERS RE: SAME	2.30	2,070.00
06/11/25	SYC	FINAL REVIEW OF STATEMENT IN SUPPORT OF PLAN AND CALLS/EMAILS WITH M.SOLIMANI RE: SAME	1.10	990.00
06/11/25	LSM	REVISE, FILE AND CIRCULATE TO CS TEAM THE STATEMENT OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN SUPPORT OF DEBTORS' AMENDED JOINT PLAN	0.40	160.00

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06/12/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING PLAN DOCUMENTS (.1); CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING CONFIRMATION ORDER AND COMMENTS THERETO (.1);	0.20	160.00
06/12/25	SYC	REVIEW AND COMMENT ON DRAFT CONFIRMATION ORDER (1.5); EMAIL TO A. TERSIGNI RE: SAME (.3)	1.80	1,620.00
06/12/25	SYC	REVIEW AND COMMENT ON INSURANER COMMENTS TO PLAN DOCUMENTS (1.4); EMAILS WITH DEBTORS RE: SAME (.3)	1.70	1,530.00
06/12/25	AAT	REVIEW AND REVISE DRAFT CONFIRMATION ORDER IN LIGHT OF S. CARNES EDITS TO SAME (1.2); EMAIL WITH CS, MWE, AND PROVINCE RE: SAME (0.2)	1.40	882.00
06/12/25	AAT	DRAFT EMAIL TO DEBTORS RE: REVISIONS TO CONFIRMATION ORDER	0.10	63.00
06/12/25	AAT	DRAFT EMAIL TO UCC MEMBERS RE: DRAFT CONFIRMATION ORDER	0.20	126.00
06/13/25	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING CONFIRMATION ORDER (.2);	0.20	160.00
06/13/25	AAT	EMAILS WITH DEBTORS COUNSEL RE: COMPENSATION SCHEDULE FOR PLAN ADMINISTRATOR (0.2); CALL WITH S. CARNES RE: SAME (0.1); REVISE PLAN ADMINISTRATOR COMPENSATION SCHEDULE (0.2)	0.50	315.00
06/13/25	AAT	EMAIL WITH UCC MEMBERS RE: DRAFT CONFIRMATION ORDER	0.20	126.00
06/13/25	AAT	EMAILS WITH CS, MWE AND PROVINCE RE: DRAFT CONFIRMATION ORDER (0.1); CORRESPONDENCE WITH CS TEAM RE: DRAFT EMAILS TO UCC MEMBERS AND DEBTORS (0.1)	0.20	126.00
06/13/25	AAT	EMAILS WITH CS AND MWE RE: CONFIRMATION ORDER AND DRAFT UCC MEMBER EMAIL (0.3); PREPARE REVISIONS TO SAME (0.5); EMAILS WITH DEBTORS COUNSEL RE: REVISED CONFIRMATION ORDER (0.4)	1.20	756.00
06/13/25	MAS	EMAILS WITH S. CARNES, J. ALBERTO, AND A. MAGAZINER RE: STATEMENT IN SUPPORT LANGUAGE	0.10	40.50
06/13/25	JRA	FURTHER CORRESPONDENCE WITH CS, YCST AND UCC MEMBERS RE CONFIRMATION ORDER	0.30	277.50
06/13/25	JRA	EMAILS WITH CS AND YCST RE CONFIRMATION ORDER	0.40	370.00
06/13/25	SYC	REVIEW AND REVISE CONFIRMATION ORDER (1.2); REVIEW DRAFT EMAIL TO UCC RE: SAME (.3); EMAILS WITH DEBTORS RE: SAME (.4); COMMENTS TO PLAN ADMINISTRATION AGREEMENT (.8)	2.70	2,430.00
06/13/25	SYC	CALLS AND EMAILS WITH A. SELICK (KDW) RE: PLAN	0.60	540.00

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/16/25	SLN	CORRESPONDENCE WITH DEBTOR PROFESSIONALS REGARDING CONFIRMATION HEARING (.1); REVIEW TEXAS CONFIRMATION OBJECTION (.1);	0.20	160.00
06/16/25	MAS	REVIEW TEXAS TAXING AUTHORITIES OBJECTION RE: CONFIRMATION	0.20	81.00
06/16/25	JRA	CORRESPOND WITH S. CARNES AND YCST RE PLAN ADMINISTRATION AMOUNT	0.40	370.00
06/16/25	JRA	EMAILS WITH R. POPPITI AND S. CARNES RE CHUBB PLAN COMMENTS	0.20	185.00
06/16/25	SYC	CALL WITH J. ALBERTO RE: PLAN AND CONFIRMATION HEARING	0.50	450.00
06/16/25	JRA	T/C WITH CLAIMANT RE VOTING ISSUES	0.10	92.50
06/17/25	AAT	ANALYSIS OF PLAN SUPPLEMENT LANGUAGE RE: PLAN ADMINISTRATION AGREEMENT TERMS (0.6); REVIEW EMAILS WITH DEBTORS RE: SAME (0.1)	0.70	441.00
06/17/25	JRA	REVIEW AS FILED CONFIRMATION ORDER	0.40	370.00
06/17/25	JRA	CORRESPOND WITH CS AND YCST TEAMS RE PLAN ISSUES AND PROPOSED LANGUAGE FOR ADMINISTRATION BUDGET	0.60	555.00
06/17/25	JRA	REVIEW TEXAS TAXING AUTHORITIES' PLAN OBJECTION	0.10	92.50
06/17/25	SYC	REVIEW DRAFT PLAN OBJECTION	0.90	810.00
06/17/25	SYC	REVIEW AND RESPOND TO INSURER COMMENTS TO PLAN	1.10	990.00
06/17/25	SYC	EMAILS WITH DEBTORS RE: PLAN ISSUES AND REVISE SAME	2.20	1,980.00
06/18/25	MAS	DRAFT UPDATE TO UCC RE: BALLOT TABULATION (.6); EMAILS WITH J. ALBERTO AND MWE TEAM RE: SAME (.1)	0.70	283.50
06/18/25	JRA	REVIEW BALLOTING CERTIFICATION (.3); CORRESPOND WITH CS, MWE AND UCC MEMBERS RE SAME (.3)	0.60	555.00
06/18/25	JRA	CORRESPOND WITH YCST, CS AND OTTERBOURG RE PLAN LANGUAGE REVISIONS	0.40	370.00
06/18/25	SYC	REVIEW PLAN REVISIONS AND EMAILS WITH DEBTORS RE: SAME	1.30	1,170.00
06/19/25	SLN	CORRESPONDENCE WITH UCC COUNSEL REGARDING CONFIRMATION HEARING (.1); CORRESPONDENCE WITH MWE AND CS TEAMS REGARDING REVISED PLAN AND REVIEW SAME (.1);	0.20	160.00
06/19/25	JRA	CORRESPOND WITH S. CARNES AND R. POPPITI RE PLAN ISSUES	0.40	370.00
06/19/25	JRA	FURTHER CORRESPONDENCE WITH YCST AND CS TEAMS RE PLAN REVISIONS AND CONFIRMATION ISSUES	0.50	462.50
06/20/25	JRA	CORRESPOND WITH PROVINCE, CS AND C. SIMON RE FINAL DISTRIBUTION UNDER PLAN ISSUES	0.40	370.00

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/20/25	SYC	REVIEW PLAN REVISIONS AND EMAILS WITH DEBTORS AND MWE RE: SAME	1.90	1,710.00
06/22/25	JRA	REVIEW REVISED CONFIRMATION DOCS (.6); CORRESPOND WITH YCST AND CS RE SAME (.2)	0.80	740.00
06/23/25	SLN	REVIEW AMENDED PLAN (.4); REVIEW REVISED PROPOSED CONFIRMATION ORDER (.3); REVIEW BROWN DECLARATION (.8); REVIEW VOGEL DECLARATION (.6);	2.10	1,680.00
06/23/25	SYC	REVIEW REVISED PLAN DOCUMENTS (2.3); EMAILS WITH MWE AND S. NEWMAN RE: COVERAGE FOR CONFIRMATION HEARING (.4)	2.70	2,430.00
06/24/25	SLN	REVIEW CONFIRMATION BRIEF (.4); CORRESPONDENCE WITH CS TEAM REGARDING PLAN (.2); TELEPHONE CALL WITH PROVINCE (.1); CORRESPONDENCE WITH DEBTORS REGARDING EFFECTIVE DATE (.1);	0.80	640.00
06/24/25	MAS	DRAFT UPDATE TO UCC RE: CONFIRMATION HEARING (.8); EMAILS WITH S. CARNES AND S. NEWMAN RE: SAME (.1); EMAILS WITH MWE TEAM RE: SAME (.1)	1.00	405.00
06/24/25	JRA	CORRESPOND WITH UCC MEMBERS AND CS TEAM RE PLAN CONFIRMATION	0.40	370.00
06/24/25	JRA	REVIEW CONFIRMATION BRIEF AND RELATED DECLARATIONS	1.40	1,295.00
06/24/25	JRA	EMAILS WITH LENDERS AND CS TEAM RE PLAN CONFIRMATION	0.20	185.00
06/24/25	JRA	CORRESPOND WITH YCST, LENDERS AND CS RE EFFECTIVE DATE ISSUES	0.50	462.50
06/24/25	SYC	EMAILS WITH DEBTORS AND LENDERS RE: HEARING PREP	0.50	450.00
06/24/25	JRA	EMAILS WITH CS AND YCST RE EFFECTIVE DATE TIMING	0.20	185.00
<b>VENDOR MATTERS</b>			<b>0.30</b>	<b>121.50</b>

<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
06/02/25	MAS	EMAILS WITH M. BAILEY RE: GBRP OFFERS (.1); CALL WITH M. BAILEY RE: SAME (.1)	0.20	81.00
06/06/25	MAS	EMAILS WITH H. CONGLETON RE: STRANDED GOODS	0.10	40.50

TOTAL HOURS 192.10

PROFESSIONAL SERVICES:

\$144,896.50

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**TIMEKEEPER SUMMARY**

<b><u>NAME</u></b>	<b><u>TIMEKEEPER TITLE</u></b>	<b><u>HOURS</u></b>	<b><u>RATE</u></b>	<b><u>AMOUNT</u></b>
Amanda A. Tersigni	Associate	26.00	630.00	16,380.00
Elazar A. Kosman	Associate	2.80	430.00	1,204.00
Jack M. Dougherty	Associate	0.90	575.00	517.50
Justin R. Alberto	Member	30.40	925.00	28,120.00
Larry S. Morton	Paralegal	7.40	400.00	2,960.00
Michael A. Solimani	Associate	28.80	405.00	11,664.00
Pauline Z. Ratkowiak	Paralegal	0.20	405.00	81.00
Sarah A. Carnes	Member	74.90	900.00	67,410.00
Stacy L. Newman	Member	20.70	800.00	16,560.00
<b>Total</b>		<b>192.10</b>		<b>\$144,896.50</b>

**COST DETAIL**

<b><u>DATE</u></b>	<b><u>Description</u></b>	<b><u>QUANTITY</u></b>	<b><u>AMOUNT</u></b>
06/02/25	COURT FEES	9.00	0.90
06/02/25	COURT FEES	21.00	2.10
06/02/25	COURT FEES	2.00	0.20
06/02/25	COURT FEES	12.00	1.20
06/05/25	ONLINE RESEARCH	1.00	73.36
06/08/25	COURT FEES	1.00	0.10
06/08/25	COURT FEES	29.00	2.90
06/10/25	FILING FEES	1.00	50.00
06/10/25	COURT FEES	2.00	0.20
06/10/25	COURT FEES	1.00	0.10
06/11/25	COURT FEES	4.00	0.40
06/11/25	COURT FEES	2.00	0.20
06/13/25	COURT FEES	14.00	1.40
06/13/25	COURT FEES	3.00	0.30
06/13/25	COURT FEES	3.00	0.30
06/13/25	COURT FEES	3.00	0.30
06/13/25	COURT FEES	3.00	0.30
06/13/25	COURT FEES	4.00	0.40
06/13/25	COURT FEES	30.00	3.00
06/16/25	COURT FEES	18.00	1.80
06/16/25	COURT FEES	12.00	1.20
06/16/25	COURT FEES	5.00	0.50

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<b><u>DATE</u></b>	<b><u>Description</u></b>	<b><u>QUANTITY</u></b>	<b><u>AMOUNT</u></b>
06/16/25	COURT FEES	4.00	0.40
06/16/25	COURT FEES	30.00	3.00
06/16/25	COURT FEES	11.00	1.10
06/16/25	COURT FEES	3.00	0.30
06/16/25	COURT FEES	3.00	0.30
06/16/25	COURT FEES	3.00	0.30
06/16/25	COURT FEES	3.00	0.30
06/16/25	COURT FEES	29.00	2.90
06/16/25	COURT FEES	29.00	2.90
06/23/25	ELECTRONIC DOCUMENT PROCESSING	1.00	317.40
06/24/25	COURT FEES	4.00	0.40
06/24/25	COURT FEES	21.00	2.10
06/24/25	COURT FEES	7.00	0.70
06/24/25	COURT FEES	4.00	0.40
<b>Total</b>			<b>\$473.66</b>

TOTAL SERVICES AND COSTS:	\$	145,370.16
PREVIOUS BALANCE DUE:	\$	<u>211,810.80</u>
<b>TOTAL DUE THIS INVOICE:</b>	<b>\$</b>	<b><u><u>357,180.96</u></u></b>