

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE SOUTHERN DISTRICT OF TEXAS
 HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
WESCO AIRCRAFT HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 23-90611 (MI)
)	
Debtors.)	(Jointly Administered)
)	
)	

**FIFTEENTH MONTHLY FEE STATEMENT OF HAYNES AND BOONE, LLP,
 AS CO-COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION, FOR
 ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
 FOR THE PERIOD FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Name of Applicant:	Haynes and Boone, LLP, as co-counsel for the Debtors and Debtors in Possession
Date of Retention Order:	August 22, 2023, effective as of June 1, 2023 (the " <u>Petition Date</u> ") [Docket No. 672]
Period for which Fees and Expenses are Incurred:	September 1, 2024 through and including September 30, 2024
Interim Fees Incurred:	\$183,672.50
Interim Payment of Fees Requested (80%):	\$146,938.00
Interim Expenses Incurred:	\$226.41
Total Fees (80%) and Expenses (100%) Due:	\$147,164.41

¹ The Debtors operate under the trade name Incora and have previously used the trade names Wesco, Pattonair, Haas, and Adams Aviation. A complete list of the Debtors in these chapter 11 cases, with each one's federal tax identification number and the address of its principal office, is available on the website of the Debtors' noticing agent at <http://www.kcellc.net/incora/>. The service address for each of the Debtors in these cases is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.



1. Pursuant to sections 327, 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 Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 421 (the “Interim Compensation Order”), Haynes and Boone, LLP (“Haynes Boone”), as co-counsel for Wesco Aircraft Holdings, Inc. and its affiliated debtors (collectively the “Debtors”), files this Fifteenth Monthly Fee Statement (the “Fee Statement”) for the period from September 1, 2024 through September 30, 2024² (the “Application Period”).

2. Haynes Boone requests compensation for reasonable and necessary legal services rendered in the amount of \$183,672.50 (the “Fees”) and reimbursement of out-of-pocket expenses in the amount of \$226.41 (the “Expenses”) for the Application Period. Pursuant to the Interim Compensation Procedures Order, Haynes Boone requests payment of eighty percent (80%) of its Fees (\$146,938.00) and one hundred percent (100%) of its Expenses (\$226.41) incurred during the Application Period for a total requested amount of \$147,164.41.

3. A summary of the time expended by Haynes Boone’s professionals by matter name/number, hours and Fees requested is attached hereto as Exhibit 1. A summary of Haynes Boone’s out-of-pocket Expenses for the Application Period is attached hereto as Exhibit 2. A summary of time expended by Haynes Boone’s attorneys and professional support staff for the

² The Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* states, [e]ach Monthly Fee Statement shall be filed with the Court and served by first-class mail or electronic mail to each of the Notice Parties within 31 days following the end of the month or months for which a Retained Professional seeks compensation or as soon as reasonably practicable thereafter (and, with respect to June 2023, by August 15, 2023 or as soon as reasonably practicable thereafter).” Docket No. 606, ¶ 1(a).

Application Period is attached hereto as **Exhibit 3**. Haynes Boone's detailed invoices for the Application Period are attached hereto as **Exhibit 4**.

4. Pursuant to the Interim Compensation Procedures Order, notice of this Fee Statement will be served by first-class mail or electronic transmission upon the Debtors, counsel to the Debtors, counsel to the First Lien Noteholder Group, counsel to the Official Committee of Unsecured Creditors, and the Office of the U.S. Trustee (collectively, the "Application Recipients").

5. Parties in interest shall have fourteen (14) calendar days after delivery of the Fee Statement to the Application Recipients to object to the requested fees and expenses. Upon expiration of such fourteen (14) day period, the Debtors are authorized and directed to pay Haynes Boone an amount equal to 80% of the Fees and 100% of the Expenses requested herein. Haynes Boone submits that in light of the relief requested, no other or further notice need be provided.

WHEREFORE, Haynes Boone respectfully requests payment of eighty percent (80%) of its Fees in the amount of \$146,938.00 and reimbursement of 100% of its Expenses in the amount of \$226.41 for a total requested amount of \$147,164.41 for the Application Period.

Dated: October 17, 2024

Respectfully submitted,

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr. (TX Bar No. 02016600)

Patrick L. Hughes (TX Bar No. 10227300)

Martha Wyrick (TX Bar No. 24101606)

Re'Necia Sherald (TX Bar No. 24121543)

HAYNES AND BOONE, LLP

1221 McKinney Street, Suite 4000

Houston, TX 77010

Telephone: 1 (713) 547-2000

Email: Charles.Beckham@HaynesBoone.com

Patrick.Hughes@HaynesBoone.com

Martha.Wyrick@HaynesBoone.com

ReNecia.Sherald@HaynesBoone.com

Co-Counsel to the

Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to the Application Recipients (as defined herein) on October 17, 2024, as required by the Interim Compensation Procedures Order.

/s/ Charles A. Beckham, Jr.
Charles A. Beckham, Jr.

EXHIBIT 1**SUMMARY OF TIME EXPENDED BY MATTER**

<u>Matter No.</u>	<u>Matter Name</u>	<u>Total Hours</u>	<u>Total Fees Requested</u>
8	Business Operations – MORs	6.4	\$5,950.00
9	Case Administration – UST Conferences, Status Conferences	12.5	\$10,540.00
10	Claims Administration and Objections	6.6	\$6,605.00
12	Fee-Employment Applications	35.7	\$27,090.00
15	Litigation – Non-Avoidance Actions	6.6	\$5,935.00
17	Plan and Disclosure Statement	143.8	\$125,417.50
34	Creditor Communications	2.7	\$2,135.00
	TOTALS:	214.3	\$183,672.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

<u>Expense Category</u>	<u>Amount</u>
Transcripts and Tapes of Hearings	\$209.90
Travel Expense	\$16.51
TOTAL:	\$ 226.41

EXHIBIT 3**SUMMARY OF TIME EXPENDED BY
ATTORNEYS AND PROFESSIONAL SUPPORT STAFF**

<u>Professional</u>	<u>Title</u>	<u>Hourly Rate</u>	<u>Total Hours</u>	<u>Total Fees</u>
Charles A. Beckham, Jr.	Partner	\$1,700	10.2	\$17,340.00
Patrick L. Hughes	Partner	\$1,200	47.0	\$56,400.00
Kourtney Lyda	Counsel	\$1,150	1.3	\$1,495.00
Jordan Chavez	Associate	\$900.00	1.3	\$1,170.00
Imaan Patel	Associate	\$675.00	5.1	\$3,442.50
ReNecia Sherald	Associate	\$750	107.6	\$80,700.00
Kimberly Morzak	Paralegal	\$575	8.2	\$4,715.00
Kenneth Rusinko	Paralegal	\$575	24.5	\$14,087.50
Jodi Valencia	Paralegal	\$475	9.1	\$4,322.50
TOTALS:			214.3	\$183,672.50

HAYNES BOONE

Invoice Number: 21669921
Invoice Date: October 17, 2024
Matter Name: Business Operations – MORS
Client/Matter Number: 0064273.00008
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

Pursuant to the Interim Compensation Procedures [Docket No. 606], this invoice is not payable until five business days after the expiration of the fourteen (14) day objection deadline after filing of the respective monthly fee statement, provided no objections are raised during the objection period.

REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$5,950.00
80% of Fees Payable Under Interim Compensation Procedures	\$4,760.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$1,190.00
Total Expenses	\$0.00
Total Fees, Expenses and Charges	\$5,950.00
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$4,760.00

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001
For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]
SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S
Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number 21669921 • Client Number 0064273.00008 • Attorney Charles A. Beckham

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669921
 Matter Name: Business Operations – MORS
 Client/Matter Number: 0064273.00008
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 2 of 3

For Professional Services Through September 30, 2024

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/10/24	Patrick L. Hughes	Review the Global Notes for the July MORs to address the further proceedings on amending and approving the disclosure statement and proceeding to confirmation (.4).	0.40
09/10/24	ReNecia Sherald	Review and revise Global Notes to July 2024 MORs (.6); correspond with HB and A&M Teams about same (.4).	1.00
09/12/24	Charles A. Beckham	Receive and review draft of July 2024 Monthly Operating Report (.4); confer with HB Team about same (.1).	0.50
09/12/24	ReNecia Sherald	Review July 2024 MORs (.8); correspond with HB and A&M Teams on same (.4).	1.20
09/13/24	Charles A. Beckham	Receive and review July 2024 Monthly Operating Reports (.3); confer with HB Team about same (.1).	0.40
09/13/24	Patrick L. Hughes	Conduct follow-up review of the updated eight July MOR draft reports and forward summary to the internal team (.8).	0.80
09/13/24	Kenneth J. Rusinko	Assist with matters relating to the filing of July 2024 Monthly Operating Reports for eight Wesco entities (1.4).	1.40
09/13/24	ReNecia Sherald	Correspond with A&M and HB Teams several times on filing mechanics for July 2024 MORs (.7).	0.70

Chargeable Hours 6.40

Total Fees \$5,950.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles A. Beckham	Partner	0.90	\$1,700.00	\$1,530.00
Patrick L. Hughes	Partner	1.20	\$1,200.00	\$1,440.00
ReNecia Sherald	Associate	2.90	\$750.00	\$2,175.00
Kenneth J. Rusinko	Paralegal	1.40	\$575.00	<u>\$805.00</u>

Total Professional Summary \$5,950.00

Total Fees, Expenses and Charges \$5,950.00

Invoice Number: 21669921
Matter Name: Business Operations – MORS
Client/Matter Number: 0064273.00008
Billing Attorney: Charles A. Beckham

October 17, 2024
Page 3 of 3

Total Amount Due

USD \$5,950.00

HAYNES BOONE

Invoice Number: 21669922
Invoice Date: October 17, 2024
Matter Name: Case Administration – UST Conferences, Status Conferences
Client/Matter Number: 0064273.00009
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

Pursuant to the Interim Compensation Procedures [Docket No. 606], this invoice is not payable until five business days after the expiration of the fourteen (14) day objection deadline after filing of the respective monthly fee statement, provided no objections are raised during the objection period.

REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$10,540.00
80% of Fees Payable Under Interim Compensation Procedures	\$8,432.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$2,108.00
Total Expenses	\$0.00
Total Fees, Expenses and Charges	\$10,540.00
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$8,432.00

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No. [REDACTED] Operating Account No. [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001

For Credit to the Account of HAYNES AND BOONE, LLP

ABA No. [REDACTED] Operating Account No. [REDACTED]

SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S

Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number 21669922 • Client Number 0064273.00009 • Attorney Charles A. Beckham

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669922
 Matter Name: Case Administration – UST Conferences, Status Conferences
 Client/Matter Number: 0064273.00009
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 2 of 3

For Professional Services Through September 30, 2024

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/03/24	Charles A. Beckham	Review and work on comments to Debtors' Objection to Adequate Protection Motion (.4); confer with HB Team about same (.1).	0.50
09/03/24	Patrick L. Hughes	Review the draft Objection to Adequate Protection Motion to be filed absent further intra party negotiations on the plan and relief in the motion, with approvals for filing when needed. (.7); attention to multiple follow-up calls to address (i) the court setting on the adequate protection motion and (ii) further extension of the response deadline (.5).	1.20
09/03/24	Kenneth J. Rusinko	Review Order entered regarding 2024/2026 Noteholders' Motion for Adequate Protection and confer with team regarding same (.2).	0.20
09/03/24	ReNecia Sherald	Receive and review Objection to Adequate Protection Motion (2.6); correspond with HB and Milbank Teams several times on same (.6); review docket entries from Court on same and discuss with HB and Milbank Teams (.5).	3.70
09/04/24	ReNecia Sherald	Review correspondence regarding further extension to Adequate Protection Motion (.5).	0.50
09/05/24	Kenneth J. Rusinko	Review Second Order Extending Section 345(b) Deadline (.2).	0.20
09/06/24	Patrick L. Hughes	Review stipulation and communications with Milbank and internal team to respond to the adequate protection motion (.3); review and approve response for filing (.4).	0.70
09/06/24	ReNecia Sherald	Review and revise Debtors' Objection to Adequate Protection Motion (1.3); receive and review correspondence regarding additional extension (.2); correspond with Milbank and HB Teams several times on filing mechanics to same (1.7); correspond with Verita Team regarding service to same (.1); deliver file-stamped copy to counsel pursuant to Certificate of Service (.1).	3.40
09/09/24	Patrick L. Hughes	Review the 1L Group Response to Oppose Minority 2024/2026 Group's Request for Adequate Protection and Fees (.5).	0.50
09/23/24	Jodi Valencia	Create pleadings notebook for hearing on 9/23/24 and submit electronic appearances (.4).	0.40
09/27/24	Kenneth J. Rusinko	Review notice regarding upcoming status conference and confer with team regarding same (.2).	0.20

Invoice Number: 21669922
 Matter Name: Case Administration – UST Conferences, Status Conferences
 Client/Matter Number: 0064273.00009
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 3 of 3

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/30/24	Kenneth J. Rusinko	Confer with C. Thomas regarding transcript of hearings held on 9-27-24, prepare order form for 8 AM and 1 PM sessions, file with Court and coordinate preparation with transcriber (.6); review Mediation Order entered and confer with R. Sherald on matters relating to same (.4).	1.00

Chargeable Hours 12.50

Total Fees \$10,540.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles A. Beckham	Partner	0.50	\$1,700.00	\$850.00
Patrick L. Hughes	Partner	2.40	\$1,200.00	\$2,880.00
ReNecia Sherald	Associate	7.60	\$750.00	\$5,700.00
Jodi Valencia	Paralegal	0.40	\$475.00	\$190.00
Kenneth J. Rusinko	Paralegal	1.60	\$575.00	<u>\$920.00</u>

Total Professional Summary \$10,540.00

Total Fees, Expenses and Charges \$10,540.00

Total Amount Due USD \$10,540.00

HAYNES BOONE

Invoice Number: 21669923
Invoice Date: October 17, 2024
Matter Name: Claims Administration and Objections
Client/Matter Number: 0064273.00010
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

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REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$6,605.00
80% of Fees Payable Under Interim Compensation Procedures	\$5,284.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$1,321.00
Total Expenses	\$0.00
Total Fees, Expenses and Charges	\$6,605.00
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$5,284.00

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001
For Credit to the Account of HAYNES AND BOONE, LLP
ABA No. [REDACTED] Operating Account No.: [REDACTED]
SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S
Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number **21669923** • Client Number **0064273.00010** • Attorney **Charles A. Beckham**

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669923
 Matter Name: Claims Administration and Objections
 Client/Matter Number: 0064273.00010
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 2 of 3

For Professional Services Through September 30, 2024

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/13/24	Charles A. Beckham	Receive and review correspondence from various creditors about Priority Claims (.3); work on responding to same (.1).	0.40
09/20/24	Charles A. Beckham	Receive and review correspondence from various creditors about Priority Claims (.2); work on responding to same (.1).	0.30
09/22/24	Charles A. Beckham	Receive and review Fourth Omnibus Objection to Claims (.3); confer with HB Team about same (.1).	0.40
09/27/24	Patrick L. Hughes	Review and final approval on the Debtors' Fourth Omnibus Objection to Claims (Amended Claims, Superseded Claims, Partially Satisfied Claims, Reclassified Claims, and Reclassified and Partially Satisfied Claims) for filing (.5); review and approve Debtors' Thirteenth Omnibus Notice of Satisfaction of Claims (.3).	0.80
09/27/24	ReNecia Sherald	Review and revise (i) Fourth Omnibus Claims Objection (1.0) and (ii) Thirteenth Omnibus Notice of Satisfaction of Claims (.9); correspond with Milbank and HB Teams on same (.7).	2.60
09/27/24	Jodi Valencia	Assist with matters related to filing the Fourth Omnibus Claims Objection and the Thirteenth Omnibus Notice of Satisfaction of Claims, and advise team of related deadlines (.5).	0.50
09/30/24	Charles A. Beckham	Confer with HB Team about Amended Thirteenth Omnibus Claim Notice (.2); receive and review correspondence from HB Team about same (.2).	0.40
09/30/24	Patrick L. Hughes	Review the need to amend the Amended Thirteenth Notice of Satisfaction of Claims (.2).	0.20
09/30/24	ReNecia Sherald	Review and revise Amended Thirteenth Notice of Satisfaction of Claims (.5); correspond with Milbank and Verita Teams on same (.2).	0.70
09/30/24	Jodi Valencia	Assist with filing the Amended Thirteenth Omnibus Notice of Satisfaction of Claims (.3).	0.30

Chargeable Hours 6.60

Total Fees

\$6,605.00

Invoice Number: 21669923
 Matter Name: Claims Administration and Objections
 Client/Matter Number: 0064273.00010
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 3 of 3

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles A. Beckham	Partner	1.50	\$1,700.00	\$2,550.00
Patrick L. Hughes	Partner	1.00	\$1,200.00	\$1,200.00
ReNecia Sherald	Associate	3.30	\$750.00	\$2,475.00
Jodi Valencia	Paralegal	0.80	\$475.00	<u>\$380.00</u>
Total Professional Summary				\$6,605.00

Total Fees, Expenses and Charges **\$6,605.00**

Total Amount Due **USD \$6,605.00**

HAYNES BOONE

Invoice Number: 21669924
Invoice Date: October 17, 2024
Matter Name: Fee-Employment Applications
Client/Matter Number: 0064273.00012
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

Pursuant to the Interim Compensation Procedures [Docket No. 606], this invoice is not payable until five business days after the expiration of the fourteen (14) day objection deadline after filing of the respective monthly fee statement, provided no objections are raised during the objection period.

REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$27,090.00
80% of Fees Payable Under Interim Compensation Procedures	\$21,672.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$5,418.00
Total Expenses	\$0.00
Total Fees, Expenses and Charges	\$27,090.00
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$21,672.00

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No. [REDACTED] Operating Account No. [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001
For Credit to the Account of HAYNES AND BOONE, LLP
ABA No. [REDACTED] Operating Account No. [REDACTED]
SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S
Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number 21669924 • Client Number 0064273.00012 • Attorney Charles A. Beckham

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669924
Matter Name: Fee-Employment Applications
Client/Matter Number: 0064273.00012
Billing Attorney: Charles A. Beckham

October 17, 2024
Page 2 of 4

For Professional Services Through September 30, 2024

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/04/24	Kimberly Morzak	Review exhibits to HB's Fourteenth Monthly Fee Statement for accuracy and compliance with local and US Trustee guidelines (1.5).	1.50
09/05/24	Patrick L. Hughes	Review and direct supplemental disclosure on new clients on unrelated matters (.2); review and approve authority to file A&M's Fourteenth Monthly Fee Statement (.4)	0.60
09/05/24	ReNecia Sherald	Review and revise A&M's Fourteenth Monthly Fee Statement (.6); correspond with HB and Milbank Teams on same (.2); correspond with Verita Team regarding service of same (.1); correspond with HB Team regarding supplemental disclosures (.1).	1.00
09/05/24	Jodi Valencia	Assist with filing the Fourteenth Fee Statement of Alvarez & Marsal North America (.2).	0.20
09/12/24	Charles A. Beckham	Receive and review draft of Fifth Supplemental PwC Declaration (.3); confer with HB Team about same (.1).	0.40
09/12/24	Patrick L. Hughes	Review and approve authority to file PwC's Fifth Supplemental Declaration (.2).	0.20
09/12/24	Kenneth J. Rusinko	Assist with matters relating to the filing of PwC's Fifth Supplemental Declaration (.6).	0.60
09/12/24	ReNecia Sherald	Review and revise PwC's Supplemental Declaration (1.0); review PwC's Retention Application and Order entered on same (1.0); correspond with Milbank and HB Teams on same (.4).	2.40
09/13/24	Charles A. Beckham	Receive and review Milbank's Tenth, Eleventh and Twelfth Monthly Fee Statements (.3); confer with HB Team about same (.1).	0.40
09/13/24	Patrick L. Hughes	Review and approve authority to file the three Milbank fee applications (.4).	0.40
09/13/24	Kenneth J. Rusinko	Confer with R. Sherald on matters relating to the filing of Monthly Fee Statements and assist with the filing of Tenth, Eleventh and Twelfth Monthly Fee Statements of Milbank (1.2).	1.20
09/13/24	ReNecia Sherald	Review and revise Milbank's Tenth Monthly Fee Statement (.7); review and revise Milbank's Eleventh Monthly Fee Statement (.6); review and revise Milbank's Twelfth Monthly Fee Statement (.5); correspond with Milbank and HB Teams on same (.5); correspond with Verita Team regarding service of same (.2); correspond with A&M and HB Teams regarding Q3 budget estimate (.4).	2.90

Invoice Number: 21669924
Matter Name: Fee-Employment Applications
Client/Matter Number: 0064273.00012
Billing Attorney: Charles A. Beckham

October 17, 2024
Page 3 of 4

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/16/24	ReNecia Sherald	Review and revise exhibits to Haynes Boone's Fourteenth Monthly Fee Statement (1.8); correspond with HB Team on same (.3).	2.10
09/17/24	Patrick L. Hughes	Review and approve Third Supplemental Declaration by A&M (.2).	0.20
09/17/24	Jodi Valencia	Revise and file A&M's Third Supplemental Declaration (.6).	0.60
09/18/24	Kourtney Lyda	Work on exhibits to HB's Monthly Fee Statement (1.0).	1.00
09/18/24	ReNecia Sherald	Review and revise exhibits to Haynes Boone's Fourteenth Monthly Fee Statement (1.8); coordinate with HB Team on same (.5); prepare Fourth Supplemental Declaration Supporting Haynes Boone's Retention (1.2).	3.50
09/19/24	Jodi Valencia	Communicate with R. Sherald and file Willkie OCP Declaration (.3).	0.30
09/20/24	Patrick L. Hughes	Review and approve A&M's Thirteenth Monthly Fee Statement for filing (.3).	0.30
09/20/24	ReNecia Sherald	Review and revise A&M's Fifteenth Monthly Fee Statement and coordinate with HB and Milbank Teams on same (.7).	0.70
09/20/24	Jodi Valencia	Assist with filing A&M's Fifteenth Monthly Fee Statement and advise team of related deadlines (.3).	0.30
09/23/24	Kimberly Morzak	Review exhibits to HB's Thirteenth Monthly Fee Statement and enter data into fee tracking spreadsheet (.9); draft HB's Thirteenth Monthly Fee Statement and prepare exhibits for same (.8).	1.70
09/24/24	Kimberly Morzak	Draft HB's Fifth Interim Fee Application and exhibits (3.1).	3.10
09/27/24	Patrick L. Hughes	Review and approve PJT's Fifteenth Monthly Fee Statement for filing (.2).	0.20
09/27/24	ReNecia Sherald	Review and revise PJT's Fifteenth Monthly Fee Statement (1.0); correspond with HB and Milbank Teams on same (.4).	1.40
09/27/24	Jodi Valencia	Assist with filing PJT's Fifteenth Monthly Fee Statement and advise team of related deadlines (.3).	0.30
09/30/24	Charles A. Beckham	Review and work on comments to draft of HB's Fourteenth Monthly Fee Statement (.3).	0.30
09/30/24	Patrick L. Hughes	Review and approve for filing the OCP applications (.2); review and approve after edits the HB 14th monthly fee application (.5).	0.70
09/30/24	Kimberly Morzak	Update HB's Fourteenth Monthly Fee Statement and redact invoices (.6); review and revise HB's Fifth Interim Fee Application and exhibits (1.1); coordinate electronic service of same (.2).	1.90

Invoice Number: 21669924
 Matter Name: Fee-Employment Applications
 Client/Matter Number: 0064273.00012
 Billing Attorney: Charles A. Beckham

October 17, 2024
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/30/24	ReNecia Sherald	Review and revise HB's Fourteenth Monthly Fee Statement (1.4); coordinate with HB Team on same (.8); review and revise Debtors' Fourth OCP Notice (.6); review and revise HB's Fifth Interim Fee Application (2.2).	5.00
09/30/24	Jodi Valencia	Assist with filing the Fourth OCP Notice (.3).	0.30

Chargeable Hours 35.70

Total Fees \$27,090.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles A. Beckham	Partner	1.10	\$1,700.00	\$1,870.00
Patrick L. Hughes	Partner	2.60	\$1,200.00	\$3,120.00
ReNecia Sherald	Associate	19.00	\$750.00	\$14,250.00
Kourtney Lyda	Counsel	1.00	\$1,150.00	\$1,150.00
Jodi Valencia	Paralegal	2.00	\$475.00	\$950.00
Kenneth J. Rusinko	Paralegal	1.80	\$575.00	\$1,035.00
Kimberly Morzak	Paralegal	8.20	\$575.00	\$4,715.00

Total Professional Summary \$27,090.00

Total Fees, Expenses and Charges \$27,090.00

Total Amount Due USD \$27,090.00

HAYNES BOONE

Invoice Number: 21669925
Invoice Date: October 17, 2024
Matter Name: Litigation – Non-Avoidance Actions
Client/Matter Number: 0064273.00015
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

Pursuant to the Interim Compensation Procedures [Docket No. 606], this invoice is not payable until five business days after the expiration of the fourteen (14) day objection deadline after filing of the respective monthly fee statement, provided no objections are raised during the objection period.

REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$5,935.00
80% of Fees Payable Under Interim Compensation Procedures	\$4,748.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$1,187.00
Total Expenses	\$0.00
Total Fees, Expenses and Charges	\$5,935.00
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$4,748.00

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001
For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]
SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S
Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number 21669925 • Client Number 0064273.00015 • Attorney Charles A. Beckham

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669925
 Matter Name: Litigation – Non-Avoidance Actions
 Client/Matter Number: 0064273.00015
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 2 of 2

For Professional Services Through September 30, 2024

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/22/24	Charles A. Beckham	Receive and review correspondence from Milbank Team and HB Team about discovery matters (.3); receive and review draft of Response to Request for Production (.3); prepare correspondence to HB Team about same (.2).	0.80
09/23/24	ReNecia Sherald	Prepare for and attend hearing on 2024/2026 Noteholders' tortious interference claims (4.2).	4.20
09/27/24	Patrick L. Hughes	Review and comment on the Debtors' Responses and Objections to the 2024/2026 Noteholder Group's Second Set of Requests for Production to address certain issues (.5).	0.50
09/27/24	ReNecia Sherald	Review and revise Responses and Objections to discovery request (.8); coordinate with HB and Milbank Teams on same (.3).	1.10

Chargeable Hours 6.60

Total Fees \$5,935.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles A. Beckham	Partner	0.80	\$1,700.00	\$1,360.00
Patrick L. Hughes	Partner	0.50	\$1,200.00	\$600.00
ReNecia Sherald	Associate	5.30	\$750.00	<u>\$3,975.00</u>
Total Professional Summary				\$5,935.00

Total Fees, Expenses and Charges \$5,935.00

Total Amount Due USD \$5,935.00

HAYNES BOONE

Invoice Number: 21669926
Invoice Date: October 17, 2024
Matter Name: Plan and Disclosure Statement
Client/Matter Number: 0064273.00017
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

Pursuant to the Interim Compensation Procedures [Docket No. 606], this invoice is not payable until five business days after the expiration of the fourteen (14) day objection deadline after filing of the respective monthly fee statement, provided no objections are raised during the objection period.

REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$125,417.50
80% of Fees Payable Under Interim Compensation Procedures	\$100,334.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$25,083.50
Total Expenses	\$0.00
Total Fees, Expenses and Charges	\$125,417.50
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$100,334.00

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001
For Credit to the Account of HAYNES AND BOONE, LLP
ABA No. [REDACTED] Operating Account No. [REDACTED]
SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S
Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number 21669926 • Client Number 0064273.00017 • Attorney Charles A. Beckham

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669926
 Matter Name: Plan and Disclosure Statement
 Client/Matter Number: 0064273.00017
 Billing Attorney: Charles A. Beckham

October 17, 2024
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For Professional Services Through September 30, 2024

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/01/24	Patrick L. Hughes	Confer with R. Sherald and direct research on 1111(b) election language for the proposed ballots (.4).	0.40
09/01/24	ReNecia Sherald	Review and analyze Fifth Circuit precedent regarding § 1111(b) elections (2.1); prepare summary on same (.4).	2.50
09/02/24	ReNecia Sherald	Review Witness and Exhibit List for September 5 Disclosure Statement approval hearing and correspond with Milbank Team on same (.5).	0.50
09/03/24	Charles A. Beckham	Confer with HB Team about and work on preparations for Disclosure Statement Hearing (.5); receive and review correspondence from HB Team and Milbank Team about same (.5).	1.00
09/03/24	Patrick L. Hughes	Review deadlines on filings for the disclosure hearing and conduct follow-up on pending matters (.3); review and approve the Debtors' Witness and Exhibit List for Disclosure Statement Hearing and exhibits (.4); review the Witness List Filed By US Trustee (.1); review the section 1111(b) issues and research for updating the ballots to confirm election and deadlines related to same (.7).	1.50
09/03/24	Kenneth J. Rusinko	Assist with matters relating to the preparation and filing of Witness and Exhibit List for Disclosure Statement Hearing and uploading of related exhibits to ECF (1.4).	1.40
09/03/24	ReNecia Sherald	Review and revise evidentiary materials for September 5 Disclosure Statement approval hearing, including Witness and Exhibit List (2.6); correspond with HB Team and Milbank Team several times on same (1.4); correspond with Verita Team regarding service of same and Certificate of Service (.4); correspond with HB and Milbank Teams regarding S.D. Tex. precedent for § 1111(b) election (.7).	5.10

Invoice Number: 21669926
 Matter Name: Plan and Disclosure Statement
 Client/Matter Number: 0064273.00017
 Billing Attorney: Charles A. Beckham

October 17, 2024
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/04/24	Patrick L. Hughes	Review and approve initial agenda for filing (.3); review with internal team other filings expected today as well as objections to reflect ongoing negotiations and amendments (.4); review the US Trustee objection and particularly as to opt out procedure (.9); review incoming witness and exhibit lists (.4); review the research and chart of cases outlining issues on the opt out procedure and approvals with internal team and add research to forward to Milbank (.7); review and forward to the team the new NY authority opt out procedure case to be addressed (.4); confer internally multiple times with team on exculpation objection issues (.4); review with Verita issues on effecting service as best practicable for the updated filings (.4); review throughout the evening with Milbank team and internal team and approve procedures for filing the Revised Plan with redline (.7); review the Revised Disclosure Statement with redline and redline notice (1.1); review the Revised Disclosure Statement Order with redline (including exhibits, i.e., Procedures, Ballots, and Hearing Notice) with redline notice (.7); review and comment on the updated witness and exhibit lists to add evidence witness (.5); review the updated agenda (.4).	7.30
09/04/24	Kenneth J. Rusinko	Assist with tasks relating to Disclosure Statement Hearing including the preparation and late night filings of (a) Agenda (.8); (b) Amended Plan (2.4); (c) Amended Disclosure Statement (2.4); (d) Notice of Redline of Plan (1.0); (e) Notice of Redline of Disclosure Statement (1.0); (f) Proposed Re-Solicitation Order (1.0); (g) Notice of Redline of Re-Solicitation Order (.9); (h) Amended Agenda (1.5); (i) Amended Witness and Exhibit List with exhibits (2.0) and coordinate service of all filings (.4); review, circulate and discuss US Trustee's Objection to Disclosure Statement Motion (.4); review docket in connection with US Trustee objection (.8); download, review and circulate Objections to Disclosure Statement Motion to team (1.0); review and circulate Stipulation regarding Motion for Adequate Protection (.4).	16.00
09/04/24	ReNecia Sherald	Review and revise Agenda for September 5 Disclosure Statement Approval hearing (2.1); correspond with HB and Milbank Teams regarding same (2.0); correspond with Milbank Team regarding amended filings (2.0); review and analyze Disclosure Statement objections (1.8); prepare summary chart on same (1.9); correspond with HB and Milbank Teams several times regarding Amended Plan (3.1); correspond with HB and Milbank Teams several times regarding Amended Disclosure Statement (2.8); correspond with HB, Milbank, and Verita Teams several times on filing mechanics to same (1.6).	17.30
09/05/24	Charles A. Beckham	Prepare for and attend Disclosure Statement hearing (1.0); confer with HB Team about same (.5); receive and review correspondence from HB Team about same (.2).	1.70

Invoice Number: 21669926
 Matter Name: Plan and Disclosure Statement
 Client/Matter Number: 0064273.00017
 Billing Attorney: Charles A. Beckham

October 17, 2024
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/05/24	Patrick L. Hughes	Conduct early morning review and approval of the filings made to update the Plan and Disclosure Statement with the technical updates (.6); review the form of Disclosure Statement approval order and exhibits (.5); review the objections and related reservation of rights matters (.7); prepare for and attend hearing on the approval of the Disclosure Statement (1.4); attention to updates on the Disclosure Statement and Order and address issues on re-solicitation to be considered (1.2); conduct follow-up on obtaining the audio file and review of same to confirm the comments made by the Court at the hearing (.4); conduct follow-up on service requirements for the updated Disclosure Statement and preview solicitation matters to be handled (.6); review the updated Disclosure Statement language and edit the notice of redline to be filed (.5); review the updates to the Plan to reflect technical clarifications and to align to the Court's comments, along with associated notice of redlines (.5); conduct final review and approvals for filing the updated documents and redlines. (.4).	6.80
09/05/24	Kenneth J. Rusinko	Confer with team and assist with matters relating to Disclosure Statement hearing (.6); coordinate submission of electronic appearances (.2); confer with R. Sherald regarding Court's ruling on the Disclosure Statement (.2).	1.00
09/05/24	ReNecia Sherald	Review and revise Amended Plan (1.4); review and revise Disclosure Statement (1.1); review and revise redlines to same (1.0); review and revise Amended Witness and Exhibit List (.8); review and revise Amended Agenda (.9); correspond with Milbank and HB Teams several times regarding filing mechanics for same (2.0); correspond with Verita Team regarding service of same (.7); prepare for and attend September 5 Hearing on Disclosure Statement Approval and Second Extension of Section 345(B) Motion (3.4); receive and review further revised Disclosure Statement (1.2); prepare Notice of Redline reflecting Court's comments from the September 5 hearing (1.2); correspond with Chambers regarding same (.3); correspond with Verita Team regarding Certificate of Service to same (.3).	14.30
09/05/24	Jodi Valencia	Submit Electronic Appearances (.2); download and circulate audio from 9 a.m. hearing (.3); assist with matters related to filing the Modified Second Amended Plan (.5), Disclosure Statement for the Modified Second Amended Joint Chapter 11 Plan (.5), and Notice of Filing Redlines for Plan and Disclosure Statement (.2).	1.70
09/06/24	Jordan Chavez	Review and analyze additional decision on third-party releases and correspond with P. Hughes regarding same (.3).	0.30
09/06/24	Patrick L. Hughes	Review the order regarding approval of the disclosure statement and team conference to solicitation and notice issues (1.7).	1.70
09/06/24	Kenneth J. Rusinko	Review Disclosure Statement Order and confer with R. Sherald regarding same (.2).	0.20
09/06/24	ReNecia Sherald	Review Order entered on Disclosure Statement (2.1); prepare summary regarding noticing and solicitation requirements (1.2); correspond with HB Team on same (1.0).	4.30

Invoice Number: 21669926
Matter Name: Plan and Disclosure Statement
Client/Matter Number: 0064273.00017
Billing Attorney: Charles A. Beckham

October 17, 2024
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/09/24	Patrick L. Hughes	Review summary regarding the solicitation order procedures and confer with internal team and Milbank on service, notice and other implementation matters (.9); review the transcript of September 5 Disclosure Statement hearing particularly on release terms and process (.7); review and circulate the decision on authorizing non-debtor releases (.4); review the brief [185 pages] objecting to Langur Maize's damages claims (.9).	2.90
09/09/24	ReNecia Sherald	Attention to correspondence from HB and Milbank Teams regarding solicitation process (.2).	0.20
09/09/24	Jodi Valencia	Review transcript of 9/5 Disclosure Statement Hearing and circulate copies to team (.2).	0.20
09/11/24	Patrick L. Hughes	Review and confirm solicitation completed, including the matrix used (.6).	0.60
09/11/24	ReNecia Sherald	Correspond with HB and Verita Teams regarding completion of solicitation transmittal (.5).	0.50
09/12/24	Patrick L. Hughes	Review the solicitation package and confer with R. Sherald on status of service and balloting (.3); comparison of matrix to schedule F and confirm contents of the solicitation materials served (.2).	0.50
09/13/24	Patrick L. Hughes	Review complete solicitation package and comments regarding the service verification to be provided (.4); review and correspond with L. Milligan regarding the language the state requests on the confirmation order (.3).	0.70
09/13/24	Kourtney Lyda	Confer with Haynes Boone team regarding supplemental solicitation and review documents related to same (.3).	0.30
09/13/24	ReNecia Sherald	Review creditor matrix parties for solicitation (.9); correspond with A&M and HB Teams on same (.4).	1.30
09/16/24	Patrick L. Hughes	Review, comment, and approve proof of service for the solicitation to be finalized and filed (.3).	0.30
09/16/24	ReNecia Sherald	Review and revise certificate of service on Resolicitation Package reflecting docket entries as appropriate (.6); correspond with HB and Verita Teams several times on same (.8); correspond with Milbank Team regarding extension of plan supplement and objection deadlines (.4); draft Emergency Motion to Extend Deadlines (2.4).	4.20
09/17/24	Patrick L. Hughes	Review and edit the emergency motion to extend deadlines on confirmation objections for review by Milbank and filing (1.3); review the Langur Maize motion to strike and preserve ability to pursue claims around the plan issues (.9); confer with counsel for the TCEQ and correspond with the Milbank team to address issues on today's plan objection and the draft language provided (.3); attention to multiple communications internally and with Milbank team to finalize the emergency motion for extension of deadlines to object to confirmation, including review of the edits and further revisions, and coordination on filing and service (1.3).	3.80

Invoice Number: 21669926
 Matter Name: Plan and Disclosure Statement
 Client/Matter Number: 0064273.00017
 Billing Attorney: Charles A. Beckham

October 17, 2024
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/17/24	ReNecia Sherald	Correspond with HB Team regarding Emergency Extension Motion (.6); circulate file-stamped copies to Chambers regarding same (.1).	0.70
09/17/24	Jodi Valencia	Revise and file Emergency Motion to Extend Plan Supplement and Objection Deadlines (.9).	0.90
09/18/24	Patrick L. Hughes	Conduct follow-up with the Court regarding plan objection deadlines (.2); review issues on service of the extension request on the MSL and not the entire creditor matrix (.2); draft amended service notice for the extension request (.3); review the Court's audio file from 09.05.24 on the updated modified disclosure statement and plan and also address the disputes over the Court's decision regarding treatment of the dissenting bondholders (.9).	1.60
09/18/24	Jodi Valencia	Communicate with P. Hughes and assist with drafting an Amended Certificate of Service for the Motion to Extend Deadline to File Plan Supplement (.8).	0.80
09/19/24	Patrick L. Hughes	Review the 2024/2026 Holders' Supplemental Post-Trial Brief on Tortious Interference (.6); review the Counterclaim Defendants' Supplemental Brief on 2024-2026 Holders' Claim for Tortious Interference (.6); correspond with creditor counsel A. Harnisher for TSS US and TSS UK on re-solicitation and opt out questions, and confirming class her client belongs in with preliminary response to the inquiry (.3); correspond and reply to Minister Finenza's inquiry regarding receipt by the French Ministry of Finance regarding notice of the confirmation hearing (.3); review and address plan supplement notice service with Verita (.3); review and edit the Draft Notice of Filing Third Amended Plan Supplement for service on all creditors (.7).	2.80
09/19/24	ReNecia Sherald	Prepare Notice of Filing of Third Amended Plan Supplement (.9); correspond with HB Team on same (.6); attention to correspondence from Milbank, Verita, and HB Teams regarding service of Plan Supplement (.4); attention to correspondences regarding opt-out ballots (.2); provide direction on Exclusivity Research (.2).	2.30
09/19/24	Jodi Valencia	Communicate with Verita regarding service, update Amended Certificate of service and file the same (.7).	0.70
09/20/24	Patrick L. Hughes	Address legal issues and updated legal research needed for the exclusivity extension motion to be filed and confer with internal team regarding same (.8).	0.80
09/20/24	Imaan Patel	Review and analyze SDTX authorities regarding exclusivity and confer with HB team regarding same (3.2).	3.20
09/21/24	Patrick L. Hughes	Review the legal research from I. Patel on the exclusivity issues and confer on the precedent located (.6); forward to Milbank team to finalize the motion (.2).	0.80
09/21/24	Imaan Patel	Review and analyze authorities regarding exclusivity period extensions and prepare summary of same (1.9).	1.90

Invoice Number: 21669926
 Matter Name: Plan and Disclosure Statement
 Client/Matter Number: 0064273.00017
 Billing Attorney: Charles A. Beckham

October 17, 2024
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/22/24	Charles A. Beckham	Confer with HB Team about and work on Mediation issue and Plan Confirmation (.3); receive and review correspondence from HB Team about same (.2); prepare correspondence to HB Team about same (.2).	0.70
09/22/24	Patrick L. Hughes	Review and edit the second motion to extend deadlines regarding plan confirmation to accommodate further negotiations and possibly mediation (.4).	0.40
09/22/24	ReNecia Sherald	Draft Amended Emergency Motion to Extend Plan Supplement and Objection Deadlines (1.2); correspond with HB and Milbank Teams on same (1.1).	2.30
09/23/24	Charles A. Beckham	Confer with HB Team about and work on Confirmation hearing matters (.2); receive and review correspondence from HB Team about same (.2); confer with HB Team about preparations for Status Conference (.2); receive and review correspondence from HB Team about Mediation (.2).	0.80
09/23/24	Patrick L. Hughes	Review and comment on the further exclusivity motion and revert to the Milbank team for filing (.7); conduct internal review and discussion on the issues raised by the Court in the prior hearing, and the amendments (.4); conduct final review and approval of the second emergency motion to extend deadlines regarding plan confirmation (.3); provide further edits and communications on the updated exclusivity motion and approve further revisions for filing (.4); attend hearing on issues relating to the tort claims remaining in dispute as well as the emergency motion to mediate the disputes and to extend deadlines (1.3).	3.10
09/23/24	Kenneth J. Rusinko	Review Emergency Motion for Appointment of Mediator, notice of hearing on same and advise team (.2).	0.20
09/23/24	ReNecia Sherald	Review and revise Fourth Motion to Extend Exclusivity (2.1); review and revise Second Emergency Motion to Extend Deadlines (1.3); correspond with Milbank and HB teams on same (2.7); prepare for and attend hearing on (1.2).	7.30
09/23/24	Jodi Valencia	Assist with matters related to filing the Second Emergency Motion to Extend Deadlines and Fourth Motion to Extend Exclusivity (.6).	0.60
09/24/24	Patrick L. Hughes	Review issues and results from hearings on both the adversary case and the plan process, including mediation candidates and recommend other candidates for consideration (.8).	0.80
09/24/24	Kenneth J. Rusinko	Review Order extending deadlines relating to Plan Confirmation and confer with team regarding same (.2).	0.20
09/24/24	ReNecia Sherald	Correspond regarding resubmission of opt-out forms (.2).	0.20
09/24/24	Jodi Valencia	Advise team of updated deadlines as per Order Extending Plan Supplement and Objection Deadlines (.5).	0.50

Invoice Number: 21669926
 Matter Name: Plan and Disclosure Statement
 Client/Matter Number: 0064273.00017
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 8 of 9

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/25/24	Charles A. Beckham	Confer with HB Team about Mediation (.2); receive and review correspondence from HB Team about same (.2).	0.40
09/25/24	Patrick L. Hughes	Attend Status Conference on Mediation update and report to the team (.5).	0.50
09/26/24	Jordan Chavez	Review, analyze, and summarize recent third party release decision and correspond with P. Hughes regarding same (1.0).	1.00
09/26/24	Kenneth J. Rusinko	Confer with team regarding status of mediation motion and related confirmation matters (.3).	0.30
09/27/24	Patrick L. Hughes	Monitor and updates on the mediation and scheduling for the confirmation hearing (.3); review Judge Goldblatt's opinion limiting opt out procedures (.3); review the Notice of adjournment of the confirmation hearing and comments for approval from Milbank (.2).	0.80
09/27/24	ReNecia Sherald	Participate in status conferences on September 27 regarding mediation and confirmation hearing issues (2.1); provide update to HB Team on same (.5); prepare Notice Adjourning Confirmation Hearing and Deadlines (.9); correspond with HB and Milbank Teams on same (.4).	3.90
09/30/24	Charles A. Beckham	Confer with HB Team about Plan Mediation (.3); receive and review correspondence from HB Team about same (.3); receive and review draft of Notice of Adjourned Confirmation Hearing (.2).	0.80
09/30/24	Patrick L. Hughes	Correspond and approve notice of adjournment of the confirmation hearing and deadlines pending the mediation (.4); review and correspond on the Agreed Order Appointing Mediator & Governing Mediation Procedure (.4).	0.80
09/30/24	ReNecia Sherald	Review and revise Notice of Adjourned Confirmation Hearing and coordinate with HB Team on same (.7).	0.70
09/30/24	Jodi Valencia	Assist with filing the Notice of Adjournment of October 7, 2024 Confirmation Hearing and Related Dates and Deadlines and advise team of updated dates and deadlines (.5).	0.50

Chargeable Hours 143.80

Total Fees

\$125,417.50

Invoice Number: 21669926
 Matter Name: Plan and Disclosure Statement
 Client/Matter Number: 0064273.00017
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 9 of 9

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles A. Beckham	Partner	5.40	\$1,700.00	\$9,180.00
Patrick L. Hughes	Partner	38.90	\$1,200.00	\$46,680.00
Imaan Patel	Associate	5.10	\$675.00	\$3,442.50
Jordan Chavez	Associate	1.30	\$900.00	\$1,170.00
ReNecia Sherald	Associate	67.60	\$750.00	\$50,700.00
Kourtney Lyda	Counsel	0.30	\$1,150.00	\$345.00
Jodi Valencia	Paralegal	5.90	\$475.00	\$2,802.50
Kenneth J. Rusinko	Paralegal	19.30	\$575.00	<u>\$11,097.50</u>

Total Professional Summary **\$125,417.50**

Total Fees, Expenses and Charges **\$125,417.50**

Total Amount Due **USD \$125,417.50**

HAYNES BOONE

Invoice Number: 21669928
Invoice Date: October 17, 2024
Matter Name: Creditor Communications
Client/Matter Number: 0064273.00034
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

Pursuant to the Interim Compensation Procedures [Docket No. 606], this invoice is not payable until five business days after the expiration of the fourteen (14) day objection deadline after filing of the respective monthly fee statement, provided no objections are raised during the objection period.

REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$2,135.00
80% of Fees Payable Under Interim Compensation Procedures	\$1,708.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$427.00
Total Expenses	\$0.00
Total Fees, Expenses and Charges	\$2,135.00
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$1,708.00

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No. [REDACTED] Operating Account No. [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001
For Credit to the Account of HAYNES AND BOONE, LLP
ABA No. [REDACTED] Operating Account No. [REDACTED]
SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S
Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number **21669928** • Client Number **0064273.00034** • Attorney **Charles A. Beckham**

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669928
 Matter Name: Creditor Communications
 Client/Matter Number: 0064273.00034
 Billing Attorney: Charles A. Beckham

October 17, 2024
 Page 2 of 2

For Professional Services Through September 30, 2024

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
09/02/24	ReNecia Sherald	Receive and review creditor correspondence and relay to Milbank and A&M Teams (.2).	0.20
09/03/24	Kenneth J. Rusinko	Speak to attorney C. Cuwado regarding service issues and contact Noticing Agent regarding same (.4).	0.40
09/13/24	ReNecia Sherald	Correspond with HB, Milbank, and Verita Team regarding creditor notices in chapter 11 cases (.5).	0.50
09/17/24	ReNecia Sherald	Attention to creditor correspondence regarding unpaid invoices and coordinate with HB and Milbank Teams on same (.5).	0.50
09/20/24	Patrick L. Hughes	Review and respond to inquiry by Nyco, as a critical vendor on expired contract and needed contract extension (.2).	0.20
09/20/24	ReNecia Sherald	Attention to correspondence as follow-up to previous communications regarding property taxes and coordinate with HB and Milbank Teams on same (.5).	0.50
09/23/24	ReNecia Sherald	Correspond regarding mailing address for individual (.2).	0.20
09/26/24	Patrick L. Hughes	Telephone conference with D. Brickley regarding plan matters and emergence (.2).	0.20

Chargeable Hours 2.70

Total Fees \$2,135.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Patrick L. Hughes	Partner	0.40	\$1,200.00	\$480.00
ReNecia Sherald	Associate	1.90	\$750.00	\$1,425.00
Kenneth J. Rusinko	Paralegal	0.40	\$575.00	<u>\$230.00</u>

Total Professional Summary \$2,135.00

Total Fees, Expenses and Charges \$2,135.00

Total Amount Due USD \$2,135.00

HAYNES BOONE

Invoice Number: 21669927
Invoice Date: October 17, 2024
Matter Name: Expenses
Client/Matter Number: 0064273.00024
Billing Attorney: Charles A. Beckham

Wesco/Incora
Attn: Dawn Landry
2601 Meacham Blvd., Suite 400
Fort Worth, TX 76137

Pursuant to the Interim Compensation Procedures [Docket No. 606], this invoice is not payable until five business days after the expiration of the fourteen (14) day objection deadline after filing of the respective monthly fee statement, provided no objections are raised during the objection period.

REMITTANCE PAGE

For Professional Services Through September 30, 2024

Total Fees	\$0.00
80% of Fees Payable Under Interim Compensation Procedures	\$0.00
20% of Fees Held Back Pursuant to Interim Compensation Procedures	\$0.00
Total Expenses	\$226.41
Total Fees, Expenses and Charges	\$226.41
Total Invoice Balance Due (80% of Fees, 100% of Expenses)	USD \$226.41

Haynes and Boone, LLP Tax Identification No: [REDACTED]

CHECK PAYMENT INSTRUCTIONS

Haynes and Boone, LLP
P.O. Box 841399
Dallas, TX 75284-1399

ACH PAYMENT INSTRUCTIONS

For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]

WIRE PAYMENT INSTRUCTIONS

BANK OF AMERICA 100 West 33rd Street New York, NY 10001
For Credit to the Account of HAYNES AND BOONE, LLP
ABA No.: [REDACTED] Operating Account No.: [REDACTED]
SWIFT Code - USD: BOFAUS3N • SWIFT Code - Foreign Currency: BOFAUS6S
Bank wire fees are the responsibility of the sender.

NOTE: For ACH / Wire payments, remittance details should be sent to: PaymentDetail@haynesboone.com
Please Reference: Invoice Number 21669927 • Client Number 0064273.00024 • Attorney Charles A. Beckham

PAYMENT IS DUE UPON RECEIPT, UNLESS OTHERWISE AGREED.

Invoice Number: 21669927
Matter Name: Expenses
Client/Matter Number: 0064273.00024
Billing Attorney: Charles A. Beckham

October 17, 2024
Page 2 of 2

For Professional Services Through September 30, 2024

Expenses Summary

<u>Description</u>	<u>Amount</u>
Travel Expense	\$16.51
Transcripts and Tapes of Hearing	<u>\$209.90</u>
Total Expenses	\$226.41

Total Fees, Expenses and Charges **\$226.41**

Total Amount Due **USD \$226.41**