CAPLIN & DRYSDALE, CHARTERED

Kevin C. Maclay (admitted pro hac vice) Todd E. Phillips (admitted *pro hac vice*) Jeffrey A. Liesemer (VSB No. 35918) Nathaniel R. Miller (admitted pro hac vice) 1200 New Hampshire Avenue NW, 8th Floor Washington, DC 20036 Telephone: (202) 862-5000

Counsel for the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	Chapter 1
--------	-----------

HOPEMAN BROTHERS, INC., Case No. 24-32428 (KLP)

Debtor.

SUMMARY OF FIRST INTERIM APPLICATION OF NERA ECONOMIC CONSULTING, INC. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM OCTOBER 10, 2024, THROUGH DECEMBER 31, 2024

Name of Applicant: NERA Economic Consulting, Inc.

Authorized to Provide Professional Services to: Official Committee of Unsecured

Creditors

Petition Date: June 30, 2024

Date of Retention: Order entered December 10, 2024,

effective as of October 10, 2024 [Docket

October 10, 2024, through December 31,

No. 416]

Period for which Compensation and

Reimbursement are sought:

2024

Amount of Compensation sought as actual,

reasonable and necessary: \$333,941.00

Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$8,024.00
Total compensation approved by interim order to date:	\$0.00
Total expenses approved by interim order to date:	\$0.00
Blended rate in this interim Application for all professionals:	\$582.08
Compensation sought in this interim Application already paid pursuant to the interim compensation order but not yet allowed:	\$0.00
Expenses sought in this interim Application already paid pursuant to the interim compensation order but not yet allowed:	\$0.00
Number of professionals included in this interim Application:	5
If applicable, number of professionals in this interim Application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought during the Fee Period:	N/A
Number of professionals billing fewer than 15 hours to the case during the Fee Period:	0

CAPLIN & DRYSDALE, CHARTERED

Kevin C. Maclay (admitted *pro hac vice*) Todd E. Phillips (admitted *pro hac vice*) Jeffrey A. Liesemer (VSB No. 35918) Nathaniel R. Miller (admitted *pro hac vice*) 1200 New Hampshire Avenue NW, 8th Floor Washington, DC 20036 Telephone: (202) 862-5000

Counsel for the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	Chapter 11
HOPEMAN BROTHERS, INC.,	Case No. 24-32428 (KLP)
Debtor.	

FIRST INTERIM APPLICATION OF NERA ECONOMIC CONSULTING, INC. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM OCTOBER 10, 2024 THROUGH DECEMBER 31, 2024

NERA Economic Consulting, Inc. ("NERA"), insurance allocation expert to the Official Committee of Unsecured Creditors (the "Committee"), submits this application (the "Application") for interim allowance of compensation for professional services rendered to the Committee for the period from October 10, 2024 through December 31, 2024 (the "Application Period"), and reimbursement of actual and necessary expenses incurred by NERA during the Application Period 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 Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court of the Eastern District of Virginia (the "Local Rules"), and the *Order (I)*

Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief entered on September 9, 2024 [Docket No. 162] (the "Interim Compensation Order"). In support of this Application, NERA represents as follows:

JURISDICTION AND BASIS FOR RELIEF

- 1. This Court has subject-matter jurisdiction to hear and decide this Application under 28 U.S.C. §§ 157(a) and 1334(b) and the Standing Order of Reference from the United States District Court for the Eastern District of Virginia, dated August 15, 1984. This matter is a core proceeding under 28 U.S.C. § 157(b), and this Court has authority to adjudicate this Application consistent with Article III of the United States Constitution.
- 2. The bases for the relief requested herein are sections 330, 331, 503(b)(2), and 507(a)(2) of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Rules, and the Interim Compensation Order.

BACKGROUND

- 3. On June 30, 2024, the Debtor filed a petition for relief under chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 case (the "Chapter 11 Case"). The largest creditor constituency in the Chapter 11 Case consists of holders of claims for personal injury or wrongful death arising from exposure to asbestos or asbestos-containing products.
- 4. On July 22, 2024, the Office of the United States Trustee for Region 4 notified the Court that, pursuant to 11 U.S.C. § 1102, it had appointed the Committee. [Docket No. 69].
- 5. On September 9, 2024, the Court entered the Interim Compensation Order, which approved the compensation procedures set forth therein (the "Compensation Procedures").

- 6. On December 10, 2024, the Court entered the Order Authorizing the Retention and Employment of NERA, as Insurance Allocation Expert to the Official Committee of Unsecured Creditors, Effective *Nunc Pro Tunc* as of October 10, 2024 [Docket No. 416].
- 7. Pursuant to the Compensation Procedures, professionals retained in this case are authorized to file monthly fee statements and serve such statements on the Notice Parties (as defined in the Compensation Procedures). Provided that no objection to a monthly fee statement is timely filed, the Debtor is authorized to pay such professional an amount equal to eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such monthly fee statement.
- 8. Additionally, pursuant to the Compensation Procedures, beginning with the period ending on August 31, 2024, and at three-month intervals thereafter, professionals retained in this case are authorized to file interim fee applications with the Court.
- 9. The Compensation Procedures also provide that all Retained Professionals (as defined in the Compensation Procedures), to the extent applicable, shall make reasonable efforts to comply with the U.S. Trustee's requests for information and additional disclosures set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C.* § 330 by Attorneys in Larger Chapter 11 Cases (the "Appendix B Guidelines") in connection with the interim and final fee applications filed in this case.

RELIEF REQUESTED

10. NERA submits this Application (a) for interim allowance of reasonable compensation for the actual, reasonable and necessary professional services that it has rendered as insurance allocation expert to the Committee in this case for the period from October 10, 2024 through December 31, 2024, and (b) for reimbursement of actual, reasonable and necessary expenses incurred during that same period. For the period covered by this Application, NERA

seeks fees for services rendered in the amount of \$333,941.00 and reasonable and necessary expenses totaling \$8,024.00.

- 11. The Application is supported by the following Exhibits, which are attached hereto and patterned on the Appendix B Guidelines:
 - <u>Exhibit A</u> contains a summary schedule of the time expended by NERA's professionals during the Application Period.
 - Exhibit B is a summary of the expenses incurred by NERA during the Application Period.
 - Exhibit C contains a disclosure of "customary and comparable compensation" charged by NERA's professionals. As requested in the Appendix B Guidelines, Exhibit C provides a summary of the blended hourly rates of the timekeepers (segregated by rank) included in this Application compared to the blended hourly rates for similar non-bankruptcy domestic timekeepers.
 - Exhibit D contains the monthly fee statement (the "Monthly Statement") previously served by NERA and covering the Application Period.

BASIS FOR RELIEF REQUESTED

12. During the Application Period, NERA provided numerous services to the Committee in connection with acting as an expert on the allocation of asbestos-related claims to the Debtor's liability insurance coverage, including but not limited to: (i) reviewing and analyzing insurance policy, coverage, and liability issues; (ii) preparing coverage and allocation analyses; (iii) preparing an expert report, and supplemental materials, on allocation and insurance coverage issues; (iv) preparing for and attending depositions; and (v) communicating with the Committee and its other professionals regarding the foregoing.

13. Pursuant to the terms of the Interim Compensation Order, NERA filed and served the following Monthly Statement:

Period						
Covered by					Fees	Expenses
Monthly	Total	Total	Date Served	Objection	Received	Received
Statement	Fees	Ewnonges	[Doolrot No.1	Daadlina	(000/)	(1000/)
Statement	rees	Expenses	[Docket No.]	Deadline	(80%)	(100%)
10/10/2024-	rees	Expenses	1/31/2025	Deadine	(80%)	(100%)

- 14. The time and expense detail related to this Application is attached hereto as **Exhibit D**. The fees charged by NERA in this Chapter 11 Case are billed in accordance with its existing billing rates and procedures in effect during the Application Period. NERA believes that the time and expense entries included in Exhibit D comply with the requirements of Local Rule 2016-1.
- 15. NERA received no payment and no promises of payment from any source for services rendered or to be rendered in any capacity whatsoever with respect to the matters covered by this Application. There is no agreement or understanding between NERA and any other person, other than the shareholders of NERA, for the sharing of compensation to be received for services rendered in this Chapter 11 Case.

LEGAL BASIS FOR REQUESTED RELIEF

- 16. Under 11 U.S.C. § 330(a)(1), the Court may award reasonable compensation for actual, necessary services rendered by professionals employed by the Committee based on the nature, extent, and value of the services rendered; time spent on such services; and the cost of comparable services other than in a bankruptcy case. The Court may also award reimbursement for actual, necessary expenses. *Id.*
 - 17. Section 330(a)(3) provides:

In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, the 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 toward 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 experience 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.
- 18. The professional services performed by NERA were necessary and appropriate to the administration of this Chapter 11 Case and were performed in the most expeditious and economical manner possible. Compensation for these services as requested is commensurate with the complexity, importance, and nature of the problems, issues, or tasks involved. Further, the professionals at NERA have coordinated their activities with Committee's other professionals to avoid undue duplication of effort on behalf of the Committee in the case whenever possible.
- 19. In accordance with 11 U.S.C. § 504 and Bankruptcy Rule 2016(a), there is no agreement or understanding between NERA and any other person, other than the shareholders of NERA, for the sharing of compensation to be received for services rendered in this Chapter 11 Case.
- 20. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by NERA.

STATEMENT PURSUANT TO APPENDIX B GUIDELINES

21. The following is provided in response to the questions set forth in ¶ C.5 of the Appendix B Guidelines:

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 application period?

Response: No, NERA did not vary its standard or customary billing rates, fees, or terms for services pertaining to this engagement.

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

Response: Not applicable.

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

Response: No.

Question: Does the fee 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 billed 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.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?

Response: No.

Question: Does this fee application include rate increases since retention?

Response: No.

Question: Did the client agree when retaining NERA to accept all future rate increases? If not, did NERA inform the 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: The client was notified at the outset of the engagement that NERA's hourly rates are reviewed and revised generally on a periodic basis.

NOTICE

22. Notice of this Application has been provided in accordance with the terms of the Interim Compensation Order. NERA submits that no other or further notice need be provided.

CONCLUSION

23. WHEREFORE, NERA respectfully requests that the Court enter an Order (a) approving this Application and allowing on an interim basis NERA's request for \$333,941.00 in fees and reimbursement of \$8,024.00 in expenses for the Application Period; (b) authorizing and directing the Debtor to pay the as-yet unpaid balances for the Application Period; and (c) granting such other and further relief as the Court deems just and proper.

Dated: July 16, 2025 /s/ Stephanie Plancich

Stephanie Plancich Managing Director NERA Economic Consulting, Inc.

Insurance Allocation Expert for the Committee of Unsecured Creditors

ELECTRONICALLY FILED BY:

/s/ Jeffrey Liesemer

CAPLIN & DRYSDALE, CHARTERED

Jeffrey A. Liesemer (VSB No. 35918) 1200 New Hampshire Avenue NW, 8th Floor Washington, DC 20036 Telephone: (202) 862-5000

Email: jliesemer@capdale.com

Counsel for the Official Committee of Unsecured Creditors

CAPLIN & DRYSDALE, CHARTERED

Kevin C. Maclay (admitted *pro hac vice*) Todd E. Phillips (admitted *pro hac vice*) Jeffrey A. Liesemer (VSB No. 35918) Nathaniel R. Miller (admitted *pro hac vice*) 1200 New Hampshire Avenue NW, 8th Floor Washington, DC 20036 Telephone: (202) 862-5000

Counsel for the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	Chapter 11
HOPEMAN BROTHERS, INC.,	Case No. 24-32428 (KLP)
Debtor.	

ORDER GRANTING FIRST INTERIM APPLICATION OF NERA ECONOMIC CONSULTING, INC. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM OCTOBER 10, 2024 THROUGH DECEMBER 31, 2024

Upon consideration of the First Interim Application (the "Application")¹ of NERA Economic Consulting, Inc. ("NERA"), insurance allocation expert for the Official Committee of Unsecured Creditors, for the period from October 10, 2024 through December 31, 2024 (the "Application Period"); and the Court having reviewed the Application and the Monthly Statement that was served by NERA, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper and adequate notice has been given and

1 Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 12 of 31

that no other or further notice is necessary; and after due deliberation thereon; and good and

sufficient cause appearing therefor,

IT IS HEREBY ORDERED as follows:

1. The Application is GRANTED.

2. NERA is hereby granted allowance of compensation for professional services in

the amount of \$333,941.00 and reimbursement of actual and necessary expenses in the amount of

\$8,024.00 as requested in the Application.

3. The Debtor is hereby authorized and directed to remit to NERA the full amount of

the fees and expenses set forth in paragraph 2 of this Order less any amounts previously paid to

NERA on account of monthly fee statements filed for the Application Period.

4. The Debtor is authorized and empowered to take such actions as may be necessary

and appropriate to implement the terms of this Order.

5. The Court shall retain jurisdiction to hear and determine all matters arising from

the entry of the within Order, including the interpretation, implementation, or enforcement of the

within Order.

6. This Order shall be immediately effective and enforceable upon its entry.

Dated: _______, 2025

HONORABLE KEITH L. PHILLIPS

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (VSB No. 35918)
Nathaniel R. Miller (admitted *pro hac vice*)
CAPLIN & DRYSDALE, CHARTERED
1200 New Hampshire Avenue NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000

Email: kmaclay@capdale.com tphillips@capdale.com jliesemer@capdale.com nmiller@capdale.com

Counsel for the Official Committee of Unsecured Creditors

CERTIFICATION OF ENDORSEMENT UNDER LOCAL BANKRUPTCY RULE 9022-1(C)

I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Jeffrey A. Liesemer

EXHIBIT A

SUMMARY OF FEES BY PROFESSIONAL

OCTOBER 10, 2024 THROUGH DECEMBER 31, 2024

COMPENSATION BY PROFESSIONAL				
PROFESSIONAL	POSITION	HOURLY BILLING RATE	TOTAL HOURS	TOTAL COMPENSATION
Connor Goggins	Analyst	\$470	154.1	\$72,427.00
Daniel Klemonski	Senior Analyst	\$520	134	\$69,680.00
Rohan Kumar	Analyst	\$480	135.5	\$65,040.00
Janeen D. McIntosh	Senior Consultant	\$730	48.8	\$35,624.00
Stephanie Plancich	Managing Director	\$900	101.3	\$91,170.00
TOTAL			573.7	\$333,941.00

EXHIBIT B

SUMMARY OF EXPENSES INCURRED DURING THE FEE PERIOD

EXPENSE CATEGORY	AMOUNT
Outside Legal Fees ¹	\$8,024.00
TOTAL	\$8,024.00

¹ Copies of outside counsel's invoices are included in the previously filed Monthly Statement, attached hereto as Exhibit D.

EXHIBIT C

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURE

CATEGORY OF TIMEKEEPER	BLENDED HOURLY RATE FOR PRECEDING YEAR	BLENDED HOURLY RATE DURING THE APPLICATION PERIOD
Managing Director	\$793.00	\$900.00
Senior Consultant	\$680.00	\$730.00
Senior Analysts	\$510.00	\$520.00
Analysts	\$460.00	\$474.68
Associate Analysts	\$393.00	N/A

EXHIBIT D

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 18 of 31

BCBP

BECK, CHAET, BAMBERGER & POLSKY, S.C.

October 31, 2024

Bill: 65319 DJE
Client 20002 Matter 11600
Billed Through:10/31/24

Two Plaza East, Suite 1085 330 East Kilbourn Avenue Milwaukee, WI 53202

> 414.273.4200 **FAX** 414.273.7786 http://www.bcblaw.net **FEIN** #39-1568467

NERA Economic Consulting 1166 Avenue of the Americas New York, NY 10036

NERA - Hopeman Matter # 2024-00490M

PROFESSIONAL SERVICES

10 16 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Stephanie Plancich regarding Hopeman retention application.	0.20 hrs	460 /hr	92.00
10 16 2024 L110	DJE A104	Fact Investigation/Development: Review case information in connection with Hopeman retention application.	0.30 hrs	460 /hr	138.00
10 16 2024 L110	CSW A103	Fact Investigation/Development: Begin draft of retention application to employ and declaration in support.	2.50 hrs	400 /hr	1,000.00
10 17 2024 L110	CSW A103	Fact Investigation/Development: Draft proposed order for retention application.	0.80 hrs	400 /hr	320.00
10 18 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Stephanie Plancich and Deirdre Nash regarding Hopeman retention application.	0.20 hrs	460 /hr	92.00
10 18 2024 L110	DJE A103	Fact Investigation/Development: Update Hopeman retention application.	0.20 hrs	460 /hr	92.00
10 18 2024 L110	CSW A103	Fact Investigation/Development: Additional revisions to draft retention application.	0.20 hrs	400 /hr	80.00
10 18 2024 L110	CSW A103	Fact Investigation/Development: Revise declaration in support of retention application.	0.20 hrs	400 /hr	80.00

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 19 of 31

	Docume	iii Faye 19 (01 21		
NERA Economic Cons 20002 11600	sulting			Page Invoice	2 2:65319
10 18 2024 CSW L110 A103	Fact Investigation/Developm proposed order for retention		0.10 hrs	400 /hr	40.00
10 22 2024 DJE L110 A104	Fact Investigation/Developm comment on draft engageme		0.30 hrs	460 /hr	138.00
10 22 2024 DJE L110 A108	Fact Investigation/Developm correspondence with Deirdre Stephanie Plancich regarding letter.	Nash and	0.10 hrs	460 /hr	46.00
10 22 2024 DJE L110 A103	Fact Investigation/Developm retention application.	ent: Update	0.60 hrs	460 /hr	276.00
10 22 2024 DJE L110 A108	Fact Investigation/Developm correspondence to Nate Mille committee) regarding update application.	er (counsel for	0.10 hrs	460 /hr	46.00
10 30 2024 DJE L110 A108	Fact Investigation/Developm conference with Nate Miller (committee) regarding status application.	counsel for	0.10 hrs	460 /hr	46.00
10 30 2024 DJE L110 A108	Fact Investigation/Developm conference with Stephanie P status of retention application	lancich regarding	0.20 hrs	460 /hr	92.00
			Total Professio	nal Services:	\$2,578.00
BILL SUMMARY					
Werle, Carr	rie S. A	ssociate	3.80 hrs	400.00 /hr	1,520.00
Eggert, Dev	on J. P	artner	2.30 hrs	460.00 /hr	1,058.00
Total Fees			6.10 hrs		2,578.00
TOTAL PRO	OFESSIONAL SERVICES		\$2,578.0	00	
	RRENT CHARGES	_	\$2,578.0	_	
BAI ANCE I	FORWARD FROM LAST BILL		\$0.0	00	
DALANGE I GIVVAND FROIVI LAGT BILL					

\$2,578.00

BALANCE DUE

NERA Economic Consulting 20002 11600 Page 3 Invoice:65319

Payment in full due upon receipt of statement. Please reference bill number on your remittance.

For your convenience we now accept credit cards.

Please go to www.bcblaw.net and click on Make Payment or contact our Accounting department.

Funds will be debited from client trust account no earlier than five business days from the post mark date of this invoice.

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BCBP ATTORNEYS

BECK, CHAET, BAMBERGER & POLSKY, S.C.

November 30, 2024

Bill: 65502 DJE

Client 20002 Matter 11600

Billed Through: 11/30/24

Two Plaza East, Suite 1085 330 East Kilbourn Avenue Milwaukee, WI 53202

> 414.273.4200 **FAX** 414.273.7786 http://www.bcblaw.net **FEIN** #39-1568467

NERA Economic Consulting 1166 Avenue of the Americas New York, NY 10036

NERA - Hopeman Matter # 2024-00490M

PROFESSIONAL SERVICES

11 04 2024 L110	DJE A104	Fact Investigation/Development: Review updated draft retention documents.	0.60 hrs	460 /hr	276.00
11 04 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Stephanie Plancich regarding updated draft retention documents.	0.20 hrs	460 /hr	92.00
11 04 2024 L110	DJE A108	Fact Investigation/Development: Telephone conference with Jeff Liesemer, Nate Miller and Stephanie Plancich regarding updated draft retention documents.	0.30 hrs	460 /hr	138.00
11 04 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Deirdre Nash regarding updated draft retention documents.	0.20 hrs	460 /hr	92.00
11 05 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Deirdre Nash regarding open questions for finalizing retention application.	0.30 hrs	460 /hr	138.00
11 06 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Deirdre Nash regarding retention application.	0.10 hrs	460 /hr	46.00
11 06 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence to Nate Miller regarding retention application.	0.10 hrs	460 /hr	46.00

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 22 of 31

NERA Econo 20002	omic Cons 11600	sulting		Page Invoice:	
11 08 2024 L110	DJE A104	Fact Investigation/Development: Review updated retention documents.	0.20 hrs	460 /hr	92.00
11 08 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Stephanie Plancich and Nate Miller regarding updated retention documents.	0.10 hrs	460 /hr	46.00
11 12 2024 L110	DJE A104	Fact Investigation/Development: Review filed retention application documents.	0.30 hrs	460 /hr	138.00
11 12 2024 L110	DJE A108	Fact Investigation/Development: E-mail correspondence with Stephanie Plancich regarding filed retention application documents.	0.10 hrs	460 /hr	46.00
			Total Professiona	Il Services:	\$1,150.00

BILL SUMMARY

Eggert, Devon J.	Partner	2.50 hrs	460.00 /hr	1,150.00
Total Fees		2.50 hrs		1,150.00
		44.45 0		
TOTAL PROFESSIONAL SERVICES		\$1,150.0	00	
TOTAL CURRENT CHARGES		\$1,150.0	00	
BALANCE FORWARD FROM LAST BI	LL	\$2,578.	00	
LESS RECEIPT SINCE LAST BILL N	ovember 19, 2024	(\$2,578.0	0)	
BALANCE DUE		\$1,150.	00	

Payment in full due upon receipt of statement. Please reference bill number on your remittance.

For your convenience we now accept credit cards. Please go to www.bcblaw.net and click on Make Payment or contact our Accounting department.

Funds will be debited from client trust account no earlier than five business days from the post mark date of this invoice.

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 23 of 31

BCBP

BECK, CHAET, BAMBERGER & POLSKY, S.C.

December 31, 2024

Bill: 65706 DJE

Client 20002 Matter 11600

Billed Through: 12/31/24

Two Plaza East, Suite 1085 330 East Kilbourn Avenue Milwaukee, WI 53202

> 414.273.4200 FAX 414.273.7786 http://www.bcblaw.net FEIN #39-1568467

NERA Economic Consulting 1166 Avenue of the Americas New York, NY 10036

NERA - Hopeman Matter # 2024-00490M

PROFESSIONAL SERVICES

12 10 2024 L110	CSW A103	Fact Investigation/Development: Draft fee application monthly template.	0.80 hrs	400 /hr	320.00
12 10 2024 L110	CSW A104	Fact Investigation/Development: Review monthly fee application from other professionals in connection with preparation of fee statement template.	0.30 hrs	400 /hr	120.00
12 10 2024 L110	DJE A104	Fact Investigation/Development: Review interim compensation procedures order for preparation of fee statements.	0.30 hrs	460 /hr	138.00
12 16 2024 L110	CSW A103	Fact Investigation/Development: Draft first fee Statement.	5.30 hrs	400 /hr	2,120.00
12 17 2024 L110	CSW A104	Fact Investigation/Development: Review compensation procedures order.	0.20 hrs	400 /hr	80.00
12 17 2024 L110	CSW A104	Fact Investigation/Development: Review and comment on first fee statement exhibits.	0.80 hrs	400 /hr	320.00
12 17 2024 L110	DJE A104	Fact Investigation/Development: Review and comment on draft of first fee statement.	1.30 hrs	460 /hr	598.00
12 17 2024 L110	DJE A103	Fact Investigation/Development: Finalize first fee statement.	1.50 hrs	400 /hr	600.00

Total Professional Services:

\$4,296.00

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 24 of 31

NERA Economic Consulting Page 2 20002 11600 Invoice:65706

BILL SUMMARY

Werle, Carrie S.	Associate	8.90 hrs	400.00 /hr	3,560.00
Eggert, Devon J.	Partner	1.60 hrs	460.00 /hr	736.00
Total Fees		10.50 hrs		4,296.00
TOTAL PROFESSIONAL SERVICES	3	\$4,296	.00	
TOTAL CURRENT CHARGES		\$4,296	.00	
BALANCE FORWARD FROM LAST	BILL	\$3,818	.00	
LESS RECEIPT SINCE LAST BILL	December 23, 2024	(\$3,818.	00)	
BALANCE DUE		\$4,296	.00	

Payment in full due upon receipt of statement. Please reference bill number on your remittance.

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Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 25 of 31

Professional	Billing Rate	Work Date	Work Hours		Work Amount	Narrative
Floressional	Dilling Kate	WOIK Date	WOIK HOUIS			Review case information for initial project management
Plancich, Stephanie (Managing Director)	USD 900.00	10/10/2024	0.70	æ	630.00	, , , ,
riancion, Stephanie (Managing Director)	03D 900.00	10/10/2024	0.70	Φ		Review case materials f (0.3); telephone conference with UCC
Planeigh Stanbania (Managing Director)	USD 900.00	10/11/2024	0.50	æ		counsel regarding same (0.2).
Plancich, Stephanie (Managing Director)	03D 900.00	10/11/2024	0.50	Φ		Review case materials (0.2); telephone conference with UCC
Dianaigh Stanbania (Managing Director)	USD 900.00	10/12/2024	0.30	φ.		counsel regarding the same (0.1).
Plancich, Stephanie (Managing Director)	03D 900.00	10/13/2024	0.30	Ф		Code exhibits with exhaustion and policy information (4.0);
Kumar, Rohan (Analyst)	USD 480.00	10/14/2024	5.00	æ		review interrogatories (1.0).
Ruman, Roman (Analyst)	03D 400.00	10/14/2024	5.00	Ψ		Review background materials for preparing project outline
						(1.7); telephone conference with NERA working group regarding
Plancich, Stephanie (Managing Director)	USD 900.00	10/14/2024	2.00	æ		project scope (0.3).
Plancich, Stephanie (Managing Director)	03D 900.00	10/14/2024	2.00	Ф		Analyze coverage files (5.0); prepare questions in connection
Goggins, Connor (Analyst)	USD 470.00	10/15/2024	5.70	æ		with same (0.7).
Goggins, Connor (Analyst)	030 470.00	10/15/2024	5.70	Ф		Draft questions for UCC counsel regarding project open
Kumar Bahan (Analyat)	USD 480.00	10/15/2024	2.00	æ	960.00	
Kumar, Rohan (Analyst)	USD 460.00	10/15/2024	2.00	Ф		Review materials provided by UCC for initial project issues
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/15/2024	1.50	φ.		
(Senior Consultant)	030 730.00	10/15/2024	1.50	Ф	1,095.00	(1.0).
						Teleuhana aanfananaa wiith LICC aasunaal na nandina maalaat atatus
						Telephone conference with UCC counsel regarding project status (0.5), reviews case materials in connection with same (2.0),
Diamaiah Otambania (Mananian Dimantan)	1100 000 00	40/45/0004	0.00	_		
Plancich, Stephanie (Managing Director)	USD 900.00	10/15/2024	2.90	Ф		telephone conference with NERA working group regarding same (0.4).
Consine Conner (Analyst)	LICD 470 00	40/46/2024	0.00	φ.		Review coverage chart and schedules (5.0); prepare analysis and
Goggins, Connor (Analyst)	USD 470.00 USD 480.00	10/16/2024 10/16/2024	8.00 3.00		3,760.00	table of findings (3.0). Review and comment on data questions.
Kumar, Rohan (Analyst)	USD 480.00	10/16/2024	3.00	Ф	1,440.00	Review and comment on data questions.
						Telephone conference with NEDA working grown regarding coveres
						Telephone conference with NERA working group regarding coverage
Malatach Janeau D (Canias Canaciltant)	LICD 720 00	40/46/2024	2.00	φ.		and assumptions from case materials (0.7); review background
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/16/2024	2.00	Þ	1,460.00	materials in connection with same (1.3).
						Telephone conference with NERA working group to coordinate on
Diamaiah Chambania (Mananian Dimantan)	1100 000 00	40/40/0004	4.70	_	4 500 00	project status (0.7); draft questions regarding coverage and model assumptions (1.0).
Plancich, Stephanie (Managing Director)	USD 900.00	10/16/2024	1.70	Ъ		Prepare policy information from case materials (4.0); draft
(A t)	1100 470 00	40/47/0004	0.00	_		
Goggins, Connor (Analyst)	USD 470.00	10/17/2024	8.00	\$	3,760.00	policy questions based upon review of materials (4.0).
L	1100 400 00	40/47/0004	4.00	_		Review coverage in place (CIP) agreements (3.0); review coded
Kumar, Rohan (Analyst)	USD 480.00	10/17/2024	4.00	\$		policy information (1.0).
	1100 000 00	40/47/005:		_		Review coverage chart (0.5); prepare additional questions for
Plancich, Stephanie (Managing Director)	USD 900.00	10/17/2024	1.00	\$	900.00	UCC counsel regarding same (0.5).
		1011010000				Analyze files received from UCC counsel (1.1); code CIP
Goggins, Connor (Analyst)	USD 470.00	10/18/2024	2.10	\$		information (1.0).
			_			Revise CIP tables (2.0); create comprehensive policy table
Kumar, Rohan (Analyst)	USD 480.00	10/18/2024	3.00		1,440.00	
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/18/2024	1.00	\$	730.00	Review case materials provided by UCC counsel (1.0).

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 26 of 31

Professional	Billing Rate	Work Date	Work Hours	Work Amount	Narrative
	1	•			
					Review and comment on coverage and allocations questions (2.0);
					e-mail correspondence to UCC counsel regarding same (0.2); review
Plancich, Stephanie (Managing Director)	USD 900.00	10/18/2024	3.70	\$ 3,330.00	case materials in connection with same (1.5).
Plancich, Stephanie (Managing Director)	USD 900.00	10/20/2024	1.70	\$ 1,530.00	Review CIPs and coverage information.
					Review CIPs and coverage documents (6.9); prepare
Goggins, Connor (Analyst)	USD 470.00	10/21/2024	7.80	\$ 3,666.00	questions regarding same (0.9).
					Review coverage documents (4.2); review CIPs (3.7); prepare
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/21/2024	8.30	\$ 4,316.00	questions for UCC counsel regarding the same (0.4).
					Performed data cleaning and coding for policy towers
Kumar, Rohan (Analyst)	USD 480.00	10/21/2024	5.50	\$ 2,640.00	(3.1);update summaries from exhibits and CIPs (2.4).
					Telephone conference with NERA working group regarding project
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/21/2024	1.30	\$ 949.00	
					Review coverage (1.5); review polices (1.5); draft additional
					questions for UCC counsel regarding coverage and policies (1.0);
					telephone conference with NERA working group regarding the same
Plancich, Stephanie (Managing Director)	USD 900.00	10/21/2024	5.00	\$ 4,500.00	(1.0).
Goggins, Connor (Analyst)	USD 470.00	10/22/2024	9.00	\$ 4,230.00	Prepare all sums allocation.
					Review allocation assumptions (3.5); telephone conference with
					NERA working group regarding same (0.5); write allocation code
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/22/2024	8.70	\$ 4,524.00	(4.7).
					Continue updating summary data from exhibits and CIPs (3.4),
Kumar, Rohan (Analyst)	USD 480.00	10/22/2024	6.00	\$	reconcile discrepancies in same (2.6).
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/22/2024	4.00	\$ 2,920.00	Review CIP agreements.
Plancich, Stephanie (Managing Director)	USD 900.00	10/22/2024	0.20	\$ 180.00	Review project status.
					Review coverage detail (5.0); draft questions for UCC counsel
					in connection with same (1.4); assess data requests in connection
Goggins, Connor (Analyst)	USD 470.00	10/23/2024	8.40	\$ 3,948.00	with same (2.0).
					Review allocations assumptions (3.0); telephone conference with
					NERA working group regarding same (0.7); create allocation code
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/23/2024	7.70	\$ 4,004.00	
					Reconcile differences in policy data (4.7); update defense
Kumar, Rohan (Analyst)	USD 480.00	10/23/2024	6.00	\$ 2,880.00	treatment coding for new CIPs (1.3).
					Review and comment on open issues for claims data (1.5);
Plancich, Stephanie (Managing Director)	USD 900.00	10/23/2024	2.20	\$ 1,980.00	telephone conference with UCC counsel regarding same (0.7).
					Develop data questions (2.0); construct template for inputs
Goggins, Connor (Analyst)	USD 470.00	10/24/2024	8.20	\$ 3,854.00	(3.2); continue building allocation (3.0).
					Prepare claims template for UCC counsel (2.0); continue working
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/24/2024	7.80	\$ 4,056.00	on allocation coding (5.8).
					Continue reconciling differences in policy data (3.8); draft
Kumar, Rohan (Analyst)	USD 480.00	10/24/2024	5.50	\$ 2,640.00	Python script for All Sums analysis (1.7).
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/24/2024	3.00	\$ 2,190.00	Review case documents and files.

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 27 of 31

Professional	Billing Rate	Work Date	Work Hours	W	ork Amount	Narrative
<u> </u>						Telephone conference with NERA working group regarding
						allocation coding (0.5); review allocation coding issues in
						connection with same (0.6); e-mail correspondence with UCC counsel
Plancich, Stephanie (Managing Director)	USD 900.00	10/24/2024	1.50	\$		regarding data requirements (0.4).
(Managing Biredor)	GGB 000.00	10/24/2024	1.00	Ψ	1,000.00	Continue building out all sums allocation (1.2); review
Goggins, Connor (Analyst)	USD 470.00	10/25/2024	1.50	\$		responses from UCC counsel regarding open questions (0.3).
Coggino, Comici (Amaryot)	00D 470.00	10/20/2024	1.00	Ψ		Review coverage documents (4.0); prepare allocation code
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/25/2024	7.50	\$	3,900.00	
Triomenorit, Barner (Cerner / trialyet)	000 020.00	10/20/2021	7.00	Ψ		Continue work on all sums script in Python (3.5); update
Kumar, Rohan (Analyst)	USD 480.00	10/25/2024	4.00	\$		questions for all sums assumptions (0.5).
(Vilalyst)	GGD 400.00	10/20/2024	4.00	Ψ		Review case documents and files for project status (1.2);
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/25/2024	1.50	\$		update project status outline in connection with same (0.3).
Plancich, Stephanie (Managing Director)	USD 900.00	10/25/2024	0.30			Review and comment on coverage assumptions.
Goggins, Connor (Analyst)	USD 470.00	10/26/2024	2.80			Finalized all sums input and output script.
Coggino, Comici (Amaryot)	00D 470.00	10/20/2024	2.00	Ψ		Review coverage documents (1.1); prepare allocation code
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/26/2024	2.20	\$	1,144.00	
Triomonati, Barner (Gerner Ariaryer)	GGD 020.00	10/20/2024	2.20	Ψ		Develop parts of allocation model (3.5); prepare coverage file
Goggins, Connor (Analyst)	USD 470.00	10/28/2024	5.00	\$		in connection with same (1.5).
Coggino, Comici (Finalyst)	00D 470.00	10/20/2024	0.00	Ψ		Review coverage documents (4.1); prepare allocation code
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/28/2024	8.10	\$		regarding the same (4.0).
Triomonati, Barner (Gerner Ariaryer)	GGD 020.00	10/20/2024	0.10	Ψ		Review preliminary all sums program script (3.0); prepare data
Kumar, Rohan (Analyst)	USD 480.00	10/28/2024	7.50	\$		questions for policy data for UCC counsel (4.5).
(Vilalyst)	GGD 400.00	10/20/2024	7.00	Ψ		Develop allocation of claims (3.5); complete coverage chart
Goggins, Connor (Analyst)	USD 470.00	10/29/2024	8.50	\$		(2.5); analyze claims file (2.5).
Coggino, Comici (Finalyst)	00D 470.00	10/20/2024	0.00	Ψ		Review claims data (2.4); prepare questions about claims data
						for UCC counsel (2.0); review coverage documents (1.0); continue
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/29/2024	7.40	\$		preparing allocation code (2.0).
Triomonati, Barner (Gerner Ariaryer)	GGD 020.00	10/20/2024	7.40	Ψ		Begin working on Python program to run all sums allocation
						(4.0); finalize data questions for analysis and policy data for UCC
Kumar, Rohan (Analyst)	USD 480.00	10/29/2024	7.00	\$		counsel (3.0).
rtamar, rtemarr (/ maryet)	002 100.00	10/20/2021	7.00	Ψ		Review data compiled by NERA working group (1.5); telephone
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/29/2024	2.50	\$		conference with UCC counsel regarding project status (1.0).
Monteon, Garcon B. (Corner Concatant)	002 100.00	10/20/2021	2.00	Ψ	1,020.00	gornorono mar o o o ocurico regularig prejectotatas (110).
						Telephone conference with NERA working group to discuss
						modeling and create work plan (2.5); review preliminary claims data
Plancich, Stephanie (Managing Director)	USD 900.00	10/29/2024	4.50	\$		(1.0); telephone conference with UCC counsel regarding same (1.0).
Transient, etophanie (Managing Birester)	002 000.00	10/20/2021	1.00	Ψ	1,000.00	Analysis of insurance coverage (3.5); finalize coverage chart
						(2.5); draft additional questions for UCC counsel regarding chart
Goggins, Connor (Analyst)	USD 470.00	10/30/2024	9.30	\$		(1.5) build alternative allocation (1.8).
	2 2 0.30	. 0, 00, 202 1	3.00	—		Review coverage documents (4.1); prepare allocation code
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/30/2024	8.40	\$		regarding the same (4.3).
	332 323.30	10,00,2024	5.40	Ψ	1,000.00	Construct liability template (2.0); work on all sums Python
Kumar, Rohan (Analyst)	USD 480.00	10/30/2024	8.00	\$		program (4.0); reconcile policy data (2.0).
tuman, itoman (Amarysi)	400.00	10/30/2024	0.00	Ψ	3,040.00	program (+.0), reconcile policy data (2.0).

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 28 of 31

Professional	Billing Rate	Work Date	Work Hours		Work Amount	Narrative
						Review and comment on allocation of claims (2.0); review and
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/30/2024	4.00	\$		comment on coverage chart (2.0).
	10000				_,,,,	Review coverage documents and programs (2.8); review pending
Plancich, Stephanie (Managing Director)	USD 900.00	10/30/2024	3.50	\$		claim data (0.7).
, , , , , , , , , , , , , , , , , , , ,						\(\frac{1}{2}\)
						Review and comment on questions for UCC counsel (1.1); review
						and revise chart assumptions (1.9); prepare second coverage chart
Goggins, Connor (Analyst)	USD 470.00	10/31/2024	8.80	\$		(3.8); revise all sums allocation (2.0).
	1		0.00		.,	Review coverage documents (3.6); prepare questions for UCC
						counsel about coverage (0.5), telephone conference with UCC
						counsel
Klemonski, Daniel (Senior Analyst)	USD 520.00	10/31/2024	8.60	\$		regarding the same (0.6); prepare allocation code (3.9).
Therrending Barrier (Berner / maryer)	002 020:00	10/01/2021	0.00	Ψ.		Reconcile difference in policy data (3.5); work on Python
Kumar, Rohan (Analyst)	USD 480.00	10/31/2024	8.00	\$		program (3.0); begin preliminary liability data review (1.5).
(,				Ť		Update analysis of insurance coverage (2.0); review status of
McIntosh, Janeen D (Senior Consultant)	USD 730.00	10/31/2024	3.00	\$		alternative allocation development (1.0)
(Cornor Cornouncint)	000 100.00	10/01/2024	0.00	Ψ	2,100.00	anomativo anocation acrosopment (1.0)
						Telephone conference with NERA working group to discuss project
						status (0.2); review and comment on draft of coverage issues (2.2),
						telephone conference with UCC counsel regarding same (0.6); review
Plancich, Stephanie (Managing Director)	USD 900.00	10/31/2024	4.20	Φ.		forecast file (0.7), draft outline of forecast issues (0.5).
riancion, diephanie (Managing Director)	000 900.00	10/31/2024	4.20	Ψ		Revise allocation model (9.1); answer UCC counsel questions on
						allocation model (0.5); telephone conference with NERA working
Goggins, Connor (Analyst)	USD 470.00	11/1/2024	10.10	Ф		group regarding the same (0.5).
Coggins, Connor (Analyst)	000 470.00	11/1/2024	10.10	Ψ		Review coverage documents (4.5); prepare allocation output
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/1/2024	8.10	Ф		tables in connection with same (3.6).
Riemonski, Danier (Semoi Analyst)	03D 320.00	11/1/2024	0.10	Ψ		Update liability data summaries (2.5); draft questions for
						liability data for UCC counsel (1.5); update summary data for input
						claims (1.0); reconcile input claims data (1.0); additional revisions to all
Kumar, Rohan (Analyst)	USD 480.00	11/1/2024	8.00	æ		sums program (2.0).
(Analyst)	03D 400.00	11/1/2024	0.00	Ψ	3,040.00	Review insurance code analysis (4.5); telephone conference with
McIntosh, Janeen D (Senior Consultant)	USD 730.00	11/1/2024	5.00	Ф		UCC counsel regarding the same (0.5).
(Seriol Consultant)	030 730.00	11/1/2024	5.00	φ	3,030.00	Develop allocation model (3.5); review preliminary inputs from
						Austin team (1.0); review case materials in connection with the
						same (1.5); telephone conference with UCC counsel regarding the same
Dianaiah Stanbania (Managina Dinastan)	1100 000 00	44/4/0004	6.50	φ.		, , ,
Plancich, Stephanie (Managing Director)	USD 900.00	11/1/2024	6.50	Ф	5,850.00	Review and revise allocation output (2.5); create preliminary
Cogging Conner (Analyst)	LISD 470 00	11/2/2024	4.00	Φ.		
Goggins, Connor (Analyst)	USD 470.00	1 1/2/2024	4.00	Ф		summary tables (1.5). Review preliminary analysis results (1.4); prepare draft
Diancish Stanbania (Managing Diag-to-)	1160 000 00	44/0/0004	0.00	٠		exhibits (0.9).
Plancich, Stephanie (Managing Director)	USD 900.00	11/2/2024	2.30	Ф	2,070.00	Draft output tables (2.3); run allocation test (1.0); reconcile
Coggina Conner (Areliet)	LICD 470 00	44/0/0004	F 00	٠		, , , , , , , , , , , , , , , , , , , ,
Goggins, Connor (Analyst)	USD 470.00	11/3/2024	5.30 1.90			data in connection with same (2.0).
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/3/2024	1.90	Ъ	988.00	Prepare allocation output tables.

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 29 of 31

Professional	Billing Rate	Work Date	Work Hours	١٨	ork Amount	Narrative
Tolessional	Dining Rate	WOIR Date	WOIR HOUIS	<u></u>		Prepare draft report (2.5); e-mail correspondence with counsel
						for UCC regarding project status and questions (1.0); review
Plancich, Stephanie (Managing Director)	USD 900.00	11/3/2024	5.50	\$		additional data in connection with same (2.0).
Triancien, Stephanie (Managing Director)	000 900.00	11/3/2024	5.50	Ψ		Run allocation test with new data (6.8); prepare exhibits
Goggins, Connor (Analyst)	USD 470.00	11/4/2024	12.80	\$		(4.0); revise draft report (2.0).
Coggino, Comici (Analyst)	00D 470.00	11/4/2024	12.00	Ψ		Prepare report exhibits (7.0); revised and comment on draft
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/4/2024	9.40	\$		report (2.4).
Tuerrenam, Barner (Berner / maryer)	000 020.00	11/1/2021	0.10	Ψ		Work on reconciliation allocation (5.5); additional revisions
Kumar, Rohan (Analyst)	USD 480.00	11/4/2024	7.50	\$		to draft report (2.0).
				1	2,000.00	Review data files and analyses for draft report (5.2); revise
McIntosh, Janeen D (Senior Consultant)	USD 730.00	11/4/2024	8.00	\$		draft report in connection with same (2.8).
				1	2,01010	Additional revisions to draft report (10.5); email
Plancich, Stephanie (Managing Director)	USD 900.00	11/4/2024	10.70	\$		correspondence with UCC counsel regarding the same (0.2).
, , , , , , , , , , , , , , , , , , , ,				,	•	Analyze new data (7.3); create report in connection with the
Goggins, Connor (Analyst)	USD 470.00	11/5/2024	11.50	\$	5,405.00	same (4.2).
, , , , , , , , , , , , , , , , , , ,					·	Run all sums allocation program with updated inputs (4.6);
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/5/2024	10.60	\$		update report exhibits (3.5); revise draft report (2.5).
, , , , , , , , , , , , , , , , , , , ,						Review data files and analysis (3.0); finalize draft report in
McIntosh, Janeen D (Senior Consultant)	USD 730.00	11/5/2024	4.00	\$	2,920.00	connection with same (1.0).
·						Telephone conference with NERA working group on finalized
						report (0.5); update draft report (6.5); email correspondence to
Plancich, Stephanie (Managing Director)	USD 900.00	11/5/2024	7.20			UCC counsel regarding the same (0.2).
Goggins, Connor (Analyst)	USD 470.00	11/6/2024	1.30	\$		Update exhibits based on new data (1.3).
						Review project status (0.7); update project outline in
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/6/2024	1.40	\$	728.00	connection with same (0.7).
						Additional allocation work with liability data (3.0); reconcile
Kumar, Rohan (Analyst)	USD 480.00	11/6/2024	7.00			differences in allocation data (4.0).
McIntosh, Janeen D (Senior Consultant)	USD 730.00	11/6/2024	1.50	\$		Review and comment on additional data analysis.
						Analyze data provided from Y Austin (2.0); review Mishkin
Plancich, Stephanie (Managing Director)	USD 900.00	11/6/2024	3.00	\$		report (1.0).
						Run calculations on alternative assumptions (0.6); prepare
Goggins, Connor (Analyst)	USD 470.00	11/7/2024	1.00			files for production (0.4).
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/7/2024	2.10	\$		Review files for production.
						Complete reconciling allocation differences (2.0); review new
Kumar, Rohan (Analyst)	USD 480.00	11/7/2024	6.00	\$		exhibits for allocation iterations (4.0).
						Analyze data (2.1); prepare production files regarding the same
Plancich, Stephanie (Managing Director)	USD 900.00	11/7/2024	3.20		2,880.00	
Goggins, Connor (Analyst)	USD 470.00	11/8/2024	0.50	\$	235.00	Update report materials.
						The Company of the Co
						Telephone conference with NERA working group regarding updated
Managaria Danial (Canian Analy 1)	1100 500 60	44/0/0004	0.40	 		allocation assumptions (1.0); review and compile documents for
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/8/2024	3.10	\$		production (2.1).
Kuman Dahan (Anakast)	1100 400 00	44/0/0004	0.00	_		Reconciled allocation iterations (4.0); update exhibits in
Kumar, Rohan (Analyst)	USD 480.00	11/8/2024	6.00	\$	2,880.00	connection with the same (2.0).

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 30 of 31

Professional	Billing Rate	Work Date	Work Hours		Work Amount	Narrative
						Telephone conference with UCC working group regarding project
						status (1.0); review model in connection with same (1.0); finalize
Plancich, Stephanie (Managing Director)	USD 900.00	11/8/2024	2.80	\$	2,520.00	production (0.8).
, , , , , , , , , , , , , , , , , , , ,					•	Telephone conference with UCC working group regarding
Plancich, Stephanie (Managing Director)	USD 900.00	11/9/2024	1.00	\$	900.00	allocation analysis.
Goggins, Connor (Analyst)	USD 470.00	11/10/2024	0.40	\$	188.00	Prepare new inputs (0.2); run allocation (0.2).
						Run scenarios using new inputs (3.0); reconcile differences in
Goggins, Connor (Analyst)	USD 470.00	11/11/2024	4.50	\$	2,115.00	connection with same (1.5).
						Review and comment on updated analysis (2.7); e-mail
Plancich, Stephanie (Managing Director)	USD 900.00	11/11/2024	3.00	\$	2,700.00	correspondence with UCC counsel regarding the same (0.3).
						Reconcile differences in analysis (2.3); review and update
Goggins, Connor (Analyst)	USD 470.00	11/12/2024	3.80	\$	1,786.00	exhibits (1.5).
						Review allocation input files (3.1); perform sensitivity tests
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/12/2024	6.10	\$	3,172.00	for all sums allocation (3.0).
						Run new alternate allocation (4.0); review and analysis of
Kumar, Rohan (Analyst)	USD 480.00	11/12/2024				issues in allocation program (2.0).
Plancich, Stephanie (Managing Director)	USD 900.00	11/12/2024				Run additional test scenarios (3.5).
Goggins, Connor (Analyst)	USD 470.00	11/13/2024	1.60	\$	752.00	Perform test scenarios with aggregating outputs.
						Perform sensitivity tests for all sums allocation (3.0); review
						Mishkin report in connection with same (1.4); prepare summaries in
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/13/2024	6.40	\$	3,328.00	connection with same (2.0).
		4.440.000.4	5.00		0.400.00	Reconcile supplemental exhibits (3.0); revise exhibits with
Kumar, Rohan (Analyst)	USD 480.00	11/13/2024	5.00	\$	2,400.00	updated policy information (2.0).
		4.4.4.0.400.0.4	0.00		4 000 00	Review Mishkin report (1.3); run checks on models in connection
Plancich, Stephanie (Managing Director)	USD 900.00	11/13/2024	2.00	\$	1,800.00	with same (0.7).
	1100 470 00	44/44/0004	0.00	_	4 554 00	Telephone conference with UCC counsel for deposition
Goggins, Connor (Analyst)	USD 470.00	11/14/2024	3.30	\$	1,551.00	preparation (2.3); review files for production (1.0).
						Analysis of reports and issues in connection with deposition
Klamanaki Danial (Canian Analyat)	USD 520.00	44/44/2024	F 60	Φ.	2 042 00	preparation (2.0), review and revise supplemental report draft
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/14/2024	5.60	Ф	2,912.00	ાડ.છ). Review and comment on allocation programs and assumptions
Kumar, Rohan (Analyst)	USD 480.00	11/14/2024	6.00	Ф	2 880 00	(3.0); prepare supplemental report (3.0).
Kullar, Kullari (Allaryst)	03D 460.00	11/14/2024	0.00	φ	2,000.00	Telephone conference with UCC counsel to prepare for deposition
						(2.5); review supplemental report in connection with the same
McIntosh, Janeen D (Senior Consultant)	USD 730.00	11/14/2024	3.50	Ф	2,555.00	
Welliosti, Janeer D (Seriloi Consultant)	03D 730.00	11/14/2024	3.30	Ψ	2,333.00	Prepare for deposition (2.9); telephone conference with UCC
						counsel in connection with same (0.3); draft supplemental report
Plancich, Stephanie (Managing Director)	USD 900.00	11/14/2024	5.20	\$	4,680.00	
Goggins, Connor (Analyst)	USD 470.00	11/15/2024				Finalize supplemental report.
(maryor)	0.55 170.50	11/10/2024	3.00	Ψ.	123.00	Revise supplemental report (1.6); review Y. Austin report
Klemonski, Daniel (Senior Analyst)	USD 520.00	11/15/2024	4.60	\$	2.392.00	(2.0); prepare summaries in connection with the same (1.0).
Kumar, Rohan (Analyst)	USD 480.00	11/15/2024				Additional review of supplement report and exhibits (4.0).

Case 24-32428-KLP Doc 1032 Filed 07/16/25 Entered 07/16/25 22:53:49 Desc Main Document Page 31 of 31

Professional	Billing Rate	Work Date	Work Hours	Work Amount	<u>Narrative</u>
					Finalize supplemental report (2.0); review Y. Austin report
McIntosh, Janeen D (Senior Consultant)	USD 730.00	11/15/2024	3.00	\$ 2,190.00	(1.0).
					Telephone conference with UCC counsel for deposition
					preparation (1.0); review case materials for deposition preparation
Plancich, Stephanie (Managing Director)	USD 900.00	11/15/2024	4.00	\$ 3,600.00	(2.0); finalize supplemental report and exhibits (1.0).
Plancich, Stephanie (Managing Director)	USD 900.00	11/17/2024	1.00	\$ 900.00	Review case materials for deposition preparation.
Kumar, Rohan (Analyst)	USD 480.00	11/18/2024	5.50	\$ 2,640.00	Review statistics to prepare for deposition.
					Review case materials to prepare for deposition (3.5); attend
Plancich, Stephanie (Managing Director)	USD 900.00	11/18/2024	4.50	\$ 4,050.00	deposition (1.0).

Totals 573.7 \$ 333,941.00