

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

FULCRUM BIOENERGY, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-12008 (TMH)

(Jointly Administered)

Objection Deadline:

April 11, 2025, at 4:00 p.m. (ET)

**SUMMARY SHEET TO THE THIRD MONTHLY FEE APPLICATION OF
KURTZMAN CARSON CONSULTANTS, LLC DBA VERITA GLOBAL,
AS ADMINISTRATIVE ADVISOR TO THE DEBTORS, FOR THE PERIOD
FROM DECEMBER 1, 2024 THROUGH AND INCLUDING DECEMBER 31, 2024**

General Information

Name of Applicant:	Kurtzman Carson Consultants, LLC dba Verita Global
Authorized to Provide Services to:	The above-captioned debtors
Petition Date:	September 9, 2024
Date of Retention Order:	October 15, 2024, effective as of September 9, 2024
Type of Application:	Monthly

Summary of Fees and Expenses Sought in the Fee Application

Period for Which Compensation and Reimbursement is Sought in the Fee Application:	December 1, 2024 through December 31, 2024
Amount of Compensation Sought as Actual, Reasonable, and Necessary for the Fee Period:	\$1,200.20 (80% of \$1,500.25)
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary for the Fee Period:	\$0.00

¹ The Debtors and Debtors in possession in these chapter 11 cases, along with each debtor's federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors' service address is: Fulcrum BioEnergy, Inc., P.O. Box 220 Pleasanton, CA 94566. All Court filings can be accessed at: <https://www.veritaglobal.net/Fulcrum>.



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Total Compensation and Expense

Reimbursement Request for the Fee Period: \$1,200.20 (80% of \$1,500.25)

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Schedules & SOFAs	7.2	\$1,500.25
Totals	7.2	\$1,500.25

COMPENSATION BY INDIVIDUAL

Initials	Name	Position	Hours	Rate	Total
DPM	Daniel McSwigan	Solicitation Consultant	6.4	\$ 208.25	\$ 1,332.80
SMZ	Stanley Martinez	Solicitation Consultant	0.6	\$ 208.25	\$ 124.95
WRG	William Gruber	Solicitation Consultant	0.2	\$ 212.50	\$ 42.50
	TOTALS		7.2		\$1,500.25

Total Incurred:	\$1,500.25
Blended Rate:	\$208.37

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April 11, 2025, at 4:00 p.m. (ET)

**THIRD MONTHLY FEE APPLICATION OF KURTZMAN
CARSON CONSULTANTS, LLC DBA VERITA GLOBAL, AS
ADMINISTRATIVE ADVISOR TO THE DEBTORS, FOR THE PERIOD
FROM DECEMBER 1, 2024 THROUGH AND INCLUDING DECEMBER 31, 2024**

Pursuant to Sections 330 and 331 of Title 11 of the United States Code, §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated October 15, 2024 [Docket No. 170] (the “Interim Compensation Order”), Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), administrative advisor for the above-captioned debtors (the “Debtors”), hereby submits its third monthly fee application (this “Fee Application”) for allowance of compensation for professional services provided in the amount of \$1,500.25 and authorization of payment of \$1,200.20 (which is 80% of \$1,500.25) for

¹ The Debtors and Debtors in possession in these chapter 11 cases, along with each debtor’s federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors’ service address is: Fulcrum BioEnergy, Inc., P.O. Box 220 Pleasanton, CA 94566. All Court filings can be accessed at: <https://www.veritaglobal.net/Fulcrum>.

the period from December 1, 2024 through and including December 31, 2024 (the “Fee Period”).

In support of this Fee Application, Verita represents as follows:

JURISDICTION

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and Verita confirms its consent pursuant to Local Rule 9013-1(f) to the entry of a final order by the Court in connection with this Fee 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 in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are section 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rules 2016-1 and 2016-2.

BACKGROUND

4. On September 9, 2024 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

5. On the September 10, 2024, the Debtors filed an application to employ Verita as its claims and noticing agent (in such capacity, the “Claims and Noticing Agent”) pursuant to 28 U.S.C. § 156(c) and Local Rule 2002-1(f) [Docket No. 4] (the “Section 156(c) Application”), which was approved by the Court on September 12, 2024 [Docket No. 50] (the “Section 156(c) Order”).

6. Given that the administration of these chapter 11 cases would require Verita to

perform duties outside the scope of 28 U.S.C. § 156(c), the Debtors supplemented the Section 156(c) Application with an application to retain Verita to perform certain services as the Debtors' administrative advisor in these chapter 11 cases (in such capacity, the "Administrative Advisor"). Accordingly, on September 24, 2024, the Debtors filed the *Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date* [Docket No. 88]. On October 15, 2024, the Court entered the *Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date* [Docket No. 168] (the "Retention Order"). The Retention Order authorized the Debtors to compensate Verita in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any orders entered in these cases governing professional compensation and reimbursement of expenses.

7. The Retention Order authorizes Verita to provide the following services:

- (a) assist with, among other things, the preparation of the Debtors' schedules of assets and liabilities, schedules of executory contracts and unexpired leases and statements of financial affairs;
- (b) assist with, among other things, solicitation, balloting, tabulation and calculation of votes, as well as prepare any appropriate reports required in furtherance of confirmation of any chapter 11 plan;
- (c) generate an official ballot certification and testify, if necessary, in support of the ballot tabulation results for any chapter 11 plan(s) in these chapter 11 cases;
- (d) generate, provide, and assist with claims objections, exhibits, claims reconciliation, and related matters; and
- (e) provide such other claims processing, noticing, solicitation, balloting, and administrative services described in the Services Agreement, but not included in the Section 156(c) Application, as may be requested by the Debtors from time to time.

8. The amounts sought in this Application do not include any fees that may be payable by the Debtors for services provided by Verita under the Section 156(c) Order. Procedures for the

payment of such fees and disbursements are separately addressed in the Section 156(c) Order. Additionally, no fees and disbursements for services provided to the Debtors under the Retention Order are or will be sought to be paid under the Section 156(c) Order.

9. All services for which compensation is requested by Verita were performed on behalf of the Debtors.

SUMMARY AND VALUATION OF SERVICES

10. The amount of time spent by each employee providing services to the Debtors for the Fee Period is detailed in line item listings of time entries and descriptive detail set forth herein and in the invoices attached hereto as Exhibit A. These are Verita's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Verita for the Fee Period as Administrative Advisor to the Debtors in these chapter 11 cases is \$1,500.25 due for fees. Verita is not seeking reimbursement for any expenses in this Application.

11. Verita professionals performed 7.2 hours of work assisting the Debtors and their professionals with the preparation of the amended Schedules of Assets and Liabilities and Statements of Financial Affairs (the "Amended Schedules and Statements"). This included preparing final versions of the Amended Schedules and Statement data. Verita believes that the time entries included in Exhibit A are in compliance with the requirements of Local Rule 2016-2.

12. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, Verita submits that the amount requested is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

CONCLUSION

WHEREFORE, Verita respectfully requests that the Court enter an Order: (i) granting the Fee Application and allowing compensation in the amount of \$1,500.25; (ii) directing payment by the Debtors of \$1,200.20 (which is 80% of \$1,500.25) for professional services; and (iii) granting such other and further relief as the Court deems just and proper.

Dated: March 28, 2025
El Segundo, California

/s/ Sarah Harbuck
KURTZMAN CARSON CONSULTANTS, LLC
DBA VERITA GLOBAL
Sarah Harbuck
Drake D. Foster
222 N. Pacific Coast Highway, 3rd Floor
El Segundo, California 90245
Tel: 310.708.6926

Administrative Advisor to the Debtors

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

In re:

FULCRUM BIOENERGY, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-12008 (TMH)

(Jointly Administered)

Objection Deadline:

April 11, 2025, at 4:00 p.m. (ET)

NOTICE OF FILING OF FEE APPLICATION

PLEASE TAKE NOTICE that, today Morris, Nichols, Arsht & Tunnell LLP (the “Professional”) filed the attached *Third Monthly Fee Application of Kurtzman Carson Consultants, LLC DBA Verita Global, as Administrative Advisor to the Debtors, for the Period from December 1, 2024 Through and Including December 31, 2024* (the “Fee Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Fee Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (D.I. 170) (the “Interim Compensation Order”) and served no later than **April 11, 2025 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”) upon on the following parties (the “Fee Notice Parties”):

- (i) Counsel to the Debtors: Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801, Attn: Robert J. Dehney, Sr., rdehney@morrisnichols.com; Curtis S. Miller, cmiller@morrisnichols.com; Clint M. Carlisle, ccarlisle@morrisnichols.com; and Avery Jue Meng, ameng@morrisnichols.com;

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- (ii) counsel to the Committee: (a) Eversheds Sutherland (US) LLP, The Grace Building, 40th Floor, 1114 Avenue of the Americas, New York, New York 10036, Attn: Jennifer Kimble, jenniferkimble@eversheds-sutherland.com and Sameer M. Alifarag, sameeralifarag@eversheds-sutherland.com, Evershed Sutherland (US) LLP, 999 Peachtree Street NW, Suite 2300, Atlanta, Georgia 30309, Attn: Todd C. Meyers, toddmeyers@eversheds-sutherland.com, and (b) Morris James LLP, 500 Delaware Avenue, Suite 1500 Wilmington, DE 19801, Attn: Jeffrey R. Waxman, jwaxman@morrisjames.com; Eric J. Monzo, emonzo@morrisjames.com; and Christopher M. Donnelly, cdonnelly@morrisjames.com; and
- (iii) the U.S. Trustee: Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 Attn: Rosa Sierra-Fox, rosa.sierra-fox@usdoj.gov.

PLEASE TAKE FURTHER NOTICE that, if an objection to the Fee Application is served prior to the Objection Deadline, the Debtors shall be authorized by the Interim Compensation Procedures Order to pay the Professional 80% of the fees and 100% of the expenses requested in the Fee Application not subject to such objection without the need for further order of the Court. Pursuant to the Interim Compensation Procedures Order, if the objecting party and the Professional are unable to resolve an objection within fourteen (14) days, the objecting party shall file an objection (the “Objection”) with the Court within three (3) days and serve such Objection on the Fee Notice Parties and the Professional. After receipt of the Objection, the Professional shall have the option to (a) file a response to the Objection with a request for payment of the disputed amount with the Court, or (b) forgo payment of the disputed amount until the next interim fee application hearing.

PLEASE TAKE FURTHER NOTICE that, if no objections to the Fee Application are served prior to the Objection Deadline, the Professional may file a certificate of no objection with the Court, after which the Debtors shall be authorized by the Interim Compensation Procedures Order to pay the Professional an amount equal to 80% of the fees and 100% of the expenses requested in the Fee Application without the need for further order of the Court.

PLEASE TAKE FURTHER NOTICE that, if you fail to respond in accordance with this notice, the court may grant the relief requested in the Fee Application without further notice or hearing.

Dated: March 28, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jake A. Rauchberg
Robert J. Dehney, Sr. (No. 3578)
Curtis S. Miller (No. 4583)
Daniel B. Butz (No. 4227)
Clint M. Carlisle (No. 7313)
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Counsel for the Debtors and Debtors in Possession

EXHIBIT A

222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245



January 16, 2025

Fulcrum BioEnergy, Inc.
Eric Pryor
PO Box 220
Pleasanton CA 94566
United States

Re: Fulcrum BioEnergy, Inc.
USBC Case No. 24-12008

Dear Eric Pryor,

Enclosed please find Kurtzman Carson Consultants LLC dba Verita Global invoice for the period December 1, 2024 to December 31, 2024 in the amount of \$1,500.25 for the above referenced matter. Pursuant to our services agreement, Verita's invoice is due upon receipt.

If you have any questions, please contact me at (310) 751-1803 or egershbein@kccllc.com.

Sincerely,
Verita Global LLC

A handwritten signature in black ink, appearing to read "Evan Gershbein".

Evan Gershbein
EVP Restructuring

Enclosures

Verita Global LLC 222 N Pacific Coast Hwy, El Segundo, CA, 90245 Phone 310-823-9000 Fax 310-823-9133 VeritaGlobal.com

222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245



1/16/2025

Contact Parties

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222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245



Robert J. Dehney, Sr.
Morris, Nichols, Arsht & Tunnell LLP
1201 N. Market Street, 16th Floor
Wilmington DE 19801
United States

Rosa Sierra-Fox
U. S. Department of Justice
844 King Street, Suite 2207 Lockbox 35
Wilmington DE 19801
United States

KCC (dba Verita Global)

Account Number	71031FA	Invoice Date	January 16, 2025
Invoice Number	US-RESTR2709838	Due Date	Due upon receipt

Fulcrum BioEnergy, Inc.***Summary***

<u>Description</u>	<u>Amount</u>
<u>Hourly Fees</u>	
Hourly Fees Charged	\$1,500.25
<i>Total of Hourly Fees</i>	\$1,500.25
<u>Expenses</u>	
Expenses	\$0.00
<i>Total Expenses</i>	\$0.00
Invoice Subtotal	\$1,500.25
Sales and Use Tax	\$0.00
<i>Total Invoice</i>	\$1,500.25

Please detach and return this portion of the statement with your check to KCC.

Please reference your Account Number and Invoice Number on your Remittance.

Account Number	71031FA	Check Payments to:	Wire Payments to:
Invoice Number	US-RESTR2709838	Verita Global LLC Department 2211 PO Box 4110 Woburn, MA 01888-4110	Verita Global LLC Grasshopper Bank, N.A. 261 5th Avenue Suite 610 New York, NY 10016 Account # 02329451396 FED ABA # 026015024
Total Amount Due	\$1,500.25		
Amount Paid	\$		

Verita Global LLC

12/1/2024 - 12/31/2024

Total Hourly Fees by Employee

<u>Initial</u>	<u>Employee Name</u>	<u>Position Type</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
DPM	Daniel McSwigan	SOL	6.4	\$208.25	\$1,332.80
SMZ	Stanley Martinez	SOL	0.6	\$208.25	\$124.95
WRG	William Gruber	SOL	0.2	\$212.50	\$42.50

Verita Global LLC

12/1/2024 - 12/31/2024

Time Detail

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Position Type</u>	<u>Category</u>	<u>Hours</u>
12/4/2024	DPM	Prepare final version of amended schedules	SOL	Schedules & SOFA	1.8
12/4/2024	WRG	Prepare revised amended SOFA 4 per comments from J Donohue of DSI	SOL	Schedules & SOFA	0.2
12/5/2024	DPM	Prepare final amended Schedule and SOFA Excel templates	SOL	Schedules & SOFA	0.8
12/11/2024	DPM	Prepare final versions of original and amended schedules in excel per request of J Donohue of DSI	SOL	Schedules & SOFA	3.0
12/11/2024	SMZ	Perform review of filed versions of schedules and prepare summary of Schedule D, E, F claims	SOL	Schedules & SOFA	0.6
12/12/2024	DPM	Prepare revisions to Excel versions of amended schedules	SOL	Schedules & SOFA	0.8

Verita Global LLC

12/1/2024 - 12/31/2024

Expenses

<u>Description</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
Printing and Mailing Expenses			\$0.00
		<i>Total Expenses</i>	<i>\$0.00</i>

Verita Global LLC

12/1/2024 - 12/31/2024

Printing and Mailing Expenses

<u>Post Date</u>	<u>Mailing Name</u>	<u>Quantity</u>	<u>Description</u>	<u>Rate</u>	<u>Total</u>
<i>Total Printing and Mailing Expenses</i>					<i>\$0.00</i>

CERTIFICATION

I, Sarah Harbuck, pursuant to 28 U.S.C. § 1746, state as follows:

- a) I am Assistant General Counsel of the applicant firm, Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”).
- b) I am familiar with the work performed by Verita on behalf of the Debtors.
- c) I have reviewed the foregoing Fee Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Local Rule 2016-2, and submit that the Fee Application substantially complies with such order.

I certify, under penalty of perjury, that the foregoing statements are true to the best of my knowledge, information, and belief.

Dated: March 28, 2025
El Segundo, California

/s/ Sarah Harbuck

Sarah Harbuck