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Attorneys for Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SANTA ROSA DIVISION**

In re
 LEFEVER MATTSON, a California
 corporation, *et al.*¹
 Debtors.

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

In re
 KS MATTSON PARTNERS, LP,
 Debtor.

**SUMMARY SHEET TO FIRST INTERIM FEE
 APPLICATION OF HOGAN LOVELLS US LLP
 AS COUNSEL TO KSMP FOR ALLOWANCE
 AND PAYMENT OF FEES AND
 REIMBURSEMENT OF EXPENSES FOR THE
 PERIOD FROM JUNE 9, 2025 THROUGH AND
 INCLUDING SEPTEMBER 30, 2025**

Date: December 12, 2025

Time: 11:00 a.m. (Pacific Time)

Place: (In Person or Via Zoom)

United States Bankruptcy Court
 1300 Clay Street, Courtroom 215
 Oakland, CA 94612

Objection Deadline: December 5, 2025

¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of KSMP's claims and noticing agent at <https://veritaglobal.net/LM>. entities in these Chapter 11 Cases.



1
2 Name of applicant: Hogan Lovells US LLP
3
4 Authorized to provide
professional services to: Debtor KS Mattson Partners, LP
5 Order entered on July 18, 2025, retaining
Date of retention: Hogan Lovells effective as of June 9, 2025
6
7 Period for which compensation
and reimbursement are sought: June 9, 2025 – September 30, 2025
8
9 Amount of compensation
Requested: \$3,590,262.73 (100%)
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11 Amount of expense
reimbursement Requested: \$18,516.76 (100%)
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13 This is an: X interim _____ final application.

14 This is the first interim fee application filed by Hogan Lovells US LLP in these chapter 11 cases.
15 Based upon the agreement reached at the inception of this case, Hogan Lovells has agreed to
16 discount its fees by fifteen percent (15%), resulting in a reduction of \$633,575.78. In addition,
17 Hogan Lovells, through the exercise of billing judgment, has deducted an additional \$331,256.00
18 of fees and \$1,780.38 of costs incurred, for a total reduction of \$964,831.78, or 21% of the total
19 bill.
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Interim Application Summary	
Name of Applicant	Hogan Lovells US LLP
Name of Client	KS Mattson Partners, LP
Time period covered by Interim Application	June 9, 2025 through and including September 30, 2025
Total compensation sought during Application Period	\$3,590,262.73
Total expenses sought during Application Period	\$18,516.76
Total compensation and expenses voluntarily deducted	\$964,831.78 ²
Involuntary Petition Date	November 22, 2024
Relief Date	June 9, 2025
Retention Date	June 9, 2025
Date of order approving employment	July 18, 2025 [Dkt. No. 223]
Total allowed compensation paid to date	\$0.00
Total allowed expenses paid to date	\$0.00
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00

² This amount is comprised of both the voluntary fifteen percent (15%) discount agreed upon at the outset of this case, resulting in a deduction of \$633,575.78 on Hogan Lovells' standard rates—and additional discretionary deductions of \$331,256.00, resulting in a total discount of \$964,831.78. Hogan Lovells also voluntarily deducted \$1,780.38 in expenses. These deductions resulted in a total discount of \$966,612.16 for both fees and expenses. At this time, Hogan Lovells is seeking to be awarded 100% of its total billed fees and 100% of its billed expenses.

Blended rate in the Interim Application for all attorneys ³	\$1,187.96
Blended rate in the Interim Application for all timekeepers	\$1,133.29
Compensation sought in the Interim Application already paid pursuant to a monthly compensation certificate but not yet allowed	\$0.00
Expenses sought in the Interim Application already paid pursuant to a monthly compensation certificate but not yet allowed	\$0.00
Number of professionals included in Interim Application	19
If applicable, number of professionals in the Interim Application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought for the Application Period	N/A
Number of professionals billing fewer than 15 hours to the case during the Application Period	3
Are any rates higher than those approved or disclosed at retention	No

³ The reported blended rate is inclusive of the fifteen percent (15%) voluntary discount provided on all Hogan Lovells fees.

**FIRST INTERIM FEE APPLICATION OF HOGAN LOVELLS US LLP
AS COUNSEL TO KSMP**

(June 9, 2025 – September 30, 2025)

CUMULATIVE COMPENSATION SUMMARY BY PROFESSIONAL

Name	Practice Group (Year Admitted)	Hourly Rate	Total Hours	Fees ⁴
Restructuring and Special Situations				
Richard L. Wynne	Restructuring and Special Situations (New Jersey: 1982; New York: 1983; California: 1985)	\$1,975	361.7	\$714,357.50
Erin N. Brady	Restructuring and Special Situations (California: 2001; Washington D.C.: 2019; New York: 2020)	\$1,570	514.3	\$807,451.00
Todd M. Schwartz	Restructuring and Special Situations / Private Equity (California: 2013; Illinois: 2007; Ohio: 2022; Texas: 2017)	\$1,925	112.7	\$216,947.50
Edward Joseph McNeilly	Restructuring and Special Situations (England and Wales: 2014; California: 2017; Washington State: 2018)	\$1,295	530.1	\$686,479.50
Danielle Ullo	Restructuring and Special Situations (New York: 2022)	\$1,035	483.1	\$500,008.50
Litigation				
Dennis H. Tracey	Litigation (New York: 1982)	\$1,990	11.8	\$23,482.00
Megan Nishikawa	Litigation (California: 2010)	\$1,630	236.3	\$385,169.00
Leen Bukai	Litigation (California: 2024)	\$760	92.2	\$70,072.00
Isolte Beale	M&A (California: 2024)	\$760	215.8	\$164,008.00
White Collar and Criminal Investigations				
Ann Kim	Litigation and White	\$1,475	91.9	\$135,552.50

⁴ The amounts in this column reflect the Firm's discretionary deductions of \$348,310.70.

Name	Practice Group (Year Admitted)	Hourly Rate	Total Hours	Fees ⁴
	Collar Investigations (California: 2000)			
Regulatory & Environmental				
Tom Boer	Global Regulatory (California: 1998; Washington DC: 2023)	\$1,400	7.7	\$10,780.00
Maia Jorgensen	Environmental & Natural Resources (California: 2022)	\$1,115	11.2	\$12,488.00
Real Estate				
Loryn Arkow	Real Estate (California: 1996)	\$1,515	107	\$162,105.00
Katie Chacho	Real Estate (California: 2024)	\$855	42.4	\$36,252.00
Tax				
Jeff Uffner	Tax (New York: 1977)	\$1,975	47.5	\$93,812.50
Caroline Koo	Tax (California: 2024; New York: 2020; Washington DC: 2023)	\$1,115	49	\$54,635.00
Legal Support Staff				
Tracy Southwell ⁵	Paralegal	\$655	169.9	\$111,284.50
Kristel Gelera	Paralegal	\$470	71.2	\$33,464.00
Henaa Salehi	Paralegal	\$450	12.2	\$5,490.00
Total:	\$1,133.29 (blended hourly rate for all timekeepers)		3,168	\$4,223,838.50
Total fees incurred after voluntary 15% discount				\$3,590,262.73

⁵ Ms. Southwell passed away unexpectedly during the First Interim Compensation Period, necessitating the engagement of another paralegal (Kristel Gelera) to ensure continuity of services.

CUMULATIVE COMPENSATION BY PROJECT CATEGORY

ACTIVITY	HOURS	FEES
Asset Analysis/Recovery & Real Estate	650.2	\$890,125.50
Asset Disposition	146.6	\$159,639.00
Relief from Stay/ Adequate Protection Proceedings	37.7	\$46,321.00
Meetings of and Communications with Creditors	95.6	\$143,820.00
Employment/Fee Applications	159.4	\$195,185.50
Other Contested Matters (excluding assumption/rejection motions)	247.6	\$400,736.00
Non-Working Travel ⁶	14.2	\$23,396.00
Business Operations	134.2	\$153,797.50
Financing/ Cash Collections	301.8	\$379,534.00
Tax Issues	120.1	\$190,635.00
Case Administration	522.9	\$531,767.50
Claims Administration and Objections	91.6	\$129,565.50
Plan and Disclosure Statement (including Business Plan)	134.6	\$215,449.50
Substantive Consolidation	260.2	\$381,722.00
Ken Mattson Matters	177.3	\$272,405.00
Hearings	74	\$109,739.50
Total	3,168	\$4,223,838.50
Voluntary 15% Discount	N/A	\$633,575.78
Total fees incurred after voluntary 15% discount⁷		\$3,590,262.73

⁶ For time recorded under the “non-working travel” task code, the Firm applied its standard practice of charging only half of the hours that attorneys entered, at the full applicable rate (rather than billing all hours and reducing the resulting fees). Thus, although attorneys recorded 28.4 hours to this category, only 14.2 hours were actually billed in the invoice. The Firm’s voluntary fifteen percent (15%) discount was then applied to the billed amount.

⁷ The amount in this row includes a voluntary deduction of \$633,575.78 applied to this First Interim Fee Application.

CUMULATIVE EXPENSE SUMMARY

Expense Category⁸	Service Provider (if applicable)	Total Expenses
Court Documents	Northern District of California Bankruptcy Court	\$34.00
Computer Research – Lexis	LexisNexis	\$248.59
Computer Research – Pacer	Pacer	\$314.30
Computer Research – Westlaw	Westlaw	\$1,945.26
Travel (Airfare)		\$731.94
Lodging		\$446.28
Ground Travel		\$250.95
Hearing Transcripts	ESCRIBERS, LLC	\$458.20
Legal Technology & Consulting		\$9,069.69
Messenger Service		\$319.27
Word Processing		\$881.25
Data Storage		\$3,817.03
GRAND TOTAL:		\$18,516.76

⁸ Hogan Lovells also wrote off all travel expenses related to Edward McNeilly's attendance at the "first day" hearing in this case. This resulted in a discount of \$1,780.38, which is not reflected in the Cumulative Expense Summary.

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Case No. 24-10545 CN (Lead Case)
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**FIRST INTERIM FEE APPLICATION OF
HOGAN LOVELLS US LLP AS COUNSEL TO
KSMP FOR ALLOWANCE AND PAYMENT OF
FEES AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM JUNE 9, 2025
THROUGH AND INCLUDING SEPTEMBER 30,
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Date: December 12, 2025
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United States Bankruptcy Court
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1 Hogan Lovells US LLP (“Hogan Lovells” or the “Firm”), counsel to KS Mattson Partners,
2 LP (“KSMP”) hereby submits its application (the “Application”), pursuant to sections 330 and 331
3 of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (as amended, the
4 “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy
5 Rules”), the United States Trustee Appendix B Guidelines for Reviewing Applications for
6 Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger
7 Chapter 11 Cases, effective November 1, 2013 (the “U.S. Trustee Guidelines”), and the Guidelines
8 for Compensation and Expense Reimbursement of Professionals and Trustees for the Northern
9 District of California, dated February 19, 2014 (the “Local Guidelines”), for interim approval and
10 allowance of (i) compensation for professional services rendered to KSMP from June 9, 2025
11 through and including September 30, 2025 (the “First Interim Compensation Period”) and (ii)
12 reimbursement of expenses incurred in connection with such services; and, in support thereof,
13 respectfully represents as follows:
14

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16 **I. PRELIMINARY STATEMENT**

17 1. Since Hogan Lovells’ retention by KSMP on June 9, 2025 (the “Relief Date”), it has
18 been actively engaged in all aspects of this case with the overarching goal of stabilizing KSMP’s
19 estate and maximizing recoveries for the victims of Kenneth Mattson’s fraud. The Firm recognizes
20 that this Application seeks approval of a substantial amount of fees and expenses, and therefore
21 endeavors to provide the Court and investors with the information necessary to conclude that the
22 work done and charged for was essential to protecting the estate and maximizing recoveries for
23 creditors.
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25 2. When Robbin L. Itkin, appointed as an independent fiduciary on the Relief Date (the
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1 “Responsible Individual”), assumed control of the estate and retained Hogan Lovells as KSMP’s
2 counsel, the estate was in an extremely precarious condition: there were no functioning operational,
3 legal, accounting or other financial records, properties (to the extent they had even been identified
4 as owned by KSMP) were uninsured or underinsured, rents were uncollected, and significant health,
5 safety, and environmental issues had gone unaddressed. Through the concerted efforts of the
6 Responsible Individual and her professionals, and substantial assistance from the professional
7 advisors to the Committee and LFM Debtors, meaningful order has been brought out of chaos.

9 3. Today, every identified property owned by KSMP has been stabilized, insured,
10 evaluated and either listed for sale or prepared for sale. Environmental, health, and safety issues
11 have been identified and are being addressed, tenants have been located, and (where possible) rent
12 is being collected. These accomplishments reflect the Responsible Individual’s early decision—
13 implemented with the assistance of Hogan Lovells and KSMP’s operations and property manager,
14 Stapleton Group, a part of J.S. Held (“Stapleton”)—to launch a coordinated sale process as quickly
15 as possible. This required an enormous amount of front-loaded effort to organize, document, and
16 secure the estate. As a result of that work, 15 properties are currently listed for sale, one is in
17 escrow (with a sale notice being prepared), and another 10 have received one or more offers.

19 4. In a typical chapter 11 case of this magnitude, likely as much as half of the
20 foundational work done in this First Interim Compensation Period would have occurred prepetition
21 (likely over many months). Here, none of that work—or even the basic financial and legal
22 information necessary to perform that work—existed. When the Responsible Individual was
23 appointed, she inherited a failing real estate enterprise with little funds, no books and records, little
24 or no documentation for its complex real-property holdings or secured-credit transactions, no tenant
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1 list or rent rolls, limited insurance information, no accounts-payable or accounts-receivable ledgers,
2 and no employees with historical knowledge. To the extent any of these records even existed, they
3 had been seized by the U.S. Department of Justice as part of its criminal investigation of Kenneth
4 Mattson and were not available to KSMP.

5
6 5. For the better part of this First Interim Compensation Period, the Responsible
7 Individual and KSMP's professionals were required to build a functioning understanding of the
8 estate from the ground up. Hogan Lovells worked with Stapleton to review public real property
9 records to determine what properties KSMP owned; prepared state-by-state litigation searches to
10 identify any litigation liabilities; reviewed the filed proofs of claim in the LFM Debtors' cases that
11 referenced KSMP to obtain information and understand potential creditor claims (and to obtain
12 relevant documents); and analyzed convoluted title histories that appeared intentionally designed
13 to obscure coownership and cash flows. The Firm issued subpoenas to banks for KSMP's *own*
14 account records and coordinated outreach to creditors, investors, co-owners, and tenants to locate
15 the documentation and information necessary to create reliable books and records. To this day,
16 KSMP is still discovering new information about properties in which it may hold an interest.

17
18 6. The Responsible Individual did not merely step into the Debtor's shoes when she
19 was appointed—she and her professionals had to reconstruct KSMP's records from scratch.

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21 7. With this context, the remainder of this Preliminary Statement explains Hogan
22 Lovells' strategic approach to stabilizing the estate, advancing these cases, and ensuring that all
23 work performed—and all fees and expenses incurred—were necessary and appropriate under the
24 circumstances.

1 **A. Devising an Initial Case Strategy**

2 8. The most effective means of controlling professional spend—particularly in a
3 chaotic situation such as this—is developing an initial case strategy grounded in efficiency, cost
4 control, stabilization of the estate and facilitating prompt distributions to investors. Hogan Lovells
5 worked extensively with the Responsible Individual and Stapleton to develop such a strategy and
6 put it into practice. Together the team (i) identified the properties that KSMP owned and any tenants
7 (as well as their contractual and payment status); (ii) secured financing; (iii) addressed urgent
8 obligations such as insurance, utilities, environmental, regulatory, and life-safety issues; (iv)
9 attended to KSMP’s obligations as a debtor-in-possession, including preparing statements,
10 schedules, monthly operating reports and otherwise complying with the Bankruptcy Code,
11 Bankruptcy Rules and U.S. Trustee Guidelines; and (v) developed a strategy to shorten the
12 bankruptcy process wherever possible by initiating a sales process for the KSMP portfolio and
13 pursuing a prompt chapter 11 plan—whether standalone or jointly with the LFM Debtors—to
14 enable the earliest possible distributions to investors.
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16 9. This case strategy also focused on avoiding unnecessary professional costs by
17 leveraging existing resources and coordinating work across professionals. The Responsible
18 Individual worked with Stapleton, Hogan Lovells, and the Committee’s and LFM’s professionals
19 to develop a streamlined, coordinated workflow. Whenever appropriate, the Firm relied on the
20 substantial factual, financial, and procedural work already completed by the Committee and LFM
21 Debtors’ advisors, enabling the estate to utilize existing work product rather than recreating it from
22 scratch. Practically, this coordinated approach eliminated the need for KSMP to hire a separate
23 financial advisor or forensic accountant—avoiding millions of dollars in additional expense.
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1 Instead, the estate (1) employed Stapleton as operations and property manager, with the expanded
2 responsibilities set forth in its employment application, (2) relied on the Committee's forensic
3 accountant to assist with investor claims analysis, and (3) where appropriate, drew on work
4 performed by the LFM Debtors' professionals on shared issues, including matters related to the
5 settlement with Socotra Capital, Inc. ("Socotra") discussed below. This integrated staffing model
6 ensured that, where interests were aligned, work was performed just once, by the appropriate
7 professional, and avoided the duplication, inefficiency, and cost that would result from multiple
8 uncoordinated workstreams.

10 10. Even as this coordinated strategy was being implemented—and before the estate
11 had fully stabilized—two case-defining issues required immediate attention: determining KSMP's
12 position on (1) the proposed substantive consolidation of KSMP into the LFM Debtors, and (2)
13 proposing either a joint chapter 11 plan with the LFM Debtors and the Committee or seeking to
14 propose a standalone KSMP plan. To that end, almost immediately after the Responsible
15 Individual's appointment, the estate was required to assess and take a position on the *Motion of the*
16 *Official Committee of Unsecured Creditors for Substantive Consolidation of Debtor Lefever*
17 *Mattson and KS Mattson Partners, LP* [Dkt. No. 1585] (the "Substantive Consolidation Motion"),
18 which demanded a meaningful investigation into the available facts and legal considerations of
19 substantive consolidation on an incredibly compressed timeline. While this investigation was
20 underway, the Committee informed KSMP that it intended to move quickly toward proposing a
21 chapter 11 plan to expedite payment to the hundreds of investors harmed by Ken Mattson's
22 fraudulent schemes, and requested that KSMP join the Committee and LFM Debtors as a co-
23 proponent of a plan premised on substantive consolidation and another highly factual issue: a Ponzi-
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1 scheme presumption. These issues demanded prompt, independent analysis, extensive stakeholder
2 consultation, and the development of well-supported positions on an expedited timetable. Because
3 of the compressed timetable and the highly complex issues at play, Hogan Lovells committed to
4 significant night and weekend work in order to effectively meet the set targets.

6 **B. The Firm's "Core Team" Approach**

7 11. To manage the volume and pace of the multiple workstreams facing the KSMP
8 estate while maintaining efficiency, Hogan Lovells has utilized a "core team" structure. A small,
9 dedicated group of bankruptcy attorneys has led all major case efforts, with specialists engaged
10 only when their expertise is required. This approach has ensured that all work is informed by a
11 comprehensive understanding of the estate and the issues it faces, has avoided the inefficiency of
12 siloed or duplicative efforts, and has provided a cohesive strategic direction that simply cannot be
13 achieved when multiple uncoordinated professionals tackle discrete issues without visibility into
14 the overall case. In the First Interim Compensation Period the core team approach was implemented
15 as follows:

- 17 • Partners Richard Wynne and Erin Brady lead the engagement, assisted by
18 bankruptcy associates Edward McNeilly and Danielle Ullo. The core bankruptcy
19 team accounts for **64% of the fees billed to this matter.**
- 21 • Where necessary or appropriate, other specialists handle different specific matters,
22 working with one or more of the core team members as appropriate. These include:
 - 23 ○ **DIP Financing:** Todd Schwartz
 - 24 ○ **Ken Mattson Criminal Issues and Related Affairs:** Ann Kim
 - 25 ○ **Litigation (including substantive consolidation):** Megan Nishikawa, Leen

Bukai and Isolte Beal

- **Real Estate:** Loryn Arkow
- **Environmental:** Tom Boer and Maia Jorgensen
- **Tax:** Jeff Uffner and Caroline Koo

C. The Firm Leveraged Existing Work Product.

12. In addition to employing a core team structure, and consistent with the estate's efficiency goals, the Firm's strategy began with leveraging—wherever possible—the substantial work product developed in the LFM Chapter 11 Cases. The types of work the Firm could leverage fell into two primary categories: (i) the procedural frameworks used in the LFM Debtors' cases, including Court-approved asset-sale procedures, claims-administration processes, and form sale agreements; and (ii) the extensive factual record and legal analysis underlying substantive consolidation and the Ponzi-scheme investigation. These materials provided a strong foundation, but each required careful evaluation to determine which portions could be used or relied up on wholesale, which needed to be adapted to KSMP's unique circumstances, and which necessitated the development of an entirely different approach.

13. At the procedural and transactional level, KSMP's case differed in important respects from the LFM Chapter 11 Cases, which meant that the Hogan Lovells team could not necessarily adopt those materials wholesale. In many instances, the Firm was required to significantly adapt the existing forms, procedures and analyses to account for tenants in common, environmental issues, cross-collateralized loans, a property portfolio burdened by recorded *lis pendens*, unauthorized tenants (including by Kenneth Mattson, his family and associates), the consequences of Kenneth Mattson's efforts to quickly dispose of estate's property interests in the

1 face of his impending indictment, and the absence of reliable financial, legal, and property records.
2 The overlapping creditor and investor populations also necessitated modifying claims, notices, and
3 forms to avoid confusion among investors. And in areas where the differences were too significant
4 to bridge through modification, Hogan Lovells was required to develop tailored procedures and
5 documents specifically for KSMP—doing so only where necessary and always with an eye toward
6 minimizing cost and ensuring clarity.
7

8 14. The Firm applied the same approach with respect to the case-defining issues of
9 substantive consolidation and the Ponzi-scheme investigation. Rather than replicating the
10 Committee’s full forensic investigation, the Hogan Lovells team conducted a targeted, quality
11 control review of the extensive record. This entailed testing discrete portions of the Committee’s
12 analysis and reviewing samples of core documents—such as proofs of claims, property records,
13 deeds of trust, grant deeds, transfer agreements, transaction documents, and related
14 correspondence—to evaluate whether the evidentiary foundation supporting substantive
15 consolidation and the Ponzi-scheme presumption was sufficiently robust. Through this expedited
16 review, Hogan Lovells verified the accuracy and reliability of the conclusions reached in the LFM
17 Chapter 11 Cases—allowing the estate to pivot to collaborating with the Committee and the LFM
18 Debtors on developing and implementing a consolidated plan structure within the first three months
19 of the case. The Firm and the Responsible Individual also successfully proposed to the Committee
20 and the LFM Debtors that the issue of substantive consolidation was most appropriately delayed
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1 until Plan confirmation, and that creditors should be allowed to vote on the issue.¹⁰

2 **D. Coordination Upon Joint Plan Proponents**

3 15. Upon the filing of a joint chapter 11 plan, and to enhance efficiency and reduce
4 costs, the Responsible Individual instructed the Firm to, wherever possible, coordinate
5 responsibilities with the Committee and the LFM Debtors' professionals to ensure consistency
6 across the estates, avoid duplication of effort, and reduce administrative expense. The Firm
7 assumed lead responsibility for several cross-estate issues where centralized work would promote
8 efficiency, including developing a coordinated tax strategy to minimize adverse tax consequences
9 for the estates, creditors, and investors, and engaging with criminal authorities regarding the release
10 or resolution of *lis pendens* affecting properties subject to forfeiture so that sales may proceed for
11 the benefit of victims, with proceeds to be distributed through the proposed plan.
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14 16. On other matters, responsibility was shared. For example, KSMP's professionals
15 collaborated closely with the Committee and LFM Debtor professionals in mediating and resolving
16 claims against Socotra—a pivotal event in the case expected to provide approximately \$28.7
17 million in value to the estate and save the estate significant litigation cost—and in the formulation
18 of the proposed plan and disclosure statement. Hogan Lovells anticipates working collaboratively
19 with the Committee and LFM Debtors and their professionals to address and resolve common issues
20 throughout plan confirmation process. This coordinated approach has been a central element of
21 KSMP's overall case strategy—promoting efficiency, reducing duplication, and conserving estate
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25 ¹⁰ This decision had an extremely significant additional benefit: it avoided a protracted litigation battle with various
26 parties objecting to substantive consolidation, particularly Socotra. Socotra, who is the largest secured creditor of
27 KSMP and the LFM Debtors, filed a preliminary objection to substantive consolidation. Delaying substantive
28 consolidation to plan confirmation effectively paved the way for KSMP, LFM, the Committee, and Socotra to mediate
to a global settlement, removing Socotra as an obstacle to property sales and confirmation of a chapter 11 plan.

resources wherever possible. That same strategy underlies Hogan Lovells' approach to professional compensation.

E. Summary of Writeoffs and Discounts

17. While the Firm has worked diligently to streamline the administration of this case and minimize professional fees wherever possible, it recognizes that such fees impose a significant financial burden on defrauded investors. As discussed in more detail below, acutely conscious of the burden that professional fees impose upon the estate and victims, Hogan Lovells agreed with the Responsible Individual to provide the estate with a fifteen percent (15%) discount on its billed fees at the outset of these cases. That discount equates to a fee reduction of \$633,575.78. In addition, Hogan Lovells has also voluntarily written off another \$331,256.00 in fees and \$1,708.38 in expenses to further reduce the professional fee burden on the estate and investors. In total, this fee application reflects a total discount of \$966,612.16 or approximately 21% of the total fees and expenses billed to this matter.¹¹

18. Moreover, the Firm recognizes that approval of the fees and expenses for the First Interim Compensation Period does not equate to immediate payment. Given the uncertainty surrounding the timing of upcoming asset sales, Hogan Lovells and the Responsible Individual continue to evaluate when payments can prudently be made. At this time, the Firm seeks only approval of the requested fees and expenses, with the timing of payment to be determined by the Responsible Individual in her discretion.

JURISDICTION

19. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and

¹¹ Summary charts detailing the amount of fees charged and hours worked by each of Hogan Lovells' professionals and paraprofessionals during the Interim Period are incorporated herein and set forth in **Exhibits A through E**.

1 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order
2 24 (N.D. Cal.) and Rule 5011-1(a) of the Local Rules. This is a core proceeding pursuant to 28
3 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

4 **BACKGROUND**

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6 20. On November 22, 2024, KSMP became subject to an involuntary petition for relief
7 under chapter 11 of the Bankruptcy Code in the Bankruptcy Court for the Northern District of
8 California (the “Court” and the case the “KSMP Chapter 11 Case”).

9 21. On the Relief Date, the Court entered the Stipulated Order for Relief in an
10 Involuntary Case [Dkt. No. 131] and appointed Robbin L. Itkin as the Responsible Individual in
11 this case, with effect from June 16, 2025 [Dkt. No. 172].

12 22. On September 19, 2024, LeFever Mattson and fifty-seven affiliates and subsidiaries
13 (collectively, the “LFM Debtors”)—parties related to KSMP—filed voluntary petitions for relief
14 under chapter 11 of the Bankruptcy Code, commencing their jointly administered bankruptcy cases
15 (the “LFM Chapter 11 Cases”).

16 23. On July 29, 2025, the Court entered the Stipulated Bridge Order in Connection with
17 the *Motion to Substantively Consolidate the Bankruptcy Estates of LeFever Mattson and KS*
18 *Mattson Partners, LP* [Dkt. No. 1887], which, among other things, jointly administers KSMP
19 Chapter 11 Case with the LFM Chapter 11 Cases (collectively, the “Chapter 11 Cases”).

20 24. On October 9, 2024, pursuant to section 1102 of the Bankruptcy Code, the Office
21 of the United States Trustee for the Northern District of California (the “U.S. Trustee”) appointed
22 the Committee in the LFM Chapter 11 Cases [Dkt. No. 135]. On August 26, 2025, the U.S. Trustee
23 appointed the same Committee in KSMP’s Chapter 11 Case [Dkt. No. 2104].
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1 motion for substantive consolidation;

- 2 k. assisting KSMP in reviewing, estimating, and resolving claims asserted
3 against KSMP's estate;
- 4 l. commencing, conducting, and/or defending in this Court litigation that is
5 necessary and appropriate to assert rights held by KSMP, and, as
6 appropriate, protect assets of KSMP's estate, or otherwise further the goal
7 of completing KSMP's successful liquidation or reorganization;
- 8 m. providing non-bankruptcy services for KSMP to the extent requested by
9 KSMP, including, among other things, advice related to corporate
10 governance or management in pending litigation; and
- 11 n. performing all other necessary and appropriate legal services in connection
12 with the chapter 11 case for or on behalf of KSMP.

13 [Case No. 24-10715, Dkt. No. 185]

14 **Summary of Professional Compensation**
15 **and Reimbursement of Expenses Requested**

16 27. Hogan Lovells seeks allowance of interim compensation for professional services
17 performed during the First Interim Compensation Period in the amount of \$3,590,262.73 and for
18 reimbursement of expenses incurred in connection with the rendition of such services in the amount
19 of \$18,516.76. During the First Interim Compensation Period, Hogan Lovells attorneys and
20 paraprofessionals expended a total of 3,168 hours in connection with the necessary services
21 performed. In an exercise of its billing judgment, Hogan Lovells, in its discretion, reduced its fees
22 for professional services rendered during the First Interim Compensation Period by \$331,256.00
23 and provided an additional fifteen percent (15%) discount over all time billed at Hogan Lovells'
24 standard rates, resulting in an additional reduction of \$633,575.78, totaling \$964,831.78 in
25 discounted fees.

26 28. Hogan Lovells has no understanding, agreement, or arrangement of any kind to
27 divide with or pay to anyone any of the fees to be awarded in these Chapter 11 Cases, except as
28 such fees may be shared among Hogan Lovells partners. Except as set forth below, during the First

1 Interim Compensation Period, Hogan Lovells received no payment or promises of payment from
2 any source for services rendered or to be rendered in any capacity whatsoever in connection with
3 the matters covered by this Application. The fees charged by Hogan Lovells in the Chapter 11
4 Cases are billed in accordance with Hogan Lovells' existing billing rates and procedures in effect
5 during the First Interim Compensation Period. The rates Hogan Lovells charges for the services
6 rendered by its professionals and paraprofessionals in the Chapter 11 Cases are generally the same
7 rates Hogan Lovells charges for professional and paraprofessional services rendered in comparable
8 bankruptcy and non-bankruptcy related matters (although, as noted, we have provided a fifteen
9 percent (15%) discount off of our billed fees, as well as significant additional write offs). Such fees
10 are reasonable based on the customary compensation charged by comparably skilled practitioners
11 in comparable bankruptcy and non-bankruptcy cases in a competitive national legal market.

12 29. The summary sheets contain a schedule of Hogan Lovells professionals and
13 paraprofessionals who have performed services for KSMP during the First Interim Compensation
14 Period, the capacities in which each individual is employed by Hogan Lovells, the department in
15 which each individual practices, the hourly billing rate charged by Hogan Lovells for services
16 performed by such individuals, the year in which each attorney was first licensed to practice law,
17 where applicable, and the aggregate number of hours expended in this matter and fees billed
18 therefor. Biographical information for the attorneys who have worked on this case during the First
19 Interim Compensation Period is attached to this application as **Exhibit G**.

20 30. In addition, the summary sheets contains a summary of Hogan Lovells' hours billed
21 during the First Interim Compensation Period using project categories (each of which correspond
22 to a billing task code) hereinafter described. Hogan Lovells maintains computerized records of the
23 time spent by all Hogan Lovells attorneys and paraprofessionals in connection with its
24 representation of KSMP.

25 31. The summary sheets also contain a schedule specifying the categories of expenses
26 for which Hogan Lovells is seeking reimbursement and the total amount for each expense category.

1 32. **Exhibit F** contains the Firm's invoices for the Fee Period, which includes a detailed
2 breakdown of Hogan Lovells' time entries and the expenses Hogan Lovells incurred. As noted,
3 Hogan Lovells agreed to a voluntary fifteen percent (15%) discount of its normal hourly attorney
4 rates. *See Declaration of Richard L. Wynne in Support of Application of Debtor for Order*
5 *Authorizing the Retention and Employment of Hogan Lovells US LLP as Counsel for the Debtor*
6 [Dkt. No. 185, Exhibit C].

7 33. Annexed hereto as **Exhibit A** is a summary and comparison of the aggregate
8 blended hourly rates billed by Hogan Lovells timekeepers in its U.S. offices on all matters during
9 the preceding year on a rolling 12-month basis for the year ending September 30, 2025 and the
10 blended hourly rates billed to KSMP during the First Interim Compensation Period.

11 34. To the extent that time or disbursement charges for services rendered or
12 disbursements incurred relate to the First Interim Compensation Period but were not processed
13 prior to the preparation of this Application, Hogan Lovells reserves the right to request additional
14 compensation for such services and reimbursement of such expenses in a future application.

15 **Summary of Services Performed**
16 **by Hogan Lovells During the First Interim Compensation Period**

17 35. The following summary of services rendered during the First Interim Compensation
18 Period is not intended to be a detailed description of the work performed. Rather, it merely
19 highlights certain project billing categories in which significant services were rendered by Hogan
20 Lovells, as well as identifies some of the issues Hogan Lovells was required to address. Detailed
21 descriptions of the day-to-day services provided by Hogan Lovells and the time expended
22 performing such services in each project billing category are attached hereto as **Exhibit D**. Such
23 detailed descriptions demonstrate that Hogan Lovells was heavily involved in the performance of
24 services for KSMP on a daily basis, including night and weekend work, often under extreme time
25 constraints, to meet the needs of KSMP.

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39. Building on this diligence and legal analysis, the Firm worked with the Responsible Individual and Stapleton to position the assets for efficient monetization. The Firm prepared, reviewed, and negotiated property-management and sale-related agreements; coordinated with brokers, title companies, and other stakeholders; and facilitated the marketing of both residential and commercial properties. The Firm also advised on real-estate disclosure requirements, compliance with local and state real-estate laws, and the resolution of claims or issues affecting the marketability of individual properties. These steps ensured that properties could be brought to market promptly, transparently, and in a manner designed to maximize sale proceeds.

40. Through this coordinated effort, the Firm helped ensure that all potential sources of recovery were identified, preserved, and prepared for liquidation for the benefit of creditors and stakeholders. Given the absence of reliable records and the fragmented nature of KSMP's real-property holdings, this work was essential to maximizing the value of the estate's assets.

Asset Disposition

Fees: \$159,639.00; Total Hours: 146.6

41. Asset disposition is central to the overall case strategy, as KSMP's real properties represent the estate's primary source of recovery for victims. During the First Interim Compensation Period, Hogan Lovells—working closely with the Responsible Individual and Stapleton—designed and implemented an efficient, scalable sale process tailored to KMSP's mixed portfolio of commercial properties and high-value residential assets. Consistent with the estate's emphasis on efficiency and cost control, the Firm began by adapting Court-approved sale procedures, forms, and transaction documents from the LFM Debtors' cases, modifying them where necessary to reflect KSMP's unique co-ownership structures, creditor composition, and operational realities. The Firm also assisted the Responsible Individual in retaining brokers and prepared a comprehensive sale-procedures motion governing the marketing and sale of both residential and commercial properties.

42. Building on this framework, the Firm coordinated with the DIP lender and other key

1 stakeholders to ensure that the estate's marketing and sale strategy was aligned with their
2 expectations. This collaborative approach—central to the broader case strategy—avoided
3 unnecessary disputes and helped streamline decision-making on issues.

4 43. As individual properties moved toward market, the Firm worked with Stapleton to
5 address numerous property-specific issues that required careful and often expedited attention. This
6 included resolving complications arising from tenant-in-common ownership arrangements
7 (including those without written agreements or incomplete title records), correcting errors in chains
8 of title, developing strategies to address co-ownership disputes that affected marketability, and
9 evaluating the treatment of properties subject to *lis pendens* arising from Kenneth Mattson's
10 criminal proceedings. At each step, the Firm's goal was to identify and mitigate obstacles to sale
11 early, resolve questions regarding ownership and possession efficiently, and position each property
12 to transition smoothly from marketing to closing.

13 44. These coordinated efforts—spanning process design, stakeholder engagement, and
14 property-specific problem solving—have been essential to advancing the orderly and efficient
15 disposition of the estate's assets. By positioning properties for prompt and successful sales, the
16 Firm has worked to maximize recoveries, enable meaningful distributions for creditors, and move
17 these Chapter 11 Cases toward a successful resolution for the victims of Kenneth Mattson's fraud.

18 **Relief from Stay/Adequate Protection Proceedings**

19 Fees: \$46,321.00; Total Hours: 37.7

20 45. Hogan Lovells addressed a variety of complex stay relief and adequate protection
21 issues during the First Interim Compensation Period, including responding to multiple threatened
22 foreclosure actions and stay relief violations. Hogan Lovells negotiated, both formally and
23 informally, with various secured creditors and other litigants that had filed or threatened to file
24 motions seeking relief from stay to pursue non-bankruptcy litigation and drafted and filed responses
25 to motions for stay relief. The team's work in this area was essential to protecting KSMP's interests
26 and preserving estate value.

1 **Meetings of and Communications with Creditors Meetings of and**
2 **Communications with Creditors**

3 Fees: \$143,820.00; Total Hours: 95.6

4 46. From the outset of these cases, the Responsible Individual emphasized that
5 consistent, transparent communication with investors and creditors—many of whom are victims of
6 Kenneth Mattson’s fraud—was a central priority. In response, the Firm devoted substantial time
7 during the First Interim Compensation Period to investor and creditor engagement. At the outset of
8 its engagement, to ensure the free flow of information between KSMP and the Committee. The
9 Firm drafted and revised a common interest agreement among KSMP, the Committee and LFM
10 Debtors. Thereafter, the Firm prepared for the 341 meeting of creditors (which was continued on
11 multiple occasions) and took the lead in conducting a dedicated investor town hall to explain the
12 KSMP claims process and respond to investor questions. Following that session, the Firm, working
13 with Committee counsel, prepared and distributed a supplemental video update to address
14 additional questions raised by investors and to provide further guidance regarding claims
15 submission and related issues.

16 47. Throughout this period, the Firm maintained regular and detailed communications
17 with Committee counsel, creditors, and investors regarding case developments, claims
18 administration, and issues affecting individual investors. The Firm developed scripts, talking
19 points, and written updates to ensure accuracy and consistency in messaging, and maintained real-
20 time responsiveness as new issues arose. The Firm also fielded innumerable calls and emails from
21 investors during this period, providing tailored explanations regarding the claims process, asset
22 disposition efforts, case milestones, and individual rights. These communication efforts were
23 integral to maintaining transparency, minimizing confusion among overlapping creditor/investor
24 constituencies, and supporting the efficient administration of the case.

25 **Employment/Fee Applications**

26 Fees: \$195,185.50; Total Hours: 159.4

27 48. During the First Interim Compensation Period, a substantial portion of Hogan
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1 Lovells' work involved assisting the Responsible Individual in determining—under significant
2 time pressure—which professionals the estate required to stabilize operations and how those roles
3 should be structured. The Responsible Individual had initially anticipated appointing Stapleton—
4 which had been engaged by KSMP prior to the Relief Date and possessed some historical
5 knowledge of KSMP's properties—as Chief Restructuring Officer and financial advisor on an
6 expedited basis. After consultation with the United States Trustee, the Committee and the LFM
7 Debtors, and further analysis, the Responsible Individual concluded that a CRO was unnecessary
8 and that a more streamlined professional structure would conserve estate resources without
9 compromising effectiveness.

10 49. Working with the Firm, the Committee, and other stakeholders, the Responsible
11 Individual then assessed the appropriate role for Stapleton. Because Stapleton had knowledge of
12 the properties and their operational issues—and in light of the pending Substantive Consolidation
13 Motion which, if granted, would have obviated the need for KSMP to have its own financial
14 advisor—the Responsible Individual determined that Stapleton should serve as operations and
15 property manager rather than as a full-fledged financial advisor. Implementing this decision—as it
16 evolved over time—required the Firm to draft and revise multiple iterations of retention materials
17 and ultimately file a section 363 motion to retain Stapleton in this focused operational role.

18 50. During this same period, the Firm also prepared its own retention application and
19 worked with the Responsible Individual to evaluate what additional professional support the estate
20 needed to carry out its sale strategy and administer the case effectively. After considering various
21 options—and with a focus on efficiency, geographic coverage, and property-specific expertise—
22 the Responsible Individual determined that retaining five real-estate brokers would provide the
23 necessary support for the marketing and sale of KSMP's diverse portfolio. The Firm prepared,
24 reviewed, and revised engagement letters, fee agreements, and retention applications for those
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1 brokers¹² ensuring compliance with the Bankruptcy Code, local rules, and applicable Court orders,
2 and confirming that all disclosures and scope descriptions were accurate and appropriate.

3 51. To ensure that these professionals functioned as a coordinated team rather than as
4 isolated workstreams, the Firm collaborated with the Responsible Individual and Stapleton to
5 develop an integrated workflow and staffing plan for all professionals. This framework—
6 incorporated into a supplement to Stapleton’s retention application—was designed to avoid
7 duplication of effort, allocate responsibilities efficiently, and ensure that the estate’s limited
8 resources were deployed in the most cost-effective manner possible.

9 52. Together, these efforts ensured that the estate’s professional team was assembled
10 quickly, structured efficiently, and positioned to advance the case in a coordinated and cost-
11 effective manner for the benefit of creditors and victims.

12 **Other Contested Matters (excluding assumption/rejection motions)**

13 Fees: \$400,736.00; Total Hours: 247.6

14 53. Hogan Lovells devoted substantial time during the First Interim Compensation
15 Period to a wide range of contested matters. The most significant portion of time billed to this task
16 code was related to the Socotra mediation and resulting settlement. As noted, the Socotra settlement
17 was one of the most consequential steps taken to generate value for the estate and position the
18 Chapter 11 Cases for confirmation.

19 54. Hogan Lovells, alongside the Committee’s counsel, took a leading role in the
20 Socotra mediation. While the Committee’s counsel drafted a complaint before Hogan Lovells’
21 involvement—and conducted the extensive legal and factual diligence necessary to do so—Hogan
22 Lovells was deeply involved in the mediation process. After independently evaluating the
23 Committee’s legal and factual analysis, the team prepared the papers to appoint a mediator to the

24 ¹² Broker employment applications included: (i) Kidder Matthews [Dkt. No. 2041], granted by order dated September
25 8, 2025 [Dkt. No. 2243]; (ii) Compass [Dkt. No. 2043], granted by order dated September 8, 2025 [Dkt. No. 2240];
26 (iii) W Real Estate [Dkt. No. 2049], granted by order dated September 8, 2025 [Dkt. No. 2242]; (iv) Premiere Estates
27 [Dkt. No. 2052], granted by order dated September 8, 2025 [Dkt. No. 2241]; and (v) Douglas Elliman [Dkt. No. 2228],
28 granted by order dated September 16, 2025 [Dkt. No. 2357].

1 Socotra dispute, extensively commented on the plan proponents' joint Socotra mediation brief, took
2 the lead in drafting a "reply" brief requested by the mediator, and worked closely with the mediator
3 and joint plan proponents, participating in extensive pre-mediation sessions and attending the final
4 two-day mediation. Splitting responsibilities, the Committee took the lead in drafting the settlement
5 agreement (although Hogan Lovells was substantially involved in negotiating and finalizing the
6 terms with Socotra), and Hogan Lovells drafted the 9019 motion to approve the settlement (as well
7 as, after the First Interim Compensation Period, a reply addressing objections thereto). These efforts
8 were coordinated with the Committee and LFM Debtors at every step.¹³

9 55. In addition to the Socotra matter, Hogan Lovells also spent time addressing various
10 pending state court litigation disputes, issuing subpoenas to banks to acquire KSMP's own financial
11 records, and attending to other informal negotiations with parties in interest on a wide array of
12 discrete issues and disputes. The team redeemed a property in Jackson Oregon that had gone into
13 foreclosure proceedings due to non-payment of taxes and coordinated with various stakeholders to
14 protect KSMP's assets. The Firm's work in this area required close collaboration with KSMP, the
15 Committee, and other professionals, and was instrumental in advancing the interests of the estate,
16 resolving disputes, and moving the Chapter 11 Cases toward a successful conclusion.

17 **Non-Working Travel**

18 Fees: \$23,396.00; Total Hours: 14.2

19 56. During the First Interim Compensation Period, Hogan Lovells billed time for non-
20 working travel to the Northern District of California in connection with critical hearings and other
21 case-related proceedings. This included travel to and from court and meetings with stakeholders.
22 The Firm ensured that all travel was conducted in accordance with applicable guidelines and that
23 time was billed at the appropriate reduced rates. Travel was necessary to facilitate in-person
24 participation in key hearings and to advance the interests of the estate. This time category is billed

25 ¹³ The Socotra 9019 motion was filed after the First Interim Compensation Period, but a significant amount of time
26 was expended during the First Interim Compensation Period preparing the motion and discussing with parties in
27 interest.

1 at 50%.¹⁴

2 **Business Operations**

3 Fees: \$153,797.50; Total Hours: 134.2

4 57. During the First Interim Compensation Period, the Firm dedicated substantial time
5 to preparing and filing required court documents—including monthly operating reports, schedules
6 and statements of financial affairs, creditor matrices, status reports, and notices of appearance—
7 and ensuring compliance with all applicable reporting requirements. In an ordinary chapter 11 case,
8 these filings would be completed using the debtor's existing books and records and require
9 substantially less involvement by counsel. Here, however, virtually no reliable records existed. As
10 a result, preparing these filings required the Firm, Stapleton and the Responsible Individual to
11 reconstruct KSMP's financial and operational history from the ground up.

12 58. While Stapleton took the laboring oar on this reconstruction, the effort required
13 Hogan Lovells' assistance and guidance as to the process, obtaining and then at times assisting in
14 reviewing thousands of pages of bank statements, incomplete rent rolls, and scattered materials
15 obtained from the Committee and others; piecing together historical transactions; identifying
16 tenants and payment histories; and confirming the existence, location, and status of bank accounts,
17 leases, insurance policies, and utilities. In many instances, the Firm and Stapleton had to rely on
18 third-party information—such as title reports, lender correspondence, property-manager files, or
19 creditor-provided documents, including those attached to proofs of claim—because no internal
20 records were available. The Firm worked closely with Stapleton throughout this process to verify
21 property-level information, reconcile inconsistencies among external data sources, and ensure the
22 accuracy of these filings despite the absence of foundational accounting records. The Firm also
23 conducted extensive outreach to lenders, co-owners, tenants, banks, and other stakeholders to
24 determine the status of leases, accounts, and other operations necessary to complete the required

25 ¹⁴ For time recorded under the “non-working travel” task code, the Firm applied its standard practice of charging only
26 half of the hours that attorneys entered, at the full applicable rate (rather than billing all hours and reducing the resulting
27 fees). Thus, although attorneys recorded 28.4 hours to this category, only 14.2 hours were actually billed in the invoice.
28 The Firm's voluntary fifteen percent (15%) discount was then applied to the billed amount.

1 filings.

2 59. This intensive effort was essential to bringing the estate into compliance with its
3 reporting obligations and attempting to establish a reliable factual baseline from which the estate
4 could be administered going forward. Because the underlying data was often incomplete or
5 unavailable, the Firm also drafted extensive qualification notes to accompany the schedules and
6 other required filings, ensuring full transparency regarding the limits of the information provided.
7 Throughout this process, the Firm remained focused on efficiency and on advancing the
8 Responsible Individual's mandate to administer the estate in a manner that maximizes value for
9 creditors and victims.

10 **Financing/ Cash Collections**

11 Fees: \$379,534.00; Total Hours: 301.8

12 60. Hogan Lovells dedicated significant time during the First Interim Compensation
13 Period to matters involving debtor-in-possession financing, cash collateral, and related financial
14 issues. At the beginning of this case, KSMP had nearly no unrestricted cash, and, having no rent
15 rolls, no visibility into rental payment streams. At the same time, the KSMP estate was also faced
16 with both immediate and foreseeable longer term operating expenses for insurance, utilities,
17 maintenance and repairs, and environmental and life-safety issues, and KSMP needed to prepare
18 its properties for sale as soon as possible. With the estate in need of liquidity, the Firm assisted
19 KSMP in soliciting and evaluating DIP credit proposals and, ultimately, in negotiating the terms of
20 a DIP facility that would provide the estate with the liquidity needed to stabilize operations. [Dkt.
21 No. 2414]. This work included negotiating and preparing, a DIP credit agreement and proposed
22 DIP orders; addressing lender protections, borrowing conditions, carveouts, and reporting
23 requirements; and ensuring that the terms were feasible in light of KSMP's limited records and the
24 operational needs of its real-estate portfolio.

25 61. As part of its efforts to obtain DIP financing (as well as to prepare the schedules),
26 Hogan Lovells was required to front-load its property analysis in order to compile an informed

1 collateral package for the DIP lender. Thus, property analysis of those assets that were ultimately
2 deemed DIP collateral was recorded to this task code—time which otherwise would have been
3 recorded elsewhere.

4 62. The Firm also coordinated with counsel to KMSP's prepetition lenders, the DIP
5 lender, and the Committee, and worked closely with Stapleton to prepare DIP budgets, cash flow
6 projections, and related materials. In addition to the DIP facility itself, Hogan Lovells also
7 negotiated limited cash-collateral stipulations with individual lenders to permit the estate to use
8 encumbered cash on a short-term basis for urgent operational needs.

9 63. These efforts were essential to securing the liquidity necessary for KSMP's
10 continued operations, addressing immediate financial obligations across its property portfolio, and
11 ensuring that all financing arrangements were negotiated and documented in a manner consistent
12 with the best interests of the estate and its creditors.

13 **Tax Issues**

14 Fees: \$190,635.00; Total Hours: 120.1

15 64. During the First Interim Compensation Period, Hogan Lovells provided extensive
16 advice and analysis regarding tax issues affecting both the KSMP and LFM estates. Critically, the
17 Firm also took the lead in analyzing and addressing those tax issues related to the joint plan of
18 liquidation, such that the LFM Debtors did not have to engage their own special tax counsel.

19 65. The team drafted, reviewed and analyzed tax filings, K-1 disclosures, and the tax
20 consequences of proposed settlements and asset sales. It also prepared a position paper for purposes
21 of discussion with the IRS, and coordinated with tax advisors, government agencies, and other
22 professionals to address complex tax matters, including the treatment of partnership interests,
23 cancellation of debt income, and the impact of restructuring transactions. Moreover, the Firm also
24 provided guidance on tax strategy, compliance with IRS requirements, and the resolution of tax
25 disputes, all of which are critical to the successful administration of the Chapter 11 Cases.

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Case Administration

Fees: \$531,767.50; Total Hours: 522.9

66. During the First Interim Compensation Period, Hogan Lovells devoted substantial resources to case administration and coordination—work that formed the backbone of the Firm’s efforts and was indispensable during the earliest and most chaotic phase of the case. Because the estate had no employees, no internal infrastructure, and no functioning books and records at the outset, the initial weeks of the case required the Firm to serve as the central coordinating hub for virtually all case activity. This category therefore captures a large volume of time spent establishing the foundational systems and processes necessary to administer the estate, even before formal matter numbers or workstreams had been created. Although the Firm made every effort to reallocate time to the most appropriate billing categories after the fact, the pace and scope of the early work—combined with the absence of established matter numbers—meant that certain necessary tasks were recorded in this category even though they related to workstreams that later received their own dedicated codes.

67. The work performed in this category included managing the day-to-day operational demands of the case: preparing for and participating in twice weekly (and often more frequent) status calls with the Responsible Individual and Stapleton; coordinating the exchange of information across professionals; preparing, reviewing, and filing status reports, notices of appearance, and standard procedural filings; and ensuring compliance with all applicable court, U.S. Trustee, and local reporting requirements. The Firm also coordinated communications with the United States Trustee, chambers, and other stakeholders; oversaw document collection, review, and production; and implemented the internal systems required to manage an estate that, at the outset, had no reliable reporting structure of its own.

68. These administrative and coordination efforts—though necessarily broad at the start—were essential to stabilizing the case, imposing order on an estate with no functioning internal processes, and enabling all subsequent workstreams to proceed efficiently. As the case

1 progressed and discrete workstreams became more defined, the Firm transitioned work out of this
2 category and into specific matter codes, but the foundational coordination performed during this
3 period was critical to advancing the estate and ensuring the smooth administration of the case.

4 **Claims Administration and Objections**

5 Fees: \$129,565.50; Total Hours: 91.6

6 69. During the First Interim Compensation Period, Hogan Lovells focused on the
7 administration and processing of claims, which was a central component of the case given the
8 absence of reliable historical records and the overlapping creditor and investor constituencies. The
9 Firm developed and implemented customized claims procedures for the estate, beginning with the
10 design of a bar date process tailored to KSMP's unique circumstances. [Dkts. No. 1951 and 2184]
11 This required preparing and filing the bar date motion, coordinating with the claims and noticing
12 agent, and creating procedures that were clear, efficient, and workable for both traditional creditors
13 and individuals who were investors in the LFM Debtors' cases and thus already familiar with an
14 entirely different claims process.

15 70. To ensure accessibility and avoid confusion among these overlapping stakeholder
16 groups, Hogan Lovells conducted multiple meetings and discussions with the Committee and small
17 investor groups to understand what would be most straightforward and least burdensome for
18 investors. Based on this feedback, the Firm evaluated the LFM Debtors' claims procedures and
19 made substantial modifications to those frameworks so they could be adapted appropriately for
20 KSMP—balancing consistency across estates with the need to minimize investor confusion,
21 prevent duplicative effort and reduce the risk that investors or creditors might mistakenly rely on
22 prior filings.

23 71. Hogan Lovells also reviewed and analyzed claim documentation from the LFM
24 Debtors' case that was relevant to KSMP's, implemented confidentiality procedures necessary to
25 protect investors, and worked collaboratively with the Responsible Individual, Stapleton, the
26 Committee professionals and claims agent to ensure the proper processing of all claims in

1 accordance with Court orders, the Bankruptcy Code, and applicable procedures.

2 72. In addition, the Firm oversaw updates to the claims submission portal, drafted and
3 refined detailed instructional materials to guide creditors and investors through the process, and
4 responded to numerous inquiries regarding claims requirements, supporting documentation, and
5 the interplay between this case and the related LFM Debtors' cases. These collective efforts were
6 essential to creating a claims process that was transparent, administratively efficient, and accessible
7 to all stakeholders—particularly given the complexity and sensitivity of KSMP's creditor body.

8 **Plan and Disclosure Statement (including Business Plan)**

9 Fees: \$215,449.50; Total Hours: 134.6

10 73. Hogan Lovells devoted significant time during the First Interim Compensation
11 Period to the review, negotiation, and refinement of the joint plan of reorganization and related
12 materials. Although the Firm did not prepare the initial drafts of these documents, it conducted a
13 comprehensive and substantive review of each component, providing extensive comments and
14 revisions to ensure accuracy, internal consistency, and alignment with KSMP's unique
15 circumstances. This work included a detailed analysis of the Investigation Report, during which the
16 Hogan Lovells team carefully examined the factual record, supporting documents, and applicable
17 legal authorities to confirm that the case for substantive consolidation was fully supported and that
18 the evidentiary basis for the Ponzi-scheme finding was robust. As part of this process, the Firm also
19 made substantial revisions to the Investigation Report to improve clarity, organization, and
20 readability, ensuring that the report was accessible to investors and presented the complex facts and
21 legal conclusions in a straightforward manner.

22 74. The Firm also undertook an extensive evaluation of whether three additional KSMP-
23 related entities should be placed into chapter 11 and included in the jointly proposed plan. This
24 analysis required a detailed, entity-by-entity assessment of the limited records available, including
25 corporate documents, historical property information, governance materials and investor claims
26 involving these entities. For one of the entities, Hogan Lovells and the Responsible Individual were

1 unable—despite significant effort—to identify the equity holders necessary to authorize a
2 bankruptcy filing under the entity’s governance documents. Because proper corporate authority
3 could not be established, the Firm concluded that the entity could not be placed into chapter 11.

4 75. Having made this determination, with respect to the remaining two affiliated
5 entities, Hogan Lovells assessed whether it would be feasible and cost effective to prepare the
6 schedules, statements, first-day materials, and operational support required for a chapter 11 filing,
7 particularly given the near-total absence of reliable records. The Firm concluded that filing the
8 remaining entities—and the schedules they would be required to file—would necessitate recreating
9 books and records from scratch at substantial cost to the estate. Moreover, once it became clear that
10 investors of the one affiliated entity could participate in the plan only through non-debtor
11 substantive consolidation (requiring revision of the proposed chapter 11 plan to address this issue),
12 the Responsible Individual reassessed the cost-benefit analysis for filing the remaining entities.
13 Because non-debtor substantive consolidation would also allow investors with claims against the
14 remaining two affiliates to participate in plan distributions, proceeding through non-debtor
15 consolidation was determined to be the most efficient and cost-effective path. As these petitions
16 were prepared, but never filed, Hogan Lovells voluntarily deducted a significant portion of the time
17 spent on preparing such petitions.

18 76. In addition to addressing this unique-to-KSMP issue, Hogan Lovells also engaged
19 in extensive negotiations with stakeholders regarding plan structure, classification, treatment, and
20 recoveries; evaluated confirmation-related issues; and provided advice regarding plan feasibility
21 and compliance with the Bankruptcy Code. The Firm participated in numerous meetings to address
22 plan-related issues and to ensure that KSMP’s interests (and those of its stakeholders) were
23 accurately reflected and protected in the plan documents and disclosure materials.

24 77. All of this work was undertaken on an extremely compressed timeline—within
25 approximately the first 90 to 120 days of a highly complex case—requiring the Firm to analyze
26 significant factual and legal issues, reach informed positions quickly, and negotiate a coordinated
27

1 plan structure on an expedited basis. These efforts were critical to advancing the cases toward
2 confirmation and ensuring that the resulting plan was fair, feasible, and in the best interests of
3 creditors.

4 **Substantive Consolidation**

5 Fees: \$381,722.00; Total Hours: 260.2

6 78. As already discussed, during the First Interim Compensation Period, Hogan Lovells
7 devoted substantial time to analyzing the Substantive Consolidation Motion and the claims issues
8 intertwined with it. This work required a careful review of the evidentiary record developed by the
9 Committee, targeted research into its application to KSMP's facts, and an evaluation of the
10 documents and transfers most relevant to KSMP's creditor body. As part of this effort, the Firm
11 conducted targeted diligence by testing selected portions of the factual and legal analysis and
12 examining sample sets of core documents—such as proofs of claim, property records, grant deeds,
13 transfer agreements, correspondence, and other transactional materials—to evaluate the evidentiary
14 foundation for substantive consolidation and whether it was sufficiently robust.

15 79. The Firm also analyzed the general claims landscape across KSMP and affiliated
16 entities, including how different consolidation outcomes would affect creditor recoveries.

17 80. Throughout this process, the Firm advised the Responsible Individual regarding the
18 legal, operational, and economic implications of consolidation—particularly its impact on creditor
19 recoveries, plan feasibility, and administrative efficiency. Conducted on an accelerated timetable,
20 this analysis enabled KSMP to take a well-supported position on substantive consolidation and
21 contributed significantly to advancing the case toward a coordinated plan framework.

22 **Ken Mattson Matters**

23 Fees: \$272,405.00; Total Hours: 177.3

24 81. During the First Interim Compensation Period, Hogan Lovells addressed a wide
25 range of issues arising from Kenneth Mattson's criminal case and its impact on KSMP and its
26 assets. This work included monitoring and analyzing criminal-case filings, reviewing government

1 and defense submissions, and keeping abreast of developments in the criminal matter that bore on
2 KSMP's estate. The Firm engaged in numerous discussions with the U.S. Attorney's Office
3 concerning properties owned by KSMP that were referenced in the criminal proceedings or subject
4 to *lis pendens*, solely for the purpose of understanding the potential implications for estate assets
5 and ensuring the Responsible Individual had accurate information to administer the estate. The
6 Firm also communicated with Kenneth Mattson's criminal counsel regarding matters affecting
7 KSMP, including asset-related issues, tenancy concerns, property interests, and the interplay
8 between the criminal allegations and KSMP's bankruptcy obligations.

9 82. In addition, the Firm analyzed the potential effects of the criminal proceedings on
10 title, possession, and salability of Ken Mattson's properties; considered the treatment of potential
11 forfeiture claims; and raised for consideration the concept of distributing proceeds from *lis pendens*
12 properties through a chapter 11 plan to ensure that recoveries are directed toward victims in a
13 structured, court-approved manner. Throughout this work, the Firm's focus was on protecting the
14 estate and its creditors, identifying risks created by the criminal case, and ensuring that the
15 Responsible Individual could administer KSMP's assets in a manner consistent with the
16 Bankruptcy Code and the best interests of victims.

17 Hearings

18 Fees: \$109,739.50; Total Hours: 74

19 83. During the First Interim Compensation Period, Hogan Lovells devoted significant
20 time to preparing for, attending, and following up on hearings before the Bankruptcy Court and
21 related proceedings. The team prepared detailed hearing outlines, coordinated with KSMP,
22 Stapleton, the Committee, the LFM Debtors and other professionals regarding hearing strategy, and
23 reviewed relevant pleadings and supporting materials. Members of the Hogan Lovells team
24 regularly attended and participated in hearings, including those considering debtor-in-possession
25 financing, plan status conferences, motions for relief from stay, asset sales, and mediation-related
26 issues. The Firm also participated in pre- and post-hearing meetings with the Responsible

1 Individual and, when appropriate, the Committee and LFM Debtors, to discuss outcomes, next
2 steps, and the implementation of court orders. These efforts were essential to advancing the Chapter
3 11 Cases, ensuring that KSMP's positions were effectively presented to the Court and facilitating
4 the resolution of key issues in the process. To control fees, Hogan Lovells typically did not bill for
5 the attendance of attorneys at hearings who were not directly participating in the hearing.

6 ***

7 84. The regular hourly rates of all professionals and paraprofessionals rendering
8 services in this Case are set forth in Exhibit B, attached hereto. Hogan Lovells billed its time for
9 each calendar month during the First Interim Compensation Period on an hourly basis using its
10 regular hourly rates, provided, however, that Hogan Lovells voluntarily discounted its fees by
11 fifteen percent (15%). During the First Interim Compensation Period, Hogan Lovells' application
12 of the voluntary discount has decreased the amount of Hogan Lovells' fee request by \$633,575.78
13 (not including additional discretionary writeoffs).

14 85. The professional services performed by Hogan Lovells on behalf of KSMP during
15 the First Interim Compensation Period required an aggregate expenditure of 3,168 recorded hours
16 by Hogan Lovells partners, counsel, associates and paraprofessionals. Of the aggregate time
17 expended, 1,490.90 recorded hours were expended by Hogan Lovells partners; 1,423.80 recorded
18 hours were expended by associates, counsel, practice area attorneys and discovery attorneys; and
19 253.30 recorded hours were expended by paraprofessionals and other non-legal staff of Hogan
20 Lovells

21 86. During the First Interim Compensation Period, Hogan Lovells billed for time
22 expended by attorneys based on standard hourly rates ranging from \$760 to \$1,990 per hour for
23 attorneys. Allowance of compensation in the amount requested would result in a blended hourly
24 billing rate for attorneys of approximately \$1,187.96, once the voluntary discount of fifteen percent
25 (15%) is applied.

Actual and Necessary Disbursements

87. Hogan Lovells has disbursed \$18,516.76 in expenses incurred in providing professional services during the First Interim Compensation Period. These expenses are reasonable and necessary and were essential to the efforts described in this Application.

88. Hogan Lovells has made every effort to minimize its disbursements in these Chapter 11 Cases. The actual expenses incurred in providing professional services were necessary, reasonable and justified under the circumstances to serve the needs of KSMP.

Other Compliance with U.S Trustee Guidelines Requirements

89. **Exhibits A through E**, attached hereto, contain information that complies with the requirements of the U.S. Trustee Guidelines. In addition, pursuant to paragraph C.5 of the Large Case Guidelines, Hogan Lovells provides the following information:

INQUIRY	STATEMENTS
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? If so, please explain.	Yes, Hogan Lovells has agreed to voluntarily discount its total incurred fees by fifteen percent (15%) after other voluntary writeoffs.
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?	Not applicable.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
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 billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	No, the Application includes no time related to reviewing or revising time records.

1 Does this fee application include time or fees 2 for reviewing time records to redact any 3 privileged or other confidential information? If 4 so, please quantify by hours and fees.	No.
5 If the fee application includes any rate 6 increases since retention: (i) Did your client 7 review and approve those rate increases in 8 advance? (ii) Did your client agree when 9 retaining the law firm to accept all future rate 10 increases? If not, did you inform your client 11 that they need not agree to modified rates or 12 terms in order to have you continue the 13 representation, consistent with ABA Formal 14 Ethics Opinion 11-458?	Hogan Lovells did not change its rates for this 15 matter during the applicable period.

Client Review of Billing Statements

90. Pursuant to the Local Guidelines, a cover letter enclosing this Application will be emailed to KSMP's Responsible Individual, Robbin L, Itkin. The letter invites Ms. Itkin to discuss with KSMP's professionals and the UST any objections, concerns, or questions she may have with regard to the requested compensation and reimbursement set forth in the KSMP professionals' first interim fee applications. A copy of that cover letter is attached hereto as **Exhibit H**.

THE REQUESTED COMPENSATION SHOULD BE ALLOWED

91. The professional services rendered by Hogan Lovells have required a high degree of professional competence and expertise to address, with skill and dispatch, the numerous issues requiring evaluation and action by KSMP. The services rendered to KSMP were performed efficiently, effectively, and economically, and the results obtained to date have benefited the unsecured creditors of KSMP's estate.

92. The allowance of interim compensation for services rendered and reimbursement of expenses in chapter 11 cases is expressly provided for in section 331 of the Bankruptcy Code:

Any professional person . . . may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered . . . as is provided under section 330 of this title.

1 93. With respect to the level of compensation, section 330(a)(1)(A) of the Bankruptcy
2 Code provides, in pertinent part, that the Court may award to a professional person “reasonable
3 compensation for actual, necessary services rendered[.]” Section 330(a)(3), in turn, provides that:

4 In determining the amount of reasonable compensation to be
5 awarded to . . . [a] professional person, the court shall consider the
6 nature, the extent, and the value of such services, taking into account
all relevant factors, including —

- 7 (A) the time spent on such services;
8 (B) the rates charged for such services;
9 (C) whether the services were necessary to the administration of, or beneficial at
the time which the service was rendered toward the completion of, a case
under this title;
10 (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;
11 (E) with respect to a professional person, whether the person is board certified
or otherwise has demonstrated skill and expertise in the bankruptcy field;
12 and
13 (F) whether the compensation is reasonable based on the customary
compensation charged by comparably skilled practitioners in cases other
14 than cases under this title.

15 94. In the instant case, and as extensively described herein, Hogan Lovells submits that
16 the services for which it seeks compensation and the expenditures for which it seeks reimbursement
17 in this Application were necessary for and beneficial to the preservation and maximization of value
18 for creditors in these chapter 11 cases. The compensation requested herein is reasonable and
19 appropriate in light of the nature, extent and value of such services to KSMP, as well as the size
20 and complexity of these Chapter 11 Cases. The professional services were performed expediently
21 and efficiently. Whenever possible, Hogan Lovells sought to minimize the costs of its services to
22 KSMP. Accordingly, approval of the compensation for professional services and reimbursement
23 of expenses sought herein is warranted.

24 **NOTICE**

25 Notice of this Application will be provided to (i) the LFM Debtors, (ii) the United States
26 Trustee; (iii) the Committee, (iv) Serene Investment Management, LLC, the DIP Lender; and (v)

1 those persons who have formally appeared in these Chapter 11 Cases and requested service
2 pursuant to Bankruptcy Rule 2002. Based on the circumstances surrounding this Application and
3 the nature of the relief requested herein, Hogan Lovells respectfully submits that no further notice
4 is required.

5
6 **CONCLUSION**

7 WHEREFORE, Hogan Lovells respectfully requests that the Court enter an order,
8 substantially in the form attached hereto as **Exhibit I**: (i) allowing Hogan Lovells (a) interim
9 compensation for professional services rendered as counsel for KSMP during the First Interim
10 Compensation Period in the amount of \$3,590,262.73; and (b) reimbursement of expenses incurred
11 in connection with rendering such services in the aggregate amount of \$18,516.76, for a total award
12 of \$3,608,779.49; (ii) authorizing KSMP to pay to Hogan Lovells \$3,608,779.49 for services
13 rendered and expenses incurred during the First Interim Compensation Period; and (iii) granting
14 such further relief as is just.

15 Dated: November 21, 2025

16 HOGAN LOVELLS US LLP

17 By: Richard L. Wynne
18 Richard L. Wynne (Bar No. 120349)
richard.wynne@hoganlovells.com
19 Erin N. Brady (Bar No. 215038)
erin.brady@hoganlovells.com
20 Edward J. McNeilly (Bar No. 314588)
edward.mcneilly@hoganlovells.com
21 HOGAN LOVELLS US LLP
22 1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
23 Telephone: (310) 785-4600
24 Facsimile: (310) 785-4601

Exhibit A

Customary and Comparable Compensation Disclosures

Hogan Lovells' hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Hogan Lovells' hourly rates for bankruptcy services are comparable to the rates charged by Hogan Lovells, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required.

The blended hourly rate for all Hogan Lovells timekeepers across all geographical U.S. offices and all practice areas (including both professionals and paraprofessionals) who are not primarily restructuring timekeepers (collectively, the "Non-Restructuring Timekeepers") during the 12-month period beginning October 1, 2024 and ending on September 30, 2025 (the "Comparable Period") was, in the aggregate, approximately \$989.87. By comparison, the blended hourly rate for all Hogan Lovells timekeepers (including both professionals and paraprofessionals) who worked on the Chapter 11 Cases during the Application Period was, in the aggregate, \$1,133.29.¹⁵

The following table shows blended hourly rates by category of professional and paraprofessional (rounded to the nearest dollar) for the Comparable Period.

Position at Hogan Lovells	Blended Rate for This Application Period	Blended Rate for Non-Restructuring Attorneys
Partner	\$1,453.62	\$1,272.60
Associate	\$909.78	\$848.75
Paralegal	\$504.16	\$405.65

¹⁵ The blended rate is inclusive of the voluntary fifteen percent (15%) discount provided on all Hogan Lovells fees.

Exhibit B

Summary of Timekeepers Included in this Application

Name	Practice Group (Year Admitted)	Hourly Rate	Total Hours	Fees¹⁶
Restructuring and Special Situations				
Richard L. Wynne	Restructuring and Special Situations (New Jersey: 1982; New York: 1983; California: 1985)	\$1,975	361.7	\$714,357.50
Erin N. Brady	Restructuring and Special Situations (California: 2001; Washington D.C.: 2019; New York: 2020)	\$1,570	514.3	\$807,451.00
Todd M. Schwartz	Restructuring and Special Situations / Private Equity (California: 2013; Illinois: 2007; Ohio: 2022; Texas: 2017)	\$1,925	112.7	\$216,947.50
Edward Joseph McNeilly	Restructuring and Special Situations (England and Wales: 2014; California: 2017; Washington State: 2018)	\$1,295	530.1	\$686,479.50
Danielle Ullo	Restructuring and Special Situations (New York: 2022)	\$1,035	483.1	\$500,008.50
Litigation				
Dennis H. Tracey	Litigation (New York: 1982)	\$1,990	11.8	\$23,482.00
Megan Nishikawa	Litigation (California: 2010)	\$1,630	236.3	\$385,169.00
Leen Bukai	Litigation (California: 2024)	\$760	92.2	\$70,072.00
Isolte Beale	M&A (California: 2024)	\$760	215.8	\$164,008.00
White Collar and Criminal Investigations				
Ann Kim	Litigation and White Collar Investigations	\$1,475	91.9	\$135,552.50

¹⁶ The amounts in this column reflect the Firm's discretionary deductions of \$348,310.70.

Name	Practice Group (Year Admitted)	Hourly Rate	Total Hours	Fees ¹⁶
	(California: 2000)			
Regulatory & Environmental				
Tom Boer	Global Regulatory (California: 1998; Washington DC: 2023)	\$1,400	7.7	\$10,780.00
Maia Jorgensen	Environmental & Natural Resources (California: 2022)	\$1,115	11.2	\$12,488.00
Real Estate				
Loryn Arkow	Real Estate (California: 1996)	\$1,515	107	\$162,105.00
Katie Chacho	Real Estate (California: 2024)	\$855	42.4	\$36,252.00
Tax				
Jeff Uffner	Tax (New York: 1977)	\$1,975	47.5	\$93,812.50
Caroline Koo	Tax (California: 2024; New York: 2020; Washington DC: 2023)	\$1,115	49	\$54,635.00
Legal Support Staff				
Tracy Southwell ¹⁷	Paralegal	\$655	169.9	\$111,284.50
Kristel Gelera	Paralegal	\$470	71.2	\$33,464.00
Henaa Salehi	Paralegal	\$450	12.2	\$5,490.00
Total:	\$1,133.29 (blended hourly rate for all timekeepers)		3,168	\$4,223,838.50
Total fees incurred after voluntary 15% discount				\$3,590,262.73

¹⁷ Ms. Southwell passed away unexpectedly during the First Interim Compensation Period, necessitating the engagement of another paralegal (Kristel Gelera) to ensure continuity of services.

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Exhibit C
Budget and Staffing Plan
Not applicable; intentionally left blank

Exhibit D-1

Summary of Compensation Requested by Project Category

ACTIVITY	HOURS	FEES
Asset Analysis/Recovery & Real Estate	650.2	\$890,125.50
Asset Disposition	146.6	\$159,639.00
Relief from Stay/ Adequate Protection Proceedings	37.7	\$46,321.00
Meetings of and Communications with Creditors	95.6	\$143,820.00
Employment/Fee Applications	159.4	\$195,185.50
Other Contested Matters (excluding assumption/rejection motions)	247.6	\$400,736.00
Non-Working Travel ¹⁸	14.2	\$23,396.00
Business Operations	134.2	\$153,797.50
Financing/ Cash Collections	301.8	\$379,534.00
Tax Issues	120.1	\$190,635.00
Case Administration	522.9	\$531,767.50
Claims Administration and Objections	91.6	\$129,565.50
Plan and Disclosure Statement (including Business Plan)	134.6	\$215,449.50
Substantive Consolidation	260.2	\$381,722.00
Ken Mattson Matters	177.3	\$272,405.00
Hearings	74	\$109,739.50
Total	3,168	\$4,223,838.50
Voluntary 15% Discount	N/A	\$633,575.78
Total fees incurred after voluntary 15% discount¹⁹		\$3,590,262.73

¹⁸ For time recorded under the “non-working travel” task code, the Firm applied its standard practice of charging only half of the hours that attorneys entered, at the full applicable rate (rather than billing all hours and reducing the resulting fees). Thus, although attorneys recorded 28.4 hours to this category, only 14.2 hours were actually billed in the invoice. The Firm’s voluntary fifteen percent (15%) discount was then applied to the billed amount.

¹⁹ The amount in this row includes a voluntary deduction of \$633,575.78 applied to this First Interim Fee Application.

Exhibit D-2

Summary of Expense Reimbursement Requested by Category

Expense Category	Service Provider (if applicable)	Total Expenses
Court Documents	Northern District of California Bankruptcy Court	\$34.00
Computer Research – Lexis	LexisNexis	\$248.59
Computer Research – Pacer	Pacer	\$314.30
Computer Research – Westlaw	Westlaw	\$1,945.26
Travel (Airfare)		\$731.94
Lodging		\$446.28
Ground Travel		\$250.95
Hearing Transcripts	ESCRIBERS, LLC	\$458.20
Legal Technology & Consulting		\$9,069.69
Messenger Service		\$319.27
Word Processing		\$881.25
Data Storage		\$3,817.03
GRAND TOTAL:		\$18,516.76

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Exhibit E
Summary Cover Sheet of Application

Interim Application Summary	
Name of Applicant	Hogan Lovells US LLP
Name of Client	KS Mattson Partners, LP
Time period covered by Interim Application	June 9, 2025 through and including September 30, 2025
Total compensation sought during Application Period	\$3,590,262.73
Total expenses sought during Application Period	\$18,516.76
Total compensation and expenses voluntarily deducted	\$964,831.78 ²⁰
Involuntary Petition Date	November 22, 2024
Relief Date	June 9, 2025
Retention Date	June 9, 2025
Date of order approving employment	July 18, 2025 [Dkt. No. 223]
Total allowed compensation paid to date	\$0.00
Total allowed expenses paid to date	\$0.00
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00

²⁰ This amount is comprised of both the voluntary fifteen percent (15%) discount agreed upon at the outset of this case, resulting in a deduction of \$633,575.78 on Hogan Lovells' standard rates—and additional discretionary deductions of \$331,256.00, resulting in a total discount of \$964,831.78. Hogan Lovells also voluntarily deducted \$1,780.38 in expenses. These deductions resulted in a total discount of \$966,612.16 for both fees and expenses. At this time, Hogan Lovells is seeking to be awarded 100% of its total billed fees and 100% of its billed expenses.

Blended rate in the Interim Application for all attorneys ²¹	\$1,187.96
Blended rate in the Interim Application for all timekeepers	\$1,133.29
Compensation sought in the Interim Application already paid pursuant to a monthly compensation certificate but not yet allowed	\$0.00
Expenses sought in the Interim Application already paid pursuant to a monthly compensation certificate but not yet allowed	\$0.00
Number of professionals included in Interim Application	19
If applicable, number of professionals in the Interim Application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought for the Application Period	N/A
Number of professionals billing fewer than 15 hours to the case during the Application Period	3
Are any rates higher than those approved or disclosed at retention	No

²¹ The reported blended rate is inclusive of the voluntary fifteen percent (15%) discount provided on all Hogan Lovells fees.

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Exhibit F
Invoices



Hogan Lovells US LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
T +1 310 785 4600
F +1 310 785 4601
www.hoganlovells.com

KS Mattson Partners, LP
16350 Ventura Boulevard
Suite D-509
Encino, CA 91436
United States

Attention: Robbin Itkin, Independent Manager

Date

November 21, 2025

Invoice No

19600011730

Our ref

795070.000001

Partner

Rick Wynne

Email

rick.wynne@hoganlovells.com

Fed ID

53-0084704

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Summary

Professional Services

Less 15% Discount

Total Professional Services

Total Disbursements and Charges

Amount

USD

1,808,722.00

(271,308.30)

1,537,413.70

4,101.65

Subtotal

1,541,515.35

Total Due

1,541,515.35

Payment Details

Electronic payments should be sent to
Wells Fargo Bank NA, 420 Montgomery Street
San Francisco, CA 94104

Account: Hogan Lovells US LLP – Operating Account
SWIFT code: WFBUS6S

Account No: 2000010688096

ABA #121000248 For Wire Transfers Only

ABA #054001220 (For ACH Transfers Only)

Payment requested
within 30 days from
invoice date

Please reference invoice
number/client-matter
number on payments and
send remittance advices
to ar@hoganlovells.com

Check payments may be
sent to:

Lockbox Services - 75890
Hogan Lovells US LLP
P.O. Box 715890
Philadelphia, PA 19171-
5890

For US based clients, invoices can be paid online
at

<https://www.e-billexpress.com/ebpp/HoganLovells>

Please contact
ebillexpresshelp@hoganlovells.com
to obtain login credentials.

Date	November 21, 2025
Invoice No	19600011730
Our Ref	795070.000001

Period July 31, 2025

Detail by jurisdiction	Professional Services	Disbursements & Charges	Total USD
Hogan Lovells US LLP	1,537,413.70	4,101.65	1,541,515.35
Total	1,537,413.70	4,101.65	1,541,515.35

Disbursements & charges	Charges USD
Travel	889.25
Taxi	210.95
Courier and Shipping Costs	81.43
Filing Fees	34.00
Court and Government Fees	98.60
Lit Support fees payable by HLUS LLP to HLTech Legal Tech LLC	732.19
Document Production	706.25
Search Fees	584.93
eDiscovery Data Storage Fees - Internal	764.05
Total	4,101.65

	Date	November 21, 2025
KS Mattson Partners, LP	Invoice No	19600011730
	Our Ref	795070.000001

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Professional Services

01 - Substantive Consolidation

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/10/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with S. Golden regarding substantive consolidation and case background
06/11/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Attend meeting with Pachulski team regarding hearing, status of their case, and substantive consolidation motion
06/12/25	Erin Brady	HLUS	1,570.00	4.00	6,280.00	Review Pachulski substantive consolidation presentation (1.4); attend presentation regarding same (1.9); review indictment (.7)
06/16/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Analyze substantive consolidation issues
06/17/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Confer with R. Itkin regarding substantive consolidation issues
06/18/25	Erin Brady	HLUS	1,570.00	2.80	4,396.00	Review and analyze substantive consolidation motion
06/19/25	Erin Brady	HLUS	1,570.00	2.00	3,140.00	Confer with S. Golden regarding substantive consolidation issues (.2); confer with R. Itkin regarding same (.2); confer with M. Nishikawa regarding case background and litigation issues (.5); prepare background documents regarding same (.2); analyze substantive consolidation issues (.4); review revised draft (.5)
06/19/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review draft substantive consolidation motion
06/23/25	Ann Chungsun Kim	HLUS	1,475.00	0.70	1,032.50	Review and analyze substantive consolidation motion

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06/23/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Review email from M. Nishikawa regarding substantive consolidation and respond to same
06/23/25	Megan Nishikawa	HLUS	1,630.00	2.80	4,564.00	Review indictment and recent motion for substantive consolidation and discuss same with Hogan Lovells team
06/24/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Attend meeting with M. Nishikawa regarding litigation and substantive consolidation
06/24/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Telephone conference with E. Brady regarding hearing and substantive consolidation (.2); review substantive consolidation motion (.6)
06/25/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Review and respond to emails from LeFever Mattson committee regarding substantive consolidation meetings
06/25/25	Megan Nishikawa	HLUS	1,630.00	0.60	978.00	Prepare e-mail to L. Bukai regarding research confirming burden of proof when seeking substantive consolidation
06/25/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review substantive consolidation motion in preparation for call regarding same
06/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review letter from T. LeFever to K. Mattson
06/25/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Exchange internal correspondence regarding substantive consolidation
06/25/25	Leen Bukai	HLUS	760.00	2.90	2,204.00	Research Ninth Circuit standard for substantive consolidation in bankruptcy
06/26/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Conference call with

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						Pachulski team, R. Itkin, R. Wynne and E. McNeilly regarding substantive consolidation
06/26/25	Rick Wynne	HLUS	1,975.00	1.20	2,370.00	Attend substantive consolidation meeting
06/26/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Attend video conference with Hogan Lovells and Pachulski teams regarding substantive consolidation
06/26/25	Leen Bukai	HLUS	760.00	1.70	1,292.00	Conduct research on required standard and burden for substantive consolidation in bankruptcy
06/27/25	Erin Brady	HLUS	1,570.00	1.30	2,041.00	Confer with M. Nishikawa regarding case management conference and substantive consolidation issues (.3); analyze issues regarding substantive consolidation analysis (.6); analyze issues regarding upcoming case management conference (.1); conference with M. Nishikawa regarding water board issues (.1); review documents regarding same (.2)
06/28/25	Megan Nishikawa	HLUS	1,630.00	0.80	1,304.00	Review and comment on legal research regarding appropriate standard for substantive consolidation
06/30/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Confer with D. Ullo, L. Bakai and M. Nishikawa regarding review of investor claims (.5); confer with S. Golden regarding substantive consolidation questions and issues (1.0)
06/30/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Correspondence regarding substantive consolidation and K. Mattson objections

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06/30/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Internal call with Hogan Lovells team members regarding litigation review of proofs of claims and interests
06/30/25	Leen Bukai	HLUS	760.00	0.70	532.00	Participate in internal discussions with partners and associates regarding litigation review of investor claims
07/01/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Review draft declarations in support of substantive consolidation
07/01/25	Rick Wynne	HLUS	1,975.00	4.80	9,480.00	Review substantive consolidation motion by debtor (); correspondence with R. Itkin and E. Brady regarding same (); review Umpqua Bank objection (); prepare outline of questions for official creditors committee team, including review of motion exhibits (3.8); review declarations and prepare notes on next steps and additional information (1.0)
07/01/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Review filings in Lefever Mattson matter regarding substantive consolidation
07/02/25	Erin Brady	HLUS	1,570.00	2.00	3,140.00	Attend meeting with committee and debtor teams regarding substantive consolidation
07/02/25	Megan Nishikawa	HLUS	1,630.00	2.00	3,260.00	Prepare for and attend presentation by committee counsel in support of substantive consolidation
07/02/25	Rick Wynne	HLUS	1,975.00	3.60	7,110.00	Review substantive consolidation materials and exhibits, property spreadsheets, and draft declaration exhibits (1.4); attend meeting with

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						Pachulski, Keller Benvenuti, DSI and Hogan Lovells teams and PriceWaterhouse Coopers board of LeFever Mattson regarding review of substantive consolidation motion and our notes, questions and declarations (2.0); review correspondence regarding substantive consolidation (.2)
07/02/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Attend presentation from debtor's counsel regarding substantive consolidation
07/02/25	Leen Bukai	HLUS	760.00	2.00	1,520.00	Participate in discussions with Hogan Lovells team and Pachulski team regarding substantive consolidation support
07/03/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Meet with M. Nishikawa and L. Bukai regarding substantive consolidation diligence
07/03/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Review filings in Lefever Mattson matter regarding substantive consolidation
07/03/25	Leen Bukai	HLUS	760.00	0.70	532.00	Meet with M. Nishikawa and E. Brady to discuss substantive consolidation diligence and strategy
07/07/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Exchange correspondences with litigation team regarding substantive consolidation analysis and review proofs of claim provided by LFM committee counsel
07/08/25	Erin Brady	HLUS	1,570.00	2.10	3,297.00	Confer with M. Nishikawa, A. Kim and L. Bukai regarding substantive consolidation diligence (.5); conference call with Fennemore team regarding

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						K. Mattson views on substantive consolidation (1.3); follow up call with R. Itkin, M. Nishikawa, D. Ullo, R. Wynne and L. Bukai regarding same (.3)
07/08/25	Megan Nishikawa	HLUS	1,630.00	4.50	7,335.00	Prepare for and attend meetings with L. Bukai and then larger Hogan Lovells team to discuss presentation by Fennemore regarding opposition to substantive consolidation (1.6); prepare for, attend, and debrief with Hogan Lovells team regarding presentation by Fennemore regarding opposition to substantive consolidation (1.8); review and comment on draft Riviera and Jeremiassen declarations in support of substantive consolidation (1.1)
07/08/25	Rick Wynne	HLUS	1,975.00	3.20	6,320.00	Review revised Rivera declaration regarding substantive consolidation in preparation for meeting, including brief exhibit review (.8); review draft of T. Jeremissian declaration (.4); attend meeting with M. Nishikawa, I. Beal and L. Bukai, Hogan Lovells substantive consolidation team regarding diligence strategy (.5); attend meeting with K. Mattson counsel regarding their views with respect to substantive consolidation (1.5)
07/08/25	Danielle Ullo	HLUS	1,035.00	1.50	1,552.50	Attend video conference with Fennemore team regarding issues relating to substantive consolidation

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Date	Name	LLP	Rate	Hours	Amount	Narrative
07/08/25	Leen Bukai	HLUS	760.00	5.60	4,256.00	Participate in internal discussions regarding substantive consolidation strategy (1.6); analyze updated declarations and exhibits supporting motion for substantive consolidation (2.5); meet with Fennemore team to discuss substantive consolidation approach (1.5)
07/09/25	Erin Brady	HLUS	1,570.00	1.80	2,826.00	Meeting with LeFever Mattson, Hogan Lovells and LeFever Mattson committee substantive consolidation teams (.8); follow up call with Hogan Lovells substantive consolidation team and S. Golden regarding same (.4); follow up call with M. Nishikawa, R. Itkin, D. Ullo, R. Wynne and L. Bukai regarding next steps on substantive consolidation (.3); review questions/diligence for PwC and other declarants (.3)
07/09/25	Megan Nishikawa	HLUS	1,630.00	5.60	9,128.00	Prepare for and attend calls with committee counsel and Hogan Lovells team regarding declarations in support of substantive consolidation and KS Mattson Partners questions regarding same (2.4); review declarations of K. Rivera and T. Jeremiassen in support of substantive consolidation and prepare e-mail to committee counsel with questions regarding same (3.2)
07/09/25	Rick Wynne	HLUS	1,975.00	2.40	4,740.00	Review K. Rivera declaration and outline of

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						questions and comments (.9); attend meeting with LeFever Mattson debtor and official creditors committee regarding their substantive consolidation motion and issues and questions we have on their substantive consolidation declarations, and follow up internal call regarding same (1.5)
07/09/25	Danielle Ullo	HLUS	1,035.00	1.20	1,242.00	Attend video conference with LeFever Mattson counsel and committee counsel regarding substantive consolidation
07/09/25	Leen Bukai	HLUS	760.00	4.50	3,420.00	Analyze and annotate draft declaration in support of substantive consolidation (2.5); review sample responses to substantive consolidation (.5); meet with counsel for LeFever to discuss substantive consolidation strategy (1.5)
07/10/25	Megan Nishikawa	HLUS	1,630.00	5.30	8,639.00	Review partial summary of supporting documentation relating to Riviera declaration in support of substantive consolidation (.8); review documentation regarding Rivera declaration in support of substantive consolidation (2.9); correspond with committee counsel regarding declaration of T. Jeremiassen in support of substantive consolidation and supporting documentation and review revised same declaration (1.6)
07/10/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with S. Golden regarding substantive consolidation

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						ideas
07/10/25	Leen Bukai	HLUS	760.00	3.60	2,736.00	Analyze cited documents in draft declarations in support of substantive consolidation (2.0); analyze draft addendum for any potential additions prior to filing (.6); organize plan to acquire pleadings in Benedetti vs. Mattson case (1.0)
07/11/25	Erin Brady	HLUS	1,570.00	3.60	5,652.00	Conference call with R. Wynne and R. Itkin regarding various issues, including substantive consolidation diligence status and review substantive consolidation evidence filed by committee and LFM debtor (3.2); review Umpqua opposition to substantive consolidation (.4)
07/11/25	Megan Nishikawa	HLUS	1,630.00	2.40	3,912.00	Further review declaration of T. Jeremiassen and communicate with committee counsel regarding same (1.6); review Umpqua bank's opposition to motion for substantive consolidation (.8)
07/11/25	Rick Wynne	HLUS	1,975.00	1.50	2,962.50	Review diligence information regarding substantive consolidation, memoranda and cases, as well as factual issues
07/11/25	Leen Bukai	HLUS	760.00	2.50	1,900.00	Identify and organize all filed declarations and supporting exhibits in support of substantive consolidation (1.1); communicate with counsel from Fennemore to request pleading

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						documents (.2); review and analyze updated declarations and supporting exhibits in support of substantive consolidation (1.2)
07/12/25	Megan Nishikawa	HLUS	1,630.00	2.90	4,727.00	Review requested documentation from PwC for purposes of evaluating request for substantive consolidation
07/13/25	Megan Nishikawa	HLUS	1,630.00	2.80	4,564.00	Further review documentation submitted in support of substantive consolidation in preparation for call with experts regarding same
07/13/25	Leen Bukai	HLUS	760.00	0.40	304.00	Organize and share with client all filed documents in support of substantive consolidation in one accessible format
07/14/25	Erin Brady	HLUS	1,570.00	3.10	4,867.00	Meeting with LeFever Mattson, PwC and Hogan Lovells team regarding PwC declarations and underlying evidence (1.0); prepare for and attend meeting with T. Jeremiassen, LeFever Mattson counsel and LeFever Mattson committee counsel regarding T. Jeremiassen declaration (.6); analyze issues regarding whether to file additional debtor entities (.5); prepare email to R. Itkin regarding same (.2); analyze substantive consolidation evidence and positions to take on pending motion (.8)
07/14/25	Megan Nishikawa	HLUS	1,630.00	4.70	7,661.00	Prepare for and attend meeting with declarant K. Riviera and committee counsel to discuss

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						substantive consolidation (2.6); Prepare for and attend meeting with financial consultant and committee counsel to discuss substantive consolidation (.9); Review as filed declarations and related exhibits filed in support of substantive consolidation (1.2)
07/14/25	Edward Joseph McNeilly	HLUS	1,295.00	1.40	1,813.00	Review supporting declarations for substantive consolidation motion
07/14/25	Danielle Ullo	HLUS	1,035.00	2.80	2,898.00	Review declarations of K. Rivera and T. Jeremiassen regarding substantive consolidation (.6); attend interview of K. Rivera regarding substantive consolidation declaration (1.5); attend interview of Tom Jeremiassen regarding substantive consolidation declaration (.8)
07/14/25	Leen Bukai	HLUS	760.00	2.70	2,052.00	Participate in discussions with individuals that submitted declarations in support of substantive consolidation to discuss bases for their findings
07/15/25	Megan Nishikawa	HLUS	1,630.00	3.60	5,868.00	Review draft response and recommendation in response to committee's substantive consolidation motion
07/15/25	Leen Bukai	HLUS	760.00	3.30	2,508.00	Draft preliminary response to motion for substantive consolidation
07/16/25	Erin Brady	HLUS	1,570.00	2.30	3,611.00	Analyze issues regarding need to file additional debtor entities (.5); conference call with S. Golden and E. McNeilly

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						regarding same (.7); confer with S. Golden regarding extension to objection deadline and other issues (1.0); coordinate with M. Nishikawa and L. Bukai regarding attending K. Mattson deposition (.1)
07/16/25	Megan Nishikawa	HLUS	1,630.00	3.30	5,379.00	Further review and revise response to motion seeking substantive consolidation
07/16/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Call with E. Brady regarding substantive consolidation and plan idea for us to delay it until then
07/16/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Call with E. Brady and S. Golden regarding substantive consolidation
07/16/25	Leen Bukai	HLUS	760.00	6.60	5,016.00	Draft preliminary response to the official committee of unsecured creditors' motion for substantive consolidation of LeFever Mattson and KS Mattson Partners, LP
07/17/25	Erin Brady	HLUS	1,570.00	3.50	5,495.00	Conference call with R. Wynne regarding substantive consolidation issues (.4); conference call with R. Wynne, D. Grassgreen and S. Golden regarding substantive consolidation issues (1.5); confer with M. Nishikawa regarding substantive consolidation resolution and revising pleading (.5); prepare summary of points from group call (.4); review draft stipulation extending deadlines to respond (.1); review correspondence from M. Bostick regarding substantive consolidation (.2); conference with R.

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						Wynne regarding same (.3); prepare email to M. Nishikawa and L. Bukai regarding Speciality Properties, Treehouse and Perris (.1)
07/17/25	Megan Nishikawa	HLUS	1,630.00	2.50	4,075.00	Conference with E. Brady regarding updated strategy with respect to response to substantive consolidation (.3); revise response to substantive consolidation and discuss same with larger team (2.0)
07/17/25	Rick Wynne	HLUS	1,975.00	10.30	20,342.50	Review correspondence from K. Mattson counsel with various requests and their substantive consolidation positions (.2); attend meeting with Pachulski, including D. Grassgreen, S. Golden and team, E. Brady and R. Itkin regarding substantive consolidation motion, including our issues and concerns, and their views on path forward (1.0); prepare status report and preliminary reply regarding substantive consolidation, including review of materials from Stapleton and Fennemore, and call and correspondence with Stapleton, A. Kim, Fennemore, Pachulski and KBK regarding Ocean Front documents (8.0); attend meeting with LeFever Mattson committee and debtors regarding substantive consolidation and our response and suggestions regarding delay to plan confirmation, mediation, joint administration, and

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						follow up call with E. Brady regarding same (1.1)
07/17/25	Leen Bukai	HLUS	760.00	2.20	1,672.00	Revise and prepare second draft of response to motion for substantive consolidation
07/18/25	Erin Brady	HLUS	1,570.00	2.00	3,140.00	Prepare initial comments to draft substantive consolidation statement (1.5); review substantive consolidation objections (.5)
07/18/25	Megan Nishikawa	HLUS	1,630.00	1.70	2,771.00	Review Socotra opposition to substantive consolidation (1.1); review list of due diligence performed to determine propriety of substantive consolidation (.6)
07/18/25	Rick Wynne	HLUS	1,975.00	8.40	16,590.00	Telephone conference with R. Itkin regarding substantive consolidation resolution ideas (.2); review and revise substantive consolidation reply (.5); review substantive consolidation objections (1.5); prepare KS Mattson Partners substantive consolidation response (1.2); review objections filed to substantive consolidation by the Haleys (.9); review objections to substantive consolidation by Socotra and others including creditor R. Tillman (1.9); review and revise introduction to our reply papers regarding substantive consolidation to outline continuance, mediation, joint administration ideas, and review M. Nishikawa draft (2.2)

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07/18/25	Leen Bukai	HLUS	760.00	1.50	1,140.00	Compile list of all due diligence conducted by client and its representatives regarding substantive consolidation (.9); identify and organize all filed oppositions to motion for substantive consolidation (.4)
07/19/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Conference call with LeFever Mattson counsel, committee counsel, R. Wynne, M. Nishikawa and R. Itkin regarding substantive consolidation issues and objections (1.3); follow up with R. Wynne regarding same (.2)
07/19/25	Megan Nishikawa	HLUS	1,630.00	5.00	8,150.00	Prepare for and attend call with LeFever Mattson team and client to discuss proposed response regarding substantive consolidation (1.8); review and revise response to motion regarding substantive consolidation (3.2)
07/19/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Call with S. Golden regarding substantive consolidation details and our reply, order issues, and U.S. Trustee issues and concerns, as well as our positions
07/19/25	Rick Wynne	HLUS	1,975.00	1.50	2,962.50	Call with R. Itkin, E. Brady, LeFever Mattson debtor group and official creditors committee regarding substantive consolidation motion and bridge order idea (1.0); call with M. Nishikawa and E. Brady regarding substantive consolidation reply and bridge order idea, and review KS

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						Mattson Partners diligence we ran with respect to substantive consolidation (.5)
07/20/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Exchange emails with M. Nishikawa and R. Wynne regarding pleading in litigation case (.2); prepare email to R. Wynne regarding joint administration and order (.8)
07/20/25	Rick Wynne	HLUS	1,975.00	2.10	4,147.50	Call with R. Itkin regarding issues with substantive consolidation reply and order (.3); call with D. Grassgreen regarding meeting with U.S. Trustee with respect to order on substantive consolidation and joint administration issues (.2); correspondence with R. Itkin and E. Brady regarding our reply and order changes, including multiple revisions to same (1.3); prepare correspondence to LeFever Mattson group regarding order, including my review and concerns (.3)
07/20/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review substantive consolidation response
07/21/25	Erin Brady	HLUS	1,570.00	6.90	10,833.00	Revise substantive consolidation response (2.7); conference call with S. Golden, M. Nishikawa, R. Itkin, J. Rosell, R. Wynne and D. Grassgreen regarding substantive consolidation interim resolution and next steps (.5); follow up call with E. McNeilly, R. Itkin, M. Nishikawa and R. Wynne regarding same (.4); conference call with J.

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						Rosell, J. Day, D. Grassgreen and D. Silvera regarding proposed interim substantive consolidation resolution (.5); review draft interim order and comment on same (.7); further conferences with R. Wynne, D. Grassgreen, R. Itkin and M. Nishikawa regarding substantive consolidation (1.0); prepare email to R. Itkin regarding substantive consolidation (.3); prepare emails to R. Itkin and R. Wynne regarding proposed order (.1); further revise proposed order (.3); review and consider committee comments to order (.2); prepare email to E. McNeilly regarding substantive consolidation response (.1); prepare follow up email to E. McNeilly regarding substantive consolidation response (.1)
07/21/25	Megan Nishikawa	HLUS	1,630.00	2.80	4,564.00	Further prepare response to motion seeking substantive consolidation and review related legal research
07/21/25	Rick Wynne	HLUS	1,975.00	4.50	8,887.50	Attend internal Hogan Lovells team meeting regarding all open to do items (.5); attend full group meeting with LeFever Mattson and committee regarding substantive consolidation, U.S. Trustee positions and all issues, and follow up internal meeting regarding same (1.0); attend meeting with D. Grassgreen, R. Itkin and M. Nishikawa

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						regarding order issues with respect to joint administration, U.S. Trustee position, details of substantive consolidation, including review by us and questions for committee, and U.S. Trustee negotiations, and follow up correspondence regarding same (.9); follow up calls with R. Itkin and E. Brady regarding position to take with respect to substantive consolidation given U.S. Trustee position and objectors, and committee and LeFever Mattson preferences vs. our issues (1.1); follow up call with D. Grassgreen regarding U.S. Trustee positions with respect to substantive consolidation (.2); follow up group call with R. Itkin, Pachulski and E. Brady regarding substantive consolidation order and correspondence regarding changes (.8)
07/21/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review official creditors committee comments to our reply and revisions to same, and correspondence with R. Itkin and E. Brady regarding same
07/21/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Call with R. Wynne, E. Brady, R. Itkin, M. Nishikawa regarding substantive consolidation motion (.3); review substantive consolidation order (.1); emails regarding E. Brady comments on substantive consolidation (.2); review and comment on substantive consolidation response (.4)

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07/21/25	Leen Bukai	HLUS	760.00	2.30	1,748.00	Conduct research for case law support on partial joint administration under bankruptcy rule 1015
07/22/25	Erin Brady	HLUS	1,570.00	5.00	7,850.00	Prepare revisions to substantive consolidation response (.3); revise substantive consolidation response in light of feedback from U.S. Trustee (1.2); confer with R. Itkin regarding same (.2); confer with D. Grassgreen and D. Silvera regarding feedback from the U.S. Trustee (.4); confer with R. Itkin regarding U.S. Trustee feedback (.3); confer with R. Wynne regarding same (.3); analyze issues raised by U.S. Trustee feedback on interim settlement proposal (.3); review Sharp declaration (.2); review R. Itkin comments to response (.3); confer with M. Nishikawa and E. McNeilly by email regarding same (.1); coordinate with committee and LeFever Mattson counsel regarding discussion proposed resolution with objectors (.1); negotiate extension to objection deadline (.1); conference with S. Golden regarding same (.1); review stipulation regarding same (.1); confer with A. Anderson regarding mediation motion (.1); analyze and incorporate further comments from R. Itkin (.5); review email from committee counsel regarding response papers (.1); confer by email with R. Itkin regarding same

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	Our Ref	795070.000001

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

01 - Substantive Consolidation

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.1); finalize substantive consolidation response (.2)
07/22/25	Megan Nishikawa	HLUS	1,630.00	4.20	6,846.00	Further review and revise response to motion seeking substantive consolidation and discuss same with larger Hogan Lovells team
07/22/25	Rick Wynne	HLUS	1,975.00	4.00	7,900.00	Further review and revise reply papers, draft order changes, and U.S. Trustee position-required revisions to order and reply papers, and calls and correspondence with R. Itkin, Hogan Lovells team, Pachulski, Keller Benvenuti and U.S. Trustee regarding same, as well as further evening calls and correspondence with E. Brady regarding reply papers finalizing issues, and results of discussions with objectors on our proposed resolution (3.5); call with R. Fernandez and R. Harris regarding the Haley objection and background, and our proposed resolution (.5)
07/22/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Review LeFever Mattson response and declaration
07/22/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Review and provide comments to draft response to motion for substantive consolidation
07/22/25	Leen Bukai	HLUS	760.00	3.90	2,964.00	Proofread and revise draft response to motion for substantive consolidation
07/23/25	Erin Brady	HLUS	1,570.00	2.80	4,396.00	Review revised substantive consolidation order (.2); prepare email to R. Wynne regarding outreach to objecting parties (.1);

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01 - Substantive Consolidation

Date	Name	LLP	Rate	Hours	Amount	Narrative
						confer with M. Nishikawa and L. Bukai regarding Mattson deposition (.5); confer with R. Itkin regarding feedback on substantive consolidation motion (.2); analyze issues regarding Specialty Properties, Treehouse and Perris (.6); prepare email to D. Grassgreen regarding joint administrative order (.1); prepare email to R. Wynne and R. Itkin regarding joint administrative order (.1); further correspondence with M. Nishikawa regarding Mattson deposition (.1); prepare email to J. Rosell regarding draft joint administrative order (.1); review draft of committee reply to substantive consolidation (.6); prepare feedback for committee on same (.2)
07/23/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Review order and correspondence regarding same with respect to substantive consolidation bridge order to objectors, LeFever Mattson debtor and committee (.5); review official creditors committee draft reply on substantive consolidation (.6); review further order changes for objector comments (.2)
07/24/25	Erin Brady	HLUS	1,570.00	3.60	5,652.00	Confer with R. Wynne regarding hearing and other issues (.4); prepare for hearing (1.8); confer by email with M. Nishikawa regarding Mattson deposition (.3); review objector comments to

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01 - Substantive Consolidation

Date	Name	LLP	Rate	Hours	Amount	Narrative
						proposed joint administrative order (.2); prepare email to committee and LeFever Mattson counsel regarding same (.1); follow up correspondence with committee and LeFever Mattson counsel regarding same (.1); correspondence with committee and LeFever Mattson counsel regarding Mattson position on proposed order (.1); prepare email correspondence to R. Itkin regarding hearing (.2); confer with R. Wynne regarding substantive consolidation order and other issues (.4)
07/25/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Attend hearing on LFM Committee's motion for substantive consolidation
07/25/25	Kristel Gelera	HLUS	470.00	2.30	1,081.00	Assist team with preparation of DIP motion, order and supporting declaration
07/31/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with S. Golden regarding various substantive consolidation and plan issues
07/31/25	Leen Bukai	HLUS	760.00	0.50	380.00	Identify and analyze most compelling proofs of claim in support of substantive consolidation
			Subtotal	236.10	347,680.00	

02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/11/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Review Pachulski presentation to Department of Justice, 1059 account PowerPoint and outline

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/12/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with R. Itkin regarding criminal case pleadings and issues
06/15/25	Ann Chungsun Kim	HLUS	1,475.00	2.10	3,097.50	Review and analyze background materials and indictment, and internal correspondence regarding access to files and mail
06/16/25	Ann Chungsun Kim	HLUS	1,475.00	4.90	7,227.50	Telephone conference with Hogan Lovells team regarding status of proceedings, strategy, and next steps (1.4); analyze and assess issues regarding criminal proceedings and prepare for telephone conference with Department of Justice (.9); telephone conference with R. Itkin, E. Brady, and E. McNeilly regarding Department of Justice call strategy (.5); telephone conference with Department of Justice regarding criminal proceeding and access to records (.8); review and analyze documents from criminal proceeding (1.3)
06/16/25	Erin Brady	HLUS	1,570.00	4.30	6,751.00	Prepare for call with Department of Justice (1.1); conference call with Department of Justice regarding various issues (.8); review and analyze Department of Justice bail filings (2.2); follow up with E. McNeilly regarding same (.2)
06/17/25	Ann Chungsun Kim	HLUS	1,475.00	2.20	3,245.00	Telephone conference with E. McNeilly regarding retention application and privilege issues (.3); telephone conference with E. Brady regarding privilege and

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						independence issues (.3); telephone conference with E. Brady and R. Itkin regarding retention and privilege issues (.3); review and analyze documents regarding privilege and retention issues (.7); review and revise email to K. Matson's counsel regarding document production (.2); telephone conference with Hogan Lovells and Stapleton teams, and R. Itkin regarding retention and privilege issues (.4)
06/18/25	Ann Chungsun Kim	HLUS	1,475.00	0.60	885.00	Review communications regarding obtaining discovery from K. Mattson's counsel, draft email to Assistant U.S. Attorneys regarding same, and internal emails regarding review of same
06/19/25	Ann Chungsun Kim	HLUS	1,475.00	1.30	1,917.50	Analyze and assess issues regarding bank accounts, data review, and workstreams in furtherance of bankruptcy and investigative matters, and internal correspondence regarding same (.5); emails with U.S. Attorney's Office regarding access to discovery, and internal correspondence regarding same (.2); analyze and assess issues regarding KS Mattson Partners bank account and correspondence regarding same (.6)
06/20/25	Ann Chungsun Kim	HLUS	1,475.00	2.30	3,392.50	Review emails regarding discovery issues and draft email to R.S. Pollock regarding obtaining documents from criminal

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						discovery, and internal emails regarding same (.4); analyze and assess issues regarding Morrison Foerster representation of KS Mattson Partners and K. Mattson in Securities and Exchange Commission and Department of Justice investigations, and internal correspondence regarding same (.6); telephone conference with R. Itkin, E. Brady and E. McNeilly regarding substantive consolidation issues, retention issues, and criminal and Securities and Exchange Commission case representation issues (1.0); review and analyze draft engagement letter with Stapleton (.3)
06/20/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with A. Kim regarding Morrison Foerster outreach on KS Mattson Partners representation
06/23/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review pretrial motion regarding K. Mattson assets
06/24/25	Ann Chungsun Kim	HLUS	1,475.00	0.70	1,032.50	Internal discussion regarding preparation for telephone conference with criminal and Securities and Exchange Commission counsel for K. Mattson and telephone conference with counsel (.6); emails with client and Hogan Lovells team regarding criminal and Securities and Exchange Commission representation issues (.1)
06/24/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Meeting with Morrison Foerster, A. Kim and R.

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Itkin regarding KS Mattson Partners representation in criminal matters
06/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Review index of criminal discovery provided (.3); review pleadings in criminal case for relevance to KS Mattson Partners bankruptcy (.4)
06/26/25	Ann Chungsun Kim	HLUS	1,475.00	2.50	3,687.50	Email to counsel regarding engagement letter (.1); review and analyze criminal discovery production (.5); review engagement letters and analyze issues regarding Securities and Exchange Commission enforcement action against KS Mattson Partners (1.3); emails with R. Itkin and E. Brady regarding Securities and Exchange Commission complaint (.3); draft email to Securities and Exchange Commission (.1); emails with R. Itkin and R.S. Pollock regarding meeting to discuss government investigations (.2)
06/27/25	Ann Chungsun Kim	HLUS	1,475.00	2.20	3,245.00	Review engagement letters and analyze representation issues in government investigations, and telephone conference with R. Itkin and E. Brady regarding same (1.1); telephone conference with Securities and Exchange Commission regarding investigation (.6); correspondence with R. Itkin regarding meeting with Securities and Exchange Commission and proposed communication to counsel, retention issues

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						with financial advisor, and potential response to Securities and Exchange Commission action
06/27/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Confer with A. Kim and R. Itkin regarding Morrison Foerster representation (.4); confer with A. Kim and Securities and Exchange Commission regarding investigation (.5)
06/27/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review Morrison Foerster engagement letter and call with E. Brady regarding documents to get
06/30/25	Ann Chungsun Kim	HLUS	1,475.00	0.30	442.50	Analyze and assess issues regarding government investigations and emails with R. Itkin regarding meeting with criminal and Securities and Exchange Commission counsel
07/01/25	Ann Chungsun Kim	HLUS	1,475.00	0.50	737.50	Analyze and assess issues regarding counsel issues, property payments, and conflicts issues, and correspondence regarding same
07/02/25	Ann Chungsun Kim	HLUS	1,475.00	1.40	2,065.00	Review and analyze issues regarding rental payments and telephone conference with R. Itkin and E. Brady regarding same (.7); telephone conference with E. Brady regarding property issues, contact with government, collection of records, and investigation strategy (.5); review and analyze email regarding property issue (.2)
07/02/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Confer with R. Itkin and A. Kim regarding Securities and Exchange Commission, Morrison

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Foerster and rent collection concerns (.5); follow up conference with A. Kim regarding Securities and Exchange Commission stay and rent collection concerns (.5)
07/03/25	Ann Chungsun Kim	HLUS	1,475.00	0.30	442.50	Telephone conference with N. Marino and R. Itkin regarding Securities and Exchange Commission investigation
07/07/25	Ann Chungsun Kim	HLUS	1,475.00	3.70	5,457.50	Review email from U.S. Attorney's Office, and review and analyze filing in criminal matter, and internal correspondence regarding same (.8); telephone conference with R. Itkin and Hogan Lovells team regarding criminal motion and property issues (.8); analyze and assess issues regarding properties at issue in criminal matter (.5); telephone conference with Department of Justice regarding property issues and K. Mattson motion to modify pre-trial asset restraint, and follow-up conference with E. Brady regarding same (1.0); telephone conference with R. Itkin and E. Brady regarding call with Department of Justice and representation issues, and revise email to counsel regarding representation issues (.3); draft email to Department of Justice regarding representation issues (.1); emails with R. Itkin and Hogan Lovells team regarding correspondence with counsel regarding termination of

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						representation (.2)
07/07/25	Erin Brady	HLUS	1,570.00	4.00	6,280.00	Conference call with R. Itkin, R. Wynne and A. Kim regarding criminal filing and K. Mattson claims to property (.5); diligence regarding same (.8); conference call with A. Kim, C. Lee, Assistant U.S. Attorney, Agent R. Grace and N. Bhagat (Assistant U.S. Attorney) regarding K. Mattson claims to property (.8); confer with A. Kim regarding next steps with respect to same (.2); confer with R. Wynne regarding same (.2); confer with S. Golden regarding call with US Attorney's Office (.3); confer with M. Bergthold regarding 1832/1834 properties (.2); analyze issues regarding same (.4); review chain of title documents regarding same (.3); review preservation order (.3)
07/07/25	Rick Wynne	HLUS	1,975.00	1.90	3,752.50	Review preservation order (.2); review correspondence from U.S. Attorney regarding criminal case, and official creditors committee draft pleadings (.4); attend meeting with R. Itkin, A. Kim and E. Brady regarding fraudulent transfer issues with respect to property subject to bail reform motion, and possible replies (.8); Pprepare correspondence to R. Itkin, A. Kim and E. Brady regarding Morrison Foerster and KS Mattson Partners continued okay as

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						counsel or not (.5)
07/07/25	Leen Bukai	HLUS	760.00	1.10	836.00	Analyze strategy regarding filed motion to modify pretrial asset restraint
07/08/25	Ann Chungsun Kim	HLUS	1,475.00	1.40	2,065.00	Analyze and assess issues regarding property transfers to assess issues related to criminal proceedings (.8); telephone conference with Hogan Lovells team regarding property issues and criminal proceedings (.6)
07/08/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Conference call with S. Golden regarding criminal proceedings (.4); follow up call with S. Golden regarding criminal proceedings (.2); attend internal Hogan Lovells bi-weekly call with R. Wynne, D. Ullo, A. Kim, and I. Beal to discuss criminal issues (.5)
07/08/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review correspondence regarding 405 London property issues, and K. Mattson position with respect to properties for bail reform
07/09/25	Ann Chungsun Kim	HLUS	1,475.00	0.90	1,327.50	Email to Securities and Exchange Commission regarding waiver and status of litigation (.1); draft correspondence regarding prior representation issue and access to files (.3); review and analyze correspondence regarding property issues (.5)
07/10/25	Ann Chungsun Kim	HLUS	1,475.00	3.80	5,605.00	Review and analyze government's opposition to motion regarding KS Mattson Partners property,

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						and telephone conference with R. Itkin, E. Brady, and R. Wynne regarding same (2.6); emails with Securities and Exchange Commission regarding waiver of summons and stay (.2); review and analyze rules and case law, and draft email to former counsel regarding request for KS Mattson Partners files (.6); telephone conference with Department of Justice regarding property issues, and email to R. Itkin and R. Wynne regarding same (.4)
07/10/25	Erin Brady	HLUS	1,570.00	2.30	3,611.00	Review criminal pleadings from government (.4); prepare email to L. Arkow regarding recordation of deed for 1832/1834 (.2); analyze issues regarding same (.4); confer with A. Kim regarding Castle Rock properties (.1); confer with D. Ullo regarding same (.1); confer with A. Kim, R. Wynne and R. Itkin regarding criminal filing and next steps (.6); conference call with N. Bhagat (U.S. Attorney's Office), Agent R. Grace and C. Lee (U.S. Attorney's Office) (.5)
07/10/25	Megan Nishikawa	HLUS	1,630.00	1.20	1,956.00	Review government's opposition to K. Mattson's motion to modify pre-trial asset restraint
07/10/25	Rick Wynne	HLUS	1,975.00	1.60	3,160.00	Review U.S. Attorney opposition to Mattson bank information motion (.8); review K. Mattson motion for release of properties, including

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						reviewing some KS Mattson Partners property records regarding same in line with United States Attorney's Office opposition documents filed (.8)
07/11/25	Ann Chungsun Kim	HLUS	1,475.00	0.60	885.00	Analyze and assess potential fraudulent conveyance issues regarding Del Mar properties
07/11/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with A. Kim regarding various criminal related issues
07/13/25	Ann Chungsun Kim	HLUS	1,475.00	1.00	1,475.00	Analyze and assess issues regarding criminal case, property issues and internal investigation, and correspondence regarding same
07/14/25	Ann Chungsun Kim	HLUS	1,475.00	1.10	1,622.50	Analyze issues regarding Del Mar properties, and correspondence with Stapleton regarding same (.9); emails with R. Itkin and Hogan Lovells team regarding hearing in criminal proceedings (.2)
07/14/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with A. Kim regarding July 31 hearing (.1); confer with D. Silvera regarding July 31 hearing (.1); analyze issues regarding K. Mattson (.1)
07/14/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Review government opposition to modification to pre-trial restraints
07/15/25	Ann Chungsun Kim	HLUS	1,475.00	0.50	737.50	Analyze and assess issues regarding property conveyances and potential claims
07/16/25	Ann Chungsun Kim	HLUS	1,475.00	1.70	2,507.50	Telephone conference with E. Brady and E. McNeilly regarding Del Mar

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						property issues, and proposed meeting with M. Lair (.6); review criminal docket for update on status of criminal proceedings (.2); email to Department of Justice regarding revised protective order (.1); review and analyze communications regarding Del Mar properties (.8)
07/16/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with A. Kim regarding criminal and privilege issues, 1716 property, and upcoming hearing (.4); follow up with A. Kim regarding protective order modification (.1)
07/16/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Call with A. Kim and E. Brady regarding 1834-1836 Ocean Drive
07/17/25	Ann Chungsun Kim	HLUS	1,475.00	1.90	2,802.50	Review letter from Fennemore regarding substantive consolidation (.3); review documents and prepare questions for M. Lair interview (1.1); telephone conferences with R. Wynne regarding Del Mar property issues (.5)
07/17/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Call and correspondence with A. Kim regarding Mattson bail motion and implications for KS Mattson Partners properties, including review of title issues, U.S. Attorney papers and decisions on next steps
07/18/25	Ann Chungsun Kim	HLUS	1,475.00	0.80	1,180.00	Analyze and assess issues regarding Del Mar property conveyance issues, and internal correspondence regarding same (.4); review correspondence from R.

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Pollock and review forfeiture notice, and correspondence regarding same (.4)
07/22/25	Ann Chungsun Kim	HLUS	1,475.00	0.30	442.50	Review and analyze follow-up questions for K. Mattson counsel, and edits to same
07/23/25	Megan Nishikawa	HLUS	1,630.00	4.20	6,846.00	Further prepare for deposition of K. Mattson, including reviewing key documents
07/23/25	Leen Bukai	HLUS	760.00	1.10	836.00	Meet with E. Brady and M. Nishikawa to prepare for upcoming Mattson deposition
07/24/25	Ann Chungsun Kim	HLUS	1,475.00	1.00	1,475.00	Review reply brief in support of motion to modify pre-trial asset restraint, and internal correspondence regarding same
07/24/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Review Mattson response to bond motion (.4); prepare correspondence with A. Kim and R. Wynne regarding same (.2); prepare correspondence with S. Golden regarding same (.2)
07/24/25	Megan Nishikawa	HLUS	1,630.00	6.40	10,432.00	Attend deposition of K. Mattson and prepare e-mail to team regarding same
07/24/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review K. Mattson deposition summary
07/24/25	Leen Bukai	HLUS	760.00	8.00	6,080.00	Attend Ken Mattson deposition
07/25/25	Ann Chungsun Kim	HLUS	1,475.00	3.20	4,720.00	Review and analyze criminal and bankruptcy proceedings filings in preparation for K. Mattson criminal hearing, and internal correspondence

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02 - Criminal Case

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						regarding same (2.4); analyze and assess issues regarding privilege questions and correspondence regarding same (.5); correspondence regarding obtaining criminal discovery (.3)
07/25/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Review K. Mattson reply to bail opposition (.3); confer with A. Kim regarding criminal discovery (.1); confer with A. Kim regarding criminal hearing (.2)
07/25/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Review K. Mattson criminal case filings
07/26/25	Ann Chungsun Kim	HLUS	1,475.00	0.10	147.50	Review and revise email to Fennemore regarding financial analysis
07/28/25	Ann Chungsun Kim	HLUS	1,475.00	1.20	1,770.00	Telephone conference with R. Wynne and E. Brady regarding criminal hearing strategy (.7); prepare for hearing (.5)
07/28/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Confer with A. Kim and R. Wynne regarding upcoming criminal hearing
07/28/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Call with A. Kim and E. Brady regarding criminal hearing, KS Mattson Partners properties, and monthly operating report equity numbers
07/29/25	Ann Chungsun Kim	HLUS	1,475.00	1.90	2,802.50	Review and analyze court order denying defendant's motion regarding pre-trial asset restraint, and correspondence regarding same (.5); emails with R.S. Pollock regarding production of criminal discovery (.1); telephone conference with Department of Justice (.4);

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						telephone conference with E. Brady and R. Itkin regarding Piedmont property trustee sale (.5); emails with L. Arkow regarding research on Piedmont property (.1); review and analyze protective order, and correspondence regarding same (.3)
07/29/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Review email from A. Kim regarding 7/31 hearing (.1); prepare email to D. Silvera regarding same (.1); review email correspondence from R.S. Pollock and A. Kim regarding criminal production (.1); confer with A. Kim and U.S. Attorney's Office regarding various issues (.3); follow up call with R. Itkin and A. Kim regarding same (.4)
07/29/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review court order in criminal case, and correspondence regarding same (.5); review criminal case files descriptions for analysis (.3)
07/29/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Exchange internal correspondences regarding preservation order and call with the government
07/30/25	Ann Chungsun Kim	HLUS	1,475.00	1.80	2,655.00	Review and analyze documents related to property conveyance and ownership issues, and internal correspondence regarding same (1.4); telephone conference with E. Brady regarding property conveyance issues and strategy regarding same (.4)

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Date	Name	LLP	Rate	Hours	Amount	Narrative
07/31/25	Ann Chungsun Kim	HLUS	1,475.00	3.40	5,015.00	Review and analyze documents regarding property conveyance issues and ex parte application for hearing on pre-trial asset restraints, and correspondence regarding same (1.8); review and revise proposed common interest agreement, and internal correspondence regarding same (.9); telephone conference with E. Brady regarding La Salle property issues (.2); review and analyze bank statements, and internal correspondence regarding same (.5)
07/31/25	Erin Brady	HLUS	1,570.00	1.60	2,512.00	Review renewed motion for bail modification (.6); confer with A. Kim by email regarding same (.1); confer with S. Golden regarding K. Mattson filing (.4); confer with A. Kim regarding criminal filings (.2); confer with R. Itkin regarding criminal filings (.1); confer with R. Wynne, D. Ullo and E. McNeilly regarding criminal filings (.2)
07/31/25	Megan Nishikawa	HLUS	1,630.00	1.30	2,119.00	Review and comment on proposed common interest agreement
07/31/25	Rick Wynne	HLUS	1,975.00	4.90	9,677.50	Review correspondence from S. Golden regarding common interest agreement and correspondence with A. Kim and M. Nishikawa regarding same (.5); review and revise common interest agreement (.6); prepare correspondence to D. Tracey regarding Ponzi scheme issues (.2);

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						research EPD case and follow up cases and articles (1.8); prepare outline of issues for D. Tracey (.9); review K. Mattson emergency criminal motion regarding KS Mattson Partners properties (.9)
			Subtotal	111.40	167,954.00	

03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/11/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with E. Brady regarding hearing preparation
06/12/25	Erin Brady	HLUS	1,570.00	5.40	8,478.00	Prepare for 6/13 hearing, including review of involuntary case, other background reading and preparation of hearing notes
06/13/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Revise hearing notes (.3); meeting with R. Itkin, J. Rosell, E. McNeilly, and B. Wilson to prepare for hearing (.7); prepare for hearing (.5); attend hearing (.9)
06/13/25	Danielle Ullo	HLUS	1,035.00	1.20	1,242.00	Prepare for and attend hearing regarding retention of responsible person
06/24/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Confer with R. Itkin regarding hearing (.2); prepare for hearing (.3); attend hearing (.4); follow up with R. Itkin regarding hearing (.2)
06/24/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Telephone conference with E. Brady regarding orders following hearing (.2); revise orders following hearing and send same to

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03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
						T. Southwell (.2)
06/24/25	Danielle Ullo	HLUS	1,035.00	0.60	621.00	Attend hearing regarding motion to extend time to file schedules and statements
06/24/25	Tracy Southwell	HLUS	655.00	0.40	262.00	Prepare hearing materials for E. Brady
06/27/25	Leen Bukai	HLUS	760.00	1.10	836.00	Prepare for upcoming case management conference in the case of County of Sonoma vs. Mattson
07/01/25	Leen Bukai	HLUS	760.00	3.10	2,356.00	Prepare for and attend case management conference in County of Sonoma vs. Mattson civil case
07/10/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend meeting with E. Brady, R. Itkin and A. Kim regarding hearing preparation and follow up with A. Kim and R. Itkin
07/11/25	Erin Brady	HLUS	1,570.00	2.90	4,553.00	Attend hearing (2.7); follow up call with Hogan Lovells team regarding shame (.2)
07/11/25	Rick Wynne	HLUS	1,975.00	2.00	3,950.00	Attend hearing on inter-debtor lending and other issues, including pre-hearing correspondence, and post-hearing discussion with Pachulski, DSI and B. Sharp
07/11/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Attend LeFever Mattson hearing regarding inter-debtor financing and other filings
07/18/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend LeFever Mattson fee application hearings (partial)
07/18/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Attend fee application hearing
07/18/25	Danielle Ullo	HLUS	1,035.00	1.20	1,242.00	Attend LeFever Mattson

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03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
						fee application hearing
07/24/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Call and correspondence with E. Brady regarding hearing preparation, including issues to prepare for, and status of motions (.9); call with Hogan Lovells team regarding hearing and motion preparation (.5)
07/24/25	Tracy Southwell	HLUS	655.00	3.00	1,965.00	Prepare electronic hearing binder for motion to consolidate and status conference
07/25/25	Erin Brady	HLUS	1,570.00	3.80	5,966.00	Prepare for status conference and substantive consolidation hearing (1.1); conference call with Stapleton Group to prepare for status conference (1.2); conference call with R. Itkin to prepare for status conference (.8); attend and participate in hearing (.7)
07/25/25	Megan Nishikawa	HLUS	1,630.00	1.80	2,934.00	Prepare for and attend status conference to discuss potential substantive consolidation
07/25/25	Rick Wynne	HLUS	1,975.00	2.40	4,740.00	Prepare for and attend hearing, including pre-hearing calls and correspondence with R. Itkin and E. Brady, Keller Benvenuti and Pachulski, and review drafts of order and changes regarding same (2.2); calls and correspondence with D. Grassgreen, R. Itkin, E. Brady and E. McNeilly regarding post-hearing follow up with respect to next steps and bar date motion (.2)

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03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/25/25	Edward Joseph McNeilly	HLUS	1,295.00	1.40	1,813.00	Prepare for hearing (.7); attendance at hearing (.7)
			Subtotal	39.80	55,948.50	

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Date	Name	LLP	Rate	Hours	Amount	Narrative
06/09/25	Erin Brady	HLUS	1,570.00	2.50	3,925.00	Confer with R. Wynne and E. McNeilly regarding case organization and background (.5); confer with M. Bergthold, H. Davidson, A. Kazmarski and D. Kieffer regarding same (1.0); confer with R. Itkin, R. Wynne, and E. McNeilly regarding case background and next steps (.5); follow up call with R. Itkin and E. McNeilly regarding same (.5)
06/09/25	Rick Wynne	HLUS	1,975.00	4.60	9,085.00	Analyze dockets for prior pleadings to pull for review (.6); multiple calls with E. Brady regarding scope of project, and task list required (.6); calls with E. McNeilly regarding scope of project, and task list required (.3); attend meeting with E. McNeilly and E. Brady regarding bankruptcy preparation immediate needs (.5); prepare correspondence regarding revisions to stipulated order for relief, negotiations over same, and R. Itkin employment (.9); prepare further correspondence regarding stipulated order (.3); review KS Mattson Partners LP pleadings sent by Fennemore (1.4)
06/09/25	Tracy Southwell	HLUS	655.00	4.00	2,620.00	Research service parties and prepare service list for

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						case (2.3); emails and confer with E. McNeilly regarding filings (.5); review local rules (.5); set-up PacerPro for additional matter (.2); research additional creditor information for service list (.5)
06/10/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Confer with D. Taylor regarding case background and issues
06/10/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with E. Brady regarding next hearing items to do list
06/10/25	Edward Joseph McNeilly	HLUS	1,295.00	12.90	16,705.50	Email with J. Rosell regarding chapter 11 case (.1); prepare task list, including deadlines and key tasks for new chapter 11 case (.7); telephone conference with I. Beal regarding new shared drive for real estate documents (.2); meet with Hogan Lovells team regarding first days (.5); multiple calls with Stapleton and E. Brady regarding new case to do items (2.0); draft Stapleton retention application, declaration and motion to shorten, and review engagement letter (8.3); review premium finance motion (1.1)
06/10/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Attend Hogan Lovells call regarding new matter and initial strategy
06/10/25	Isolte Beal	HLUS	760.00	3.80	2,888.00	Communication with Hogan Lovells team (1.5); review and update checklist (2.3)
06/10/25	Kristel Gelera	HLUS	470.00	1.50	705.00	Correspond with T. Southwell regarding filing procedure for pending

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						motion to approve, motion to employ, motion to shorten
06/10/25	Tracy Southwell	HLUS	655.00	7.00	4,585.00	Coordinate late night filing coverage and prepare for filings with K. Gelera (1.5); research ECF filing events (.5); coordinate and confer with E. McNeilly regarding service of documents (.5); review order upload procedures (.3); prepare order on motion to shorten for uploading (.5); upload same (.3); prepare notice of hearing regarding Itkin designation (.8); finalize and ECF file same (.5); after-hours prepare and standby for filings including (2.1)
06/11/25	Rick Wynne	HLUS	1,975.00	1.80	3,555.00	Review KS Mattson Partners LP mail and bank items to do list, and correspondence and replies regarding same (.3); calls and correspondence regarding Stapleton role (.4); calls and correspondence with R. Itkin regarding independent director role issues (.7); review research regarding independent directors (.4)
06/11/25	Edward Joseph McNeilly	HLUS	1,295.00	11.40	14,763.00	Finalize Stapleton retention application and emails regarding same (.8); multiple calls with D. Ullo regarding premium financing motion and Stapleton documents (1.0); telephone conference with Pachulski, Keller Benvenuti teams and E. Brady regarding U.S. Trustee retention issues (.9); telephone conference

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						with R. Itkin and E. Brady regarding U.S. Trustee comments on retention and next steps (1.3); telephone conferences with M. Bergthold regarding retention application (.8); telephone conferences with M. Fairbanks, Fennemore regarding bank accounts (.3); telephone conference with U.S. Trustee regarding Itkin retention application (.7); review and revise premium financing motion (3.0); revise motion to shorten (.3); multiple emails regarding shorten time (.3); draft McNeilly declaration on shorten time motion (.4); review and revise Stapleton application and documents (.2); multiple emails and calls regarding preparation for June 13 hearing and immediate tasks (1.4)
06/11/25	Danielle Ullo	HLUS	1,035.00	1.10	1,138.50	Conduct research regarding applicability of bridge orders in United States Bankruptcy Court for the Northern District of California (.7); attend video conference with Stapleton regarding engagement letter, retention application and premium financing agreement (.4)
06/11/25	Isolte Beal	HLUS	760.00	9.40	7,144.00	Communication with Hogan Lovells team (.5); review and analyze diligence and document management (1.5); draft insurance motion (3.8); research rules for appointment of a "responsible party" (3.6)

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Date	Name	LLP	Rate	Hours	Amount	Narrative
06/11/25	Tracy Southwell	HLUS	655.00	3.00	1,965.00	Review judge's rules and calendar (.5); email with team regarding same (.2); prepare calendar notice (.2); confer and emails with E. McNeilly regarding filings and service, and prepare email regarding procedures to follow (.5); prepare certificate of service for multiple filings (.8); work on case ECF noticing (.5); review docket (.3)
06/12/25	Rick Wynne	HLUS	1,975.00	1.50	2,962.50	Review LeFever Mattson trustee motion (.3); review to do lists and scheduling requirements (.6); prepare correspondence regarding conflicts issues, including review of same (.6)
06/12/25	Edward Joseph McNeilly	HLUS	1,295.00	8.70	11,266.50	Telephone conference with R. Wynne and E. Brady regarding Itkin retention (.3); emails regarding task lists (.1); telephone conference with R. Itkin, R. Wynne and E. Brady (.4); telephone conference with E. Brady regarding task list (.2); emails regarding preparation for hearing (.2); work on to do list (.1); review U.S. Trustee email and language (.1); multiple emails regarding cash collateral, real property list, first day motions required (.4); draft letter (.8); correspond with Stapleton regarding to do list (.2); call with Stapleton and R. Itkin regarding to do list (.5); call with Pachulski (2.0); call with E. Brady (.3); emails with Stapleton (.2); revise form of order (.4); travel time

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						(2.0) (charged at 50%); work on shells (1.1); email with S. Golden regarding property issues (.2); work on outline for E. Brady (1.0)
06/12/25	Tracy Southwell	HLUS	655.00	1.00	655.00	Retrieval of cases in preparation for hearing on motion to designate R. Itkin (.3); coordinate PacerPro notices for related case (.2); email to E. McNeilly regarding proof of service for multiple filings (.1); prepare and ECF file same (.4)
06/13/25	Edward Joseph McNeilly	HLUS	1,295.00	2.20	2,849.00	Prepare e-mail regarding first day lists (.5); emails with U.S. Trustee (.2); work on letter (.7); call with Stapleton (.2); call with Fennemore (.1); call with clerk regarding order (.1); e-mail with Fennemore (.4)
06/13/25	Danielle Ullo	HLUS	1,035.00	4.50	4,657.50	Prepare list of key filing dates and deadlines (1.1); exchange correspondence regarding litigation check for notices of suggestion of bankruptcy (.3); update chapter 11 filing checklist and key dates in chapter 11 case (1.5); review and revise various first day motions regarding new information received from Stapleton (1.6)
06/13/25	Isolte Beal	HLUS	760.00	3.00	2,280.00	Attend to research (.7); attend to diligence (1.6); communication with Hogan Lovells team (.7)
06/13/25	Tracy Southwell	HLUS	655.00	0.80	524.00	Prepare and upload order regarding designation of R. Itkin

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Date	Name	LLP	Rate	Hours	Amount	Narrative
06/14/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Review permitted parties order and comment on same
06/14/25	Edward Joseph McNeilly	HLUS	1,295.00	5.90	7,640.50	Review first days (.4); mark-up permitted party order (.4); multiple emails regarding first day issues and loan issues (.8); emails regarding first days and loan issues (.3); suggestion of bankruptcy (.1); first days and schedules Stapleton (1.0); S. Golden (Pachulski) (.5); L Arkow (.3); J. Chang (.3); E. Brady (.5); D. Ullo (.1); email Stapleton regarding loans and properties (.5); J. Chang regarding same (.1); E. Brady email regarding permitted party order (.1); work on Itkin declaration (.5)
06/14/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Review research regarding global litigation check for notices of suggestion of bankruptcy
06/15/25	Edward Joseph McNeilly	HLUS	1,295.00	6.60	8,547.00	Call with W. Winter (.4); e-mails with Fennmore (.1); E. Brady/permitted party (.1); real estate title things/Justine (.2); Winter (.1); Bergthold (.1); review secured creditor information (.4); review first days and other issues (.9); call with E. Brady regarding first days and mailbox issues (1.0); prepare lists of key issues (1.5); comments regarding Top 20 list (.6); emails regarding taking control of assets, loan issues, bank (1.2)
06/16/25	Erin Brady	HLUS	1,570.00	2.60	4,082.00	Conference call with A. Kim, T. Schwartz, E.

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						McNeilly, I. Beal, and D. Ullo regarding creditor matrix, first day pleadings, and obtaining information for same from Department of Justice (1.3); review creditor matrix and top 30 list (.2); revise draft disclaimer (.4); confer with R. Itkin regarding same (.1); review multiple drafts of creditor matrix and top 30 list (.4); confer with W. Winter regarding suggestions of bankruptcy (.2)
06/16/25	Isolte Beal	HLUS	760.00	2.30	1,748.00	Communication with Hogan Lovells team (1.9); attend to upcoming filing deadlines and deliverables (.4)
06/16/25	Tracy Southwell	HLUS	655.00	8.80	5,764.00	Email with E. McNeilly regarding coordinating filings for the week (.2); coordinate filing coverage (.2); research and retrieval of mailing matrix requirements for E. McNeilly (.4); prepare and upload order in LeFever Mattson case regarding permitted procedures (.3); prepare calendar notice (.2); research filing events for petition deficiency filings (.4); correspond with E. McNeilly regarding preparation of matrix filing (.4); research requirements to submit declarations or verifications with filings (.5); prepare notice of related cases filing (.5); ECF file same (.5); prepare top 30 creditors filing (1.3); ECF file same (.5); review and comment on matrix received from

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						financial advisor (.5); prepare creditor matrix filing for docket and upload (1.3); ECF file and upload matrix (.7); after hours standby time (.9)
06/17/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Conference call with E. McNeilly and D. Ullo regarding first day and other filings (.6); confer with T. Rupp, KBK regarding various issues (.4)
06/17/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Draft email to Mattson criminal counsel regarding discovery (.3); e-mail with L. Arkow regarding property tax (.1); call with T. Rupp (.3); follow up email with E. Brady regarding motions (.2)
06/17/25	Isolte Beal	HLUS	760.00	0.50	380.00	Communication with Hogan Lovells team
06/17/25	Tracy Southwell	HLUS	655.00	8.40	5,502.00	Retrieval and distribution of case filings (.3); email to court regarding updates to ECF noticing (.3); prepare mail service list and related materials for service (1.5); email to team regarding filings and service (.2); research and prepare ECF instructions for tax, insurance, cash collateral and utilities motions (1.0); emails to D. Cooper regarding requirements for filings (.5); email and call to clerk regarding filing events (.4); prepare schedule of filing procedures (1.0); call and email with K. Gelera regarding ECF filings (.7); standby for after-hours filing of motion to extend time to file schedules (2.5)

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06/18/25	Edward Joseph McNeilly	HLUS	1,295.00	1.70	2,201.50	E-mail with criminal counsel (.1); attend video conference with E. Brady, T. Schwartz, D. Ullo and Stapleton team regarding cash collateral issues (1.0); telephone conferences with D. Ullo regarding motions (.6)
06/18/25	Isolte Beal	HLUS	760.00	0.40	304.00	Communication with Hogan Lovells team
06/19/25	Erin Brady	HLUS	1,570.00	2.00	3,140.00	Review email from government regarding documents discovery/protective order (.2); conference with A. Kim regarding same (.1); conference call with M. Bennett, M. Bergthold, S. Cuff, L. Arkow, S. Golden, R. Itkin, D. Kieffer, E. McNeilly, J. Romey, T. Schwartz, D. Ullo and D. Taylor regarding property management and stabilization, property control, bank accounts and similar issues (1.1); follow up call with S. Golden regarding same (.1); analyze issues regarding government discovery and sources of information (.5)
06/19/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Review list of key tasks
06/19/25	Todd Schwartz	HLUS	1,925.00	3.50	6,737.50	Telephone conference with D. Kieffer and M. Bergthold, Stapleton, S. Cuff and J. Romey, DSI, E. McNeilly, E. Brady, and D. Ullo regarding status update (1.0); telephone conference with M. Bergthold, A. Kaczmarksi and H. Davidson, Stapleton, E. Brady, E. McNeilly, and D. Ullo regarding 13-week budget

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						(.9); correspond with E. Brady regarding sale issues (.1); correspond with I. Beal and E. McNeilly regarding same (.1); draft, review and revise sale motion (1.0); correspond with I. Beal regarding same (.1); correspond with E. McNeilly regarding same (.2)
06/19/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Update closing checklist with status of open and closed matters
06/19/25	Isolte Beal	HLUS	760.00	3.60	2,736.00	Communication with Hogan Lovells team (1.3); attend to filings (.7); attend to case administration (.9); draft 2016(b) motion (.7)
06/20/25	Edward Joseph McNeilly	HLUS	1,295.00	6.40	8,288.00	Call with K. Hagey regarding bankruptcy tasks (.2); call with M. Fairbanks regarding substitutions of counsel (.2); revise Itkin retention order (2); emails regarding key tasks (.2); telephone conferences with D. Ullo regarding retention application (.4); telephone conference with L. Arkow regarding title report information (.2); telephone conferences with E. Brady regarding preparation for second day hearing and sale motion (.5); attend video conference with R. Itkin, A. Kim and E. Brady regarding criminal case issues and substantive consolidation (1.0); telephone conference with E. Brady regarding second day motions and sale procedures motion (.7); emails regarding bank issues (.2); emails with

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						Hogan Lovells team regarding task list for second day motions (.3); emails with Pachulski and Keller Benvenuti teams regarding confidentiality and proof of interest issues (.2); review and comment on Stapleton retention application (1.5); review, revise and finalize revised Itkin retention order (.5); review hearing notice (.1); emails with K. Hagey and paralegal regarding finalizing and service of revised Itkin retention order and notice of hearing (.4)
06/20/25	Isolte Beal	HLUS	760.00	2.20	1,672.00	Communication with Hogan Lovells team (.8); attend to case administration (1.4)
06/21/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with E. McNeilly regarding various motions and timing issues (.1); confer with R. Itkin regarding same (.1)
06/21/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Review and revise supplemental Itkin declaration (.3); review Rule 1020 statement (.2); telephone conference with K. Hagey regarding broker motion (.3); email with Stapleton regarding sale procedures motion property list (.1); review and revise sale procedures motion (.9)
06/21/25	Isolte Beal	HLUS	760.00	1.30	988.00	Attend to case administration (1.0); communication with Hogan Lovells team (.3)
06/22/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with E. McNeilly regarding various motions (.1); review compensation

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						disclosure (.1)
06/22/25	Edward Joseph McNeilly	HLUS	1,295.00	2.10	2,719.50	Revise counsel compensation disclosure form (.3); review Stapleton engagement letter (.3); review Stapleton retention application (.2); revise broker motion shell (.3); revise counsel compensation disclosure form (.2); email with Stapleton team regarding sale procedures motion (.4); revise Stapleton engagement letter (.2); email with R. Itkin regarding same (.1); review substitution of counsel (.1)
06/23/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Review revised draft compensation disclosure (.1); review substitution of counsel (.1)
06/23/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Telephone conference with E. McNeilly regarding to do items, and call with E. Brady regarding same and hearing preparation
06/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Telephone conference with R. Wynne regarding next steps on first day motions .3); email with U.S. Trustee regarding redaction of confidential information (.2); review updated creditor matrix; correspondence regarding changes to creditor matrix (.4)
06/23/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Update chapter 11 filing checklist and exchange correspondences regarding same
06/23/25	Isolte Beal	HLUS	760.00	2.50	1,900.00	Correspondence with Hogan Lovells team regarding upcoming filing matters (1.0); attend to

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						case administration (1.5)
06/23/25	Tracy Southwell	HLUS	655.00	4.90	3,209.50	Review case docket updates (.2); review correspondence on case status (.2); email with E. McNeilly regarding upcoming filings (.1); prepare and ECF file statement per Rule 2016(b) (.5); review case materials and prepare calendar notices (.9); confer with H. Salehi regarding services on June 20-21, 2025 (.2); assist with finalizing certificate of service regarding same (.4); prepare supplemental declaration of R. Itkin for ECF filing and file same (.6); prepare small business statement disclosure for ECF filing and file same (.6); coordinate mail service of same (.5); prepare certificate of service regarding June 23, 2025 filings and ECF file same (.5); update PacerPro notices (.2)
06/24/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review motion to remand and reply, and memorandum regarding status report (.4); attend team call with R. Itkin, Stapleton and Hogan Lovells (.5)
06/24/25	Todd Schwartz	HLUS	1,925.00	1.10	2,117.50	Telephone conference with M. Bergthold, D. Kieffer, Stapleton, R. Itkin, and E. Brady, E. McNeilly, and D. Ullo regarding check in and status update
06/24/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Attend Hogan Lovells team meeting (.3); revise creditor matrix (.3); review

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						and comment on task list (.2)
06/24/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Internal call with Hogan Lovells attorneys regarding case status (.5); call with I. Beale regarding case checklist and status of motions to be filed (.3)
06/24/25	Tracy Southwell	HLUS	655.00	2.00	1,310.00	Finalize certificate of service (.2); ECF file same (.3); review docket updates and prepare calendar notices (.5); prepare and upload orders regarding R. Itkin and schedules and SOFA extension deadline, including correcting defective order (1.2)
06/25/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review S. Golden letter from T. LeFever to K. Mattson
06/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Draft agenda for call with Stapleton (.1); counsel substitution notice (.2); review and comment on checklist (.2)
06/25/25	Isolte Beal	HLUS	760.00	1.90	1,444.00	Attend to upcoming filings (1.2); correspondence with Hogan Lovells team regarding upcoming filing matters (.7)
06/25/25	Tracy Southwell	HLUS	655.00	2.00	1,310.00	Review docket and pleadings for calendaring information (.2); prepare calendar notices (.7); prepare substitution of attorney for ECF filing (.2); review ECF filing procedures (.2); confer with clerk regarding linking attorneys to substitution (.3); ECF same (.4)
06/26/25	Danielle Ullo	HLUS	1,035.00	4.00	4,140.00	Prepare other first day motions (.6); call with

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						LeFever Mattson committee counsel regarding substantive consolidation and other chapter 11 issues (1.2); exchange internal correspondences regarding rates for Hogan Lovells retention application (.2) and substantive consolidation (.1); call with LeFever Mattson committee counsel regarding substantive consolidation and other open chapter 11 issues (1.2); exchange correspondences with LeFever Mattson committee counsel regarding U.S. Trustee guidelines for larger chapter 11 cases (.2); exchange internal correspondences regarding conflicts clearance for Hogan Lovells retention as debtor counsel (.5)
06/26/25	Isolte Beal	HLUS	760.00	1.60	1,216.00	Correspondence with Hogan Lovells team regarding upcoming filing matters (.8); attend to upcoming filings (.8)
06/26/25	Tracy Southwell	HLUS	655.00	1.80	1,179.00	Prepare creditor matrix filing (.6); prepare substitution of attorney filing for LeFever Mattson case (.2); prepare proof of service and service list for same (.5); ECF file same (.5)
06/27/25	Megan Nishikawa	HLUS	1,630.00	1.10	1,793.00	Coordinate with bankruptcy counsel for K. Mattson regarding outstanding items
06/27/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Attend meeting with E. Brady regarding to do

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						items and next steps
06/27/25	Danielle Ullo	HLUS	1,035.00	3.50	3,622.50	Review revised creditor matrix and confirm accuracy and exchange correspondence with Stapleton regarding required revisions (.5); coordinate filing of amended creditor matrix (.5); internal call with Hogan Lovells team regarding open items including retention and cash collateral (1.0); call with Stapleton team regarding asset recovery, DIP financing, and other open chapter 11 issues (1.0); update chapter 11 filing checklist and exchange correspondence regarding open items and revise key players list (.5)
06/27/25	Tracy Southwell	HLUS	655.00	1.60	1,048.00	Prepare matrix filing for ECF filing and upload (1.1); ECF file and upload same (.5)
06/28/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Review and revise chapter 11 checklist and exchange correspondences regarding same
06/28/25	Isolte Beal	HLUS	760.00	1.80	1,368.00	Attend to upcoming filings (1.3); correspondence with Hogan Lovells team regarding upcoming filing matters (.5)
06/29/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with D. Ullo regarding outstanding workstreams
06/29/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Call with E. McNeilly regarding chapter 11 checklist and status of open matters
06/29/25	Isolte Beal	HLUS	760.00	0.40	304.00	Correspondence with Hogan Lovells team

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						regarding upcoming filing matters
06/30/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Attend meeting with D. Ullo regarding case checklist
06/30/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Correspondence with A. Turnbull and others regarding clearing conflicts with respect to Bank of New York and JPMorgan Chase
06/30/25	Isolte Beal	HLUS	760.00	2.20	1,672.00	Attend to upcoming filings (1.5); correspondence with Hogan Lovells team regarding upcoming filing matters (.7)
06/30/25	Tracy Southwell	HLUS	655.00	0.40	262.00	Work on case noticing (.2); assist with large file transfer (.2)
07/01/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Attend Hogan Lovells team meeting regarding substantive consolidation, LeFever Mattson claim, and Stapleton retention issues
07/02/25	Danielle Ullo	HLUS	1,035.00	0.10	103.50	Exchange correspondences with debtor's counsel regarding amended creditor's matrix
07/02/25	Isolte Beal	HLUS	760.00	1.60	1,216.00	Attend to communication with Hogan Lovells team regarding upcoming filing matters (.9); attend to checklist and upcoming filings (.7)
07/02/25	Tracy Southwell	HLUS	655.00	0.20	131.00	Review docket and update calendar notice
07/03/25	Tracy Southwell	HLUS	655.00	1.50	982.50	Research and prepare calendar notices for LeFever Mattson case and KS Mattson case
07/04/25	Isolte Beal	HLUS	760.00	1.00	760.00	Attend to checklist and upcoming filings

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07/07/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Follow up telephone conference with R. Itkin regarding insurance lapse notice, bail reform issues, substantive consolidation and next steps (.4); prepare correspondence regarding 405 London Way insurance layer issue (.2); prepare correspondence to R. Itkin regarding open issues to cover, including items to do and task list, and preparation of substantive consolidation issues list and retention application (.8)
07/07/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Correspond with E. Brady regarding required next steps
07/07/25	Danielle Ullo	HLUS	1,035.00	4.40	4,554.00	Update chapter 11 checklist with open items (1.0); exchange correspondence with R. Itkin and Stapleton regarding open items including insurance matters (.6); exchange correspondence regarding 341 meeting of creditors (.1); review and summarize Live Oak motion to appoint chapter 11 trustee for Live Oak Investments and supporting documents in LFM matter (.6); exchange correspondence with committee counsel regarding property subject to motion (.2); review and provide summary of Lefever Mattson motion to approve inter-debtor lending (.7); exchange correspondence with R. Itkin regarding same (.2); review and distribute preservation order in K. Mattson involuntary

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						bankruptcy (.1); review Lefever Mattson docket for recent filings (.3); revise motion to redact confidential information (.5); exchange correspondence with E. Brady regarding same (.1)
07/07/25	Isolte Beal	HLUS	760.00	1.20	912.00	Attend to checklist and upcoming filings (.5); correspondence with Hogan Lovells team regarding upcoming filing matters (.7)
07/07/25	Tracy Southwell	HLUS	655.00	0.20	131.00	Update calendar invites
07/08/25	Ann Chungsun Kim	HLUS	1,475.00	1.50	2,212.50	Attend bi-weekly telephone conference with R. Itkin, Stapleton, and Hogan Lovells
07/08/25	Erin Brady	HLUS	1,570.00	2.10	3,297.00	Attend bi-weekly call with Stapleton and Hogan Lovells teams (1.7); attend follow up call with R. Itkin, R. Wynne, A. Kim and D. Ullo regarding follow ups on criminal issues (.4)
07/08/25	Todd Schwartz	HLUS	1,925.00	2.50	4,812.50	Attend KSMP bi-weekly check-in call (1.0); conference with Hogan Lovells working group regarding same (.5); review and analyze issues regarding DIP financing (1.0)
07/08/25	Danielle Ullo	HLUS	1,035.00	4.30	4,450.50	Prepare agenda for status call with Stapleton (.9); call with Stapleton regarding open items and asset recovery (2.1); internal Hogan Lovells call regarding open items, upcoming filings and substantive consolidation (1.0); coordinate review access for Stapleton team regarding proofs of

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						claim/POIs (.1); exchange correspondence regarding document review platform (.2)
07/08/25	Isolte Beal	HLUS	760.00	3.50	2,660.00	Attend to checklist and upcoming filings (.6); attend call with Hogan Lovells and Stapleton teams regarding diligence and case developments (1.5); attend call with Hogan Lovells team regarding diligence and case developments (1.0); attend to communication with Hogan Lovells team regarding upcoming filing matters (.4)
07/09/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Review and distribute documents from criminal case (.3); coordinate access to LeFever Mattson proof of claim/proof of interest review platform for R. Itkin (.2)
07/09/25	Isolte Beal	HLUS	760.00	1.40	1,064.00	Attend to communication with Hogan Lovells team regarding upcoming filing matters (.6); attend to checklist and upcoming filings (.8)
07/10/25	Todd Schwartz	HLUS	1,925.00	3.00	5,775.00	Conference with E. Brady and M. Scherneck regarding term sheet; attend Hogan Lovells only KSMP bi-weekly check-in; correspond with R. Itkin regarding DIP term sheet; correspond with M. Bergthold and E. Brady regarding same; correspond with E. Brady regarding same
07/10/25	Isolte Beal	HLUS	760.00	2.10	1,596.00	Communication with Hogan Lovells team regarding upcoming filing matters (.9); attend to

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						checklist and upcoming filings (.7); attend call with Hogan Lovells team regarding diligence and case developments (.5)
07/10/25	Tracy Southwell	HLUS	655.00	5.80	3,799.00	Review judge's calendar for hearing information in LeFever Mattson (.2); update calendar invite and email to attorneys regarding same (.2); research ECF filing events (.4); finalize periodic report for ECF filing (.4); ECF file same (.2); after-hours standby time (4.4)
07/11/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Attend biweekly check in call with Stapleton and R. Itkin
07/11/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Attend meeting with R. Itkin and E. Brady regarding KS Mattson Partners hearing, substantive consolidation position, update on diligence, and proposal to make
07/11/25	Isolte Beal	HLUS	760.00	1.90	1,444.00	Attend call with Hogan Lovells and Stapleton teams regarding diligence and case developments (.8); attend to checklist and upcoming filings (.7); attend to communication with Hogan Lovells team regarding upcoming filing matters (.4)
07/12/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Review LFM docket and DIP pleadings and agreements
07/13/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Confer with E. McNeilly regarding case status (.7); coordinate regarding 341 meeting (.1)
07/13/25	Edward Joseph	HLUS	1,295.00	0.60	777.00	Telephone conference with

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	McNeilly					D. Ullo regarding open matters on KS Mattson Partners case, including substantive consolidation and DIP (.3); telephone conference with E. Brady regarding open matters on KSMP case, including substantive consolidation and DIP (.3)
07/14/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Review emails regarding 341 meeting (.1); prepare email to E. McNeilly regarding same (.1); attend internal coordination meeting (.5); prepare email to E. McNeilly regarding various open issues (.3)
07/14/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Correspondence to Morrison Foerster regarding demand for client files
07/14/25	Todd Schwartz	HLUS	1,925.00	1.50	2,887.50	Attend Hogan Lovells bi-weekly check-in (1.0); review and analyze issues regarding DIP term sheet (.5)
07/14/25	Danielle Ullo	HLUS	1,035.00	1.10	1,138.50	Pull and review documents for E. McNeilly (.7); attend internal Hogan Lovells call regarding case strategy and upcoming filings (.4)
07/14/25	Isolte Beal	HLUS	760.00	3.10	2,356.00	Attend to communication with Hogan Lovells team regarding upcoming filing matters (.5); attend call with Hogan Lovells team regarding diligence and upcoming filing matters (.4); attend to checklist and upcoming filings (1.2)
07/14/25	Tracy Southwell	HLUS	655.00	0.50	327.50	Review case calendar checklist to plan for upcoming filings (.3); review docket and prepare calendar notices (.2)

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07/15/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Review information for R. Itkin decision regarding additional debtors to possibly file
07/15/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Emails regarding status conference and status conference report (.2); partial attendance at all-hands call on weekly task list (.5)
07/15/25	Isolte Beal	HLUS	760.00	1.50	1,140.00	Draft status conference statement
07/15/25	Isolte Beal	HLUS	760.00	2.60	1,976.00	Attend call with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.4); attend to checklist and upcoming filings (.7); communications with Hogan Lovells team regarding case developments and upcoming filings (.5)
07/15/25	Kristel Gelera	HLUS	470.00	0.30	141.00	Confer with T. Southwell regarding bar date motion, response to substantive consolidation motion and status conference statement
07/15/25	Tracy Southwell	HLUS	655.00	2.80	1,834.00	Review judges calendar for 7/18 and prepare hearing information for calendar notice (.4); analysis of upcoming filing and plan for filing and service, including researching events (1.0); confer with K. Gelera to coordinate filings (.2); research conference statements (.3); update calendar notices (.3); email to E. McNeilly to plan for filings (.2); review LeFever docket and service list (.4)
07/16/25	Danielle Ullo	HLUS	1,035.00	3.30	3,415.50	Prepare list of topics for

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						341 preparation call (.6); call with R Itkin and Stapleton regarding 341 preparation (1.1); review docket regarding hearing to lift stay (.2); meeting with E. McNeilly regarding chapter 11 checklist and case strategy (1.0); draft stipulation with Socotra regarding payment of insurance premium (.4)
07/16/25	Isolte Beal	HLUS	760.00	1.50	1,140.00	Review communications with Hogan Lovells team regarding case developments and upcoming filings (.5); review checklist and upcoming filings (1.0)
07/16/25	Tracy Southwell	HLUS	655.00	0.80	524.00	Prepare updates to calendar notices regarding expanded team and revised reminders
07/17/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Review draft status report and send comments to E. McNeilly regarding same (.3); conference with R. Wynne regarding same (.1); review revised status conference report (.2)
07/17/25	Megan Nishikawa	HLUS	1,630.00	0.50	815.00	Review status conference report for accuracy
07/17/25	Rick Wynne	HLUS	1,975.00	3.90	7,702.50	Prepare for 341A meeting with R. Itkin, attend 341 with R. Itkin, and meeting after regarding substantive consolidation, diligence, status report and property sales and marketing (2.5); review and revise status conference report (.6); calls with E. McNeilly regarding bar date motion, monthly operating report issues, schedules and statement of financial affairs (.4); review status

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						conference statement revisions and correspondence with R. Itkin, E. McNeilly and E. Brady regarding same (.4)
07/17/25	Edward Joseph McNeilly	HLUS	1,295.00	3.10	4,014.50	Telephone conference with R. Wynne regarding status conference report (.1); revise status report (2.4) telephone conference with R. Wynne regarding status conference report (.1); revise status report (.2); email with R. Itkin regarding status conference statement (.3)
07/17/25	Kristel Gelera	HLUS	470.00	0.30	141.00	Confer with E. McNeilly regarding filing of bar date motion and status conference statement
07/18/25	Kristel Gelera	HLUS	470.00	3.00	1,410.00	Assist T. Southwell with filing stipulation authorizing limited use of cash collateral (2.0); assist T. Southwell with filing status conference report (1.0)
07/18/25	Tracy Southwell	HLUS	655.00	3.80	2,489.00	Retrieval and distribution of case filings (.2); research procedures regarding stipulations and orders (.5); confer with D. Ullo (.2) and E. McNeilly (.2) regarding same; prepare stipulation and order regarding cash collateral for ECF filing and upload (.5); submit same via ECF (.3); email to E. McNeilly regarding service requirements for status conference statement (.2); prepare certificate of service for status conference statement (.3); prepare status conference report

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						for ECF filing and file same (.4); coordinate service of various pleadings (.2); assist K. Gelera with real-time overview of ECF filings in case (1.0)
07/19/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Call with Judge Newsome regarding possibly serving as plan mediator (.2); call with R. Itkin regarding mediation (.2); call with B. Spiegel regarding possible service as independent director for LeFever Mattson case background (.2)
07/19/25	Isolte Beal	HLUS	760.00	1.40	1,064.00	Review checklist and upcoming filings (.9); communications with Hogan Lovells team regarding case developments and upcoming filings (.5)
07/20/25	Isolte Beal	HLUS	760.00	0.70	532.00	Communications with Hogan Lovells team regarding case developments and upcoming filings (.4); attend to checklist and upcoming filings (.3)
07/21/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Review orders entered in the KSMP and LFM matters and provide summaries for client (.2); coordinate access to document review platform for E. McNeilly (.1) ; Review, download and distribute KSMP claims filed in the LFM matter (.2); Internal call with R. Wynne, E. Brady and E. McNeilly regarding DIP, sale motion, and other open items (.5)
07/21/25	Isolte Beal	HLUS	760.00	1.90	1,444.00	Communications with Hogan Lovells team

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						regarding case developments and upcoming filings (.5); analyze checklist and upcoming filings (.9); call with Hogan Lovells team regarding case developments and upcoming filings (.5)
07/21/25	Tracy Southwell	HLUS	655.00	2.50	1,637.50	Review calendar for this week (.2); prepare calendar notices (.4); retrieval of orders and coordinate service (.4); retrieval and organization of case documents (.7); email to team to coordinate filings (.1); prepare and ECF file operating report (.4); coordinate service of order on Hogan Lovells retention application (.3)
07/22/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Prepare for and attend bi-weekly call with Stapleton Group and R. Itkin (partial attendance) (.6); review and analyze monthly operating report (.3)
07/22/25	Isolte Beal	HLUS	760.00	1.50	1,140.00	Attend to checklist and upcoming filings (.6); communications with Hogan Lovells team regarding case developments and upcoming filings (.3); attend call with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.6)
07/22/25	Tracy Southwell	HLUS	655.00	3.80	2,489.00	Update certificate of service regarding various pleadings (.6); ECF file same (.2); confer with attorneys regarding filings (.2); prepare filing

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						instructions for multiple after-hours filings (1.3); coordinate same with K. Gelera (.1); prepare certificates of service for response to substantive motion filings (.5); prepare certificate of service for motion to appoint mediator (.5); research LeFever Mattson hearings and prepare calendar notice updates (.4)
07/23/25	Isolte Beal	HLUS	760.00	1.40	1,064.00	Attend to checklist and upcoming filings (.6); communications with Hogan Lovells team regarding case developments and upcoming filings (.5); communications with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.3)
07/23/25	Tracy Southwell	HLUS	655.00	0.30	196.50	Review docket updates regarding calendaring
07/24/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Telephone conference with B. Spiegel regarding serving as independent director for LeFever Mattson debtors with respect to inter-debtor loan (.3); calls with E. McNeilly regarding bar date, motion regarding mediator preparation, and hearing issues (.5)
07/25/25	Danielle Ullo	HLUS	1,035.00	1.70	1,759.50	Prepare agenda for call with Stapleton and Robbin Itkin regarding matter status (.4); Attend call with Stapleton and Robbin Itkin regarding same (1.3)
07/25/25	Isolte Beal	HLUS	760.00	3.00	2,280.00	Attend call with Hogan Lovells and Stapleton teams regarding case

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						developments and upcoming filings (2.0); attend to checklist and upcoming filings (.6); communications with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.4)
07/25/25	Kristel Gelera	HLUS	470.00	2.00	940.00	Waiting time in preparation of DIP motion, order and supporting declaration
07/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Emails with R. Itkin and Stapleton regarding in-depth interview (.1); emails with A. Kim regarding use of information for preparing schedules and statements (.1)
07/27/25	Isolte Beal	HLUS	760.00	0.70	532.00	Communications with Hogan Lovells team regarding case developments and upcoming filings (.2); attend to checklist and upcoming filings (.5)
07/28/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Attend biweekly coordination call to discuss miscellaneous issues (excluding DIP)
07/28/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Attend KS Mattson Partners bi-weekly call with Hogan Lovells team
07/28/25	Danielle Ullo	HLUS	1,035.00	0.70	724.50	Internal status update call regarding open items, including DIP Motion and Sale Procedures
07/28/25	Isolte Beal	HLUS	760.00	1.60	1,216.00	Attend to checklist and upcoming filings (.6); communications with Hogan Lovells team regarding case developments and upcoming filings (.3);

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						attend call with Hogan Lovell steam regarding case developments and upcoming filings (.7)
07/28/25	Tracy Southwell	HLUS	655.00	0.70	458.50	Communicate with creditor regarding address change (.2); update service list, including ECF parties (.5)
07/29/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Telephone conference with R. Itkin regarding bar date motion and issues, criminal court ruling, and document production from K. Mattson counsel (.3); telephone conference with R. Itkin regarding planning meeting and issues to cover, document production, Assistant U.S. Attorney meeting regarding next steps in criminal case, and K. Mattson attempts to get money out of KS Mattson Partners properties (.3)
07/29/25	Isolte Beal	HLUS	760.00	3.80	2,888.00	Attend to checklist and upcoming filings (.6); communications with Hogan Lovells team regarding case developments and upcoming filings (.3); attend call with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (2.5); communications with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.4)
07/30/25	Isolte Beal	HLUS	760.00	0.80	608.00	Attend to checklist and upcoming filings (.5); communications with Hogan Lovells team

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						regarding case developments and upcoming filings (.3)
07/30/25	Kristel Gelera	HLUS	470.00	1.70	799.00	Review and upload replacement expedited order regarding motion to shorten time
07/30/25	Tracy Southwell	HLUS	655.00	0.90	589.50	Prepare service materials and email to Verita (.4); prepare calendar notices (.3); review filing updates (.2)
07/31/25	Danielle Ullo	HLUS	1,035.00	2.70	2,794.50	Internal videoconference regarding DIP financing and creditor interests (1.0)'; exchange internal email correspondences regarding TIC properties and creditor interests (.5); draft and revise broker motions and declarations for 5 real estate brokers (1.2)
07/31/25	Isolte Beal	HLUS	760.00	2.00	1,520.00	Attend to checklist and upcoming filings (.4); communications with Hogan Lovells team regarding case developments and upcoming filings (.3); attend call with Hogan Lovells team regarding case developments and upcoming filings (1.1); communications with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.2)
07/31/25	Kristel Gelera	HLUS	470.00	1.50	705.00	Review and file notice of corrected DIP term sheet
			Subtotal	314.40	330,717.50	

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/09/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Analyze issues regarding properties owned by debtor
06/10/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Confer with L. Arkow regarding real estate research and analysis
06/10/25	Loryn Dunn Arkow	HLUS	1,515.00	0.80	1,212.00	Attend call regarding debtor details (.6); correspondence regarding structure of ownership and debtor information (.2)
06/10/25	Danielle Ullo	HLUS	1,035.00	2.30	2,380.50	Draft motion to authorize payment of utility providers (1.6); prepare and update chapter 11 filing checklist (.4); coordinate preparation of first day motions regarding taxes, utilities and cash management (.3)
06/11/25	Loryn Dunn Arkow	HLUS	1,515.00	0.80	1,212.00	Review diligence files relating to real property collateral (.3); analysis of rights of Reprop Financial Mortgage based on assignment of rents for real properties under California statute (.5)
06/12/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with Stapleton, R. Itkin and E. McNeilly regarding identifying assets, use of cash collateral and related issues
06/13/25	Erin Brady	HLUS	1,570.00	1.40	2,198.00	Attend meeting with R. Itkin and E. McNeilly regarding post-appointment tasks, including contacting banks and securing properties and E. McNeilly to prepare
06/13/25	Loryn Dunn Arkow	HLUS	1,515.00	1.90	2,878.50	Telephone conference regarding analysis of assignment by creditors of deeds of trust (.3); analysis

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						of spreadsheets and title materials relating to identity of creditors interests, particularly in light of assignments (1.6)
06/13/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Call with L. Arkow (.5); review real estate matters (.5)
06/13/25	Edward Joseph McNeilly	HLUS	1,295.00	3.20	4,144.00	Emails regarding schedules and statements and first days (1.0); emails regarding post office box (.3); review first days (1.0); confer with E. Brady and R. Itkin regarding first days, schedules property securing (.9)
06/14/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Conference call with M. Bergthold, E. McNeilly and D. Ullo regarding asset analysis and cash collateral (.5); prepare email to R. Itkin regarding declaration in support of statements and schedules motion and update on current efforts (.2)
06/14/25	Loryn Dunn Arkow	HLUS	1,515.00	1.20	1,818.00	Correspondence regarding analysis of lien holders (.6); Telephone conference with S. Golden, Pachulski regarding creditor's security interests in debtor's assets (.4); Attend call regarding process for review of lienholders and title commitments (.2)
06/14/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Attend video conference with Stapleton team and R. Itkin regarding budget and progress of document collection
06/15/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Investigation regarding ownership of mailbox and related issues (.5); correspondence with

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Stapleton team regarding same (.4)
06/15/25	Loryn Dunn Arkow	HLUS	1,515.00	1.90	2,878.50	Review title reports to confirm current beneficiaries of deeds of trust and draft summary of analysis (1.4); telephone conference regarding direction on cataloguing lien holders (.3); correspondence regarding lien review, including property tax liens (.2)
06/16/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review loan level information
06/16/25	Loryn Dunn Arkow	HLUS	1,515.00	0.80	1,212.00	Review analysis of tax liens and provide feedback (.3); telephone conference regarding lien catalogue, including tax liens (.5)
06/16/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review property and secured creditor information
06/16/25	Edward Joseph McNeilly	HLUS	1,295.00	11.70	15,151.50	Email with Fennemore regarding post office box (.1); emails regarding permitted party order (.1); emails regarding claims stuff (.3); Bergthold call Kieffer Robbin (.8); Robbin (.1); Hogan Lovells call (1.3); call Mike (.1); pre-call with AUSA (.5); AUSA call (.8); call with E. Brady regarding upcoming filings and task list (.3); work on related cases, matrix top 30 list (7.0); revise letter to bank (.2); email with D. Taylor regarding property issues (.1)
06/16/25	Danielle Ullo	HLUS	1,035.00	3.10	3,208.50	Review creditor matrix received from Stapleton team (.2); update and circulate chapter 11 filing

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						checklist (.2); prepare and distribute notice of related cases (.3); attend video conference with Hogan Lovells and Stapleton teams, and R. Itkin regarding first day filings and other matters (1.5); telephone conference with K. Landry regarding precedent sale processes (i.e., Ho Kwok bankruptcy) (.3); research regarding Ho Kwok bankruptcy and sales process to determine government treatment (.6)
06/17/25	Erin Brady	HLUS	1,570.00	4.20	6,594.00	Confer with Stapleton team regarding update on real estate holdings and next steps to securing properties (1.0); confer with L. Arkow and E. McNeilly regarding various real estate issues (.5); confer with R. Itkin regarding real estate issues (.2); edit schedule and statements motion (.6); revise R. Itkin declaration in support of same and providing update on current affairs (1.7); revise M. Bergthold declaration in support of same (.2)
06/18/25	Erin Brady	HLUS	1,570.00	3.50	5,495.00	Further comments on motion and context (.4); analyze issues regarding TICs (.3); confer with R. Itkin regarding property management (.4); analyze issues regarding property management and responsibility (.7); confer with LeFever Mattson and Hometax parties to set up a call regarding same (.3); confer with S. Golden regarding same (.2); exchange emails and

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						documentation with Keller Benvenuti, Pachulski and B. Sharp regarding property control issues (.4); review revised draft of Itkin declaration (.2); analyze proposals for document hosting to purposes of reviewing documents from Pachulski and government to reconstruct books and records (.2); Confer with S. Golden regarding property sales (.3); prepare email to R. Itkin regarding same (.1)
06/18/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Attend videoconference with Stapleton team to discuss asset analysis issues and potential cash collateral motion
06/19/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Confer with R. Itkin regarding property sales (.2); analyze issues regarding property sales (.4)
06/19/25	Loryn Dunn Arkow	HLUS	1,515.00	0.60	909.00	Review and provide feedback on analysis of properties included in title searches and those missing (.3); participate in telephone conference relating to real property asset management and disposition (.3)
06/19/25	Megan Nishikawa	HLUS	1,630.00	0.60	978.00	Call with E. Brady to discuss strategy moving forward
06/19/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review affiliate chart and information (.4); review checklist and workstreams (.4)
06/19/25	Edward Joseph McNeilly	HLUS	1,295.00	9.90	12,820.50	Call with Stapleton and DSI regarding real property (1.0); draft and

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						update key workstreams list (.2); email with investor regarding KS Mattson Partners case (.1); review lists of key tasks and workstreams (.9); emails regarding conflict checking (.2); emails regarding task lists and workstreams on retention applications and other first days (.2); call with I. Beal regarding task list and workstreams (.4); call with T. Schwartz, E. Brady and D. Ullo regarding Stapleton budget (.9); draft letters to banks (1.1); research affiliate issues and account issues for letters to banks (.3); call with S. Golden regarding KS Mattson Partners affiliates and bank account issues (.4); email with U.S. Trustee regarding confidentiality protocols (.1); email with U.S. Trustee regarding R. Itkin indemnification agreement (.1); emails with R. Itkin and Hogan Lovells team regarding bank account issues (.2); email with DSI regarding bank accounts (.3); revise letters to banks (.4); email with E. Brady regarding same (.1); review and revise sale procedures motion (2.2); review precedent from LeFever Mattson case to inform drafting of sale procedures motion (.8)
06/19/25	Danielle Ullo	HLUS	1,035.00	1.30	1,345.50	Attend video conference with Stapleton and DSI teams regarding gaining control of properties and asset recovery process

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Date	Name	LLP	Rate	Hours	Amount	Narrative
06/19/25	Isolte Beal	HLUS	760.00	2.50	1,900.00	Draft motion regarding procedure for real property sales
06/20/25	Loryn Dunn Arkow	HLUS	1,515.00	1.40	2,121.00	Address question relating to inclusion on creditor's list of original lenders who transferred their loans (.2); review preliminary title reports where Socotra is lender to confirm whether any other lenders remaining to be included on creditor's list (1.2)
06/22/25	Loryn Dunn Arkow	HLUS	1,515.00	0.70	1,060.50	Review title reports for Socotra loans to confirm no other lenders to be listed on the creditor's report and identify other pertinent information
06/22/25	Megan Nishikawa	HLUS	1,630.00	1.90	3,097.00	Review litigation matters nationwide for purposes of asset analysis
06/23/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Review letter to Bank of Montreal regarding bank accounts
06/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Update bank letter (.1); finalize and send letter to Bank of Montreal (.2)
06/24/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Attend bi-weekly coordination with Stapleton to discuss cash collateral, first day motions, property securing efforts, and related issues
06/24/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Call with Stapleton team to discuss status of asset recovery and other open items
06/24/25	Isolte Beal	HLUS	760.00	4.10	3,116.00	Attend call with Hogan Lovells and Stapleton teams regarding diligence and case developments (1.2); attend to upcoming filings (1.6); call with Hogan Lovells team

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding upcoming filing matters (.8); correspondence with Hogan Lovells team regarding upcoming filing matters (.5)
06/25/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Confer with E. McNeilly regarding various asset-related issues
06/25/25	Edward Joseph McNeilly	HLUS	1,295.00	1.70	2,201.50	Telephone conference with R. Itkin regarding real property issues (.3); draft letter to water board (.4); call with R. Itkin regarding real property issues (.2); review master property matrix (.2); review water board letter (.3); email with T. Boer regarding water board letter (.3)
06/25/25	Danielle Ullo	HLUS	1,035.00	1.30	1,345.50	Multiple calls with E. McNeilly regarding asset disposition and status of open chapter 11 issues (.8); Review master property file to determine status of asset recovery and outstanding bills for first day motions (.5)
06/26/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review master property file
06/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Telephone conference with E. Brady regarding task lists (.2); prepare email regarding outstanding tasks (.2); telephone conference (.2); correspondence regarding creditor matrix (.2)
06/27/25	Erin Brady	HLUS	1,570.00	3.80	5,966.00	Attend conference call with R. Itkin, M. Bergthold, T. Schwartz and D. Ullo regarding various case issues, including property inquiries, personal property inquiries,

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						funding, securing bank accounts and securing properties (.9); prepare for same (.3); attend bi-weekly internal workstream call with D. Ullo, T. Schwartz and I. Beal to discuss status of environmental issues, DIP proposal, Bank of Montreal subpoena, retention issues, first day motions and related operational issues (1.0); revise case checklist (1.6)
06/27/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review master property file, and checklist
06/27/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Telephone conference with R. Itkin, M. Bertghold, Stapleton, and E. Brady and D. Ullo, Hogan Lovells regarding status update (.9); telephone conference with Hogan Lovells working group regarding status update (.1)
06/27/25	Isolte Beal	HLUS	760.00	4.30	3,268.00	Attend call with Hogan Lovells team regarding upcoming filing matters (.8); attend call with Hogan Lovells and Stapleton teams regarding diligence and case developments (.7); attend to communication with Hogan Lovells team regarding upcoming filing matters (.6); attend to upcoming filings (2.2)
06/28/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Exchange correspondence with Stapleton regarding master property chart and property information
06/29/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Review master property file and exchange correspondence regarding same with Stapleton and R. Itkin

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/30/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review master property list and documents provided by Pachulski
06/30/25	Danielle Ullo	HLUS	1,035.00	2.70	2,794.50	Prepare agenda for call with Stapleton team (.8) ; internal Hogan Lovells checklist call and review of master property file (1.1); exchange internal correspondence regarding DIP lenders (.1); exchange correspondence regarding document review platform (.4); review revised master property file to determine status of asset recovery and property management (.3)
07/01/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Attend bi-weekly meeting with Stapleton (.6); attend bi-weekly internal call regarding substantive consolidation diligence progress, funding, property and other issues (.6); prepare email to M. Nishikawa and L. Bukai regarding case management conference (.2); prepare follow up emails post-hearing to address issues raised (.1)
07/01/25	Megan Nishikawa	HLUS	1,630.00	0.80	1,304.00	Assist in preparation for case management conference in Benedetti case in which KS Mattson Partners may have some interest (.6); review and consider document repository database and proposed budget (.2)
07/01/25	Danielle Ullo	HLUS	1,035.00	2.60	2,691.00	Review and revise Chapter 11 case checklist to reflect current case status, including retention applications, motions in progress, upcoming

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						reporting deadlines, and communications (.5); prepare agenda for call with asset management team regarding open items and asset recover status (.5); internal call with Hogan Lovells team regarding case status and strategy (.9); attend bi-weekly update call with Stapleton team regarding case strategy and asset management matters (.6); internal follow up regarding same (.1)
07/01/25	Isolte Beal	HLUS	760.00	1.90	1,444.00	Attend to communication with Hogan Lovells team regarding upcoming filing matters (.4); attend call with Hogan Lovells and Stapleton teams regarding diligence and case developments (.5); attend call with Hogan Lovells team regarding case developments (1.0)
07/02/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review rents and property issue
07/03/25	Erin Brady	HLUS	1,570.00	1.80	2,826.00	Attend bi-weekly call with Stapleton (1.1); attend internal Hogan Lovells bi-weekly call with R. Wynne, D. Ullo and I. Beal (.7)
07/03/25	Megan Nishikawa	HLUS	1,630.00	1.70	2,771.00	Review memorandum and related e-mail correspondence regarding potential fraudulent transfer of property (.9); prepare for and attend call with E. Brady and L. Bukai regarding upcoming deadlines and July 18 response (.8)
07/03/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Telephone conference with R. Itkin regarding insurance, deadline

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						agenda, diligence to complete, and plan term sheet comments on LeFever Mattson term sheet (.5); prepare agenda for call (.2); attend meeting with team (.7)
07/03/25	Danielle Ullo	HLUS	1,035.00	2.40	2,484.00	Call with Hogan Lovells team regarding retention, financing issues, and case administration (.7); prepare agenda for videoconference with Hogan Lovells and Stapleton teams (.5); call with Stapleton team regarding asset recovery, document review, and budget issues (1.0); draft and distribute summary of same (.2)
07/03/25	Isolte Beal	HLUS	760.00	2.50	1,900.00	Communication with Hogan Lovells team regarding upcoming filing matters (.7); attend call with Hogan Lovells and Stapleton teams regarding diligence and case developments (1.0); attend to checklist and upcoming filings (.8)
07/07/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Conference call with G. Albert regarding personal property (.2); analyze and follow up with Stapleton regarding same (.3); exchange emails with R. Itkin regarding Live Oak motion and impact on KSMP assets (.2); analyze issues relating to same (.2); prepare email to M. Fairbanks regarding personal property (.2)
07/07/25	Megan Nishikawa	HLUS	1,630.00	1.40	2,282.00	Review correspondence regarding Benedetti matter and prepare e-mail

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B120 - Asset Analysis/Recovery & Real Estate

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						regarding same to LeFever Mattson counsel
07/08/25	Megan Nishikawa	HLUS	1,630.00	1.40	2,282.00	Review e-mail correspondence regarding potential fraudulent transfer issue (.6); review correspondence with PwC and committee counsel for purposes of determining material necessary for review by counsel (.8)
07/08/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Review spreadsheet of LeFever Mattson and KS Mattson Partners transaction provided by K. Mattson and Fennemore to Stapleton, and correspondence regarding same (.4); review additional Ocean Front correspondence regarding listing and ownership issues (.3); review KS Mattson Partners draft balance sheet (.3)
07/08/25	Rick Wynne	HLUS	1,975.00	2.90	5,727.50	Review LeFever Mattson statement regarding K. Mattson declaration with respect to properties owned (.4); attend call with Stapleton, R. Itkin and Hogan Lovells working group regarding large agenda of to do items (2.0); attend internal Hogan Lovells planning meeting regarding items to do (.5)
07/08/25	Danielle Ullo	HLUS	1,035.00	0.90	931.50	Review and reconcile master property spreadsheet and balance sheet
07/10/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Confer with D. Ullo regarding agenda for Stapleton biweekly call (.2); revise periodic reports of interest in non-debtor

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						entities (.8); attend biweekly Hogan Lovells coordination call (.5)
07/10/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Telephone conference with S. Golden regarding property details on property claimed by K. Mattson
07/10/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with E. Brady regarding Rule 2015.3 reporting
07/10/25	Danielle Ullo	HLUS	1,035.00	5.30	5,485.50	Revise chapter 11 checklist with open items and key dates (.5); exchange correspondence regarding document review platform (.1); attend videoconference with Hogan Lovells team regarding open items and status updates (.5); prepare and coordinate filing of Form 426 (list of debtor's interest in non-debtor subsidiaries) (3.6); review and distribute government's opposition to K. Mattson's motion to modify pre-trial asset restraint (.3); review updated balance sheet provided by Stapleton (.3)
07/11/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review need for insurance payments to be made on properties week of July 14 and attend to issues regarding same
07/11/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Attend meeting with Stapleton and Hogan Lovells team regarding property management, values, marketing, in-depth interview, statement of financial affairs and schedules
07/11/25	Todd Schwartz	HLUS	1,925.00	3.50	6,737.50	Attend bi-weekly check-in;

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						attend post-petition inter-debtor lender motion hearing; correspond with D. Ullo regarding property and secured creditor information; conference with V. Rubinstein, E. Brady and M. Scherneck regarding DIP term sheet
07/11/25	Danielle Ullo	HLUS	1,035.00	2.30	2,380.50	Prepare agenda for call with Stapleton (.5); attend videoconference with Stapleton to discuss asset recovery and other operational issues (.8); review property sales commission schedule (.3); exchange correspondences regarding same (.2); prepare broker motion for Douglass Elliman (.5)
07/14/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review Stapleton correspondence regarding Ocean Front property transfers, what KS Mattson Partners owns, and what M. Lair has done or not done
07/14/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with M. Pendergrass regarding provision of bank account information
07/14/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Exchange calls and correspondence with Stapleton regarding cash collateral issues and asset recovery
07/15/25	Todd Schwartz	HLUS	1,925.00	2.90	5,582.50	Attend bi-weekly check-in call (.5); correspond with working group regarding same (.5); correspond with D. Ullo regarding reprop insurance and issues (.4); review and analyze issues regarding cash collateral stipulations (.3); review and revise DIP term sheet (1.2)

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07/15/25	Danielle Ullo	HLUS	1,035.00	3.00	3,105.00	Prepare agenda for call with Stapleton team (.4); attend videoconference with Stapleton team regarding asset recovery and other matters (1.4); exchange correspondence with Stapleton team regarding insurance payments and cash collateral needs (1.2)
07/16/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Prepare email to M. Bergthold regarding tenant reports (.4); prepare email to R. Pollock regarding tenant reports (.3)
07/16/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Call with R. Itkin regarding substantive consolidation, property management issues, and DIP and insurance
07/17/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Prepare email to D. Ullo regarding chart of properties (.4); analyze issues regarding owned property (.3)
07/17/25	Megan Nishikawa	HLUS	1,630.00	1.80	2,934.00	Review correspondence and supporting documentation from committee counsel for purposes of determining the propriety of adding additional entities to bankruptcy
07/17/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Further review additional M. Lair documents and promissory note, and prepare correspondence to M. Bergthold, Stapleton regarding same to straighten out deed of trust and ownership issue on Ocean Front property (.4); revise questions for M. Lair (.2)
07/17/25	Danielle Ullo	HLUS	1,035.00	2.30	2,380.50	Compile contact

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						information for and begin outreach to secure lenders (1.0); review and revise chapter 11 closing checklist (.5); exchange correspondence regarding LeFever Mattson hearings (.3); attend internal Hogan Lovells call regarding case strategy (.5)
07/17/25	Isolte Beal	HLUS	760.00	2.20	1,672.00	Review checklist and upcoming filings (.9); attend call with Hogan Lovells team regarding upcoming filing matters (.5); communications with Hogan Lovells team regarding case developments and upcoming filings (.8)
07/18/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend bi-weekly conference call with Stapleton and R. Itkin
07/18/25	Rick Wynne	HLUS	1,975.00	4.10	8,097.50	Calls and correspondence with R. Itkin regarding status update (.5); attend weekly update meeting with Hogan Lovells and Stapleton (.7); review and revise status report (.2); attend meeting with E. McNeilly and Stapleton regarding insurance issues (.4); multiple calls with E. McNeilly regarding bar date order issues, mediation motion, monthly operating report issues, and preparation of schedules and SOFAs (.8); review KS Mattson Partners schedules and global notes to that, and monthly operating report (.8); review correspondence regarding insurance issues (.4); review final changes to

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						status conference report and review R. Itkin comments and response regarding same (.3)
07/18/25	Edward Joseph McNeilly	HLUS	1,295.00	3.60	4,662.00	Telephone conference with H. Davidson regarding bankruptcy schedules (.8); participate in weekly check-in call (1.0); revise status report (1.6); email with R. Itkin regarding status report (.1); email with Keller Benvenutti regarding schedules and statements (.1)
07/18/25	Danielle Ullo	HLUS	1,035.00	2.30	2,380.50	Prepare agenda for KS Mattson Partners call with Stapleton (.5); calls with D. Marcoux, Stapleton regarding lender outreach (.3); prepare agenda for call with Stapleton (.4) call with Stapleton team regarding case administration (.7); finalize and file stipulation with Socotra to pay insurance reinstatement fees (.4)
07/18/25	Isolte Beal	HLUS	760.00	2.30	1,748.00	Attend call with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.6); attend to checklist and upcoming filings (1.2); communications with Hogan Lovells team regarding case developments and upcoming filings (.5)
07/20/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Emails regarding 19343 Sonoma Highway tenant inquiry (.6); prepare Itkin draft email to respond to C. Roberson (.4)

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/20/25	Isolte Beal	HLUS	760.00	0.70	532.00	Review information on debtor properties
07/21/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Attend biweekly meeting with Stapleton and R. Itkin (.5); prepare email to R. Wynne and R. Itkin regarding committee formation (.1)
07/21/25	Megan Nishikawa	HLUS	1,630.00	3.30	5,379.00	Prepare for and attend call with counsel for LeFever Mattson regarding due diligence necessary to evaluate propriety of substantive consolidation (1.5); communicate with E. Brady regarding new facts obtained with with respect to substantive consolidation and update response to substantive consolidation motion regarding same (1.8)
07/21/25	Todd Schwartz	HLUS	1,925.00	2.70	5,197.50	Review correspondence regarding monthly operating report comments (.2); attend Hogan Lovells bi-weekly check-in (.5); correspond with working group regarding Northlight DIP term sheet (.5); correspond with E. McNeilly regarding same (1.0); correspond with M. Bergthold regarding confidentiality agreement (.5)
07/22/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to E. McNeilly regarding property management agreements
07/22/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Review and comment on listing agreements (.4); email with R. Itkin regarding property managers (.1)
07/22/25	Danielle Ullo	HLUS	1,035.00	1.20	1,242.00	Prepare agenda for weekly

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						status call with Robbin Itkin and Stapleton team (.4); Participate in videoconference with Robbin Itkin and Stapleton team regarding asset monetization and other open items (1.0)
07/23/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to Stapleton team regarding Commerce Court
07/23/25	Loryn Dunn Arkow	HLUS	1,515.00	0.70	1,060.50	Review and revise Premier Estates listing agreement
07/23/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review R.S. Pollack correspondence regarding request for specific property information
07/23/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Review discovery from bank provided (.4); review broker motion (.5); review listing agreement (.6); emails with Stapleton regarding property management agreements (.3)
07/23/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Teleconference with D. Marcoux regarding property located at 18285 Sonoma Hwy and required remedial measures and impact on budget
07/24/25	Loryn Dunn Arkow	HLUS	1,515.00	2.90	4,393.50	Review and markup leasing agreement for Ocean Avenue (1.4); review and markup property management agreement for Sonoma (1.1); review additional changes to brokerage agreement and provide input (.4)
07/24/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Revise listing agreements
07/24/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Call with Stapleton team regarding title issues relating to real property

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						located at 62 Farragut Avenue
07/25/25	Loryn Dunn Arkow	HLUS	1,515.00	0.70	1,060.50	Review and confirm revisions to sales listing agreements for three additional brokers (.4); further work related to comments regarding property management agreement (.3)
07/25/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review Stapleton documents regarding insurance, payments and cash flow projections (.3); review correspondence regarding privilege issues with respect to accessing prior Fennemore Stapleton information (.2)
07/25/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Emails with L. Arkow regarding property agreements (.2); revise and mark-up broker agreements (.9); review property management agreements (.5)
07/26/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review correspondence regarding in-depth interview, and correspondence with R. Itkin and E. McNeilly regarding same, and privilege issue with Stapleton work
07/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Emails with T. Cohen regarding sale motion (.1); email with M. Nishigawa regarding discovery (.1); revise listing agreements (.7)
07/28/25	Rick Wynne	HLUS	1,975.00	1.60	3,160.00	Review Stapleton correspondence regarding bar date and real estate issues (.2); revise to do lists and deadlines (.2); attend meeting with R.

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Itkin, E. McNeilly and E. Brady regarding bar date motion issues, filing new entities, criminal hearing position, and sale procedures and secured lender treatment, including partial conference with Pachulski regarding same (1.2)
07/28/25	Todd Schwartz	HLUS	1,925.00	1.20	2,310.00	Telephone conference with E. Brady, E. McNeilly, and D. Ullo regarding DIP motion and status (.6); review and analyze issues regarding same (.2); correspond with D. Ullo regarding same (.1); correspond with D. Ullo regarding sale motion (.1); correspond with working group regarding non-disclosure agreement (.2)
07/28/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Emails with Stapleton group regarding broker retentions
07/29/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Confer with Stapleton team and R. Itkin regarding property management agreements and non-paying tenants (.9); research regarding LaSalle property (.2)
07/29/25	Loryn Dunn Arkow	HLUS	1,515.00	0.40	606.00	Correspondence regarding 210 La Salle (.1); revise Ocean Ave and Sonoma management and leasing agreements per team comments (.3)
07/29/25	Megan Nishikawa	HLUS	1,630.00	0.90	1,467.00	Review e-mail correspondence regarding K. Mattson document production and related summary
07/29/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Revise broker agreements

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/30/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Review title documents to LaSalle property (.3); confer with A. Kim regarding same (.3); confer with R. Itkin regarding same (.2); prepare email to Stapleton regarding same (.2); prepare email to Stapleton regarding secured debt analysis (.1); analyze issues regarding LaSalle property (.4)
07/30/25	Loryn Dunn Arkow	HLUS	1,515.00	2.40	3,636.00	Analyze title documentation regarding vesting, liens and notice of default with respect to 210 LaSalle in Piedmont and prepare summary (.9); analyze additional title and court documents affecting ownership of 210 LaSalle in Piedmont (.8); respond to inquiries regarding interests in property, lien priorities, co-ownership agreement of witness in government's case and other property-related questions on 210 LaSalle in Piedmont (.7)
07/30/25	Megan Nishikawa	HLUS	1,630.00	0.60	978.00	Prepare for and attend call with E. Brady to discuss Piedmont property
07/30/25	Rick Wynne	HLUS	1,975.00	2.40	4,740.00	Telephone conference with R. Itkin regarding Socotra issues, DIP and in-depth interview (.4); attend meeting with R. Itkin, E. Brady and E. McNeilly (partial) regarding DIP, plan issues, disclosure statement, Socotra, mediation, and bar date motion (1.2); review correspondence regarding in-depth interview meeting conferences, checklist and to do list (.4); review

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						information regarding possible other related KS Mattson Partners debtors to file (.4)
07/30/25	Edward Joseph McNeilly	HLUS	1,295.00	1.20	1,554.00	Correspondence regarding subpoenas and discovery (.2); telephone conference with D. Ullo regarding broker motions (.2); revise listing agreements (.6); review broker declaration (.2)
07/30/25	Isolte Beal	HLUS	760.00	1.00	760.00	Draft broker declarations (.7); communication with D. Ullo regarding broker declarations (.3)
07/31/25	Erin Brady	HLUS	1,570.00	2.30	3,611.00	Review email from L. Arkow regarding property searches (.1); prepare email to R. Wynne and E. McNeilly regarding same (.1); review property lists (.1); analyze strategy regarding real property identification (.1); confer with E. McNeilly, D. Ullo and R. Wynne regarding various property ownership issues (.5); analyze issues regarding 1832/1834 and LaSalle properties (.3); analyze issues regarding properties (.4); analyze issues regarding BMO statements (.3); comment on letter to tenants (.4)
07/31/25	Edward Joseph McNeilly	HLUS	1,295.00	1.40	1,813.00	Video conference with S. Atherton regarding discovery from BMO (.6); correspondence regarding BMO discovery (.6); review BMO discovery (.2)
Subtotal				196.90	271,707.00	

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/18/25	Isolte Beal	HLUS	760.00	5.30	4,028.00	Draft notice of hearing on motion to extend time (.9); draft motion regarding procedure for real property sales (4.4)
06/20/25	Isolte Beal	HLUS	760.00	3.00	2,280.00	Draft motion regarding procedure for real property sales
06/23/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Review and comment on sale procedures motion
06/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Email with E. Brady and R. Itkin regarding topics for call with Stapleton (.1); revise sale procedures motion (.5)
06/25/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Draft declaration in support of sale procedures motion (.9); call with E. Brady regarding cash collateral and sale motions (.2); email with proposed financial advisor regarding sale procedures motion declaration (.2)
06/27/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review sale procedures motion
07/21/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Revise bidding procedures and sale motion per E. Brady comments
07/23/25	Danielle Ullo	HLUS	1,035.00	2.80	2,898.00	Draft application to retain Doublass Elliman as real estate broker (.6); Draft application to retain Compass as real estate broker (.6); Draft application to retain W Real Estate as real estate broker (.6); Draft application to retain Kidder Matthews as real estate broker (.6); Draft application to retain Premiere Estates as real estate broker (.6)

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/25/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Confer with E. McNeilly regarding sale motion
07/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Telephone conference with E. Brady regarding DIP and sale issues
07/28/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with R. Itkin, E. McNeilly, J. Rosell and R. Wynne regarding sale procedures
07/28/25	Edward Joseph McNeilly	HLUS	1,295.00	2.90	3,755.50	Attend video conference with Sheppard Mullin team and D. Ullo regarding sale procedures motion and potential considerations with respect to Socotra (.8); call with D. Ullo and J. Rosell regarding sale procedures (.6); attend video conference with R. Wynne, R. Itkin, E. Brady and J. Rosell (partial) regarding filing additional entities for bankruptcy and sale procedures (1.5)
07/28/25	Danielle Ullo	HLUS	1,035.00	1.40	1,449.00	Call with Socotra counsel regarding draft sale motion (.8); Call with LFM Committee Counsel regarding draft sale motion (.6)
07/29/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with Stapleton team, R. Itkin and Ed. McNeilly regarding sale procedures vs. one off asset sale process
07/30/25	Danielle Ullo	HLUS	1,035.00	2.30	2,380.50	Draft and revise 5 broker declarations (2.3); Internal call regarding same (.3)
			Subtotal	23.20	24,646.00	

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B140 - Relief from Stay/Adequate Protection Proceedings

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/05/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Respond to email from R. Itkin regarding automatic stay
07/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Review stay relief motions
07/19/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to E. McNeilly regarding relief from stay motion
07/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with A. Anderson regarding stay relief motions
07/27/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Telephone conference with A. Anderson regarding stay relief motions (.4); review property matrix and stay relief motions (.3); email with A. Anderson regarding the same (.2)
07/28/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Attend video conference with C. Gernica and A. Anderson regarding stay relief motions
07/29/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Attend video conference with S. Golden and A. Anderson regarding stay relief motions (.6); telephone conference with A. Anderson regarding same (.4)
07/31/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Confer with R. Wynne and E. McNeilly regarding TIC issues and automatic stay motions (.3); prepare email to R. Itkin regarding same (.4)
07/31/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Emails with A. Anderson regarding stay relief
			Subtotal	4.20	5,686.50	

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/11/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with D. Grassgreen, J. Rosell and E. McNeilly regarding creditor issues and checking in
06/11/25	Loryn Dunn Arkow	HLUS	1,515.00	0.70	1,060.50	Attend meeting with counsel for Socotra (.3); attend meeting with counsel for Serene (.4)
06/12/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Attend meeting with LeFever Mattson, KS Mattson Partners, Pachulski and Keller Benvenuti teams and follow up correspondence regarding same
06/18/25	Loryn Dunn Arkow	HLUS	1,515.00	0.30	454.50	Telephone conference with counsel for various parties
06/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Prepare response to inquiry from P. Barber
07/06/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Exchange correspondence regarding confidentiality of Treehouse limited partnership agreement
07/09/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Exchange correspondences with U.S Trustee regarding coordination of 341 meeting of creditors (.3); review standard Form 309F1 (.1)
07/10/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Exchange correspondence with U.S. Trustee office regarding 341 meeting of creditors and revised form of notice
07/11/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Coordinate 341 meeting of creditors and revise form notice
07/14/25	Megan Nishikawa	HLUS	1,630.00	1.00	1,630.00	Prepare for and attend meeting with committee counsel and others regarding claims by investors
07/14/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Exchange correspondences

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
						with U.S. Trustee regarding 341 meeting of creditors
07/16/25	Erin Brady	HLUS	1,570.00	1.30	2,041.00	Attend meeting with R. Itkin, E. McNeilly, M. Bergthold and R. Itkin to prepare for 341 meeting (1.0); prepare for same (.3)
07/16/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Attend video conference with E. Brady, D. Ullo, R. Itkin and Stapleton to prepare for 341 meeting
07/17/25	Danielle Ullo	HLUS	1,035.00	0.70	724.50	Attend 341 meeting of creditors (.5); follow up call with Hogan Lovells team regarding same (.2)
07/21/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Prepare contact list for secured lenders and begin outreach to collect loan documents and other information
07/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with investor regarding case
07/23/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Exchange correspondences with secured lender regarding property located at 405 London Way
07/29/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review Shepherd Mullin Socotra letter and correspondence regarding same
07/31/25	Rick Wynne	HLUS	1,975.00	1.60	3,160.00	Attend meeting with LeFever Mattson committee and Socotra regarding mediators, sale proceeds and escrow (.6); attend meeting with Socotra and LeFever Mattson creditors committee regarding mediation (1.0)
Subtotal				10.80	15,940.00	

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/09/25	Erin Brady	HLUS	1,570.00	4.40	6,908.00	Analyze retention issues for R. Itkin and Stapleton (1.3); revise motion to appoint R. Itkin as Responsible Individual; confer with E. McNeilly regarding CRO motion (3.1)
06/09/25	Rick Wynne	HLUS	1,975.00	3.20	6,320.00	Review and revise retention motion and declaration, prepare correspondence to R. Itkin regarding same, and call with E. Brady and E. McNeilly regarding same (1.5); attend meeting with R. Itkin, E. McNeilly and E. Brady regarding retention motion and preliminary to do list (.8)
06/09/25	Edward Joseph McNeilly	HLUS	1,295.00	2.00	2,590.00	Review and revise retention application and motion to shorten
06/09/25	Tracy Southwell	HLUS	655.00	5.00	3,275.00	Research ECF filing events (.5); prepare motion to designate individual (.8), declaration for R. Itkin (.8), motion to shorten (.7), and declaration regarding same (.5); ECF file same including after-hours standby time [1.7]
06/10/25	Erin Brady	HLUS	1,570.00	7.20	11,304.00	Review and edit motion to appoint R. Itkin as the Responsible Individual (3.6); review and edit Stapleton CRO motion (2.4); review and edit motion to shorten time regarding same (8); confer with E. McNeilly regarding PFA motion and real estate liens (.4)
06/10/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Calls and correspondence with Stapleton regarding scope of work

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/11/25	Erin Brady	HLUS	1,570.00	5.70	8,949.00	Confer with J. Day and E. McNeilly regarding R. Itkin retention motion and Stapleton CRO motion (.8); confer with J. Day, P. Shine, J. Rosell, T. Rupp, E. McNeilly and D. Taylor regarding R. Itkin retention motion, Stapleton's CRO motion and first day issues (.7); analyze issues raised by U.S. Trustee and next steps (.8); confer with D. Taylor regarding R. Itkin retention issues (.3); revise CRO motion (2.5); revise motion to shorten time on CRO motion (.6)
06/11/25	Danielle Ullo	HLUS	1,035.00	6.90	7,141.50	Draft Stapleton CRO retention application (2.7); draft Bergthold declaration in support of same (2.2); provide comments to Stapleton engagement letter (.6); exchange correspondence regarding same (.3); incorporate and address Stapleton comments to retention application and supporting declaration (1.1)
06/11/25	Tracy Southwell	HLUS	655.00	4.20	2,751.00	Prepare Stapleton retention application, including table of authorities (2.5); prepare order to shorten time regarding same (.6); after-hours standby time for filings (1.1)
06/12/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Revise Stapleton retention motion per information received from Stapleton team
06/13/25	Danielle Ullo	HLUS	1,035.00	1.70	1,759.50	Revise Stapleton retention application to convert from CRO application to

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						financial advisor application (1.6); exchange correspondence regarding monthly fee applications (.10)
06/14/25	Danielle Ullo	HLUS	1,035.00	3.00	3,105.00	Revise Stapleton retention application and other first day motions per information received from Stapleton and E. McNeilly comments
06/16/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with M. Bergthold, R. Itkin, A. Kim and D. Kiefer regarding retention application
06/17/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Confer with A. Kim regarding Stapleton retention (.4); follow up call with R. Itkin and A. Kim regarding same (.3); analyze Stapleton retention issues (.4)
06/17/25	Danielle Ullo	HLUS	1,035.00	1.10	1,138.50	Prepare Hogan Lovells retention application (.6); revise Stapleton retention application per Hogan Lovells call (.5)
06/18/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Analyze issues regarding Itkin retention order (.2); prepare email to R. Itkin regarding same (.3)
06/18/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Review draft Hogan Lovells retention application from K. Landry
06/19/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Analyze issues regarding Hogan Lovells and Stapleton retention applications (.4); follow up with R. Itkin regarding liability cap in retention order (.2)
06/19/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with E. Brady regarding R. Itkin retention issues and hearing

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/19/25	Danielle Ullo	HLUS	1,035.00	2.20	2,277.00	Revise Stapleton retention application to convert from CRO application to section 327 professional and conduct research into potential disinterestedness
06/20/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Confer with A. Kim, E. McNeilly and R. Itkin regarding Stapleton (.5); confer with M. Bergthold regarding retention application (.1); confer with M. Fairbanks regarding Stapleton retention and various transition issues (.3); analyze issues regarding Stapleton retention (.3)
06/20/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Review revised Itkin retention order
06/20/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Revise Stapleton retention motion per conversations with E. McNeilly and Stapleton
06/22/25	Ann Chungsun Kim	HLUS	1,475.00	0.40	590.00	Correspondence regarding retention of financial advisor, and review draft engagement letter
06/22/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Review and edit engagement letter for Stapleton Group
06/22/25	Danielle Ullo	HLUS	1,035.00	1.30	1,345.50	Revise Stapleton retention application to remove reference to attestation of disinterestedness
06/23/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Confer with M. Hobson regarding disinterestedness analysis (.2); review and respond to email correspondence regarding Stapleton application (.2); review and comment on Hogan Lovells retention motion (.7); review and comment

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						on broker retention motion (.4)
06/23/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review employment application and conflicts correspondence and replies regarding same
06/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Review and revise retention application
06/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Final review and edit to filing versions of Rule 1020(a) statement, supplemental Itkin declaration and counsel compensation disclosures
06/23/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Review E. Brady comments to Hogan Lovells retention application
06/24/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Prepare correspondence to D. Ullo regarding Hogan Lovells retention application
06/24/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Incorporate E. Brady comments to Hogan Lovells retention application
06/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Review and comment on Hogan Lovells retention application (.6); telephone conference with D. Ullo regarding retention application (.3)
06/25/25	Danielle Ullo	HLUS	1,035.00	2.70	2,794.50	Revise other first day motions per E. Brady and E. McNeilly comments to background section (.7); revise Hogan Lovells employment application per E. Brady comments and exchange internal correspondences regarding same (2.0)
06/25/25	Tracy Southwell	HLUS	655.00	0.80	524.00	Research information needed for retention

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						application for D. Ullo
06/26/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Review and comment on Hogan Lovells retention application
06/26/25	Danielle Ullo	HLUS	1,035.00	1.30	1,345.50	Revise Hogan Lovells retention application and associated declaration of R. Wynne per E. Brady comments and incorporating revised conflicts information and rates
06/26/25	Tracy Southwell	HLUS	655.00	0.70	458.50	Research information needed for retention application for D. Ullo
06/27/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Prepare correspondence to A. Turnbull and others including R. Silverman regarding application to employ issues
06/27/25	Danielle Ullo	HLUS	1,035.00	0.70	724.50	Exchange correspondences with E. Brady regarding ordinary course professionals motion (.3); prepare and revise agenda for 6/27 call with Stapleton (.4)
06/28/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Analyze issues regarding retention application
06/28/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Review E. Brady comments to Hogan Lovells retention application
06/30/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Analyze issues regarding Stapleton retention (.3); confer with Stapleton counsel regarding same (.6); confer with D. Ullo regarding Hogan Lovells retention application (.2)
06/30/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Revise Hogan Lovells retention application (.4); call with Stapleton counsel regarding Stapleton

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						retention application (.6)
07/01/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to J. Day regarding meeting on Stapleton application
07/01/25	Danielle Ullo	HLUS	1,035.00	1.50	1,552.50	Draft Hogan Lovells retention application
07/02/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to J. Day regarding meeting on Stapleton application
07/02/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review and revise retention application
07/03/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Conference with D. Flahaut, J. Day and D. Ullo regarding Stapleton retention motion
07/03/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review and revise retention application declaration, and body of application
07/03/25	Danielle Ullo	HLUS	1,035.00	1.60	1,656.00	Call with United States Trustee regarding Stapleton retention issues (.7); draft email to firm regarding KS Mattson Partners representation and potential conflicts (.2); exchange internal correspondences regarding same (.2); prepare application to retain Stapleton Group under section 363 as operations and property manager (.5)
07/05/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Confer with D. Ullo regarding Hogan Lovells retention application
07/06/25	Danielle Ullo	HLUS	1,035.00	3.00	3,105.00	Revise Hogan Lovells employment application and finalize for filing (1.8); revise Wynne declaration in support of Hogan Lovells employment application and finalize for filing (1.2)

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/07/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Confer with M. Hobson regarding Hogan Lovells retention application (.1); confer with D. Ullo regarding same (.1); confer with D. Ullo regarding Hogan Lovells retention application (.4); forward Hogan Lovells engagement letter (.1)
07/07/25	Danielle Ullo	HLUS	1,035.00	3.60	3,726.00	Revise Hogan Lovells retention application (.3); revise Wynne declaration in support of Hogan Lovells retention application (.2); exchange correspondence regarding same (.1); coordinate filing of Hogan Lovells retention application including email to all Hogan Lovells US partners (.3); review and finalize engagement letter and coordinate execution (.3); prepare Stapleton retention application under Section 363 of the Bankruptcy Code as a real estate advisor (1.6); exchange correspondence with Stapleton counsel regarding same (.4); call with E Brady regarding Hogan Lovells employment application (.4)
07/07/25	Tracy Southwell	HLUS	655.00	0.50	327.50	Review Hogan Lovells retention application and prepare list of revisions needed
07/08/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Conference with D. Ullo regarding Stapleton retention motion
07/08/25	Danielle Ullo	HLUS	1,035.00	2.70	2,794.50	Finalize and coordinate filing of Hogan Lovells engagement letter (.8); review and incorporate D.

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Fauholt comments to Stapleton retention motion (.6); draft Bergthold declaration in support of retention (.7); incorporate revisions to Hogan Lovells engagement letter and research regarding Northern District of California local rules for reimbursable expenses (.4); finalize Hogan Lovells engagement letter and prepare for filing (.2)
07/08/25	Tracy Southwell	HLUS	655.00	2.10	1,375.50	Work on finalizing Hogan Lovells retention application, order and declaration for ECF filing (.7); ECF file same including after hours standby time (1.1); retrieval of file stamped copy and coordinate mail service (.3)
07/09/25	Erin Brady	HLUS	1,570.00	1.80	2,826.00	Revise motion to employ Stapleton and supporting Itkin and Bergthold affidavits
07/10/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Review email from D. Flahaut regarding Stapleton retention motion (.2); respond to same (.1)
07/10/25	Danielle Ullo	HLUS	1,035.00	0.70	724.50	Draft broker retention motions
07/11/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Review revised Stapleton engagement letter and incorporate into retention application
07/14/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with R. Itkin and D. Ullo regarding Stapleton application (.2); prepare comments to Stapleton documents (.3)
07/14/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review fee application process to do list

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/14/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with D. Ullo regarding retention application
07/14/25	Danielle Ullo	HLUS	1,035.00	3.50	3,622.50	Revise Stapleton retention application (.8); revise Stapleton engagement letter (.4); coordinate filing of Hogan Lovells retention order (.2); prepare real estate broker retention applications (2.1)
07/14/25	Leen Bukai	HLUS	760.00	2.50	1,900.00	Draft motions for an order authorizing the retention and employment of real estate brokers
07/15/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Review R. Itkin comments to Stapleton application (.2); address R. Itkin comments (.5); confer with D. Ullo regarding application (.3)
07/15/25	Danielle Ullo	HLUS	1,035.00	3.20	3,312.00	Prepare real estate broker retention applications (.5); revise Stapleton retention application regarding indemnification provision and other items (1.8); revise Stapleton engagement letter regarding same (.9)
07/15/25	Leen Bukai	HLUS	760.00	1.90	1,444.00	Draft motions for an order authorizing retention and employment of real estate brokers
07/16/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with D. Ullo regarding Stapleton motion (.1); analyze indemnity issues (.2); conference call with D. Ullo and R. Itkin regarding Stapleton (.2)
07/16/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Emails regarding retention application order
07/16/25	Danielle Ullo	HLUS	1,035.00	0.70	724.50	Finalize and coordinate filing of Stapleton

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						retention application and supporting declarations
07/16/25	Tracy Southwell	HLUS	655.00	0.80	524.00	Prepare final Hogan Lovells retention order (.5); upload order (.3)
07/17/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Prepare emails to D. Ullo regarding Stapleton application (.1); follow up with D. Ullo regarding Hogan Lovells order (.1); confer with D. Ullo regarding LeFever Mattson fee application hearing (.1)
07/17/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Emails with D. Ullo regarding Stapleton retention motion
07/17/25	Kristel Gelera	HLUS	470.00	0.30	141.00	Assist with filing and service of Stapleton retention motion and order and hearing notice regarding same
07/17/25	Tracy Southwell	HLUS	655.00	3.80	2,489.00	Review Stapleton retention application and edit same and prepare near final drafts for ECF filing (2.4); prepare revised Stapleton retention motion, declarations and notice for ECF filing (.5); ECF file same (.5); email to attorneys for detail regarding filings on July 18th (.2); coordinate service of Stapleton retention application (.2)
07/23/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review SSL fee application order and note to Hogan Lovells team regarding same
			Subtotal	111.90	132,577.00	

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/13/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Review substantive consolidation motion
06/20/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Prepare documentation for M. Nishikawa regarding open litigation matters against company
06/21/25	Megan Nishikawa	HLUS	1,630.00	3.10	5,053.00	Review current and recent litigation against KS Mattson Partners related entities
06/24/25	Megan Nishikawa	HLUS	1,630.00	1.90	3,097.00	Research regarding litigation by and against KS Mattson Partners entities and discuss same with E. Brady
06/25/25	Megan Nishikawa	HLUS	1,630.00	3.50	5,705.00	Further review civil litigation matter in which LeFever Mattson was granted monetary reward and further investigate status of ongoing appeal (1.7); review and consider notice from Water Board and draft response for purposes of preparing for call with Water Board representative and discuss same with team (1.8)
06/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Emails regarding ongoing litigations (.2); read Keller Benvenuti opposition to trustee motion (.1)
06/26/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with E. McNeilly regarding bank account subpoenas and other issues
06/26/25	Megan Nishikawa	HLUS	1,630.00	4.20	6,846.00	Prepare for and attend call with LeFever Mattson counsel in matter pending in Sonoma County and prepare e-mail to Hogan Lovells team and client regarding same (1.2); review e-mails regarding outstanding tasks,

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						including correspondence to Water Board and subpoenas (.80); further revise correspondence to the Water Board regarding dry cleaning facility and potential remediation order and communicate regarding same to Hogan Lovells team and client (1.3); review e-mails regarding matter pending in Sonoma County and upcoming case management conference regarding same (.9)
06/26/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Telephone conference with M. Pendergrass regarding subpoena (.4); draft subpoena and document requests (.8); correspondence regarding permitted party access to proofs of claim and interest (.1)
06/27/25	Megan Nishikawa	HLUS	1,630.00	2.30	3,749.00	Research regarding pending case in Sonoma County and related case management conference and discuss same with Hogan Lovells team (1.7); correspond with counsel for LeFever Mattson in case under appeal in Sonoma County regarding potential cost recovery and prejudgment interest (.6)
06/27/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review LeFever Mattson opposition to trustee motion
06/30/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Confer with M. Nishakawa and L. Bukai regarding case management conference and bankruptcy issues in pending state court matter

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/30/25	Megan Nishikawa	HLUS	1,630.00	2.80	4,564.00	Prepare for and attend call with Hogan Lovells team regarding upcoming meeting with LeFever Mattson bankruptcy counsel and follow up with L. Bukai regarding same (1.0); call with counsel for KS Mattson Partners regarding County of Sonoma CCR violation and related call with Hogan Lovells team to discuss appearance at case management conference (1.8)
06/30/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Review motion to appoint Chapter 11 trustee in LeFever Mattson subsidiary case
06/30/25	Leen Bukai	HLUS	760.00	3.10	2,356.00	Participate in internal discussions regarding case strategy for County of Sonoma vs. Mattson (1.3); prepare for upcoming case management conference in the case of County of Sonoma vs. Mattson (1.8)
07/03/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Analyze fraudulent transfer issues around \$19 million note (.4); review criminal pleadings regarding same (.3); confer with M. Nishikawa and L. Bukai regarding same (.2)
07/06/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Analyze LFM committee request to remove confidentiality designations
07/07/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with M. Nishikawa and L. Bukai regarding fraudulent transfer analysis
07/17/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review correspondence regarding Mattson 2004 deposition and motion to

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						compel
07/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review motion to compel
07/20/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Brief review of S. Golden Mattson deposition script and correspondence with M. Nishikawa regarding same
07/22/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Review proposed mediation motion
07/22/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Revise LeFever Mattson motion to appoint mediator (.8); revise motion to appoint mediator (1.0)
07/25/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with L. Bukai regarding Mattson deposition and exhibits (.1); prepare email to R. Itkin regarding same. (.1)
07/25/25	Megan Nishikawa	HLUS	1,630.00	1.20	1,956.00	Review and consider e-mail correspondence regarding notice required as to BMO subpoena (.9); review research regarding confidential and potentially relevant litigation in Sacramento (.3)
07/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Telephone conference with M. Pendergrass regarding subpoena for records (.1); revise subpoena (.3); review documents provided by Pachulski regarding Mattson entities for purposes of subpoena (.2)
07/25/25	Leen Bukai	HLUS	760.00	5.30	4,028.00	Identify and track all litigation involving KS Mattson Partners, LP
07/27/25	Leen Bukai	HLUS	760.00	0.90	684.00	Identify and track all litigation involving KS Mattson Partners, LP

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/29/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review draft complaint against Socotra
07/30/25	Erin Brady	HLUS	1,570.00	2.30	3,611.00	Initial review of draft Socotra complaint (.3); confer with committee and Keller Benvenuti counsel regarding Socotra issues (1.0); confer with R. Itkin, E. McNeilly and R. Wynne regarding Socotra litigation and related issues (.4); confer with M. Nishikawa regarding various litigation issues (.5); attend to issues regarding agent of process (.1)
07/30/25	Rick Wynne	HLUS	1,975.00	3.10	6,122.50	Call and correspondence with E. Brady regarding Socotra issues (.3); review Socotra complaint, and draft notes with questions (1.8); attend meeting with Pachulski, Keller Benvenuti, E. Brady and E. McNeilly regarding Socotra, fraudulent transfer and aiding and abetting, claims bases, legal theories and defenses, mediation strategy, sales and escrow, prior precedent and other lenders (1.0)
07/30/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Attend video conference with Pachulski team, R. Wynne and E. Brady regarding draft Socotra complaint
07/31/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Review emails from J. Rosell and R. Wynne regarding Socotra adversary (.1); conference call with Socotra counsel regarding mediation and related issues (.7); confer with R. Itkin regarding

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Socotra (.2)
07/31/25	Megan Nishikawa	HLUS	1,630.00	0.80	1,304.00	Review e-mails between D. Tracey and R. Wynne regarding potential Ninth Circuit law
07/31/25	Rick Wynne	HLUS	1,975.00	1.20	2,370.00	Call and correspondence with L. Bogdanoff, JAMS regarding mediation (.4); prepare correspondence to Judge Bason, JAMS regarding mediation, and prepare correspondence to group on plaintiff side and entire group regarding same (.8)
07/31/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Attend meeting with Socotra counsel, R. Wynne, E. Brady and Committee counsel regarding draft Socotra complaint (.6); review Ponzi scheme decisions (.5)
			Subtotal	48.90	71,179.00	

B195 - Non-Working Travel

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/12/25	Erin Brady	HLUS	1,570.00	2.50	3,925.00	Travel to San Francisco for hearing (charged at 50%)
06/13/25	Erin Brady	HLUS	1,570.00	2.50	3,925.00	Travel to courthouse from Pachulski offices (.5); return travel to Los Angeles after hearing (4.0) (charged at 50%)
06/13/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Travel time (charged at 50%)
			Subtotal	6.00	9,145.00	

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/09/25	Edward Joseph McNeilly	HLUS	1,295.00	7.00	9,065.00	Telephone conference with Stapleton, including multiple calls with E. Brady, R. Itkin and R. Wynne regarding case set up, properties owned, schedules
06/12/25	Danielle Ullo	HLUS	1,035.00	3.30	3,415.50	Prepare timeline of key dates and update checklist with relevant dates (1.2); review and update chapter 11 filing checklist and key dates list (.5); draft utilities motion (.4); draft motion to extend time to file schedules and statements (1.2)
06/16/25	Rick Wynne	HLUS	1,975.00	2.20	4,345.00	Telephone conference with E. Brady regarding schedules, SOFAs, pending motion issues and mailbox control (.5); review motion to remand and status conference opposition memorandum (.5); review correspondence regarding mailbox issue to take control, creditors matrix, and permitted party motions (.8); prepare outline of next steps for initial work (.4)
06/17/25	Edward Joseph McNeilly	HLUS	1,295.00	8.70	11,266.50	Email with Stapleton regarding creditor matrix and schedules (.1); revise and send out First Bank letter (.1); email with R. Itkin regarding real property ownership documents and charts (.2); create task list (.1); call with E. Brady and D. Ullo regarding task lists on motions to be drafted, property expenses and other things (.9); pull together follow up list of tasks and responsibilities

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.2); review first day motions, and email to Stapleton regarding budget issues (.3); e-mail with T. Southwell regarding filings (.1); emails with bank (.2); call with R. Itkin (.2); call with Stapleton (1.5); call with R. Pollock (.1); call with KBK regarding substantive consolidation, and claims agent property issues (.5); revise statements and schedules motion (1.5); call with L. Arkow and E. Brady (.4); revise Itkin and Bergthold declarations (.5); revise statements and schedules motion and supporting declarations (1.8)
06/17/25	Danielle Ullo	HLUS	1,035.00	5.90	6,106.50	Call with E. McNeilly and E. Brady regarding case administration and strategy (1.0); draft motion to extend time to file schedules and statements and to suspend automatic bar date (1.8); conduct research regarding suspension of automatic bar date in Northern District of California (.8); draft motion to shorten time on motion to extend time to file schedules and statements and to suspend automatic bar date (1.4); prepare McNeilly declaration in support of motion to shorten time on motion to extend time to file schedules and statements and to suspend automatic bar date (.5); prepare Bergthold declaration in support of motion to shorten time on motion to extend time to

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
						file schedules and statements and to suspend automatic bar date (.4)
06/17/25	Kristel Gelera	HLUS	470.00	1.70	799.00	Review filing procedure in preparation for motion to extend time to file schedules and statement of financial affairs
06/18/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Review and comment on motion to extend deadline to file statements and schedules
06/18/25	Edward Joseph McNeilly	HLUS	1,295.00	5.50	7,122.50	Revise schedules and statements motion, supporting declarations, and motion to shorten
06/18/25	Danielle Ullo	HLUS	1,035.00	7.20	7,452.00	Finalize and file motion and order to shorten time on motion to extend SOFA and schedules (.8); motion to extend deadline to file SOFA and schedules (.9); proposed order on motion to shorten time on motion to extend SOFA and schedules (.6); Bergthold declaration in support of motion to extend SOFA and schedules (.7); McNeilly declaration in support of motion to shorten time (.4); attend video and telephone conferences with E. McNeilly regarding motion to extend deadline to file schedules and SOFAs and related documents (.6); conform motion to shorten, proposed order and related declarations per E. McNeilly comments (.8); coordinate filing of motion to extend time to file schedules and statement of financial affairs (1.2); e-mails with

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
						R. Itkin regarding drafts of motion to extend time to file SOFAs and schedules (.8); draft notice of hearing on motion to extend time to file SOFA and schedules (.4)
06/18/25	Kristel Gelera	HLUS	470.00	8.50	3,995.00	Prepare service e-mail regarding motion to extend time to file schedules and SOFAs (.5); correspond with D. Ullo and assist team regarding filing tax, utilities, insurance, and utilities motions (4.0); assist team with motion of debtor for entry of order extending time to file schedules, SOFAs, list of equity security holders, and suspending non-governmental bar date (4.0)
06/19/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Analyze issues regarding creditor matrix and bank accounts
07/02/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review monthly operating reports
07/14/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Emails with E. Brady and Stapleton regarding monthly operating reports
07/16/25	Edward Joseph McNeilly	HLUS	1,295.00	3.50	4,532.50	Work on chapter 11 status conference report statement (.4); meet with D. Ullo to discuss task list and key upcoming deadlines (1.1); email with M. Bergthold regarding monthly operating reports (.1); further revise chapter 11 status conference report statement (1.9)
07/20/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to E. McNeilly regarding monthly operating reports

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/20/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review draft monthly operating report and E. McNeilly issues and questions, including review of notes regarding same
07/20/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Review monthly operating report (.6); email with Stapleton regarding monthly operating report (.1); review draft schedules and statements (.9)
07/21/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review monthly operating report drafts, and calls with E. McNeilly regarding issues with same and U.S. Trustee regarding delay in filing
07/21/25	Edward Joseph McNeilly	HLUS	1,295.00	3.80	4,921.00	Emails regarding monthly operating reports (.1); emails regarding task list (.1); revise monthly operating reports global notes (1.0); email with D. Kieffer regarding monthly operating reports (.1); telephone conference with E. Brady regarding monthly operating reports (.3); call with Stapleton regarding monthly operating reports (.7); call with Hogan Lovells team regarding task list, including DIP (.5); review updated draft of monthly operating reports (.4); revise monthly operating report notes and emails regarding same (.4)); emails regarding monthly operating reports (.2))
07/22/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Call with E. McNeilly and R. Itkin regarding monthly operating report issues (.5); review final monthly operating report (.2)

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/22/25	Edward Joseph McNeilly	HLUS	1,295.00	4.90	6,345.50	Prepare for call with R. Itkin and R. Wynne regarding monthly operating report (.1); call with R. Itkin and R. Wynne regarding monthly operating report (.8); revise monthly operating report (.7); attend daily status call (.6); revise monthly operating report (.4); further revise monthly operating report (2.0); finalize monthly operating report for filing (.3)
07/22/25	Kristel Gelera	HLUS	470.00	6.00	2,820.00	Assist team with filing and service of monthly operating report and preliminary response and recommendation relating to committee motion for substantive consolidation
07/23/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Prepare response to M. Bostick regarding his letter with respect to various issues (.6); brief review of monthly operation reports filed in LeFever Mattson (.5)
07/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Review materials relevant to preparation of statements and schedules
07/24/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Telephone conference with H. Davidson regarding schedules
07/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with A. Kaczmariski regarding statements and schedules (.1); emails with A. Kim regarding preparation of statements and schedules (.2)
07/27/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with Fennemore regarding work product for schedules

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
			Subtotal	75.50	84,158.50	

B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/09/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Analyze issues regarding premium financing agreement (.7); analyze issues regarding use of cash collateral (.3)
06/10/25	Erin Brady	HLUS	1,570.00	1.60	2,512.00	Confer with T. Schwartz regarding cash collateral motion (.4); confer with T. Schwartz, E. McNeilly and I. Beal regarding cash collateral motion and next steps (.4); analyze issues regarding cash collateral use (.8)
06/10/25	Loryn Dunn Arkow	HLUS	1,515.00	0.10	151.50	Review and analyze loan documents
06/10/25	Danielle Ullo	HLUS	1,035.00	5.60	5,796.00	Draft expedited premium financing motion (1.2); draft proposed order regarding same (.8); incorporate comments from E. McNeilly to premium financing motion and proposed order (.7); draft memorandum of law regarding premium financing motion (1.5); revise same per E. McNeilly comments (1.4)
06/10/25	Isolte Beal	HLUS	760.00	6.90	5,244.00	Draft cash management motion (4.2); review loan documents (2.7)
06/11/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Confer with L. Arkow, T. Schwartz, J. Kim and C. Sischo regarding cash collateral (.5); follow up call with L. Arkow, V. Rubinstein and E. McNeilly regarding same (.5)

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/11/25	Erin Brady	HLUS	1,570.00	2.80	4,396.00	Confer with Stapleton team regarding assets and documents (.3); analyze issues regarding insurance premiums (.4); revise premium financing motion (2.1)
06/11/25	Isolte Beal	HLUS	760.00	1.50	1,140.00	Draft cash management motion
06/11/25	Tracy Southwell	HLUS	655.00	0.40	262.00	Retrieval of precedent documents for D. Ullo regarding premium financing motion
06/12/25	Isolte Beal	HLUS	760.00	3.00	2,280.00	Draft cash collateral motion
06/15/25	Danielle Ullo	HLUS	1,035.00	1.50	1,552.50	Conform Stapleton comments to first day utilities motion (.5); conform Stapleton comments to first day taxes motion (.5); conform Stapleton comments to first day cash management motion (.5)
06/16/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Telephone conference with working group regarding cash collateral issues
06/17/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Confer with T. Schwartz regarding cash collateral budget (.5); confer with R. Itkin regarding cash collateral issues (.2)
06/17/25	Loryn Dunn Arkow	HLUS	1,515.00	0.70	1,060.50	Telephone conference with E. Brady and E. McNeilly
06/17/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Telephone conference with E. Brady regarding cash collateral issues
06/18/25	Erin Brady	HLUS	1,570.00	1.90	2,983.00	Confer with E. McNeilly, M. Bergthold and D. Kieffer regarding cash collateral budget (1.2); confer with T. Schwartz regarding same (.3); confer with R. Itkin and E.

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						McNeilly regarding asset analysis and cash collateral use (.4);
06/18/25	Loryn Dunn Arkow	HLUS	1,515.00	0.40	606.00	Further analysis regarding collateral and lien listings
06/18/25	Todd Schwartz	HLUS	1,925.00	1.40	2,695.00	Telephone conference with E. McNeilly, E. Brady, M. Begthold, A. Kaczmarksi, and H. Davidon regarding cash collateral and budget issues (.7); review and analyze issues regarding same (.3); review and analyze issues regarding sale motion (.3); correspond with working group regarding same (.1)
06/19/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Call with Stapleton regarding proposed case budget and issues
06/23/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Call with M. Bergthold regarding cash collateral, sale procedures motion
06/24/25	Edward Joseph McNeilly	HLUS	1,295.00	1.50	1,942.50	Attend Zoom meeting with Stapleton team, E. Brady, T. Schwartz, D. Ullo, and R. Itkin regarding cash collateral and budget issues (1.1); telephone conferences with E. Brady regarding cash collateral and budget issues (.4)
06/29/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Exchange internal correspondence and correspondence with Stapleton regarding DIP financing
06/30/25	Loryn Dunn Arkow	HLUS	1,515.00	0.40	606.00	Address options for DIP financing
07/03/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with M. Scherneck regarding DIP financing
07/07/25	Isolte Beal	HLUS	760.00	4.20	3,192.00	Draft post-petition financing motion

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Date	Name	LLP	Rate	Hours	Amount	Narrative
07/08/25	Isolte Beal	HLUS	760.00	3.20	2,432.00	Draft post-petition financing motion
07/09/25	Todd Schwartz	HLUS	1,925.00	1.30	2,502.50	Correspond with M. Schernecke regarding DIP term sheet (.4); correspond with E. Brady regarding same (.4); prepare issues list regarding same (.5)
07/10/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Review updated balance sheet (.3); conference call with Stapleton team regarding same (.2); conference call with Loeb & Loeb regarding DIP term sheet (partial) (.4); confer with Stapleton regarding DIP budget (.2)
07/10/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Attend meeting with T. Schwartz regarding DIP negotiations (.5); review Serene DIP issue list (.2)
07/10/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Draft DIP motion
07/11/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Conference call with T. Schwartz and M. Schernecke regarding DIP status and term sheet (.6); review email from T. Schwartz regarding LOC concept (.1); confer with T. Schwartz regarding DIP budget (.1)
07/11/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Exchange correspondence regarding shopping DIP financing
07/12/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Review emails regarding DIP budget
07/13/25	Todd Schwartz	HLUS	1,925.00	0.20	385.00	Correspond with working group regarding DIP issues
07/14/25	Edward Joseph McNeilly	HLUS	1,295.00	2.20	2,849.00	Attend Zoom meeting with Hogan Lovells team regarding DIP (.3); review and comment on DIP term sheet (1.7); review LeFever

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						Mattson DIP documents (.2)
07/14/25	Isolte Beal	HLUS	760.00	2.40	1,824.00	Draft cash collateral stipulation (2.1); attend to communication with Hogan Lovells team regarding cash collateral stipulation (.3)
07/15/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review insurance estimates and DIP term sheet and budget
07/15/25	Danielle Ullo	HLUS	1,035.00	3.00	3,105.00	Draft cash collateral stipulation regarding Socotra properties (1.5); exchange correspondence with secured lenders regarding use of cash collateral (1.5)
07/16/25	Erin Brady	HLUS	1,570.00	2.70	4,239.00	Confer with T. Schwartz regarding DIP options and pricing (.3); meeting with D. Ullo regarding same and cash collateral issues (.5); confer with R. Itkin regarding DIP (.2); confer with E. McNeilly and D. Ullo regarding non-disclosure agreement (.2); analyze DIP issues, including marketing and alternative lender options (.4); confer with T. Schwartz and D. Ullo regarding insurance payments from cash collateral (.2); analyze issues regarding encumbered and unencumbered collateral (.3); coordinate regarding Northlight (.4); analyze issues regarding force placement insurance (.2)
07/16/25	Todd Schwartz	HLUS	1,925.00	1.20	2,310.00	Correspond with E. Brady regarding DIP term sheet (.2); correspond with R. Itkin regarding same (.1);

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						review and analyze issues regarding same (.9)
07/16/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Emails and office conference regarding cash collateral and insurance (.9); revise and draft non-disclosure agreement for DIP lender (.4)
07/16/25	Danielle Ullo	HLUS	1,035.00	0.70	724.50	Multiple discussions with Hogan Lovells and Stapleton teams regarding use of cash collateral to pay insurance reinstatement fees
07/17/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Confer with T. Schwartz regarding DIP issues (.2); confer with D. Ullo regarding use of cash collateral for insurance (.2); analyze issues regarding Northlight and liens (.1); confer with T. Schwartz regarding Hilco (.1)
07/17/25	Todd Schwartz	HLUS	1,925.00	2.80	5,390.00	Conference with M. Bergthold, A. Kaczmariski, B. Gerig, A. Grenobi and D. Kieffer regarding DIP financing matters (1.0); attend Hogan Lovells bi-weekly check-in (1.0); correspond with A. Phillips regarding DIP term sheet (.3); review and analyze issues regarding same (.5)
07/17/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Telephone conference with D. Ullo regarding Stapleton retention and cash collateral (.3); email with D. Ullo regarding Socotra cash collateral stipulation (.1); email with D. Ullo regarding lender list (.1); telephone conference with D. Ullo regarding Stapleton retention and DIP (.3);

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						telephone conference with R. Wynne regarding DIP (.2); attend video conference with T. Schwartz, D. Ullo and I. Beal regarding cash collateral, DIP and checklists (.5); review Socotra cash collateral stipulation (.1)
07/17/25	Danielle Ullo	HLUS	1,035.00	1.70	1,759.50	Telephone conference with D. Marcaoux regarding cash collateral issues (.8); finalize and coordinate filing of limited Socotra cash collateral stipulation (.5); calls and correspondence with lenders regarding cash collateral issues (.4)
07/18/25	Todd Schwartz	HLUS	1,925.00	1.30	2,502.50	Correspond with B. Gerig regarding non-disclosure agreement (.2); correspond with working group regarding same (.1); telephone conference with Stapleton and Hogan Lovells teams regarding check-in and status regarding DIP loan (.6); analyze issues regarding alternative DIP term sheet (.5); correspondence with M. Scherneck regarding same (.1); correspondence with Serene regarding DIP term sheet (.4); correspondence with alternative DIP lenders (.4)
07/18/25	Danielle Ullo	HLUS	1,035.00	5.00	5,175.00	Draft DIP motion based on Serene term sheet (3.5); draft DIP interim order based on Serene term sheet (1.5)
07/19/25	Edward Joseph McNeilly	HLUS	1,295.00	2.00	2,590.00	Review and comment on DIP motion (1.6); review and comment on DIP

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						declaration (.4)
07/20/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review 13 week DIP
07/20/25	Todd Schwartz	HLUS	1,925.00	0.20	385.00	Correspond with Stapleton regarding DIP modeling (.1); correspond with D. Ullo regarding same (.1)
07/20/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with D. Ullo regarding DIP motion
07/20/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Revise DIP motion and interim order per updated budget and comments from E. McNeilly (1.7); correspondence regarding same (.3)
07/21/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Review DIP term sheet
07/21/25	Danielle Ullo	HLUS	1,035.00	0.90	931.50	Review Serene DIP Term Sheet (.4); Prepare DIP Motion and Interim Order (.5)
07/22/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Confer with T. Schwartz, M. Bertenthal, A. Kaczmariski and E. McNeilly regarding DIP budget and monthly operating report (.5); analyze issues regarding same (.4); confer with E. McNeilly regarding same (.3)
07/22/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review new DIP term sheet
07/22/25	Todd Schwartz	HLUS	1,925.00	4.30	8,277.50	Telephone conference with Serene's counsel regarding DIP term sheet (.1); attend update call with Stapleton and Hogan Lovells (.6); draft, review and revise Northlight DIP term sheet (.8); correspond with Stapleton regarding DIP modeling (.7); review and

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						revise issues regarding same (.7); correspond with A. Kaczmariski and M. Bergthold regarding non-disclosure agreement (.7); correspond with R. Itkin regarding same (.7);
07/22/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Telephone conference with T. Schwartz, E. Brady and Stapleton team regarding DIP
07/22/25	Danielle Ullo	HLUS	1,035.00	3.40	3,519.00	Review DIP Comparison provided by Stapleton (.3); Draft DIP Motion and Interim Order based on revised Serene Term Sheet (2.6); Exchange correspondences with secured lender Socotra regarding consent to use cash collateral (.2); Exchange correspondences with Stapleton regarding cash collateral and DIP financing (.3)
07/23/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Confer with T. Schwartz regarding DIP negotiations (.3); analyze DIP issues (.4)
07/23/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Review DIP correspondence and collateral exhibit (.5); review DIP term sheet and correspondence regarding budget and terms (.6)
07/23/25	Todd Schwartz	HLUS	1,925.00	4.00	7,700.00	Correspond with R. Itkin regarding DIP term sheet and next steps (1.0); correspond with D. Ullo regarding same (1.0); correspond with E. Brady regarding same (1.0); correspond with D. Marcoux and M. Bergthold regarding NDA (1.0)
07/23/25	Danielle Ullo	HLUS	1,035.00	4.80	4,968.00	Draft and revise DIP

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Motion (1.0); draft and revise Interim DIP Order (1.5); draft Itkin declaration in support of DIP Motion (.9); teleconference with Alex Kaczmariski regarding DIP budget (.7); review revised collateral schedule and exchange correspondences regarding same (.4); exchange correspondences re: asset recovery and utility payments (.3)
07/24/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Conference call with T. Schwartz, D. Marcoux, D. Ullo and M. Berthgold regarding properties and liens
07/24/25	Todd Schwartz	HLUS	1,925.00	4.30	8,277.50	Conference with D. Marcoux, A. Kaczmariski, M. Bergthold and D. Kieffer regarding DIP term sheet (1.0); correspond with D. Ullo regarding same (.5); review and revise DIP motion and DIP Order (1.5); attend HL only bi-weekly check-in call (1.0); correspond with alternative DIP lender regarding status (.2)
07/24/25	Danielle Ullo	HLUS	1,035.00	4.00	4,140.00	Review revised DIP budget and discuss same with Stapleton team (1.0); Review revised DIP term sheet with comments from Lender (1.0); Revise DIP Motion and Interim DIP Order based on revised collateral schedule and budget (2.0)
07/25/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Review and comment on draft DIP motion (1.2); confer with D. Ullo and T. Schwartz regarding DIP budget (.3)

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/25/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review and revise DIP documents and correspondence regarding same
07/25/25	Todd Schwartz	HLUS	1,925.00	4.50	8,662.50	Attend bi-weekly check-in call (1.0); prepare for hearing on DIP motion (1.0); correspond with D. Ullo and R. Itkin regarding DIP motion (.8); review and revise DIP Motion and Order (1.0); correspond with working group regarding same (.7)
07/25/25	Edward Joseph McNeilly	HLUS	1,295.00	2.40	3,108.00	Attend meeting with Hogan Lovells and Stapleton teams and R. Itkin regarding DIP and property issues (2.0); emails regarding DIP (.4)
07/25/25	Danielle Ullo	HLUS	1,035.00	5.30	5,485.50	Revise DIP Motion per comments from HL team and Serene (3.7); prepare service list for filing of DIP Motion (.5); videoconference with E. Brady and T. Schwartz regarding updated DIP Budget (.4); exchange correspondences with Stapleton team regarding preparation of Socotra cash collateral budget and review same (.4); exchange correspondences with Socotra counsel regarding use of cash collateral to pay insurance premiums (.3)
07/25/25	Kristel Gelera	HLUS	470.00	0.30	141.00	Confer with T. Southwell and H. Salehi regarding DIP motion, order and supporting declaration
07/25/25	Tracy Southwell	HLUS	655.00	0.50	327.50	Email to D. Ullo regarding DIP filing (.1); research and call to clerk regarding ECF filing event for same

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.4)
07/26/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Correspond with working group regarding DIP motion comments
07/26/25	Danielle Ullo	HLUS	1,035.00	1.80	1,863.00	Call with Stapleton team to discuss revised DIP Budget (1.2); Exchange correspondences with Stapleton regarding Socotra cash collateral (.2); Review and incorporate Robbin Itkin's comments to DIP Declaration (.4)
07/27/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Review and comment on Itkin declaration
07/27/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Revise DIP Motion , Interim DIP Order, and Itkin Declaration per R. Itkin and E. Brady comments to Declaration and Motion and revised Budget
07/28/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Review and comment on interim DIP motion (1.4); review and respond to questions on DIP motion (.3); conference with T. Schwartz, E. McNeilly and D. Ullo regarding DIP motion, negotiations and filing (.7)
07/28/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Review motion to shorten DIP
07/28/25	Danielle Ullo	HLUS	1,035.00	5.00	5,175.00	Incorporate comments from DIP Lender into draft DIP Motion, Interim Order, and Itkin Declaration (2.5); draft Motion to Shorten Notice on DIP Motion (.9); Draft McNeilly Declaration in Support of Motion to Shorten Time (.6); Prepare list of secured lenders for notice purposes (.4);

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Exchange correspondences internally and with Stapleton regarding revised budget (.6)
07/28/25	Isolte Beal	HLUS	760.00	0.10	76.00	Finalize Hilco non-disclosure agreement
07/29/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Prepare further comments to DIP motion (.5); respond to R. Itkin comments to DIP motion (.2); prepare further email to R. Itkin, T. Schwartz and D. Ullo regarding DIP motion (.1); confer with D. Ullo regarding timing on DIP motion (.1); review DIP budget (.3); confer with Stapleton team, E. McNeilly and R. Itkin regarding DIP budget and DIP motion (.8); review final DIP papers (.2); analyze issues for DIP hearing (.2)
07/29/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Correspond with E. Brady and D. Ullo regarding DIP motion
07/29/25	Edward Joseph McNeilly	HLUS	1,295.00	4.00	5,180.00	Attend video conference with R. Itkin, Hogan Lovells and Stapleton teams regarding DIP, sales process, and bar date motion (2.0); multiple telephone conferences with D. Ullo regarding DIP motion (.7); finalize DIP motion (1.3)
07/29/25	Danielle Ullo	HLUS	1,035.00	10.20	10,557.00	Prepare agenda for videoconference with Stapleton and Robbin Itkin regarding DIP and other open issues (.4); videoconference regarding same (2.3); follow up videoconference with Stapleton team regarding DIP budget (.3); turn

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						multiple drafts of DIP Motion, Interim DIP Order and supporting Itkin Declaration per comments from DIP Lender and client and negotiate same (4.0); finalize and file DIP Motion, Interim DIP Order, supporting Itkin Declaration, Motion to Shorten Time and supporting McNeilly Declaration (3.2)
07/29/25	Kristel Gelera	HLUS	470.00	9.30	4,371.00	Confer with T. Southwell and H. Salehi regarding DIP motion, order and supporting declaration (.3); standby time in preparation for filing DIP motion, Itkin declaration, motion to shorten time, McNeilly declaration, and order regarding same (4.0); assist with filing DIP motion, Itkin declaration, motion to shorten time, McNeilly declaration and order regarding same (5.0)
07/29/25	Tracy Southwell	HLUS	655.00	11.20	7,336.00	Revise DIP motion (1.8); prepare table of authorities to same (2.2); revise R. Itkin declaration (.8); prepare exhibits (.9); revise DIP order (1.0); revise to motion to shorten time pleadings (.8); coordinate global revisions to pleadings (1.0); quality check documents (.7); coordinate after-hours filing (.9); call with K. Gelera to review status of consolidation and instructions for filings (.9); review consolidate order and proposed caption (.2)
07/30/25	Erin Brady	HLUS	1,570.00	1.70	2,669.00	Confer with T. Rupp regarding DIP motion and

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						hearing (.4); confer with T. Schwartz regarding DIP motion (.3); follow up call with T. Schwartz regarding DIP motion and hearing (.3); confer with R. Itkin regarding fee issues and DIP hearing (.4); analyze issues regarding DIP hearing (.3)
07/30/25	Todd Schwartz	HLUS	1,925.00	1.50	2,887.50	Correspond with E. Brady regarding DIP term sheet (.3); correspond with R. Itkin regarding same (.1); telephone conference with Serene's counsel regarding same (.2); review and analyze issues regarding same (.2); correspond with D. Ullo regarding corrected DIP motion (.1); review transcripts regarding DIP hearing preparation (.3); correspond with E. Brady regarding same (.2)
07/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Telephone conference with D. Ullo regarding DIP (.4); telephone conferences with court clerk regarding order on motion to shorten on DIP (.1); review and revise order on motion to shorten time on DIP (.2); telephone conferences with paralegal K. Gelera regarding same (.1)
07/30/25	Danielle Ullo	HLUS	1,035.00	3.20	3,312.00	Finalize and file various DIP documents and coordinate filing with paralegal team (2.5); Coordinate execution of DIP Term Sheet (.3); Coordinate service of various DIP documents (.5)
07/31/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Confer with T. Schwartz regarding DIP issues (.2);

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						confer with R. Itkin and T. Schwartz regarding DIP (.2); confer with R. Wynne and T. Schwartz regarding hearing (.2); prepare email to M. Bergthold and T. Schwartz regarding hearing (.1)
07/31/25	Todd Schwartz	HLUS	1,925.00	2.20	4,235.00	Attend Hogan Lovells bi-weekly call (.5); correspond with E. Brady regarding DIP term sheet (.2); correspond with D. Ullo regarding same (.1); correspond with R. Itkin regarding same (.1); telephone conference with R. Itkin and E. Brady regarding same (.2); correspond with V. Rubinstein regarding DIP language (.1); review notice of corrected DIP term sheet (.1); review and revise DIP term sheet (.2); review DIP term sheet regarding same (.2); correspondence with working group regarding filing notice of corrected DIP term sheet and revised DIP term sheet (.2); telephone conference with V. Rubenstein regarding same (.3)
07/31/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Attend Hogan Lovells team meeting regarding DIP
07/31/25	Danielle Ullo	HLUS	1,035.00	2.10	2,173.50	Draft notice of revised DIP Term Sheet (.8); Review Serene Declaration in Support of KSMP DIP Term Sheet (.4); Coordinate filing of Notice of and Revised DIP Term Sheet (.5); Exchange correspondences with DIP Lender regarding same (.4)

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
06/13/25	Isolte Beal	HLUS	760.00	2.50	1,900.00	Draft taxes motion
06/17/25	Loryn Dunn Arkow	HLUS	1,515.00	1.30	1,969.50	Prepare catalog of taxes owed
				Subtotal	3.80	3,869.50

B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/16/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with Keller Benvenuti team regarding bar date motion (.2); confer with E. McNeilly regarding same (.3);
07/17/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with R. Wynne and E. McNeilly regarding bar date motion
07/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with S. Golden regarding bar date motion
07/21/25	Edward Joseph McNeilly	HLUS	1,295.00	2.50	3,237.50	Draft bar date motion
07/22/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Analyze timing of bar date
07/22/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Telephone conference with S. Golden regarding bar date motion (.8); telephone conference with B. Huffman regarding proof of claim form (.3)
07/23/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review and comment on bar date issues (.3); confer with E. McNeilly regarding bar date motion (.1)
07/23/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review bar date motion and exhibits, prepare correspondence regarding simplification, timing, and need for investor meeting, and review correspondence and responses with client, LeFever Mattson debtor, committee and Hogan

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B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Lovells team regarding same
07/23/25	Edward Joseph McNeilly	HLUS	1,295.00	5.70	7,381.50	Draft bar date motion (1.9); telephone conference with PwC, T. Rupp, Verita and Pachulski regarding proof of interest form (.4); multiple emails with B. Wilson regarding proof of interest form (.3); multiple telephone conferences with B. Wilson regarding proof of interest form (.3); telephone conference with E. Brady regarding bar date motion (.4); email with E. Brady regarding bar date motion (.1); correspondence regarding listing agreements and property management agreements (.2); draft specialized proof of interest forms (2.1)
07/24/25	Edward Joseph McNeilly	HLUS	1,295.00	1.40	1,813.00	Attend video conference with LeFever Mattson committee regarding proof of interest form (1.0); attend video conference with E. Brady and J. Rosell regarding same (.2); attend video conference with E. Brady regarding same (.2)
07/25/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with E. McNeilly regarding bar date motion
07/25/25	Edward Joseph McNeilly	HLUS	1,295.00	1.20	1,554.00	Work on bar date motion (1.0); further bar date proof of interest form (.1); email with R. Itkin regarding bar date form (.1)
07/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Revise proof of interest form
07/27/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Work on bar date motion

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B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/28/25	Erin Brady	HLUS	1,570.00	1.30	2,041.00	Confer with E. McNeilly regarding bar date issues (.2); confer with R. Itkin, R. Wynne and E. McNeilly regarding bar date and potential new debtors (.5); confer with R. Itkin, E. McNeilly, J. Rosell and R. Wynne regarding same (.6)
07/28/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review bar date order
07/28/25	Edward Joseph McNeilly	HLUS	1,295.00	3.80	4,921.00	Revise bar date motion and order (.8); draft bar date notice and publication notice (.5); emails regarding bar date issues (.2); revise proof of interest form (.2); review proofs of claim filed in Lefever Mattson case relevant to KS Mattson Partners case (.4); revise bar date motion, order and notices (1.5); emails regarding proofs of interest (.1); email with H. Davidson regarding schedules and statements (.1)
07/29/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Prepare email correspondence to E. McNeilly regarding bar date motion (.1); prepare email to R. Itkin regarding PwC (.2); confer with Stapleton Group, E. McNeilly and R. Itkin regarding bar date process and other filing issues (.3)
07/29/25	Edward Joseph McNeilly	HLUS	1,295.00	2.30	2,978.50	Telephone conference with Verita regarding bar date form (.5); work on bar date matters (1.8)
07/30/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with E. McNeilly regarding claim form (.1); confer with E. McNeilly and R. Itkin regarding

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B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						same (.1)
07/30/25	Megan Nishikawa	HLUS	1,630.00	3.20	5,216.00	Review proofs of claim for purposes of presenting to R. Itkin
07/30/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Attend video conference with Verita and PwC teams regarding proof of interest form (.6); telephone conference with E. Brady regarding bar date motion and form (.1); revise proof of interest form (.4); email with R. Itkin regarding same (.1); revise bar date motion and notices (.4); emails regarding same (.2)
07/31/25	Megan Nishikawa	HLUS	1,630.00	2.80	4,564.00	Review proofs of claim for purposes of presenting to R. Itkin
07/31/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Revise bar date documents
				Subtotal	32.20	45,474.50

B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/09/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with R. Wynne and D. Ullo regarding bar date motion and Mattson status conference
07/09/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review joint status conference report (.4); confer with D. Ullo regarding bar date motion and Mattson status conference (.2)
07/11/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review plan term sheet (.3); review email regarding claims solicitation issues (.1)
07/12/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Correspond with D. Grassgreen regarding Hogan Lovells plan team

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
07/14/25	Erin Brady	HLUS	1,570.00	1.60	2,512.00	Review plan solicitation materials and presentation (.3); attend call with PwC and LeFever Mattson and committee professionals and follow up with R. Itkin regarding same (1.3)
07/14/25	Danielle Ullo	HLUS	1,035.00	1.50	1,552.50	Review LeFever Mattson plan term sheet (.6); telephone conference with LeFever Mattson committee counsel regarding claims and plan (.9)
07/29/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with R. Wynne regarding plan issues
07/30/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Attend call with committee and Keller Benvenuti counsel regarding plan process and solicitation issues (.6); confer with R. Itkin and R. Wynne regarding same (.6); analyze issues regarding plan process and timing (.3)
07/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Telephone conference with R. Itkin, R. Wynne and E. Brady (partial attendance) regarding plan (.7); partial attendance at plan video conference with E. Brady and Pachulski teams (.2)
07/30/25	Danielle Ullo	HLUS	1,035.00	0.60	621.00	Call with LFM Committee counsel regarding plan and disclosure statement
07/31/25	Erin Brady	HLUS	1,570.00	1.70	2,669.00	Prepare emails to J. Rosell, S. Golden, R. Itkin and R. Wynne regarding plan (.2); analyze plan term sheet and issues (1.5)
			Subtotal	9.10	13,078.00	

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Total Professional Services	1,412.10	USD 1,808,722.00
Less 15% Discount		(271,308.30)
Total Professional Services Charged		USD 1,537,413.70

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Summary

Timekeeper Name	Hours	Rate	Fees
Rick Wynne	144.20	1,975.00	284,795.00
Todd Schwartz	54.60	1,925.00	105,105.00
Megan Nishikawa	115.20	1,630.00	187,776.00
Erin Brady	227.60	1,570.00	357,332.00
Loryn Dunn Arkow	21.10	1,515.00	31,966.50
Ann Chungsun Kim	54.20	1,475.00	79,945.00
Edward Joseph McNeilly	217.30	1,295.00	281,403.50
Danielle Ullo	229.90	1,035.00	237,946.50
Leen Bukai	75.70	760.00	57,532.00
Isolte Beal	130.70	760.00	99,332.00
Tracy Southwell	102.90	655.00	67,399.50
Kristel Gelera	38.70	470.00	18,189.00
Total Professional Services	1,412.10		USD 1,808,722.00
Less 15% Discount			(271,308.30)
Total Professional Services Charged			USD 1,537,413.70

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Summary

Task	Task Code Description	Hours	Fees
01	Substantive Consolidation	236.10	347,680.00
02	Criminal Case	111.40	167,954.00
03	Hearing	39.80	55,948.50
B110	Case Administration	314.40	330,717.50
B120	Asset Analysis/Recovery & Real Estate	196.90	271,707.00
B130	Asset Disposition	23.20	24,646.00
B140	Relief from Stay/Adequate Protection Proceedings	4.20	5,686.50
B150	Meetings of and Communications with Creditors	10.80	15,940.00
B160	Fee/Employment Applications	111.90	132,577.00
B190	Other Contested Matters (excluding assumption/rejection moti	48.90	71,179.00
B195	Non-Working Travel	6.00	9,145.00
B210	Business Operations	75.50	84,158.50
B230	Financing/Cash Collections	187.90	228,961.00
B240	Tax Issues	3.80	3,869.50
B310	Claims Administration and Objections	32.20	45,474.50
B320	Plan and Disclosure Statement (including Business Plan)	9.10	13,078.00
Total Professional Services		1,412.10	USD 1,808,722.00

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Disbursement and Charges

ACE ATTORNEY SERVICE INC - Messenger service to deliver to Attorney's home.	81.43
Erin Brady - Lodging, 06/13/25, lodging while in bay area for hearing	446.28
Erin Brady - Airfare, 06/12/25, airfare to/from LAX/SFO for hearing, LAX/SFO	442.97
Erin Brady - Taxi, 06/13/25, taxi to/from SFO while in bay area for hearing	129.79
Erin Brady - Taxi, 06/12/25, taxi to/from SFO while in bay area for hearing	81.16
BANK OF AMERICA - Filing Fees, 06/27/25, Filing Fee, A33942361	34.00
Cindy Mitchell - Transcript Fees, 07/16/25, 7/11/2025 court hearing transcript	98.60
HL TECH LEGAL TECHNOLOGY & CONSULTING LLC - Services for the month of June 2025	732.19
Computer Research - Pacer	29.50
Computer Research - Westlaw	555.43
Word Processing	706.25
eDiscovery Data Storage Fees - Internal	764.05
Total for Other Charges	<u>USD 4,101.65</u>

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Outstanding Invoices

Paid-in-full invoices and corresponding payments are not shown below.
This summary reflects payments received through November 21, 2025
This statement includes the current invoice.

Invoice No.	Date	Fees	Other Charges	Total	Payments	Date Last Payment	Balance USD
19600011730	11/21/25	1,537,413.70	4,101.65	1,541,515.35	0.00		1,541,515.35
Outstanding Invoices:							1,541,515.35



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KS Mattson Partners, LP
16350 Ventura Boulevard
Suite D-509
Encino, CA 91436
United States

Attention: Robbin Itkin, Independent Manager

Date November 21, 2025
Invoice No 19600011855
Our ref 795070.000001
Partner Rick Wynne
Email rick.wynne@hoganlovells.com
Fed ID 53-0084704

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Summary	Amount
	USD
Professional Services	1,185,748.00
Less 15% Discount	(177,862.20)
Total Professional Services	1,007,885.80
 Total Disbursements and Charges	 8,020.58
 Subtotal	 1,015,906.38
Total Due	1,015,906.38

Payment Details

Electronic payments should be sent to
Wells Fargo Bank NA, 420 Montgomery Street
San Francisco, CA 94104

Account: Hogan Lovells US LLP – Operating Account
SWIFT code: WFBUS6S

Account No: 2000010688096

ABA #121000248 For Wire Transfers Only

ABA #054001220 (For ACH Transfers Only)

Payment requested
within 30 days from
invoice date

Please reference invoice
number/client-matter
number on payments and
send remittance advices
to ar@hoganlovells.com

Check payments may be
sent to:

Lockbox Services - 75890
Hogan Lovells US LLP
P.O. Box 715890
Philadelphia, PA 19171-
5890

For US based clients, invoices can be paid online
at

<https://www.e-billexpress.com/ebpp/HoganLovells>

Please contact
ebillexpresshelp@hoganlovells.com
to obtain login credentials.

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Period August 31, 2025

Detail by jurisdiction	Professional Services	Disbursements & Charges	Total USD
Hogan Lovells US LLP	1,007,885.80	8,020.58	1,015,906.38
Total	1,007,885.80	8,020.58	1,015,906.38

Disbursements & charges	Charges USD
Court and Government Fees	179.80
Lit Support fees payable by HLUS LLP to HLTech Legal Tech LLC	4,080.70
Travel	328.97
Search Fees	1,777.22
Document Production	131.25
eDiscovery Data Storage Fees - Internal	1,522.64
Total	8,020.58

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Professional Services

01 - Substantive Consolidation

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Megan Nishikawa	HLUS	1,630.00	4.20	6,846.00	Review relevant proofs of claim for purposes of presentation to client regarding evidence of intermingling and fraud
08/04/25	Leen Bukai	HLUS	760.00	1.10	836.00	Prepare for meeting walking through most compelling proofs of claim in support of substantive consolidation
08/05/25	Leen Bukai	HLUS	760.00	2.00	1,520.00	Review and edit final draft of common interest agreement (1.5); prepare for meeting walking through most compelling proofs of claim in support of substantive consolidation (.5)
08/06/25	Megan Nishikawa	HLUS	1,630.00	3.80	6,194.00	Review proofs of claim for purposes of presenting to client regarding indications of co-mingling and potential fraud
08/07/25	Megan Nishikawa	HLUS	1,630.00	4.60	7,498.00	Review and analyze proofs of claim for purposes of presenting to client findings indicating co-mingling and fraud
08/08/25	Megan Nishikawa	HLUS	1,630.00	3.80	6,194.00	Prepare for and present to client and R. Wynne findings of proofs of claim review
08/08/25	Leen Bukai	HLUS	760.00	3.00	2,280.00	Attend meeting with R. Itkin, M. Nishikawa, E. Brady and R. Wynne to walk through most compelling proofs of claim in support of substantive consolidation
08/15/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Prior to negotiations call, review Socotra objection to substantive consolidation (.7); review Socotra

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01 - Substantive Consolidation

Date	Name	LLP	Rate	Hours	Amount	Narrative
						objections to substantive consolidation, notes and final part (.3)
			Subtotal	23.50	33,343.00	

02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Ann Chungsun Kim	HLUS	1,475.00	3.50	5,162.50	Review and analyze issues related to K. Mattson's renewed motion for modification of pre-trial asset restraints, and internal correspondence regarding same (.4); review and analyze bank records for documents related to properties at issue in K. Mattson's renew motion and telephone conference with E. Brady regarding same (2.1); telephone conference with Department of Justice regarding renewed motion, and internal correspondence regarding same (1.0)
08/01/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Confer with A. Kim and United States Attorney's Office regarding Mattson criminal action (.8); follow up with R. Wynne regarding same (.1); prepare email to M. Bergthold regarding criminal pleadings (.3)
08/01/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review new K. Mattson emergency motion (.4); prepare correspondence to E. Brady regarding criminal case declaration requested by Assistant U.S. Attorney and correspondence with A. Kim regarding same (.4)

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/03/25	Ann Chungsun Kim	HLUS	1,475.00	0.80	1,180.00	Analyze and assess issues regarding K. Matson's renewed motion to modify pre-trial asset restraint, and internal correspondence regarding same
08/03/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Analyze issues regarding properties subject to criminal proceedings (.3); email correspondence with M. Bertenthal, A. Kim and R. Wynne regarding same (.1)
08/04/25	Ann Chungsun Kim	HLUS	1,475.00	1.60	2,360.00	Analyze and assess issues regarding properties at issue in criminal proceedings and correspondence regarding same (.7); analyze and assess issues regarding common interest agreement and internal correspondence regarding same (.5); telephone conference with R. Wynne regarding strategy for Socotra complaint and potential meeting with K. Mattson and counsel (.4)
08/04/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Telephone conference with A. Kim regarding criminal case, K. Mattson issues, properties and bail
08/05/25	Ann Chungsun Kim	HLUS	1,475.00	1.00	1,475.00	Review correspondence with Fennemore regarding substantive consolidation and property issues, and review draft email regarding potential meeting with K. Mattson (.7); review updated common interest agreement and correspondence regarding same (.3)

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/05/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Prepare correspondence to A. Kim regarding K. Mattson issues (.3); prepare correspondence to team regarding how to deal with K. Mattson issues, property information for transfers, and tenant issues (.2)
08/06/25	Ann Chungsun Kim	HLUS	1,475.00	0.10	147.50	Emails with SEC regarding status of litigation and potential stay
08/06/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Prepare outline of K. Mattson issues
08/07/25	Ann Chungsun Kim	HLUS	1,475.00	2.40	3,540.00	Review and analyze government's opposition to K. Mattson emergency ex parte application to modify pre-trial asset restraint, and correspondence with Hogan Lovells team regarding same (1.0); telephone conference with Hogan Lovells team regarding strategy related to 210 La Salle property issues (1.0); review and analyze reply brief in support of ex parte application to modify pre-trial asset restraint, and correspondence with Hogan Lovells team regarding same (.4)
08/07/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Review government's response to Mattson's Sixth Amendment pleading (.5); review K. Mattson response to same (.2); exchange email with A. Kim regarding same (.1); analyze issues regarding government pleadings and KS Mattson Partners ownership rights (.3)

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Date	Name	LLP	Rate	Hours	Amount	Narrative
08/07/25	Megan Nishikawa	HLUS	1,630.00	2.20	3,586.00	Review U.S. opposition to K. Mattson ex parte application seeking to modify pre-trial asset restraint
08/07/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Review United States Attorney opposition to K. Mattson motion (.3); review K. Mattson reply in support of motion to modify (.4)
08/07/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Review criminal pleadings and distribute to Hogan Lovells team
08/08/25	Ann Chungsun Kim	HLUS	1,475.00	0.20	295.00	Email correspondence with SEC regarding stay and case management conference (.1); review documents related to potential foreclosure and correspondence regarding same (.1)
08/08/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review United States government opposition to K. Mattson motion to sell KS Mattson Partners assets (modify pre-trial terms)
08/09/25	Ann Chungsun Kim	HLUS	1,475.00	0.50	737.50	Review and analyze documents from J. Chang regarding 210 La Salle property for potential claims
08/10/25	Ann Chungsun Kim	HLUS	1,475.00	0.30	442.50	Analyze and assess request from R. Pollock regarding discovery production reimbursement, and correspondence with Hogan Lovells team regarding same
08/11/25	Ann Chungsun Kim	HLUS	1,475.00	0.20	295.00	Review common interest emails regarding criminal discovery production issues (.1); correspondence with Hogan Lovells team

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding criminal discovery production issues (.1)
08/11/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Review R.S. Pollock declaration and K. Mattson criminal papers regarding seeking to sell KS Mattson Partners properties (.4); review correspondence regarding K. Mattson issues (.2)
08/12/25	Ann Chungsun Kim	HLUS	1,475.00	0.50	737.50	Telephone conference regarding common interest with respect to criminal discovery issues
08/13/25	Ann Chungsun Kim	HLUS	1,475.00	0.80	1,180.00	Review and analyze ruling on K. Mattson's renewed motion for hearing on motion to modify pre-trial asset restraint (.2); correspondence with R. Itkin and Hogan Lovells team regarding property rent issues and communications with tenants (.6)
08/13/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review and analyze issues regarding rent collection
08/13/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review court order regarding bail reform and property release
08/14/25	Ann Chungsun Kim	HLUS	1,475.00	0.80	1,180.00	Telephone conference with R. Itkin and Hogan Lovells team regarding property issues and property payments
08/14/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Conference call with A. Kim, R. Itkin, E. McNeilly and R. Wynne regarding rent collection
08/14/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Attend meeting with R. Itkin, E. Brady and A. Kim regarding K. Mattson issues (.4); review denial of K. Mattson motion on

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						modifying pre-trial asset restraint (.2)
08/14/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Review criminal docket and order denying motion to modify pretrial asset restraint and provide email update to Hogan Lovells team regarding same
08/15/25	Ann Chungsun Kim	HLUS	1,475.00	0.10	147.50	Review email from R. Itkin regarding spa tenant and internal correspondence regarding same
08/18/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Confer with M. Fairbank regarding various K. Mattson issues (.5); follow up with E. McNeilly regarding same (.1)
08/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Email regarding agenda for M. Fairbanks call (.1); call with M. Fairbanks, E. Brady and M. Nishikawa regarding K. Mattson issues (.8)
08/19/25	Ann Chungsun Kim	HLUS	1,475.00	0.90	1,327.50	Review emails regarding property rent issues, internal Hogan Lovells correspondence regarding same, and review draft communications to K. Mattson's counsel regarding rent issues (.3); review and analyze text messages from tenant (.2); review and revise correspondence to R. Pollock regarding rent collection issues (.4)
08/19/25	Erin Brady	HLUS	1,570.00	2.80	4,396.00	Prepare email to E. McNeilly regarding rent payments (.1); review email from R.S. Pollock regarding rent checks (.1); correspondence with R. Itkin and E. McNeilly regarding same (.1); draft letter to R.S. Pollock

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding various issues (.6); further revise letter to R.S. Pollock (1.4); further revise letter after D. Marcoux comments (.5)
08/21/25	Ann Chungsun Kim	HLUS	1,475.00	0.70	1,032.50	Review SEC stay filings and draft correspondence to R. Itkin regarding same (.3); telephone conference with R. Wynne regarding criminal discovery issues (.1); review and revise draft communication to R.S. Pollock regarding rent collection and criminal discovery issues (.3)
08/21/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Revise letter to R.S. Pollock with additional information
08/21/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Telephone conference with A. Kim regarding K. Mattson collecting rents and contacting tenants (.2); call with E. Brady regarding correspondence to R.S. Pollock with respect to K. Mattson misdeeds and details of his actions (.3)
08/22/25	Ann Chungsun Kim	HLUS	1,475.00	0.80	1,180.00	Correspondence with R. Itkin regarding criminal discovery issues (.2); review emails with R. Pollock regarding rent collection issues and criminal discovery (.1); review and analyze K. Mattson motion for relief of preservation order, and correspondence regarding same (.5)
08/22/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Finalize letter to R.S. Pollock (.2); prepare email to S. Golden regarding order for relief for K. Mattson (.1)

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08/22/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review correspondence from R.S. Pollock regarding K. Mattson misdeeds
08/22/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Review and revise correspondence to R.S. Pollock regarding K. Mattson stealing rents (.2); review motion by K. Mattson regarding preservation order (.4); review hearing summary (.1)
08/24/25	Ann Chungsun Kim	HLUS	1,475.00	0.40	590.00	Review and analyze correspondence and attached text messages from R.S. Pollock, and correspondence with Hogan Lovells team regarding same
08/25/25	Ann Chungsun Kim	HLUS	1,475.00	0.40	590.00	Review bill of particulars for forfeiture of property and correspondence to client and Hogan Lovells team regarding same (.3); correspondence with Hogan Lovells team regarding response to K. Mattson's motion for relief from preservation order (.1)
08/25/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Prepare email to A. Kim regarding modification of the preservation order motion (.1); prepare follow up email regarding same (.1)
08/25/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review K. Mattson motion regarding modifying preservation order and notes with respect to opposition preparation ideas (.6); review SEC and criminal case dockets (.3)
08/26/25	Ann Chungsun Kim	HLUS	1,475.00	2.50	3,687.50	Attend KS Mattson Partners bi-weekly check-

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						in meeting with R. Itkin, Hogan Lovells and Stapleton teams (.9); review and analyze schedule of assets and liabilities to prepare correspondence to Department of Justice and draft correspondence to Department of Justice (.3); attend call regarding LeFever Mattson and KS Mattson Partners work in progress (1.0); analyze and assess issues regarding potential fraudulent conveyance issues, and internal Hogan Lovells correspondence regarding same (.3)
08/26/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare e-mail to M. Fairbanks regarding K. Mattson
08/27/25	Ann Chungsun Kim	HLUS	1,475.00	0.30	442.50	Analyze and assess issues regarding property and mail collection, and correspondence regarding same
08/27/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Conference call with R.S. Pollock (.4); prepare summary notes of same (.2); conference with A. Kim regarding same (.1); coordinate with D. Marcoux regarding meeting R.S. Pollock regarding mail (.1)
08/27/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review correspondence from R.S. Pollock regarding K. Mattson issues
08/28/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Confer with R. Auerbach regarding K. Mattson retention
08/29/25	Ann Chungsun Kim	HLUS	1,475.00	0.20	295.00	Review documents regarding lis pendens filed

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						on properties and correspondence with E. Brady regarding same
			Subtotal	39.20	62,111.50	

03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Attend hearing
08/05/25	Erin Brady	HLUS	1,570.00	1.70	2,669.00	Prepare for DIP hearing (.3); attend DIP hearing (.8); follow up call with R. Itkin, R. Wynne and T. Schwartz regarding same (.4); confer with V. Rubinstein, T. Schwartz and D. Ullo regarding DIP order (.2)
08/05/25	Rick Wynne	HLUS	1,975.00	1.60	3,160.00	Telephone conference with E. Brady regarding DIP hearing issues (.2); attend DIP hearing (.9); attend DIP hearing follow up meeting (.5)
08/05/25	Danielle Ullo	HLUS	1,035.00	4.40	4,554.00	Assist with preparation for DIP hearing (1.0); attend hearing on DIP interim order (.8); call with Serene counsel regarding edits to interim DIP order (.4); revise and finalize DIP interim order (1.9); exchange correspondence with chambers regarding signed DIP interim order (.3)
08/12/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Telephone conference with E. McNeilly regarding Stapleton retention hearing issues (.2); attend meeting with E. Brady and R. Itkin regarding hearing preparation on Stapleton application and plan (.6)

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03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/15/25	Erin Brady	HLUS	1,570.00	1.80	2,826.00	Conference call with M. Bergthold to prepare for Stapleton retention hearing (.4); attend relief from stay calendar hearings (.5); prepare for Stapleton retention hearing (.5); attend and present at Stapleton retention hearing (.4)
08/15/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend hearing regarding relief from stay and Stapleton (.8); call with R. Itkin and E. Brady regarding follow up on hearing (.2)
08/15/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Prepare for hearing on stay relief motions (.3); participate in stay relief hearing (.5)
08/20/25	Erin Brady	HLUS	1,570.00	2.00	3,140.00	Conference call with R. Wynne and E. McNeilly in advance of bar date hearing (.5); attend bar date hearing (1.5)
08/20/25	Rick Wynne	HLUS	1,975.00	2.20	4,345.00	Telephone conference with R. Itkin regarding bar date issues (.2); prepare for and attend hearing on bar date motion (1.0); attend follow up meeting post-hearing with R. Itkin regarding items to do with respect to bar date form (.5); call with E. Brady and E. McNeilly regarding hearing preparation (.5)
08/20/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Attend hearing regarding bar date motion
08/20/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Attend hearing regarding bar date motion
08/22/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Attend stay relief hearing
08/26/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Attend bar date motion hearing (.5); confer with E.

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03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
						McNeilly to prepare for same (.2); debrief with E. McNeilly and R. Itkin following same (.3)
08/26/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Attend bar date hearing (.5); review bill of particulars (.1)
08/26/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Prepare for hearing (.7); participate in bar date motion hearing (.4)
08/26/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Attend hearing regarding bar date notice
			Subtotal	23.20	34,828.50	

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Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Emails regarding bar date (.1); email regarding transcript (.1); emails regarding sending proof of interest forms (.2); telephone conference with I. Beal regarding same (.1)
08/01/25	Danielle Ullo	HLUS	1,035.00	1.40	1,449.00	Prepare agenda for weekly check in call with Stapleton (.4); call with Stapleton team regarding case status and property disposition strategy (1.0);
08/01/25	Kristel Gelera	HLUS	470.00	0.70	329.00	Confer with V. Davenport regarding retrieval of July 25, 2025 hearing transcript at the request of E. McNeilly (.3); review signed July 30, 2025 order granting ex parte motion shortening time for hearing motion on interim final orders (.4)
08/04/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Call with B. Spiegel regarding independent director role for LeFever Mattson

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Date	Name	LLP	Rate	Hours	Amount	Narrative
08/04/25	Tom Boer	HLUS	1,400.00	0.80	1,120.00	Research regarding status of deadline for responses to draft 13267 order, develop strategy, and coordinate internally with team regarding same, and next steps
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Emails regarding registered agent
08/04/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Draft notice of appearance for T. Schwartz and coordinate filing of same
08/04/25	Kristel Gelera	HLUS	470.00	4.30	2,021.00	Prepare and file notice of appearance for T. Schwartz (3.0); review memorandum from E. McNeilly and T. Southwell regarding schedules and objections to motions for relief from stay to be filed (.3); review notice of revised DIP interim order for filing with court (1.0)
08/04/25	Tracy Southwell	HLUS	655.00	4.10	2,685.50	Organize case documents (.2); prepare calendar notice (.3); call with Judge Novack's clerk regarding docket revision related to stipulated bridge order (.3); call with clerk's office regarding same (.5); research and prepare schedule of ECF events for upcoming filings for the team (1.0); meeting with H. Salehi regarding coverage of filings (1.5); research deadline for monthly operating reports (.2); confer with I. Beale regarding same (.1)
08/05/25	Rick Wynne	HLUS	1,975.00	1.20	2,370.00	Prepare correspondence regarding new entities to file with KS Mattson Partners as general partners (.2); call with D. Grassgreen regarding DIP,

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						plan and substantive consolidation (.2); call with R. Itkin and E. Brady regarding bi-weekly check-in including DIP preparation (.5); review common interest agreement update for my comments (.3)
08/05/25	Kristel Gelera	HLUS	470.00	0.70	329.00	Submit DIP interim order with exhibits to court
08/05/25	Tracy Southwell	HLUS	655.00	2.00	1,310.00	Check docket for updates (.2); prepare calendar regarding filing deadlines (.5); prepare ECF events summary for upcoming filings (.8); research information to order transcript and contact eScribers for copy order (.5)
08/06/25	Isolte Beal	HLUS	760.00	1.00	760.00	Attend to checklist and upcoming filings (.7) correspond with Hogan Lovells team regarding case developments and upcoming filings (.3)
08/06/25	Kristel Gelera	HLUS	470.00	4.50	2,115.00	File and serve stipulation to revise briefing schedule on motion for relief from stay regarding First Street and Natoma properties (3.5); review memorandum from E. McNeilly and T. Southwell regarding filing anticipated schedules, SOFAs and objections to motion for relief from stay (1.0)
08/06/25	Tracy Southwell	HLUS	655.00	2.70	1,768.50	Correspondence with E. McNeilly regarding ECF filing events (.3); call to clerk regarding same (.4); email to H. Salehi regarding same (.1); review docket updates (.3); review judge's calendar for D. Ullo

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						(.3); prepare information regarding filing schedules and statement of affairs (.8); research Judge Novack's hearing dates for E. McNeilly (.3); email with eScribers regarding transcript (.1); organize hearing transcripts (.1)
08/07/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Call with Hogan Lovells team regarding upcoming filings and case status update
08/07/25	Isolte Beal	HLUS	760.00	1.50	1,140.00	Correspondence with Hogan Lovells team regarding case developments and upcoming filings (.4); attend to checklist and upcoming filings (.5); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.6)
08/07/25	Leen Bukai	HLUS	760.00	2.70	2,052.00	Track all deadlines in pending litigation matters involving KS Mattson Partners, LP
08/07/25	Kristel Gelera	HLUS	470.00	5.70	2,679.00	Telephone conference with court regarding stipulation to revise briefing schedule on motion for relief from stay regarding First Street and Natoma properties (.2); review stipulation and order regarding Socotra insurance premiums (2.5); file motion to extend removal deadline and ex parte motion to shorten time (3.0)
08/07/25	Tracy Southwell	HLUS	655.00	4.30	2,816.50	Review clerk's email regarding bar date motion and research order (.2); correspond with team regarding same (.1); review

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						emails regarding filings (.1); research and update court notices in LeFever case (.3); prepare calendar notices (.2); assist with gathering information for schedules (1.0); prepare sharefolder for same (.4); prepare ECF filing instructions regarding schedules and statements (.5); research and retrieval of document in USA v Mattson (.3); revise order re motion to shorten regarding bar date (.5); upload same (.3); distribution of case documents (.2); coordinate after-hours filing (.2)
08/08/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Review opposition to Live Oak trustee motion (.4); attend bi-weekly call with R. Itkin and Stapleton regarding KS Mattson Partners (.5); review correspondence from R. Itkin regarding bank signature card issues (.2)
08/08/25	Isolte Beal	HLUS	760.00	2.10	1,596.00	Attend to checklist and upcoming filings (.6); telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.2); correspond with Hogan Lovells team regarding case developments and upcoming filings (.3)
08/08/25	Tracy Southwell	HLUS	655.00	0.50	327.50	Research ECF filing events (.3); email to team regarding same (.2)
08/11/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review and revise task and to do list
08/11/25	Edward Joseph McNeilly	HLUS	1,295.00	2.50	3,237.50	Attend videoconference with Hogan Lovells team

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						regarding key upcoming filings and deadlines (.6); emails regarding initial debtor interview and schedules (.3)
08/11/25	Isolte Beal	HLUS	760.00	1.90	1,444.00	Correspondence with Hogan Lovells team regarding case developments and upcoming filings (.4); attend to checklist and upcoming filings (.9); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.6)
08/11/25	Kristel Gelera	HLUS	470.00	0.30	141.00	Review memorandum from E. McNeilly and T. Southwell regarding ECF event codes for certificate of no objection
08/11/25	Tracy Southwell	HLUS	655.00	3.90	2,554.50	Research and prepare reports on status of orders (.5); call to R. Bautista regarding same (.2); call with E. McNeilly regarding same (.2); review judge's calendar for Zoom link and update calendar notice (.2); research ECF filing event (.2); email to team regarding same (.1); prepare certificate of no objection regarding Stapleton retention application (1.3); prepare final order regarding same (1.0)
08/12/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with B. Spiegel regarding independent director role
08/12/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Call with Hogan Lovells team
08/12/25	Isolte Beal	HLUS	760.00	2.20	1,672.00	Telephone conference with Hogan Lovells and

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						Stapleton teams regarding case developments and upcoming filings (1.3); correspond with Hogan Lovells team regarding case developments and upcoming filings (.2); attend to checklist and upcoming filings (.7)
08/12/25	Tracy Southwell	HLUS	655.00	2.10	1,375.50	Review pleadings and prepare calendar notices (.6); review judge's calendar and email to E. McNeilly regarding same (.3); review updates regarding services done by Veritas (.1); office conference with C. Mitchell regarding templates for pleadings and filing logistics generally (.7); research and retrieval of case documents for E. Brady (.4)
08/13/25	Isolte Beal	HLUS	760.00	0.40	304.00	Attend to checklist and upcoming filings (.3); correspond with Hogan Lovells team regarding case developments and upcoming filings (.1)
08/14/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend internal call regarding open issues and tasks with E. McNeilly and D. Ullo
08/14/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Correspond with E. McNeilly regarding checklists and workstreams
08/14/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Draft agenda for Hogan Lovells call
08/14/25	Isolte Beal	HLUS	760.00	0.40	304.00	Attend to checklist and upcoming filings (.4); correspondence with Hogan Lovells team regarding case developments and

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						upcoming filings (.3); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.6)
08/14/25	Kristel Gelera	HLUS	470.00	4.30	2,021.00	Prepare supplemental Itkin declaration in support of Stapleton retention (1.5); waiting time in preparation for applications to employ and supporting declarations to be filed with court (2.8); confer with D. Ullo regarding applications to employ and supporting declarations to be filed with court (.2)
08/14/25	Tracy Southwell	HLUS	655.00	0.30	196.50	Prepare ECF filing instructions and coordinate filings
08/15/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Telephone conference with E. Brady regarding Socotra claims and DIP issues (.3); multiple calls with R. Itkin regarding Socotra mediation, plan and substantive consolidation issues (.5)
08/15/25	Edward Joseph McNeilly	HLUS	1,295.00	2.60	3,367.00	Review initial debtor interview forms (.9); further revise initial debtor interview forms (1.5); telephone conference with C. Garnica regarding initial debtor interview forms (.2)
08/15/25	Isolte Beal	HLUS	760.00	0.50	380.00	Attend to checklist and upcoming filings (.3); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2)
08/15/25	Tracy Southwell	HLUS	655.00	2.30	1,506.50	Email to Veritas regarding services (.1); review judge's

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						calendar and update calendar notice (.2); research case documents related to Perris Freeway, Specialty Partners and Treehouse Investments (.7); review judge's calendar and update calendar notice (.1); review pleading templates and comment on same (.4); research and retrieval of case documents for I. Beale (.8)
08/16/25	Edward Joseph McNeilly	HLUS	1,295.00	1.20	1,554.00	Attend videoconference with Stapleton team and R. Itkin to review draft initial debtor interview and supporting documents
08/18/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Attend Hogan Lovells team meeting
08/18/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Attend Hogan Lovells only KS Mattson Partners bi-weekly check-in call
08/18/25	Edward Joseph McNeilly	HLUS	1,295.00	3.00	3,885.00	Review and revise call agenda (.1); work on petitions (2.0); attend call with Hogan Lovells team (.6); telephone conference with E. Brady regarding petition, schedules and bar date motion (.3)
08/18/25	Isolte Beal	HLUS	760.00	2.70	2,052.00	Attend to checklist and upcoming filings (.9); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.1); telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.1); telephone conference with Hogan Lovells team regarding case

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						developments and upcoming filings (.6)
08/18/25	Kristel Gelera	HLUS	470.00	1.00	470.00	Submit Stapleton retention order to court
08/19/25	Edward Joseph McNeilly	HLUS	1,295.00	3.10	4,014.50	Call with A. Kazczynysiki regarding initial debtor interview (.9); further telephone conferences with A. Kazczynysiki regarding same (.2); further revisions to initial debtor interview (1.8); telephone conference with R. Itkin regarding initial debtor interview (.2)
08/19/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Draft ordinary course professionals motion (2.0); call with E. Brady, R. Wynne, and D. Kieffer regarding sale procedures (1.4)
08/19/25	Isolte Beal	HLUS	760.00	0.20	152.00	Attend to checklist and upcoming filings (.2); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.1)
08/19/25	Henea Salehi	HLUS	450.00	4.80	2,160.00	Prepare PDFs for five broker motions and declarations, review and revise accordingly, and file same
08/19/25	Kristel Gelera	HLUS	470.00	0.90	423.00	Re-submit Stapleton retention order to court (.4); assist H. Salehi with August 21, 2025 submissions of applications to employ filings with court (.5)
08/19/25	Tracy Southwell	HLUS	655.00	6.60	4,323.00	Review docket updates and prepare calendar notice (.3); prepare certificate of no objection regarding bar date motion (.5)

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08/20/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Review initial debtor interview materials to sign and R. Itkin comments regarding same (.8); call with E. Brady regarding bar date form, new chapter 11 petitions, and Socotra mediation (.5)
08/20/25	Edward Joseph McNeilly	HLUS	1,295.00	5.10	6,604.50	Work on initial debtor interview documents (2.0); telephone conference with R. Itkin regarding initial debtor interview (.4); revise initial debtor interview documents (.9); multiple conversations with A. Kazcmarksi regarding same (.4); finalize and submit initial debtor interview (.9); conversations with R. Itkin regarding initial debtor interview (.5)
08/20/25	Danielle Ullo	HLUS	1,035.00	1.50	1,552.50	Update checklist and organize case materials
08/20/25	Tracy Southwell	HLUS	655.00	1.70	1,113.50	Review case docket (.2); prepare calendar notices and updates (.6); email to team regarding service information from Veritas (.2); emails with M. Bergthold regarding calendaring (.2)
08/21/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend internal call regarding open issues, including bar date papers and DIP
08/21/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Attend Hogan Lovells only bi-weekly check-in call
08/21/25	Danielle Ullo	HLUS	1,035.00	1.10	1,138.50	Prepare agenda for call with Hogan Lovells team (.3); participate in call with Hogan Lovells team regarding upcoming filings and case status (.8)

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Date	Name	LLP	Rate	Hours	Amount	Narrative
08/21/25	Isolte Beal	HLUS	760.00	1.10	836.00	Attend to checklist and upcoming filings (.6); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.5)
08/21/25	Tracy Southwell	HLUS	655.00	0.30	196.50	Coordinate after hours filings (.2); email with D. Ullo regarding processing orders (.1)
08/22/25	Danielle Ullo	HLUS	1,035.00	3.60	3,726.00	Attend various LeFever Mattson hearings and provide summaries of hearings for KS Mattson Partners team
08/22/25	Isolte Beal	HLUS	760.00	0.40	304.00	Attend to checklist and upcoming filings
08/25/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Attend call regarding Hogan Lovells team bi-weekly check-in
08/25/25	Todd Schwartz	HLUS	1,925.00	2.10	4,042.50	Correspond with M. Scherneck regarding DIP credit agreement (.1); review and analyze issues regarding same (2.0)
08/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Attend videoconference with T. Schwartz, D. Ullo and I. Beal regarding task list
08/25/25	Isolte Beal	HLUS	760.00	1.30	988.00	Attend to checklist and upcoming filings (.5); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.3); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.5)
08/26/25	Todd Schwartz	HLUS	1,925.00	0.70	1,347.50	Attend daily call

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Date	Name	LLP	Rate	Hours	Amount	Narrative
08/26/25	Edward Joseph McNeilly	HLUS	1,295.00	1.40	1,813.00	Attend videoconference with Hogan Lovells, Keller Benvenuti and Pachulski teams regarding chapter 11 plan negotiations, mediation and preservation motion
08/26/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Prepare for and attend Hogan Lovells call regarding upcoming filings and other open items
08/26/25	Isolte Beal	HLUS	760.00	0.90	684.00	Attend to checklist and upcoming filings (.6); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.3)
08/26/25	Tracy Southwell	HLUS	655.00	1.10	720.50	Set up additional docket alerts (.3); prepare calendar updates and new calendar notices (.8)
08/27/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Attend initial debtor interview meeting (.4); prepare for same (.3)
08/27/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Telephone conference with R. Itkin regarding budget, hearing schedule and plan timeline (.2); telephone conference with R. Itkin regarding town hall preparation (.2)
08/27/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Prepare for initial debtor interview call (.3); attend initial debtor interview meeting (.5)
08/27/25	Isolte Beal	HLUS	760.00	0.60	456.00	Attend to checklist and upcoming filings (.4); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2)
08/27/25	Kristel Gelera	HLUS	470.00	1.70	799.00	Prepare for filing application for order

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding retention of Douglas Elliman as broker (.7); prepare for filing Douglas Elliman real estate broker motion and supporting papers (1.0)
08/27/25	Tracy Southwell	HLUS	655.00	0.50	327.50	Calendar events
08/28/25	Danielle Ullo	HLUS	1,035.00	0.90	931.50	Prepare for and attend call with Hogan Lovells team regarding status of DIP documents and other open items and upcoming filings
08/28/25	Isolte Beal	HLUS	760.00	1.60	1,216.00	Attend to checklist and upcoming filings (.5); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.9); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2)
08/29/25	Erin Brady	HLUS	1,570.00	1.40	2,198.00	Conference call with R. Wynne, E. McNeilly, D. Ullo, D. Kieffer, M. Bergthold, D. Marcoux and Stapleton team regarding sale and other issues (1.2); coordinate continuance of 9/12 hearing (.2); attend to various K. Mattson related issues (.8)
08/29/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Correspondence with committee counsel and Stapleton regarding call scheduling and other administrative matters
08/29/25	Isolte Beal	HLUS	760.00	2.40	1,824.00	Attend to checklist and upcoming filings (1.1); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2);

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.1)
08/29/25	Henaa Salehi	HLUS	450.00	1.70	765.00	Prepare PDF of stipulation to continue hearing on final DIP order, review and revise accordingly, and file stipulation
08/29/25	Kristel Gelera	HLUS	470.00	0.30	141.00	Confer with D. Ullo regarding Douglas Elliman broker motion
08/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with U.S. Trustee's office regarding insurance certificate
08/30/25	Henaa Salehi	HLUS	450.00	0.30	135.00	Correspond with D. Ullo regarding possible filing over weekend
			Subtotal	140.20	127,866.00	

B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Erin Brady	HLUS	1,570.00	2.20	3,454.00	Address property related issues on Stapleton coordination call, including tenants in common and property management (.4); confer with A. Kim regarding LaSalle property (.7); prepare email to S. Golden regarding loan agreements (.1); review property list (.6); analyze issues regarding unrecorded tenants in common (.1); review summary of issues in statements and schedules (.2); prepare email to E. McNeilly regarding same (.1)
08/01/25	Loryn Dunn Arkow	HLUS	1,515.00	0.80	1,212.00	Prepare revised markup of property management

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						agreement to address provisions adverse to owner
08/01/25	Megan Nishikawa	HLUS	1,630.00	0.70	1,141.00	Review and respond to e-mail correspondence regarding pending remediation order from California water board
08/01/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend meeting with Stapleton, R. Itkin and Hogan Lovells team regarding (a) DIP hearing preparation, (b) sale and motion, (c) bar date, (d) cash flow, and (e) K-1 issues
08/01/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Attend KS Mattson Partners bi-weekly check-in call (1.0)
08/01/25	Danielle Ullo	HLUS	1,035.00	5.40	5,589.00	Call with lawyer who filed lis pendens on 415 Pacific Way regarding tenants in common interests (.3); exchange email correspondences with Stapleton regarding KSMP properties and title issues (.5); review documents related to unrecorded 415 Pacific Way tenants in common interest (.8); exchange email and telephone conferences with secured lender regarding 405 London Way property rent issues and insurance placement (1.0); exchange email correspondence regarding 18285 Hwy 12 property concerns and email from Sonoma County (.4); exchange correspondence regarding liens on 1834/1836 Ocean Front properties (.3); exchange correspondence with LeFever Mattson

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						committee counsel regarding secured loan documents (.2); revise broker motions regarding changes to listing agreement based on sale prices and co-owner contribution (.5); exchange correspondence with DIP lender counsel regarding DIP documents and filings (.2); coordinate calendaring of all DIP dates (.2); prepare limited cash collateral stipulation for Socotra property and exchange correspondence regarding same (.5); review Socotra proposed comments on Serene DIP Order (.5)
08/01/25	Isolte Beal	HLUS	760.00	3.30	2,508.00	Attend call with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings
08/02/25	Loryn Dunn Arkow	HLUS	1,515.00	0.90	1,363.50	Prepare revised markups of listing agreement
08/03/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Review listing agreements (.4); emails with D. Marcoux and L. Arkow regarding same (.2); email with D. Ullo regarding broker motions (.1)
08/04/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Confer with D. Ullo, D. Kieffer and D. Margaux regarding 18285 Highway 12 property (.4); review title report regarding LaSalle property (.2); confer with S. Golden regarding loan agreements (.4); confer with R. Wynne regarding schedules (.2)
08/04/25	Megan Nishikawa	HLUS	1,630.00	1.20	1,956.00	Revise proposed common interest agreement and discuss same with Hogan

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						Lovells team
08/04/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Review L. Arkow correspondence regarding K. Mattson information with respect to motion to modify hearing, including review of property records (.3); telephone conference with E. McNeilly regarding review of property issues to do checklist (.3); call with team regarding same (.5)
08/04/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Attend Hogan Lovells bi-weekly check-in call
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Review listing agreements (.5); telephone conference with D. Ullo regarding broker motions (.1)
08/04/25	Danielle Ullo	HLUS	1,035.00	2.60	2,691.00	Call with LeFever Mattson committee counsel regarding secured lender loan documents and priorities (.8); prepare chart of secured lender information received (.8); call with Hogan Lovells team regarding case status and open items (.4); call with Stapleton team and R. Itkin regarding 18285 Highway 12 and letter from Sonoma County (.6)
08/04/25	Isolte Beal	HLUS	760.00	1.80	1,368.00	Attend to checklist and upcoming filings (.7); communicate with Hogan Lovells team regarding case developments and upcoming filings (.3); attend call with Hogan Lovells team regarding case developments and upcoming filings (.8)
08/05/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Attend biweekly coordination call with Stapleton team

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Date	Name	LLP	Rate	Hours	Amount	Narrative
08/05/25	Loryn Dunn Arkow	HLUS	1,515.00	0.30	454.50	Address issues arising from debtor in possession entering into property management and leasing agreements for properties owned in tenancy in common
08/05/25	Megan Nishikawa	HLUS	1,630.00	0.60	978.00	Further revise common interest agreement as proposed by counsel for LeFever Mattson
08/05/25	Todd Schwartz	HLUS	1,925.00	0.40	770.00	Attend bi-weekly check-in call
08/05/25	Edward Joseph McNeilly	HLUS	1,295.00	2.10	2,719.50	Review agenda (.1); attend meeting with Stapleton (.8); attend meeting regarding tenants in common issues with E. Brady, A. Anderson and R. Itkin (1.0); correspondence regarding Sonoma property management (.3)
08/05/25	Danielle Ullo	HLUS	1,035.00	3.10	3,208.50	Prepare agenda for call with Stapleton (.5); prepare property level task list for call with Stapleton (.4); attend call with Stapleton team regarding case status and property issues (.9); review operative complaints of purported tenants in common (.8); exchange correspondence regarding same (.5)
08/05/25	Isolte Beal	HLUS	760.00	2.50	1,900.00	Attend call with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.9); attend to checklist and upcoming filings (.7); communication with Hogan Lovells team regarding case developments and upcoming filings (.9)

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/06/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Analyze issues regarding tenants in common approach (.6); confer with T. Schwartz regarding same (.3); prepare email to L. Arkow regarding same (.3); review email from L. Arkow regarding process and analysis (.1); analyze UCC issues (.2)
08/06/25	Loryn Dunn Arkow	HLUS	1,515.00	0.40	606.00	Correspondence regarding required lien searches (.2); draft correspondence to First American Title with search parameters requesting lien search (.2)
08/06/25	Danielle Ullo	HLUS	1,035.00	0.60	621.00	Exchange correspondence with Stapleton team regarding properties to be listed and broker declarations
08/07/25	Erin Brady	HLUS	1,570.00	2.80	4,396.00	Confer with L. Arkow, M. Nishikawa and A. Kim regarding ownership rights in and strategy with respect to certain real property (1.0); analyze issues regarding schedules and statements (.3); prepare email to A. Kim, L. Arkow and M. Nishikawa regarding scheduling call to discuss certain real estate (.1); confer with L. Arkow regarding real estate issues and analysis (1.1); analyze real estate issues (.3)
08/07/25	Loryn Dunn Arkow	HLUS	1,515.00	3.20	4,848.00	Correspondence with First American Title Company regarding lien searches (.2); review correspondence relating to loan document review in preparation for meeting (.2); telephone conference with E. Brady regarding

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						objectives in loan document review and legal analysis bearing on certain aspects of the recovery of equity remaining following loan payoffs (1.1); review court filings relating to automatic state requested by Sasaki on properties for analysis of rights to properties and liabilities under notes secured by transferred properties (.4); review court filing regarding Farragut and La Salle and correspondence regarding same (.2); telephone conference regarding strategy for 210 LaSalle to avoid imminent foreclosure and loss of equity in property (1.0); correspondence regarding tenants in common interests (.1)
08/07/25	Megan Nishikawa	HLUS	1,630.00	1.20	1,956.00	Prepare for and attend call with E. Brady, A. Kim and real estate team regarding approach to determine ownership interest in property located at 210 La Salle in Oakland
08/07/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend meeting with S. Fleming, PwC, Pachulski team and R. Itkin regarding recovery analysis
08/07/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Attend Hogan Lovells team bi-weekly check-in call
08/07/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Email with D. Marcoux regarding property management issues (.1); multiple emails with Stapleton regarding broker motions and retentions (.2)

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08/07/25	Danielle Ullo	HLUS	1,035.00	0.70	724.50	Prepare chart of secured lender information and review loan documents
08/08/25	Erin Brady	HLUS	1,570.00	1.90	2,983.00	Attend biweekly meeting with Stapleton to discuss DIP, asset sales, property management and related issues (1.0); prepare email to E. McNeilly regarding tenant in common issues (.1); conference with S. Golden regarding LaSalle property and other issues (.8)
08/08/25	Loryn Dunn Arkow	HLUS	1,515.00	1.40	2,121.00	Telephone conference with D. Marcoux and E. McNeilly regarding to Sasaki vineyard property, brokerage agreements, and Center for Healing Arts management (.6); correspondence regarding tenant in common matters (.3); follow up with title company regarding notice of sale recordation and lien searches (.2); inquiry on foreclosure sale for Piedmont home (.3)
08/08/25	Megan Nishikawa	HLUS	1,630.00	1.10	1,793.00	Prepare for potential meeting with current occupant of 210 La Salle for purposes of determining ownership interests prior to foreclosure
08/08/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review correspondence from M. Nishikawa regarding LaSalle property with respect to title and ownership status
08/08/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Call with D. Marcoux, L. Arkow (partial) and D. Ullo regarding real estate
08/08/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Call with Hogan Lovells real estate team regarding

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						treatment of unrecorded tenants in common interests
08/09/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Prepare email to E. McNeilly regarding tenant in common issues (.1); conference with S. Golden regarding LaSalle property and other issues (.8)
08/09/25	Loryn Dunn Arkow	HLUS	1,515.00	0.70	1,060.50	In connection with new information relating to 210 La Salle, provide statutory and case law support for KS Mattson Partners interest in property, notwithstanding legal title (.4); review tenants in common agreement from Chang (.3)
08/09/25	Megan Nishikawa	HLUS	1,630.00	2.20	3,586.00	Prepare for and meet with J. Chen, possible owner of property at 210 La Salle in Piedmont to discuss ownership interest and upcoming foreclosure sale
08/11/25	Erin Brady	HLUS	1,570.00	1.60	2,512.00	Attend conference call with Hogan Lovells team regarding open issues and tasks (.5); confer with S. Golden regarding LaSalle property (.3); prepare correspondence to S. Golden regarding LaSalle property (.1); confer with M. Nishikawa regarding same (.1); confer with E. McNeilly regarding Natoma call (.1); analyze issues regarding Natoma (.5)
08/11/25	Loryn Dunn Arkow	HLUS	1,515.00	1.30	1,969.50	Review real estate spread sheet (.3); telephone conference with working group to analyze issues relating to tenant in common rights in bankruptcy proceeding,

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						whether recorded or unrecorded and other particular fact patterns of ownership of property by KS Mattson Partners (1.0)
08/11/25	Megan Nishikawa	HLUS	1,630.00	0.90	1,467.00	Communicate with J. Chen, potential stakeholder in 210 La Salle property
08/11/25	Todd Schwartz	HLUS	1,925.00	1.50	2,887.50	Conference with E. Brady, L. Arkow and D. Ullo regarding real estate matters (.5); attend Hogan Lovells only bi-weekly check-in call (1.0)
08/11/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Attend videoconference with E. Brady, L. Arkow, T. Schwartz and D. Ullo regarding strategy for dealing with tenants in common
08/11/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Call with real estate team regarding treatment of tenants in common interests
08/12/25	Erin Brady	HLUS	1,570.00	1.30	2,041.00	Attend biweekly call with Stapleton and R. Itkin regarding open tasks and issues
08/12/25	Loryn Dunn Arkow	HLUS	1,515.00	0.40	606.00	Review proposed final form of management agreement and correspondence regarding same (.2); review results of UCC financing statement and fixture filing searches and correspondence regarding same (.2)
08/12/25	Megan Nishikawa	HLUS	1,630.00	3.90	6,357.00	Prepare for and attend call with committee counsel (1.2); correspond with J. Chen regarding postponement of foreclosure sale and conference with Hogan

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Lovells team regarding same (.6); review proofs of claim and prepare summary of key facts for R. Itkin (2.1)
08/12/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Attend meeting with R. Itkin, Hogan Lovells and Stapleton teams regarding entire task list and to do list, including insurance, cash flow, schedules and statement of financial affairs, and tenant in common issues (1.2); review D. Hayes property documents (.2)
08/12/25	Todd Schwartz	HLUS	1,925.00	1.80	3,465.00	Attend bi-weekly check-in call (.9); correspond with D. Ullo regarding approved budget payables (.5); review and analyze issues regarding approved budget payables (.4)
08/12/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Email with Keller Benvenuti regarding Socotra (.1); email with R. Itkin regarding 1834-36 Ocean Avenue (.1) ; call with D. Ullo regarding broker issues (.1)
08/12/25	Danielle Ullo	HLUS	1,035.00	1.90	1,966.50	Prepare agenda for weekly check-in call (.3); attend weekly check-in call with R. Itkin and Stapleton team regarding property issues and open items (1.2); revise property dashboard with updated information (.4)
08/13/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Review and respond to email from M. Nishikawa regarding LaSalle property (.1); confer with R. McNeilly regarding security deposit issues (.1); analyze issues regarding security deposits (.5);

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						confer with L. Arkow regarding same (.2); confer with E. McNeilly regarding compiling tenant in common information (.1); prepare email to R. Itkin regarding same (.1)
08/13/25	Loryn Dunn Arkow	HLUS	1,515.00	1.80	2,727.00	Review and comment on provisions of various agreements relating to termination in connection with bankruptcy proceedings (.2); correspondence regarding revisions to Ocean Avenue agreement, including structure of tenant deposit (.3); correspondence regarding W. Benzian brokerage agreement (.3); review extensive comments from W. Benzian on brokerage agreement (.9); correspondence regarding management of Ocean Avenue (.1)
08/13/25	Megan Nishikawa	HLUS	1,630.00	0.70	1,141.00	Prepare e-mail to J. Chen regarding property at 210 La Salle
08/13/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Emails regarding K. Mattson misappropriation of rents (.2); emails regarding Healing Arts Center property management agreement (.1); review broker agreements (.5); review broker agreement issues (.8)
08/13/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Download and review secured loan documents (.5); update Hogan Lovells property dashboard regarding same (.5)
08/14/25	Erin Brady	HLUS	1,570.00	2.50	3,925.00	Call with R. Itkin regarding various real estate issues

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.5); conference call with D. Kieffer regarding property management issues (1.0); prepare follow up notes regarding same (.3); revise broker motion (.5); confer with M. Bergthold regarding insurance issues (.2)
08/14/25	Loryn Dunn Arkow	HLUS	1,515.00	6.00	9,090.00	Prepare for call regarding property management (.3); telephone conference with R. Itkin regarding property management issues (.3); telephone conference with D. Kieffer regarding property management agreement for Sonoma problem properties, blocking trespassers and insurance (.6); follow up regarding same (.1); work on Healing Arts PMA and vendor contract form (.3); review and revise new form of property management agreement for property with issues and include bankruptcy language and other project specific concepts (3.4); revise W. Benzian (Douglas Elliman) listing agreement for Del Mar (.7); telephone conference with E. McNeilly regarding property management arrangements and listing agreement (.3)
08/14/25	Megan Nishikawa	HLUS	1,630.00	0.60	978.00	Communication with J. Chen regarding property located at 210 La Salle
08/14/25	Rick Wynne	HLUS	1,975.00	1.20	2,370.00	Review insurance quotes (.4); attend meeting with E. Brady regarding tax issues, K. Mattson issues and plan timing (.3); attend Hogan Lovells team

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						meeting (.5)
08/14/25	Edward Joseph McNeilly	HLUS	1,295.00	5.80	7,511.00	Review emails regarding alleged K. Mattson misappropriation of rents (.2); attend videoconference with R. Wynne, E. Brady, A. Kim and L. Itkin regarding issues to resolve with K. Mattson (.8); telephone conferences with D. Ullo and D. Kieffer regarding Ocean Avenue (.4); attend videoconference with E. Brady, L. Arkow, R. Itkin (partial) and D. Kieffer (partial) regarding Sonoma Properties and property management agreements (1.0); review and revise Sonoma Properties motion and declarations (.4); attend call with Hogan Lovells team regarding real estate and case issues (.5); emails regarding Ocean Avenue and real estate issues (.3); review R. Itkin stay relief update (.2); call with T. Schwartz regarding tenants in common (.2); telephone conference with L. Arkow regarding broker agreements (.3); emails regarding tenants in common research and issues (.4); emails regarding insurance issues (.2); multiple emails regarding tenants in common and real estate issues (.9)
08/14/25	Isolte Beal	HLUS	760.00	0.70	532.00	Review documentation regarding properties with tenants in common
08/15/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with D. Ullo and E. McNeilly regarding broker and property manager

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						motions (.2); analyze dual agency issues (.3)
08/15/25	Loryn Dunn Arkow	HLUS	1,515.00	3.30	4,999.50	Provide input and revisions for draft of Healing Arts property management agreement (1.3); review and comment on form vendor contract for gardener (.8); revise property management agreement (Stapleton form) to incorporate input from E. McNeilly and address open items (.9); revise Benzian listing agreement and various correspondence regarding dual agency by selling brokers (.3)
08/15/25	Megan Nishikawa	HLUS	1,630.00	0.60	978.00	Prepare for and attend call with committee counsel
08/15/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Correspondence regarding listing and broker agreements (.3); review gardener agreement (.1); emails regarding tenants in common issues (.1)
08/15/25	Danielle Ullo	HLUS	1,035.00	0.60	621.00	Prepare broker motions for filing (.5) follow up with R. Itkin for comments (.1)
08/15/25	Isolte Beal	HLUS	760.00	1.30	988.00	Correspondence with Hogan Lovells team regarding tenants in common (.5); review documentation regarding properties with tenants in common (.8)
08/15/25	Katie M. Chacho	HLUS	855.00	3.80	3,249.00	Review and revise property management agreement for Center for Healing Arts (1.0); prepare initial draft of gardening services agreement (.8); review and revise gardener services agreement with new comments (.5); confer with

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						L. Arkow regarding changes to property management agreement (.2); revise property management agreement for Center for Healing Arts with additional comments (1.2); finalize gardening services agreement (.2); finalize property management agreement for Center for Healing Arts (.2); prepare correspondence to E. McNeilly and E. Brady regarding revised drafts of property management agreement and gardening services agreement for Center for Healing Arts (.2).
08/16/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Confer with R. Itkin and R. Wynne regarding unlawful detainer issues (.5); prepare email to E. McNeilly and D. Ullo regarding same (.2)
08/17/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Research regarding real estate counsel for tenant related issues
08/18/25	Erin Brady	HLUS	1,570.00	1.90	2,983.00	Attend bi-weekly check in call with Hogan Lovells and Stapleton teams to discuss DIP financing, property management, town hall meeting and related issues (1.1); attend conference call with D. Ullo and E. McNeilly regarding DIP loan, broker issues and other outstanding tasks (.5); confer with G. Albert regarding dual agency issues (.2); follow up with D. Ullo regarding same (.1)
08/18/25	Loryn Dunn Arkow	HLUS	1,515.00	7.40	11,211.00	Review real property

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						issues (.5); attend conference to analyze questions and identify specific research areas for analysis of tenant in common interests (.8); correspondence with E. McNeilly regarding constructive trust and listing agreement (.5); address issues relating to dual agency (.6); telephone conference with Stapleton regarding Del Mar listing agreement particular terms and pertinent characteristics (1.0); revise listing agreement and circulate (1.4); research and draft extended outline of points of inquiry to address constructive trust arguments and rights of tenants in common (2.4); telephone conference with E. McNeilly regarding tenant in common issues and listing agreement for Del Mar (.2); review revised draft of Healing Arts management agreement and circulate same to working group (.2)
08/18/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Call with Stapleton regarding property issues (.2); prepare correspondence to R. Itkin regarding eviction attorney materials (.3)
08/18/25	Edward Joseph McNeilly	HLUS	1,295.00	2.10	2,719.50	Attend weekly call with Stapleton (1.0); call with Stapleton regarding Del Mar properties (.8); call with L. Arkow regarding 1834-1836 Ocean Avenue (.2); call and correspondence regarding tenants in common issues (.4); email with L. Arkow

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding Ocean Avenue agreement (.1)
08/18/25	Danielle Ullo	HLUS	1,035.00	4.00	4,140.00	Review listing agreements and broker motions regarding dual agency and exchange correspondence regarding same (.8); revise broker motions to incorporate concept (1.0); prepare agenda for weekly check in call (.4); call with R. Itkin and Stapleton team regarding property issues and other open items (1.0); review documents regarding 415 Pacific Ave lis pendens (.8)
08/18/25	Isolte Beal	HLUS	760.00	0.30	228.00	Correspondence with Hogan Lovells team regarding tenants in common
08/18/25	Katie M. Chacho	HLUS	855.00	2.00	1,710.00	Confer with L. Arkow regarding tenants in common research (.7); prepare outline of tenants in common research (.8); research constructive trust regarding tenants in common ownership interest (.3); review correspondence from L. Arkow regarding tenants in common issues (.2).
08/19/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Confer with D. Marcoux, D. Kieffer, D. Ullo, R. Itkin, L. Arkow and E. McNeilly regarding sale procedures and Del Mar properties (1.3); follow up regarding LaSalle research (.1); research regarding 22 Boyes Blvd. property (.4); prepare correspondence to M. Fallon regarding Boyes property (.2); analyze LaSalle issues (.2); prepare email to R. Harris

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding tenant in common issue (.1); revise letter regarding 531 Camino Del Mar (.1)
08/19/25	Loryn Dunn Arkow	HLUS	1,515.00	3.50	5,302.50	Work on constructive trust legal arguments for assertion of interest in 210 La Salle as well as rights of tenants in common where tenant in common interest is not recorded (1.6); various correspondence relating to real property interests (.5); correspondence regarding change in manager for Sonoma (.1); correspondence regarding M. Lair interest in Del Mar (.1); correspondence regarding Chang rights in La Salle (.3); call with E. McNeilly regarding bankruptcy requirements as relates to property agreements (.1); revise listing agreement for Del Mar properties and circulate (.8)
08/19/25	Megan Nishikawa	HLUS	1,630.00	2.40	3,912.00	Review proofs of claim (1.7); communicate with occupant of 210 La Salle property (.7)
08/19/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review spa tenant materials regarding rent collection issues
08/19/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Draft letter to K. Mattson counsel regarding potential misappropriation of estate assets (.6); revise same (.4); draft letter to 454 15th Street tenant (.3)
08/19/25	Danielle Ullo	HLUS	1,035.00	1.40	1,449.00	Call with E. Brady, R. Wynne, and D. Kieffer regarding sale procedures
08/19/25	Isolte Beal	HLUS	760.00	0.10	76.00	Correspondence with

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						Hogan Lovells team regarding tenants in common
08/19/25	Katie M. Chacho	HLUS	855.00	3.30	2,821.50	Research regarding tenants in common ownership rights and contractual obligations (.1); analyze documents for 210 La Salle regarding ownership issues (.8); confer with L. Arkow regarding ownership issues regarding La Salle (.5); research regarding ownership issues for La Salle (.1)
08/20/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with R. Harris regarding tenant in common holder
08/20/25	Loryn Dunn Arkow	HLUS	1,515.00	1.60	2,424.00	Work on analysis of issues relating to tenants in common interests and ownership by KS Mattson Partners where it lacks record title, and complete draft outline for analysis of same
08/20/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Review LP agreements signed with exhibits (.3); review Live Oak materials regarding tax claims and other claims (.5); review property and debt listing by LeFever Mattson (.3)
08/20/25	Isolte Beal	HLUS	760.00	5.00	3,800.00	Correspondence with Hogan Lovells team regarding tenants in common (.3); review documentation regarding properties with tenants in common (4.7)
08/20/25	Katie M. Chacho	HLUS	855.00	2.50	2,137.50	Continue research regarding ownership interests of tenants in common

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08/21/25	Erin Brady	HLUS	1,570.00	1.40	2,198.00	Confer with D. Marcoux, H. Buffalo, D. Carlson and D. Kieffer regarding property management contract (.3); review proposed U.S. Trustee dual agency language (.1); prepare email to J. Day regarding same (.1); confer with D. Kieffer and D. Marcoux regarding same (.1); coordinate with D. Kieffer regarding need to amend broker agreements vs. court order to clarify dual agency issues (.2); analyze tenant in common research outline (.2); prepare email regarding U.S. Trustee requirements as they impact PURE property management agreement (.2); respond to questions from L. Arkow regarding real estate issues (.2)
08/21/25	Loryn Dunn Arkow	HLUS	1,515.00	3.50	5,302.50	Telephone conference with R. Itkin, Stapleton and PURE property manager (.5); conference with R. Itkin and Stapleton relating to Sonoma Properties, particularly problem apartment complex and skills necessary for management, as well as other brokerage arrangements for lease and sale, including for Del Mar (.5); revise provisions of listing agreement to reflect discussion of term of leasing to public and dual agency matters (.6); review multiple correspondence relating to broker arrangements and real property assets (1.4);

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						conference with E. McNeilly regarding tenants in common interest research (.2); correspondence with E. Brady and E. McNeilly regarding open issues in brokerage arrangements, including dual agency question (.3)
08/21/25	Megan Nishikawa	HLUS	1,630.00	0.40	652.00	Review e-mail correspondence and related pleadings regarding stay of SEC proceeding
08/21/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Telephone conference with D. Marcoux regarding insurance issues (.3); email regarding tenants in common research (.1); telephone conference with L. Arkow regarding strong arm powers and tenants in common research (.2)
08/21/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Review outline for tenants in common research and conduct research regarding same
08/21/25	Isolte Beal	HLUS	760.00	0.60	456.00	Correspondence with Hogan Lovells team regarding tenants in common (.2); review documentation regarding properties with tenants in common (.4)
08/22/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Review motion by K. Mattson regarding sale of properties (.3); attend to depository account issues for PURE property management (.2)
08/22/25	Loryn Dunn Arkow	HLUS	1,515.00	1.10	1,666.50	Follow up regarding Healing Arts property management agreement and other property correspondence (.2);

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						review and comment regarding analysis of legal arguments for assertion of rights of KS Mattson Partners in 210 La Salle (.9)
08/22/25	Megan Nishikawa	HLUS	1,630.00	1.80	2,934.00	Review additional proofs of claim
08/22/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review tenant in common information, chart and documents
08/22/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with R. Itkin regarding property managers
08/22/25	Isolte Beal	HLUS	760.00	6.90	5,244.00	Review documentation regarding properties with tenants in common (6.6); correspondence with Hogan Lovells team regarding tenants in common (.3)
08/22/25	Katie M. Chacho	HLUS	855.00	5.20	4,446.00	Continue research regarding ownership interests of tenants in common (4.0); prepare correspondence regarding ownership of La Salle property (1.2).
08/23/25	Loryn Dunn Arkow	HLUS	1,515.00	3.80	5,757.00	Analyze case law and arguments for assertion of rights by KS Mattson Partners in property transferred to others and rights of tenants in common in KS Mattson Partners property
08/24/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Correspond with E. McNeilly and R. Itkin regarding Natoma property
08/24/25	Loryn Dunn Arkow	HLUS	1,515.00	0.80	1,212.00	Review comments from PURE regarding property management agreement
08/25/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Prepare email to H. Buffalo

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						regarding DIP bank account requirements (.1); follow up email with R. Itkin regarding same (.1); confer by email with E. McNeilly regarding same (.2)
08/25/25	Loryn Dunn Arkow	HLUS	1,515.00	2.80	4,242.00	Correspondence regarding property interests (.3); telephone conference with Stapleton relating to tenants in common interests and property management (.9); revise property management agreement for Sonoma and circulate to working group (1.4); conference regarding tenants in common research (.2)
08/25/25	Edward Joseph McNeilly	HLUS	1,295.00	2.50	3,237.50	Email with U.S. Trustee regarding authorized depository issue (.1); emails with Stapleton regarding property matters (.1); telephone conference with R. Itkin regarding initial debtor interview and tenants in common call (.3); emails regarding tenants in common call (.1); attend videoconference with D. Kieffer, D. Marcoux and L. Arkow regarding property management and tenants in common issues (.9); correspondence regarding real estate issues (.6); correspondence regarding tenants in common issues (.4)
08/25/25	Danielle Ullo	HLUS	1,035.00	1.80	1,863.00	Research regarding tenants in common priority and strong arm powers
08/25/25	Isolte Beal	HLUS	760.00	0.60	456.00	Review documentation

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						regarding properties with tenants in common
08/25/25	Katie M. Chacho	HLUS	855.00	2.00	1,710.00	Analyze 210 LaSalle deeds regarding ownership history (.6); prepare correspondence regarding 210 La Salle ownership deeds (.2); conference with L. Arkow regarding tenants in common ownership research (.4); prepare memorandum regarding tenants in common ownership interests (.8).
08/26/25	Erin Brady	HLUS	1,570.00	3.10	4,867.00	Attend biweekly call with Stapleton team and R. Itkin regarding property management issues, K. Mattson motion to modify preservation order, initial debtor interview meeting and other issues (1.0); conference call with D. Kieffer, D. Marcoux, E. McNeilly and D. Ullo regarding 15th Street and Natoma properties (1.0); analyze and address issues with Sonoma property manager candidate (.3); prepare letter to Sonoma County Attorney regarding abatement issues (.8)
08/26/25	Loryn Dunn Arkow	HLUS	1,515.00	3.50	5,302.50	Telephone conference with D. Marcoux regarding open questions for property management agreement (.3); revise property management agreement and circulate to working group (1.3); telephone conference with Stapleton regarding assets held as tenants in common as well as 454 15th Street party in possession claiming purchase rights (1.0); review

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						memorandum regarding rights of purported tenants in common (.5); review correspondence regarding property matters (.3); review revisions to Healing Arts PMA (.1)
08/26/25	Megan Nishikawa	HLUS	1,630.00	1.40	2,282.00	Prepare for and attend call with committee counsel and Hogan Lovells team regarding status of document requests (.8); review e-mail from K. Mattson's counsel regarding substitution of counsel (.6)
08/26/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Attend meeting with Stapleton, R. Itkin and Hogan Lovells team regarding (a) property troubleshooting issues, (b) DIP budget to actual, (c) K. Mattson issues, (d) bar date hearing, (e) Socotra and (f) plan
08/26/25	Edward Joseph McNeilly	HLUS	1,295.00	2.90	3,755.50	Attend videoconference with PwC regarding bank account analysis (.4); attend videoconference with Hogan Lovells and Stapleton teams regarding real estate issues (1.4); attend videoconference with Stapleton and Hogan Lovells teams regarding Natoma and 15th Street (1.1)
08/26/25	Danielle Ullo	HLUS	1,035.00	1.80	1,863.00	Exchange correspondence regarding 18285 Highway 12 remediation (.4); correspondence with K. Chacho regarding sale of co-owned property and conduct research regarding same (1.0); correspondence with Socotra counsel regarding

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						insurance on 3003 Castle Rd. (.4)
08/26/25	Katie M. Chacho	HLUS	855.00	2.70	2,308.50	Prepare memorandum regarding tenants in common ownership interests
08/27/25	Erin Brady	HLUS	1,570.00	3.60	5,652.00	Attend call with Natoma tenants in common (1.2); follow up call with R. Itkin, C. Garnica and E. McNeilly regarding same (.3); edit email to M. Bennett regarding Natoma (.1); confer with R. Harris regarding tenant in common issues (.2); prepare email to R. Itkin regarding D. Gomez correspondence (.1); prepare email to M. Nishikawa and L. Arkow regarding LaSalle (.1); review and analyze response from L. Arkow regarding same (.3); attend call with E. McNeilly, D. Kieffer, R. Itkin, L. Arkow, and D. Marcoux to prepare for Natoma tenant in common call (.5); analyze tenant in common issues for Natoma (.8)
08/27/25	Loryn Dunn Arkow	HLUS	1,515.00	4.40	6,666.00	Review unusual deeds regarding Gateway condo parcels (.2); review summary of property issues (.3); draft correspondence to E. Brady with summary analysis of rights of estate in 210 La Salle (.2); prepare correspondence to PURE with revised draft of Sonoma Properties management agreement (.2); analysis of facts impacting tenants in common interests for

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						Natoma (.5); telephone conference with R. Itkin and Stapleton relating to strategy vis a vis tenants in common to prepare for telephone conference (.8); further review of Socotra lien and release of same on Natoma and Auburn and draft correspondence with analysis of same (.6); correspondence with Stapleton regarding tenants in common (.3); review applicable statute and guidelines relating to property manager duties with respect to trust accounts in response to PURE objection to certain provisions of property management agreement and draft correspondence with analysis (1.0); provide analysis regarding DIP lender rights vis a vis tenants in common (.3)
08/27/25	Megan Nishikawa	HLUS	1,630.00	2.50	4,075.00	Review written correspondence and related documents regarding potential remediation order at 47-49 Natoma (1.9); review e-mail correspondence regarding research as to ownership of 210 La Salle property (.6)
08/27/25	Rick Wynne	HLUS	1,975.00	1.70	3,357.50	Telephone conference with E. Brady regarding tenant in common meeting issues (.3); prepare correspondence to Stapleton regarding property listing for tax issue and debt (.4); review correspondence regarding Live Oak documents and tax return progress (8); review correspondence

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						from L. Arkow regarding tenant in common and unrecorded interests (.2)
08/27/25	Edward Joseph McNeilly	HLUS	1,295.00	6.30	8,158.50	Discovery (.4); prepare for Natoma call (1.9); post-initial debtor interview call debrief regarding Natoma (.8); work on Natoma preparation (.7); Natoma preparation (.5); call with Natoma tenants in common (1.3); follow-up call regarding Natoma with E. Brady and R. Itkin (.3); follow up emails regarding Natoma (.4)
08/27/25	Danielle Ullo	HLUS	1,035.00	1.60	1,656.00	Review and compile secured loan documents (.3); review Socotra proofs of claim against LeFever Mattson debtor regarding status of liens on Natoma properties (1.3)
08/27/25	Isolte Beal	HLUS	760.00	0.20	152.00	Correspondence with Hogan Lovells team regarding tenants in common
08/27/25	Katie M. Chacho	HLUS	855.00	3.70	3,163.50	Continue to prepare memorandum regarding tenants in common ownership interests (.5); prepare memorandum regarding La Salle ownership (3.2)
08/28/25	Erin Brady	HLUS	1,570.00	2.30	3,611.00	Conference call with R. Wynne. E. McNeilly and D. Ullo regarding sale and other issues (.8); attend to various K. Mattson related issues (1.5)
08/28/25	Loryn Dunn Arkow	HLUS	1,515.00	1.80	2,727.00	Analysis regarding impact of Chang claims with respect to handling rights of KS Mattson Partners in 210 La Salle (.3); review comments from PURE

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding property management agreement and draft comments regarding same for client and Stapleton (1.1); obtain further information regarding Natoma property and circulate (.4)
08/28/25	Megan Nishikawa	HLUS	1,630.00	2.70	4,401.00	Call with E. McNeilly regarding Golf View Terrace property (.5); perform research regarding same (2.2)
08/28/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Attend Hogan Lovells team meeting regarding DIP final order changes, tenant in common issues, status conference and plan presentation, and K. Mattson issues
08/28/25	Todd Schwartz	HLUS	1,925.00	1.60	3,080.00	Conference with D. Kieffer, E. Brady, E. McNeilly and D. Ullo regarding sale procedures matters (.6); attend Hogan Lovells team bi-weekly check-in call (1.0)
08/28/25	Danielle Ullo	HLUS	1,035.00	1.80	1,863.00	Multiple calls with Socotra counsel regarding liens on Natoma property (.8); exchange correspondence with L. Arkow and others regarding same (.7); correspondence with L. Arkow and T. Cohen, Socotra counsel regarding Natoma properties (.3)
08/28/25	Katie M. Chacho	HLUS	855.00	2.90	2,479.50	Continue to prepare memorandum regarding La Salle ownership interests (2.4); further research regarding implications of constructive trust on La Salle ownership (.5)
08/29/25	Erin Brady	HLUS	1,570.00	2.60	4,082.00	Confer with deed of trust

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						holders regarding 210 LaSalle (.7); confer with Sonoma County Attorney regarding abatement issues (.7); confer with L. Arkow, D. Kieffer and E. McNeilly regarding Sonoma PMA (.3); review PURE agreement and analyze same (.4); confer with E. McNeilly regarding PURE agreement (.3); further review of PURE issues (.2)
08/29/25	Loryn Dunn Arkow	HLUS	1,515.00	3.10	4,696.50	Telephone conference with D. Kiefer to further finalization of PURE property management agreement for Sonoma Properties (.2); revise property management agreement to address deficient language relating to rent collections and manager trust account (.8); telephone conference with E. McNeilly regarding bankruptcy court approval requirements for PMA provisions (.3); obtain further clarifications regarding handling of funds and revise property management agreement to address same and incorporate bankruptcy provisions (1.1); correspondence with working group regarding provisions of management agreement (.5); draft correspondence to PURE regarding final draft of management agreement (.2)
08/29/25	Megan Nishikawa	HLUS	1,630.00	3.90	6,357.00	Research property at 3557 Golf View Terrace (2.9); prepare for and attend call with J. Chen and family

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding 210 La Salle property (1.0)
08/29/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend meeting with committee counsel, and review property details including ownership and value, and tenant in common interest complications
08/29/25	Todd Schwartz	HLUS	1,925.00	1.60	3,080.00	Conference regarding property matters (1); attend bi-weekly check-in call (.6)
08/29/25	Edward Joseph McNeilly	HLUS	1,295.00	3.00	3,885.00	Telephone conference with E. Brady regarding penalties research (.2); attend videoconference with Pachulski, Stapleton and Hogan Lovells teams regarding real property issues (1.0); review Sonoma PURE property management agreement (.2); telephone conference with E. Brady and L. Arkow regarding property management agreement (.3); further review PURE property management agreement (.3); attend videoconference with Hogan Lovells and Stapleton teams regarding real property and other case issues (1.0)
08/30/25	Loryn Dunn Arkow	HLUS	1,515.00	0.30	454.50	Correspondence with E. McNeilly regarding removal of post-petition property liens (.1); correspondence with R. Itkin, E. Brady and D. Kieffer regarding bank account provisions of Sonoma Properties management agreement (.2)

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/30/25	Katie M. Chacho	HLUS	855.00	1.60	1,368.00	Prepare updates to memorandum regarding 210 La Salle
08/31/25	Loryn Dunn Arkow	HLUS	1,515.00	1.20	1,818.00	Revise bank account provision of Sonoma Properties management agreement and circulate with correspondence to PURE property manager (.2); review and prepare correspondence regarding new information relating to refinancing of Natoma debt with new, higher lien on Auburn and 30003 Castle (.4); review additional property information (.4); correspondence regarding eviction of K. Mattson (.2)
08/31/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Correspondence to K. Mattson regarding non-payment of rent
			Subtotal	264.80	357,597.00	

B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/05/25	Danielle Ullo	HLUS	1,035.00	3.00	3,105.00	Draft multiple broker declarations (2.0); compile list of interested parties for attachment to broker declarations and exchange internal correspondence regarding same (1.0)
08/07/25	Danielle Ullo	HLUS	1,035.00	1.90	1,966.50	Review precedent individual sale motions to prepare form for KSMP
08/11/25	Danielle Ullo	HLUS	1,035.00	2.60	2,691.00	Revise broker declarations per comments from R. Itkin and Stapleton team (1.8); prepare Hogan Lovells property dashboard with information on each property (1.0)

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/13/25	Danielle Ullo	HLUS	1,035.00	2.40	2,484.00	Correspondence regarding listing agreements (.4); revise multiple broker declarations (.5); finalize broker documents (1.5)
08/14/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Correspondence with Reprop Financial counsel regarding sale of 405 London Way
08/15/25	Tracy Southwell	HLUS	655.00	3.60	2,358.00	Research and prepare tracking chart regarding tenants in common
08/18/25	Tracy Southwell	HLUS	655.00	5.10	3,340.50	Research and prepare schedule regarding tenants in common
08/19/25	Danielle Ullo	HLUS	1,035.00	4.80	4,968.00	Finalize and coordinate filing of broker motions for Kidder Matthews (1.2); Compass (1.2); Premiere Estates (1.2); and Sonoma Realty (1.2)
08/19/25	Tracy Southwell	HLUS	655.00	0.20	131.00	Email with E. McNeilly and I. Beal regarding tenants in common data
08/20/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Confer with R. Harris regarding tenant in common holder
08/21/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Exchange correspondence regarding sales process and insurance coverage for 22 Boyes Blvd. (.3); exchange correspondence regarding insurance at 3003 Castle Rd. (.2)
08/21/25	Tracy Southwell	HLUS	655.00	5.60	3,668.00	Prepare tenants in common tracking chart with contact information and PDF links
08/25/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Prepare Douglas Elliman broker motion and correspondence regarding same
08/26/25	Danielle Ullo	HLUS	1,035.00	1.10	1,138.50	Correspondence with

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Stapleton regarding Douglas Elliman broker motion and incorporate revisions to same
08/28/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Conference call with D. Kieffer, E. McNeilly, D. Ullo and T. Schwartz regarding sale procedures (partial) (.7); conference call with G. Albert regarding sale procedures and Common Court property (.5)
08/28/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Attend videoconference with T. Schwartz, E. Brady, D. Ullo and D. Kieffer regarding sale procedures (1.0); call with Hogan Lovells team regarding sale and DIP issues (.8)
08/28/25	Danielle Ullo	HLUS	1,035.00	1.10	1,138.50	Call with E. Brady, T. Schwartz, E. McNeilly, and Stapleton team regarding sale procedures and strategy
08/28/25	Tracy Southwell	HLUS	655.00	4.40	2,882.00	Research and retrieval of voluminous proofs of claims filed by Sonoma County, including combining attachments (2.4); organize by property in NetDocs (2.0)
08/29/25	Danielle Ullo	HLUS	1,035.00	3.20	3,312.00	Prepare for and attend call with committee counsel and Stapleton team regarding sale process (1.4); revise Douglas Elliman broker motion and order per comments from U.S. Trustee and R. Itkin; (1.0); correspondence regarding same (.8)
Subtotal				43.50	39,164.50	

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B140 - Relief from Stay/Adequate Protection Proceedings

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Address stay-relief related issues on Stapleton coordination call, including tenants in common and property management (.2); prepare comments to talking points for tenants in common owners (.4)
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	1.20	1,554.00	Attend videoconference with A. Gomez and A. Anderson regarding stay relief motions (.8); email with E. Brady regarding same (.2); emails regarding schedules and statements (.2)
08/05/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Confer with E. McNeilly regarding stay relief and tenants in common (.3); conference call with R. Itkin, E. McNeilly and A. Anderson regarding same (partial) (.5)
08/05/25	Edward Joseph McNeilly	HLUS	1,295.00	1.70	2,201.50	Emails regarding stay relief (.5); attend videoconference with committee counsel and Keller Benvenuti regarding Sasaki stay relief motions (1.0); correspondence with A. Gomez regarding stay relief issues (.2)
08/06/25	Edward Joseph McNeilly	HLUS	1,295.00	1.20	1,554.00	Review and revise stay relief stipulation (.4); further revise stipulation (.5); review Sasaki stay relief stipulation (.3)
08/07/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Email with R. Itkin regarding stay relief stipulation for Sasaki property (.3); telephone conference with L. Arkow regarding Sasaki stay relief stipulation (.3); Sasaki stay relief research and analysis

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B140 - Relief from Stay/Adequate Protection Proceedings

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding deficiency claim and section 1111 given unusual circumstances of case (1.0)
08/11/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Emails regarding Sasaki stay relief motions
08/13/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Review stay relief opposition (.2); draft joinder to stay relief opposition (.6); emails regarding stay relief motion (.2)
08/14/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Telephone conference with G. Albert regarding stay relief motions
08/14/25	Tracy Southwell	HLUS	655.00	0.80	524.00	Revise joinder regarding Sasaki relief from stay motion (.3); ECF file same (3); coordinate service of same (.2)
08/21/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Confer with E. McNeilly regarding Golf Terrace property
08/27/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to E. McNeilly regarding Golf Terrace
08/28/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with M. Nishikawa regarding 3557 Golf View Terrace stay violation
08/29/25	Leen Bukai	HLUS	760.00	4.00	3,040.00	Research standard and method of calculation for punitive damages award for a bankruptcy stay violation
08/30/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Correspondence regarding Golf View Terrace stay relief issues and other stay relief issues (.4); review Socotra loan files regarding 450J and 452C Sonoma (.7)
08/31/25	Edward Joseph	HLUS	1,295.00	1.00	1,295.00	Draft proposal regarding

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B140 - Relief from Stay/Adequate Protection Proceedings

Date	Name	LLP	Rate	Hours	Amount	Narrative
	McNeilly					stay relief motion filed by A. Gomez
			Subtotal	15.90	18,378.50	

B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/04/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Correspondence to LeFever Mattson and LeFever Mattson creditors committee regarding Socotra complaint issues (.4); correspondence to LeFever Mattson and LeFever Mattson creditors committee regarding proposed common interest agreement and revisions required (.3)
08/11/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Analyze issues regarding town hall for bar date (.2); communicate with Pachulski regarding town hall logistics (.1)
08/12/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Attend meeting with LeFever Mattson and creditors committee regarding plan review
08/13/25	Rick Wynne	HLUS	1,975.00	2.40	4,740.00	Review video of LeFever Mattson committee town hall and materials they provided to creditors (2.0); attend meeting with D. Grassgreen, B. Wilson and E. Brady regarding investor town hall (.4)
08/18/25	Erin Brady	HLUS	1,570.00	1.70	2,669.00	Draft town hall announcement (1.6); respond to question from R. Itkin regarding same (.1)
08/19/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with J. Rosell regarding committee
08/20/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Attend meeting with

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
						LeFever Mattson debtors and committee regarding Socotra mediation and escrow correspondence
08/20/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with E. Brady regarding 22 Boyes Blvd. secured lender question
08/21/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Review creditor questionnaire
08/22/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Attend preparation call for 341 meeting (.7); attend 341 meeting (.4)
08/22/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Prepare correspondence to creditors committee and Pachulski regarding K. Mattson correspondence and issues with rent collection
08/22/25	Rick Wynne	HLUS	1,975.00	3.20	6,320.00	Attend meeting with R. Itkin, E. McNeilly and Stapleton regarding 341(a) questions, property insurance and values (.8); attend meeting with R. Itkin and E. McNeilly prior to 341(a) meeting, and attend 341(a) meeting regarding (a) properties and tenant in common issues, (b) claims, (c) insurance, (d) plan issues, (e) substantive consolidation, and (f) bar date notice and questions regarding forms (2.2); prepare correspondence to creditors committee and LeFever Mattson debtors regarding K. Mattson issues, and rents (.2)
08/22/25	Edward Joseph McNeilly	HLUS	1,295.00	2.80	3,626.00	Call in preparation for 341(a) meeting (.8); prepare for and attend 341(a) meeting (1.0); attend meeting with R. Wynne and R. Itkin

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding same (1.0)
08/26/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Attend LeFever Mattson and KS Mattson Partners creditors committee meeting regarding work in progress, including (a) plan issues, (b) K. Mattson motion, response, his misdeeds and turnover action, (c) miscellaneous property issues, (d) tax update, (e) Mattson case conversion or chapter 11 trustee, and (f) Socotra
08/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Attend videoconference with D. Kieffer, D. Marcoux and R. Itkin regarding initial debtor interview and Natoma
08/29/25	Rick Wynne	HLUS	1,975.00	1.80	3,555.00	Attend meeting with creditors committee counsel regarding property issues on major KS Mattson Partners properties, including condition, legal status, tenant in common interests, sales process, and K. Mattson issues and opposition to his motion to sell as well as use KS Mattson Partners properties for his criminal defense (1.0); attend meeting with LeFever Mattson creditors committee regarding DIP issues, budget, and deeds of trust request by Serene (.8)
Subtotal				19.20	34,095.00	

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/06/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Analyze issues regarding Stapleton retention and presentation to court (.4); prepare strategy e-mail regarding same (.6); conference with R. Wynne regarding same (.2)
08/06/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review correspondence from E. Brady regarding Stapleton retention issues raised by court, and reply
08/06/25	Tracy Southwell	HLUS	655.00	0.70	458.50	Research and prepare information for filing broker retention applications
08/09/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with D. Ullo regarding drafting certificate of no objection to Stapleton application
08/11/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Follow up with Stapleton regarding data for retention application submission (.1); prepare allocation of tasks matrix for professionals (.3); prepare email to R. Itkin regarding task allocation (.1); analyze issues regarding Stapleton application (.4)
08/11/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Coordinate preparation of certificate of no objection for Stapleton retention application and exchange correspondence regarding same (.3); call with E. Brady regarding supplemental declaration for Stapleton retention (.5); call with M. Bergthold and D. Marcoux at Stapleton regarding supplemental declaration and task allocation matrix (.7); prepare task allocation matrix for supplemental declaration

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.5)
08/12/25	Erin Brady	HLUS	1,570.00	6.40	10,048.00	Confer with R. Itkin and R. Wynne regarding retention coordination (.9); prepare R. Itkin declaration in support of retention application and supporting documents (4.6); revise R. Itkin declaration after further input from R. Itkin and Stapleton team (.9)
08/13/25	Erin Brady	HLUS	1,570.00	3.70	5,809.00	Confer with D. Kieffer and W. Brown regarding retention application pleadings (.8); revise supplemental Itkin declaration (1.1); prepare email to D. Ullo regarding supplemental declaration (.1); review and input Stapleton edits to declaration (.3); edit Itkin declaration (.9); revise demonstratives (.5)
08/13/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review and revise R. Itkin declaration in support of Stapleton retention
08/13/25	Danielle Ullo	HLUS	1,035.00	5.20	5,382.00	Prepare supplemental declaration in support of Stapleton retention application (2.5); call with E. Brady and Stapleton team regarding demonstratives for same (1.2); multiple calls with E. Brady regarding same (.8); revise task allocation matrix and other demonstratives (.7)
08/14/25	Erin Brady	HLUS	1,570.00	4.90	7,693.00	Continue revisions of R. Itkin declaration and attachments (1.1); prepare comments for Stapleton on budget (.2); prepare additional edits to retention declaration (.4);

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						review revised exhibits (.3); prepare for hearing on Stapleton retention (2.5); review indemnification issues (.4)
08/14/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Review and revise supplemental papers regarding Stapleton employment
08/14/25	Danielle Ullo	HLUS	1,035.00	4.10	4,243.50	Draft and revise Itkin supplemental declaration in support of Stapleton retention (1.0); draft Itkin declaration in support of Sonoma Properties retention application (1.0) review listing agreements and correspondence regarding same (.5); draft Powell declaration in support of Sonoma Properties retention application (.5); dxchange correspondence regrading broker motions (.3); finalize and coordinate filing of Itkin supplemental declaration in support of Stapleton retention (.8)
08/15/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Revise Sonoma Properties retention motion and supporting declarations per comments from E. Brady (.8); assist in preparation for hearing regarding Stapleton retention application (.8); revise broker motions and coordinate execution of same (.4)
08/15/25	Tracy Southwell	HLUS	655.00	0.10	65.50	Email with D. Ullo regarding retention applications
08/18/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Finalize and coordinate upload of Stapleton retention order

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/19/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Multiple calls with Judge Novack's chambers regarding entry of Stapleton retention order
08/19/25	Tracy Southwell	HLUS	655.00	0.60	393.00	Research regarding rejection of Stapleton retention order due to no related matter issue, including call with ECF help desk (.4); emails with D. Ullo regarding same (.1)
08/20/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Review and respond to email from J. Day regarding broker motions
08/21/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Follow up with D. Ullo regarding Stapleton order
08/21/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Exchange correspondence regarding upload of Stapleton retention order (.2); exchange correspondence regarding Douglas Elliman broker motion (.3)
08/22/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review Keller Benvenutti supplemental fee application brief
08/22/25	Danielle Ullo	HLUS	1,035.00	1.80	1,863.00	Review and revise KS Mattson Partners pre-bill for fee application (1.6); exchange correspondence with chambers and Stapleton regarding entry of Stapleton retention order (.2)
08/25/25	Danielle Ullo	HLUS	1,035.00	3.00	3,105.00	Revise pre-bill narratives and time entries for fee application
08/29/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email correspondences to J. Day regarding broker retention motions
08/29/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review Douglas Elliman retention motion

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/30/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Review and comment on draft broker motion
			Subtotal	41.00	53,168.50	

B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Dennis H. Tracey	HLUS	1,990.00	2.00	3,980.00	Review materials related to claim against Socotra defendants
08/01/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Review materials regarding lis pendens (.1); respond to email from Sonoma County Attorney regarding abatement issues (.2); prepare email to R. Itkin regarding abatement letter (.2)
08/01/25	Megan Nishikawa	HLUS	1,630.00	0.80	1,304.00	Review and respond to e-mail correspondence from counsel for LeFever regarding subpoenas to Bank of Montreal
08/01/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Calls and correspondence regarding mediation and arranging for Judge Bogdanoff
08/01/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Review Bank of Montreal discovery (.4); revise and circulate Bank of Montreal subpoena (.3); review discovery (.3)
08/04/25	Dennis H. Tracey	HLUS	1,990.00	5.50	10,945.00	Review complaint against Socotra; analyze claims; telephone conference with R Wynne .Regarding same
08/04/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Prepare email to Keller Benvenuti and Pachulski regarding common interest agreement (.1); follow up email exchanges with A. Kim regarding same (.1); follow up call with R. Wynne regarding same (.1)

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/04/25	Rick Wynne	HLUS	1,975.00	2.30	4,542.50	Telephone conference with E. Brady regarding Socotra complaint and mediation (.3); review Socotra complaint (.4); call with D. Tracey regarding Socotra complaint (.7); review four larger sample investment claims that mention KS Mattson Partners liability (.5); prepare correspondence to Hogan Lovells team regarding mediation (.2); prepare correspondence to JAMS and all parties regarding mediation (.2)
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Emails with Fennemore and Bank of Montreal regarding subpoena (.1); email regarding 3557 Golf Terrace (.3)
08/05/25	Dennis H. Tracey	HLUS	1,990.00	4.30	8,557.00	Review and analyze avoidance action against Socotra; telephone conference with R. Wynne regarding same
08/05/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review litigation counsel questions for Fennemore
08/06/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with S. Golden regarding informal production to committee (.1); confer with S. Atheron regarding same (.1); coordinate regarding same (.1); prepare email to R. Itkin regarding removal motion (.1); prepare email to E. McNeilly and D. Ullo regarding removal motion (.1)
08/06/25	Megan Nishikawa	HLUS	1,630.00	0.20	326.00	Respond to litigation questions regarding document productions from bankruptcy team
08/06/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Prepare correspondence

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding Socotra mediation permitted party request
08/06/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Review removal motion
08/06/25	Danielle Ullo	HLUS	1,035.00	4.00	4,140.00	Draft motion to extend time to remove state court litigation (1.6); draft R. Itkin declaration in support of same (.8); draft motion to shorten time related to same (1.0); draft E. McNeilly declaration in support of motion to shorten time (.6)
08/07/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Confer with M. Nishikawa regarding investor claim analysis (.4); revise motion to extend removal deadline (.8)
08/07/25	Rick Wynne	HLUS	1,975.00	3.80	7,505.00	Review Socotra complaint and revise comments, including review of EPD and other Ponzi scheme cases and articles, and prepare outline of issues (3.5); calls and correspondence regarding setting up mediation (.3)
08/07/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Correspondence regarding removal motion (.2); telephone conference with S. Golden regarding discovery (.5); email with D. Ullo regarding removal motion (.1); telephone conference with K. Gelera regarding removal motion filing (.2)
08/08/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Confer with M. Nishikawa, L. Bukai, R. Wynne and R. Itkin regarding investor claims
08/11/25	Megan Nishikawa	HLUS	1,630.00	3.20	5,216.00	Further review and analyze proofs of claim submitted

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						by investors in KS Mattson Partners and review outstanding litigation regarding same (2.6); review e-mails from committee counsel regarding K. Mattson's document production (.6)
08/11/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review creditors committee subpoena to KS Mattson Partners
08/11/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Email with R Itkin regarding Socotra confidentiality protocol (.3); email with Socotra and R. Wynne regarding permitted person status (.1)
08/12/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Execute common interest agreement (.1); conference call with committee counsel regarding discovery issues (.5)
08/12/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Review final draft of Socotra complaint (.6); attend meeting with S. Golden, Pachulski and Keller Benvenuti regarding document review and production issues, privilege and protective order (.5)
08/12/25	Leen Bukai	HLUS	760.00	2.30	1,748.00	Attend meeting with Pachulski team to discuss document discovery (1.2); identity complaints in all pending litigation matters against KS Mattson Partners and K. Mattson (1.1)
08/13/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Call with J. Kim regarding bar date motion (.2); email with R. Itkin regarding Socotra's request to be a permitted party (.3); email with J. Kim regarding

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						same (.1); review Live Oak motion and pleadings (.1)
08/14/25	Megan Nishikawa	HLUS	1,630.00	1.80	2,934.00	Further review proofs of claim and communication regarding subpoena to Bank of Montreal
08/15/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend conference call with S. Golden, D. Grassgreen, J. Rosell, D. Silveria, D. Taylor, E. McNeilly and R. Wynne regarding mediation
08/15/25	Megan Nishikawa	HLUS	1,630.00	0.20	326.00	Review correspondence regarding Bank of Montreal subpoena
08/15/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Attend meeting with Pachulski, Keller Benvenuti and Hogan Lovells regarding Socotra escrow issues and mediation (.5); telephone conference with D. Grassgreen regarding Socotra issues with respect to mediation set up (.2)
08/18/25	Megan Nishikawa	HLUS	1,630.00	0.90	1,467.00	Prepare for and attend call with K. Mattson's counsel regarding ongoing civil litigation and potential substitution of counsel
08/18/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend meeting with S. Golden regarding Socotra mediation and review their substantive consolidation reply (.4); prepare correspondence to R. Itkin regarding EPD case and materials on the issue (.6)
08/19/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Telephone conferences with D. Grassgreen regarding Socotra mediation
08/19/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Prepare for bar date hearing (.3); telephone conference with A. Estrada

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding bar date motion (.2); revise certificate of no objection for bar date (.2)
08/20/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Confer with R. Wynne regarding Socotra
08/20/25	Edward Joseph McNeilly	HLUS	1,295.00	2.20	2,849.00	Prepare for hearing (.8); attend videoconference with R. Wynne and E. Brady regarding hearing preparation (.5); debrief call regarding hearing with R. Wynne, R. Itkin and E. Brady (.6); email with Hogan Lovells and committee teams regarding K. Mattson bankruptcy strategy (.3)
08/21/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Telephone conference with E. Brady regarding bar date order (.2); leave message for attorney M. Libarle (.1); revise bar date order (1.0); telephone conference with M. Libarle regarding settlement issues (.3)
08/22/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Prepare correspondence to Dovel Luner regarding KS Mattson Partners and Socotra case
08/22/25	Edward Joseph McNeilly	HLUS	1,295.00	2.30	2,978.50	Revise bar date order and notice (.4); revise voluntary questionnaire (.3); work on certificate of no objection (.5); telephone conference with E. Brady regarding bar date order (.5); revise bar date order (.6)
08/23/25	Edward Joseph McNeilly	HLUS	1,295.00	1.70	2,201.50	Revise bar date order and motion (.6); revise removal order and upload certificate of no objection (.7); further revise bar date notice and publication notice (.4)

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/25/25	Rick Wynne	HLUS	1,975.00	1.70	3,357.50	Review and revise mediation stipulation and correspondence with Keller Benvenutti and Pachulski teams regarding same (.5); further edit stipulation (.2); telephone conference with R. Itkin regarding mediation items to do list (.2); review two versions of mediation stipulation and correspondence regarding same (.4); attend Hogan Lovells team call regarding same (.4)
08/25/25	Edward Joseph McNeilly	HLUS	1,295.00	2.70	3,496.50	Revise, finalize and compile notice of revised bar date order and exhibits (1.8); emails with R. Itkin regarding initial debtor interview preparation and bar date order (.1); telephone conference with S. Golden regarding response to K. Mattson motion to amend preservation order (.4); review mediation stipulation (.4)
08/25/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Research and correspondence with M. Nishikawa regarding 3557 Golf View Terrace stay relief violation
08/26/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Attend meeting with O. Katz regarding mediation with Socotra
08/26/25	Edward Joseph McNeilly	HLUS	1,295.00	2.10	2,719.50	Prepare for removal motion hearing (.8); telephone conference with E. Brady and R. Itkin regarding bar date hearing (.6); review E. Brady email regarding bar date order (.1); finalize and revise bar date order (.6)

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/27/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Prepare correspondence to Dovel Luner regarding Socotra case background (.9); review Judge Novack opinion (.4)
08/27/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Work on dDiscovery
08/28/25	Rick Wynne	HLUS	1,975.00	2.90	5,727.50	Prepare correspondence regarding mediation (.2); review materials turned over by Morrison Foerster (1.2); review Socotra deposition transcript of A. Sheik (1.5)
08/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Revise protective order so that it applies also in KS Mattson Partners chapter 11 case
Subtotal				66.90	108,083.50	

B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Edward Joseph McNeilly	HLUS	1,295.00	1.50	1,942.50	Work on schedules (.2); email with H. Davidson regarding schedules (.1); review documents regarding schedules (.9); emails regarding schedules (.3)
08/02/25	Edward Joseph McNeilly	HLUS	1,295.00	2.00	2,590.00	Review and comment on schedules (.7); review and comment on SOFAs (.7); draft global notes (.6)
08/03/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Draft global notes
08/04/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend internal coordination call regarding automatic stay motions, schedules and statements and related issues
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Emails with Hogan Lovells team regarding schedules and statements (.1); email

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
						with U.S. Trustee regarding committee appointment (.1); attend videoconference with Stapleton regarding statement and schedules (1.0); emails regarding initial debtor interview (.1)
08/05/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with E. McNeilly regarding schedules and statements
08/05/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Prepare correspondence regarding schedules and property questions
08/05/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review schedules
08/06/25	Erin Brady	HLUS	1,570.00	3.30	5,181.00	Attend conference call regarding statements and schedules (2.3); analyze workstreams, strategies and timelines in conjunction with plan process (1.0)
08/06/25	Edward Joseph McNeilly	HLUS	1,295.00	7.20	9,324.00	Review and revise statements and schedules (4.0); revise statements (.8); call with Stapleton team, R. Itkin and E. Brady regarding schedules (2.2); emails regarding lien searches for schedules and statements (.2)
08/07/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Telephone conference with E. McNeilly regarding schedules and statement of financial affairs issues (.2); review CRO letter to investors (.1)
08/07/25	Edward Joseph McNeilly	HLUS	1,295.00	6.80	8,806.00	Review and revise schedules and statements (4.0); attend meeting with E. Brady, T. Schwartz, D. Ullo and I. Beal regarding key workstreams (.6); revise schedules (.3);

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
						further revise schedules and statements (.5); email with R. Itkin regarding schedules (.1); draft equity securities list (.3); further revise schedules and statements (1.0)
08/08/25	Erin Brady	HLUS	1,570.00	2.80	4,396.00	Review draft notes for schedules and statements (1.4); review statements and schedules (1.4)
08/08/25	Edward Joseph McNeilly	HLUS	1,295.00	10.70	13,856.50	Revise global notes (.6); revise schedules and statements (1.3); attend bi-weekly call with Stapleton and Hogan Lovells teams regarding schedules and statements, DIP and real estate issues (1.0); telephone conference with R. Itkin regarding schedules and statements (.2); telephone conferences with Q. Brown regarding schedules and statements (.2); telephone conferences with H. Davidson and C. Garnica (partial) regarding schedules and statements (6); revise and finalize schedules and statements and equity security holders list (6.8)
08/08/25	Kristel Gelera	HLUS	470.00	4.20	1,974.00	File schedules, SOFAs, and list of equity holders (1.2); waiting time for filing of schedules, SOFAs, and list of equity holders (3.0)
08/21/25	Edward Joseph McNeilly	HLUS	1,295.00	3.40	4,403.00	Call with Alex regarding monthly operating report (.4); work on monthly operating report (.8); further revise monthly operating report (.2); email with R. Itkin regarding same (.1); further revise initial debtor

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
						interview (.3); attend videoconference with Hogan Lovells team (.5); calls with R. Itkin regarding monthly operating report (.4); finalize and file monthly operating report (.7)
08/21/25	Kristel Gelera	HLUS	470.00	3.90	1,833.00	File with court July 2025 monthly operating report (.4); waiting time for assistance with filing of July 2025 monthly operating report (3.5)
08/22/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review monthly operating reports
			Subtotal	50.80	61,613.00	

B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Address DIP related issues on Stapleton coordination call (.3); conference call with M. Bergthold, A. Kaczmariski and T. Schwartz regarding DIP budget (1.0); analyze issues for DIP hearing (1.1)
08/01/25	Todd Schwartz	HLUS	1,925.00	0.80	1,540.00	Correspond with D. Ullo regarding Socotra comments on proposed DIP order (.5); review correspondence regarding same (.3)
08/01/25	Edward Joseph McNeilly	HLUS	1,295.00	2.00	2,590.00	Attend videoconference with Hogan Lovells and Stapleton teams regarding DIP and sale issues (1.0); telephone conference with E. Brady regarding stay relief (.5); email with A. Anderson regarding stay relief (.1); emails regarding stay relief documents and equity (.4)

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/03/25	Todd Schwartz	HLUS	1,925.00	1.20	2,310.00	Correspond with V. Rubinstein regarding comments to DIP order (.1); review and analyze issues regarding same (1.0); correspond with D. Ullo regarding same (.1)
08/03/25	Danielle Ullo	HLUS	1,035.00	1.30	1,345.50	Review Socotra comments to Serene DIP order (.5); review Serene limited markup to Serene DIP order (.5); exchange correspondence with T. Schwartz and Serene counsel regarding same (.3)
08/04/25	Todd Schwartz	HLUS	1,925.00	3.00	5,775.00	Correspond with D. Ullo regarding notice of revised DIP interim order and notice of appearance (.5); prepare for DIP motion hearing (2.5)
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Attend videoconference with Hogan Lovells team regarding DIP and property issues
08/04/25	Danielle Ullo	HLUS	1,035.00	2.70	2,794.50	Negotiate revised interim DIP order with Serene and Socotra counsel (1.0); exchange correspondence regarding budget for Socotra cash collateral stipulation (.3); exchange correspondence with Stapleton regarding property level budget (.4); prepare notice of revised interim DIP order, revised interim DIP order, and redline of revised interim DIP order for filing (.5); finalize and coordinate filing of revised Interim DIP order (.5)
08/04/25	Tracy Southwell	HLUS	655.00	0.30	196.50	Assist with preparing notice of revised DIP order filing

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Date	Name	LLP	Rate	Hours	Amount	Narrative
08/05/25	Todd Schwartz	HLUS	1,925.00	6.10	11,742.50	Attend DIP motion hearing (.4); prepare for same (4.5); conference with V. Rubinstein, L. Jurich, E. Brady and D. Ullo regarding DIP interim order (.4); correspond with D. Ullo regarding filed DIP order, revised term sheet, transcript from LeFever Mattson case and DIP budget (.4); correspond with D. Ullo regarding Socotra comments on proposed DIP order (.4)
08/06/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review transcript of 8/5 hearing (.2); confer with T. Schwartz regarding DIP order (.1); prepare email to D. Ullo regarding same (.1)
08/06/25	Todd Schwartz	HLUS	1,925.00	0.20	385.00	Correspond with D. Ullo regarding DIP interim order
08/06/25	Danielle Ullo	HLUS	1,035.00	2.10	2,173.50	Exchange correspondence regarding entry of interim DIP order (.3); revise various broker declarations (1.2); revise interested parties list (.3); exchange correspondence regarding same (.3)
08/07/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Correspond with V. Rubinstein regarding DIP order
08/07/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Prepare, finalize and file Socotra cash collateral stipulation regarding insurance premiums (.6); exchange correspondence regarding interim DIP order and draw down notice (.2)
08/07/25	Tracy Southwell	HLUS	655.00	0.50	327.50	Review DIP order for calendar events (.4); email with D. Ullo regarding dates needed (.1)

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08/08/25	Todd Schwartz	HLUS	1,925.00	1.60	3,080.00	Attend bi-weekly check-in call (1.0); correspond with A. Kaczmariski, M. Bergthold, D. Kieffer and D. Marcoux regarding bank account and draw down request (.2); correspond with D. Ullo regarding DIP interim draw down notice (.1); review and analyze issues regarding DIP interim draw down notice (.3)
08/08/25	Danielle Ullo	HLUS	1,035.00	3.40	3,519.00	Prepare draw down notice (.8); correspondence with Hogan Lovells and Stapleton teams regarding same (.6); revise draw down notice per R. Itkin instruction (.4); coordinate execution and delivery of same (.3); correspondence with Serene and Stapleton team regarding title reports (.3); call with D. Marcoux at Stapleton regarding property level budget for Socotra cash collateral stipulation (1.0)
08/09/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Correspondences regarding DIP financing and review bankruptcy rules regarding notice period
08/11/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with D. Kieffer regarding various budget issues (.2); confer with T. Schwartz regarding budget (.1)
08/11/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Review DIP budget
08/11/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Email correspondences with R. Itkin regarding DIP budget
08/12/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Exchange correspondence regarding DIP variance and review interim DIP

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						order regarding same (.7); correspondence with Stapleton regarding required DIP reporting (.3)
08/14/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Correspondence with counsel to DIP lender regarding property title reports
08/19/25	Todd Schwartz	HLUS	1,925.00	1.20	2,310.00	Correspond with D. Ullo regarding DIP order (.4); correspond with M. Schernecke and D. Ullo regarding same (.3); review and analyze issues regarding same (.5)
08/19/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Correspondence with counsel to DIP lender regarding property title
08/20/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Prepare correspondence to M. Fallon regarding segregation of cash collateral and proof of insurance (.2); prepare follow up correspondence to M. Fallon regarding segregation of cash collateral and proof of insurance (.1)
08/20/25	Danielle Ullo	HLUS	1,035.00	1.60	1,656.00	Review and provide comments to DIP final order
08/21/25	Danielle Ullo	HLUS	1,035.00	3.50	3,622.50	Review and comment on final DIP order (.6); review and comment on draft DIP credit agreement (2.1); review Socotra property level budget for cash collateral stipulation (.8)
08/22/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Review and provide comments to property level budget for Socotra cash collateral stipulation
08/25/25	Danielle Ullo	HLUS	1,035.00	1.30	1,345.50	Exchange correspondence regarding DIP credit agreement (.3); review

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Socotra budget and exchange correspondence regarding same (.5); exchange correspondence regarding DIP credit agreement (.5)
08/26/25	Todd Schwartz	HLUS	1,925.00	1.30	2,502.50	Correspond with M. Scherneck and D. Ullo regarding comments to DIP credit agreement (.5); review and analyze issues regarding DIP credit agreement (.8)
08/26/25	Danielle Ullo	HLUS	1,035.00	3.30	3,415.50	Incorporate comments from M. Scherneck and T. Schwartz into DIP credit agreement (3.0); correspondence with DIP lender regarding same (.3)
08/27/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Analyze issues regarding DIP availability, ability to push DIP hearing under contract and other issues (.4); prepare email regarding committee and DIP (.1); confer with T. Schwartz and D. Ullo regarding KS Mattson Partners insurance issue and Socotra (.2)
08/27/25	Rick Wynne	HLUS	1,975.00	0.10	197.50	Review Serene DIP argument issues
08/27/25	Todd Schwartz	HLUS	1,925.00	0.80	1,540.00	Conference with working group regarding DIP (.2); correspond with D. Ullo regarding DIP (.1); correspond with E. Brady regarding insurance (.1); telephone conference with D. Ullo regarding DIP comments (.2); review and analyze issues regarding DIP comments (.4)
08/27/25	Danielle Ullo	HLUS	1,035.00	5.00	5,175.00	Call with DIP lender regarding comments to DIP credit agreement

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(1.0); follow up with Hogan Lovells team regarding open DIP items and comments (1.2); coordinate call with committee counsel regarding DIP (.4); exchange correspondence with real estate team regarding grant deeds of trust (.8); correspondence with DIP lender regarding further comments to DIP credit agreement (.6); internal correspondences regarding DIP final order (.6); correspondence with Stapleton regarding insurance obligations under DIP credit agreement (.4)
08/28/25	Danielle Ullo	HLUS	1,035.00	1.70	1,759.50	Correspondence with chambers, LeFever Mattson committee counsel, and DIP lender regarding hearing continuance (.5); prepare stipulation to continue final DIP hearing (.8); prepare order (.6)
08/29/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Telephone conference with T. Schwartz, D. Ullo and creditors committee counsel regarding DIP issues raised by creditors committee
08/29/25	Todd Schwartz	HLUS	1,925.00	0.70	1,347.50	Conference with working group regarding DIP matters (.6); correspond with D. Ullo regarding stipulation to continue hearing on final DIP order (.1)
08/29/25	Danielle Ullo	HLUS	1,035.00	3.40	3,519.00	Review and incorporate Stapleton comments to DIP credit agreement (1.0); revise stipulation to

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						extend objection deadline per comments from committee counsel (.6); finalize and file stipulation and order to continue hearing and extend committee objection deadline (1.0); participate in videoconference with committee counsel regarding DIP issues (.8)
			Subtotal	59.50	80,720.00	

B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/13/25	Jeff Uffner	HLUS	1,975.00	1.30	2,567.50	Call and correspondence with R. Wynne regarding review of emails and documentation with respect to proposed restructuring
08/13/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Call and correspondence with J. Uffner regarding tax issues and case background
08/14/25	Jeff Uffner	HLUS	1,975.00	1.80	3,555.00	Call with FTI and DSI regarding tax considerations and analysis (.5); review drafts of plan of reorganization, disclosure statement and related documentation regarding history, status and issues with respect to bankruptcy case (1.1); emails with C. Koo regarding status tax review (.2)
08/14/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Prepare correspondence regarding tax (.2); attend call with PwC, FTI and J. Uffner regarding tax (.4)
08/15/25	Jeff Uffner	HLUS	1,975.00	2.40	4,740.00	Telephone conference with C. Koo regarding transactional issues (.5);

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
						receipt and review of initial drop box materials, including 2023 tax returns (.8); emails with A. Raisdana regarding financial and tax information reflected on tax returns (.6); emails with S. Cuff regarding drop box information (.2); further review of tax returns (.3)
08/15/25	Caroline Koo	HLUS	1,115.00	3.60	4,014.00	Onboarding call with J. Uffner (.5); review and attend to client documents and materials (3.1)
08/18/25	Jeff Uffner	HLUS	1,975.00	2.80	5,530.00	General review and analysis of drop box materials provided by DSI (.8); review 2024 property sales and related tax returns and tax calculations (.6); collate materials to produce partnership structures and investor lists (1.2); review emails from FTI and A. Raisdana regarding open items and calculations (.2)
08/18/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review tax materials regarding Bishop Pine and Woodland Oak
08/19/25	Jeff Uffner	HLUS	1,975.00	1.20	2,370.00	Review additional tax returns downloaded into Dropbox (.4); review tax information sent by A. Raisdana (.3); review S. Cuff schedule of partnerships, properties and claims to determine potential course of action with respect to potential tax liabilities (.5)
08/19/25	Caroline Koo	HLUS	1,115.00	1.70	1,895.50	Review client documents and materials
08/20/25	Jeff Uffner	HLUS	1,975.00	1.20	2,370.00	Follow up call with DSIC,

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
						FTI and Hogan Lovells regarding analysis of tax situation (.6); review additional tax returns and data supplied by A. Raisdana (.4); discussion with C. Koo regarding potential access to tax authorities (.2)
08/20/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review tax documents (.4); attend meeting regarding taxes with FTI, DSI and LeFever Mattson (.5)
08/20/25	Caroline Koo	HLUS	1,115.00	3.30	3,679.50	Participate in call with FTI, DSI and LeFever Mattson regarding tax issues (1.2); review documents and materials regarding same (2.1)
08/21/25	Caroline Koo	HLUS	1,115.00	0.20	223.00	Review documents and materials from LeFever Mattson and correspondence regarding same
08/22/25	Jeff Uffner	HLUS	1,975.00	0.80	1,580.00	Review draft tax returns and tax return summaries from FTI
08/22/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review tax memoranda, and prepare correspondence to J. Uffner regarding same
08/25/25	Caroline Koo	HLUS	1,115.00	0.20	223.00	Review emails regarding documents and materials
08/26/25	Jeff Uffner	HLUS	1,975.00	0.90	1,777.50	Call with R. Wynne and C. Koo regarding proposed tax filings for LeFever Mattson entity (4.); review indictment and court filings regarding history of tax filing issue (.5)
08/26/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Call and correspondence with tax group regarding review of K-1 discharge and strategy, tax note and revisions (.8); prepare

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
						correspondence to Pachulski and Keller Benvenuti regarding tax issues (.1)
08/26/25	Caroline Koo	HLUS	1,115.00	1.00	1,115.00	Call with R. Wynne and J. Uffner regarding next steps, documents and materials, follow up call with J. Uffner regarding same, and review and provide comments to Schedule K-1 disclosure, Form 8275, and return approach narrative
08/29/25	Jeff Uffner	HLUS	1,975.00	0.40	790.00	Review emails regarding filing tax returns for LeFever Mattson entities
				Subtotal	26.40	43,540.00

B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/01/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Address claims bar date on Stapleton coordination call (.1); review email from J. Day regarding claim form (.1); confer with E. McNeilly regarding same (.1); prepare email to R. Itkin regarding investor claim meeting (.1)
08/01/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Telephone conference with E. McNeilly regarding bar date motion issues
08/01/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Email with U.S. Trustee regarding bar date motion
08/04/25	Erin Brady	HLUS	1,570.00	3.70	5,809.00	Revise bar date motion (3.5); confer with R. Itkin regarding same (.2)
08/04/25	Megan Nishikawa	HLUS	1,630.00	4.30	7,009.00	Review proofs of claim
08/04/25	Rick Wynne	HLUS	1,975.00	0.10	197.50	Telephone conference with E. McNeilly regarding bar date motion

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B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	2.60	3,367.00	Call with U.S. Trustee regarding bar date motion and committee (.7); email regarding U.S. Trustee call (.1); revise bar date motion, form and documents (.4); review motion to shorten (.5); emails regarding motion to shorten (.1); revise bar date motion (.8)
08/05/25	Megan Nishikawa	HLUS	1,630.00	5.20	8,476.00	Further review proof of claim for purposes of identifying improper comingling
08/05/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review bar date materials
08/05/25	Edward Joseph McNeilly	HLUS	1,295.00	5.90	7,640.50	Review and revise bar date motion (1.2); work on motion to shorten (.3); revise motion to shorten (.3); further revise bar date motion and motion to shorten (2.8); finalize bar date motion for filing (1.3)
08/07/25	Danielle Ullo	HLUS	1,035.00	3.90	4,036.50	Revise order to shorten time on bar date motion per court's instructions and coordinate filing of same (.4); revise motion to shorten time on motion to extend time to remove actions (.3); revise McNeilly declaration regarding same (.3); revise motion to extend time to remove actions per R. Itkin comments (.5); revise Itkin declaration regarding same (.3); revise motion to extend time to remove actions per E. Brady comments (.4); revise Itkin declaration regarding same (.3); finalize and coordinate filing of motion to extend deadline to remove actions and related

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B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						documents (1.2)
08/08/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Attend meeting with R. Itkin and Hogan Lovells team regarding investor claims analysis
08/11/25	Leen Bukai	HLUS	760.00	0.30	228.00	Search for proof of claims filed by M. Lietzan
08/12/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review KS Mattson Partners and LeFever Mattson claim documents
08/13/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with B. Wilson, R. Wynne and D. Grassgreen regarding town hall
08/13/25	Megan Nishikawa	HLUS	1,630.00	1.30	2,119.00	Review proofs of claim
08/14/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Emails regarding bar date motion
08/15/25	Megan Nishikawa	HLUS	1,630.00	2.30	3,749.00	Review proofs of claim and communicate with client regarding call with J. Chen
08/20/25	Erin Brady	HLUS	1,570.00	5.10	8,007.00	Attend post-hearing calls with R. Itkin, R. Wynne and E. McNeilly (.3) prepare questionnaire to accompany bar date notice (4.5); correspond with R. Itkin regarding same (.3)
08/22/25	Erin Brady	HLUS	1,570.00	5.00	7,850.00	Revise bar date notice (3.5); review and revise bar date order (1.3); confer with E. McNeilly regarding same (.2)
08/22/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Further review and revise bar date notice and forms, including creditor questionnaire
08/23/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review revised claims bar date filings and redlines (.2); provide comments to same (.2)
08/25/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with E. McNeilly regarding filing revised bar

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B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						date documents (.1); confer with E. McNeilly regarding updating property list on bar date questionnaire (.1)
08/25/25	Megan Nishikawa	HLUS	1,630.00	1.90	3,097.00	Review proofs of claim
08/25/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review changes to bar date documents
08/26/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Review revised bar date order and accompanying papers (.2); comment on same (.1); confer with E. McNeilly regarding adding property to questionnaire (.3)
08/27/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Prepare email to B. Wilson and D. Grassgreen regarding town hall
08/29/25	Isolte Beal	HLUS	760.00	0.20	152.00	Attend to proofs of claim
Subtotal				47.30	71,477.50	

B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
08/03/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Telephone conference with R. Wynne regarding plan
08/04/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Call with D. Grassgreen regarding plan issues, bar date, and mediation with Socotra
08/04/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Telephone conference with R. Wynne regarding mediation and plan
08/04/25	Danielle Ullo	HLUS	1,035.00	1.90	1,966.50	Draft motion and order to shorten time on bar date notice (.8); draft E. McNeilly declaration in support of motion and order to shorten time on bar date notice (.4); revise documents related to bar date motion per E.

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						McNeilly comments (.7)
08/05/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with R. Wynne and R. Itkin regarding plan and related issues
08/05/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with E. McNeilly regarding plan issues
08/07/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Attend conference call with Keller Benvenuti, PwC and Pachulski regarding recovery analysis for substantive consolidation vs. non-substantive consolidation scenarios (.7); review and comment on plan term sheet (.5)
08/10/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Review disclosure statement
08/12/25	Erin Brady	HLUS	1,570.00	2.50	3,925.00	Participate in conference call with LeFever Mattson committee, LeFever Mattson debtor, R. Itkin, R. Wynne and E. McNeilly regarding plan and disclosures statement (1.3); review draft plan term sheet (.5); review KS Mattson Partners claims rationale (.2); conference call with S. Golden and E. McNeilly regarding solicitation procedures and mediation motion (.5)
08/12/25	Rick Wynne	HLUS	1,975.00	1.90	3,752.50	Review term sheet for plan (.4); review plan and disclosure statement (1.5)
08/12/25	Edward Joseph McNeilly	HLUS	1,295.00	2.30	2,978.50	Review mediation provisions (.5); telephone conference with S. Golden regarding plan mediation issues (.5); attend call regarding plan (1.3)
08/13/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Call with I. Beal regarding petition (.2); emails with I.

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Beal regarding petition (.2); call with H. Davidson regarding initial debtor interview documents (.2)
08/15/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Prepare comments to disclosure statement
08/15/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review Keller Benvenutti comments to disclosure statement
08/15/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Correspond with S. Golden regarding disclosure statement
08/16/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Review and comment on disclosure statement
08/17/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Revise initial debtor interview (.5); review petition packet (.5)
08/18/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review E. McNeilly edits to disclosure statement on top of Keller Benvenutti edits to same
08/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with E. Brady regarding petition, schedules and bar date motion
08/19/25	Erin Brady	HLUS	1,570.00	4.80	7,536.00	Review and comment on proposed petition package for Perris, Treehouse and Specialty Properties, including analysis of various legal issues (1.2); revise draft corporate resolutions (2.5); analyze issues regarding bankruptcy filing authority (.5); confer with R. Wynne regarding same (.3); confer with R. Itkin regarding petition packages and rationale for filing (.3)
08/19/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Prepare edits to disclosure statement
08/19/25	Edward Joseph	HLUS	1,295.00	5.20	6,734.00	Research regarding

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
	McNeilly					petitions for a general partnership (1.0); further work on petitions (1.9); telephone conference with J. Rosell regarding petitions (.2); work on petitions (2.0); call with I. Beal regarding petition (.1)
08/20/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with J. Rowell regarding plan issues (.4); confer with R. Wynne regarding same (.1)
08/22/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review Keller Benvenutti plan and disclosure statement comments
08/26/25	Erin Brady	HLUS	1,570.00	1.90	2,983.00	Prepare for and attend conference call with D. Taylor, T. Ruff, D. Grassgreen, R. Wynne, S. Golden, and E. McNeilly regarding various plan and disclosure related work streams and issues (1.3); conference calls with PwC team regarding reconciliation of KS Mattson Partners claims (.6)
08/27/25	Erin Brady	HLUS	1,570.00	1.30	2,041.00	Revise disclosure statement
08/27/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review plan timeline (.2); review correspondence regarding plan and hearing (.3)
08/29/25	Erin Brady	HLUS	1,570.00	1.70	2,669.00	Attend conference call with S. Golden, M. Berghold, Q. Brown, D. Grassgreen, A. Kaczmariski, D. Kieffer, E. McNeilly, J. Rosell, D. Ullo and R. Wynne regarding properties and plan (1.2); prepare email to E. McNeilly regarding treatment of penalties under bankruptcy code (.1); confer with E.

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						McNeilly regarding plan and related issues (.4)
08/29/25	Rick Wynne	HLUS	1,975.00	2.00	3,950.00	Attend meeting with R. Itkin and Stapleton regarding plan and substantive consolidation, K. Mattson property issues, tenant in common issues and taxes (1.0); attend meeting with R. Itkin and Stapleton regarding full agenda of to do items, including plan, substantive consolidation, property sales, bar date, and tenant in common issues (1.0)
			Subtotal	39.00	59,761.50	
Total Professional Services				900.40		USD 1,185,748.00
Less 15% Discount						(177,862.20)
Total Professional Services Charged						USD 1,007,885.80

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Summary

Timekeeper Name	Hours	Rate	Fees
Dennis H. Tracey	11.80	1,990.00	23,482.00
Rick Wynne	80.80	1,975.00	159,580.00
Jeff Uffner	12.80	1,975.00	25,280.00
Todd Schwartz	33.60	1,925.00	64,680.00
Megan Nishikawa	69.50	1,630.00	113,285.00
Erin Brady	131.10	1,570.00	205,827.00
Loryn Dunn Arkow	59.30	1,515.00	89,839.50
Ann Chungsun Kim	19.00	1,475.00	28,025.00
Tom Boer	0.80	1,400.00	1,120.00
Edward Joseph McNeilly	154.30	1,295.00	199,818.50
Caroline Koo	10.00	1,115.00	11,150.00
Danielle Ullo	134.00	1,035.00	138,690.00
Katie M. Chacho	29.70	855.00	25,393.50
Isolte Beal	44.70	760.00	33,972.00
Leen Bukai	15.40	760.00	11,704.00
Tracy Southwell	54.30	655.00	35,566.50
Kristel Gelera	32.50	470.00	15,275.00
Henaa Salehi	6.80	450.00	3,060.00
Total Professional Services	900.40		USD 1,185,748.00
Less 15% Discount			(177,862.20)
Total Professional Services Charged			USD 1,007,885.80

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Summary

Task	Task Code Description	Hours	Fees
01	Substantive Consolidation	23.50	33,343.00
02	Criminal Case	39.20	62,111.50
03	Hearing	23.20	34,828.50
B110	Case Administration	140.20	127,866.00
B120	Asset Analysis/Recovery & Real Estate	264.80	357,597.00
B130	Asset Disposition	43.50	39,164.50
B140	Relief from Stay/Adequate Protection Proceedings	15.90	18,378.50
B150	Meetings of and Communications with Creditors	19.20	34,095.00
B160	Fee/Employment Applications	41.00	53,168.50
B190	Other Contested Matters (excluding assumption/rejection moti	66.90	108,083.50
B210	Business Operations	50.80	61,613.00
B230	Financing/Cash Collections	59.50	80,720.00
B240	Tax Issues	26.40	43,540.00
B310	Claims Administration and Objections	47.30	71,477.50
B320	Plan and Disclosure Statement (including Business Plan)	39.00	59,761.50
Total Professional Services		900.40	USD 1,185,748.00

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Disbursement and Charges

ESCRIBERS, LLC - Request for July 25, 2025 Hearing transcript	62.35
BANK OF AMERICA - KIM ANN CHUNGSUN 07/15/25-07/15/25	40.00
BANK OF AMERICA - KIM ANN CHUNGSUN LAX SFO LAX 07/30/25-07/31/25	288.97
ESCRIBERS, LLC - transcript of 8/5/25 hearing	50.75
ESCRIBERS, LLC - hearing transcript	66.70
HL TECH LEGAL TECHNOLOGY & CONSULTING LLC - Services for the month of July 2025	4,080.70
Computer Research - Pacer	138.80
Computer Research - Westlaw	1,389.83
On-Line Services - Lexis	248.59
Word Processing	131.25
eDiscovery Data Storage Fees - Internal	1,522.64
Total for Other Charges	<u>USD 8,020.58</u>

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Outstanding Invoices

Paid-in-full invoices and corresponding payments are not shown below.
This summary reflects payments received through November 21, 2025
This statement includes the current invoice.

Invoice No.	Date	Fees	Other Charges	Total	Payments	Date Last Payment	Balance USD
19600011855	11/21/25	1,007,885.80	8,020.58	1,015,906.38	0.00		1,015,906.38
19600011730	11/21/25	1,537,413.70	4,101.65	1,541,515.35	0.00		1,541,515.35
Outstanding Invoices:							2,557,421.73



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KS Mattson Partners, LP
16350 Ventura Boulevard
Suite D-509
Encino, CA 91436
United States

Attention: Robbin Itkin, Independent Manager

Date

November 21, 2025

Invoice No

19600011856

Our ref

795070.000001

Partner

Rick Wynne

Email

rick.wynne@hoganlovells.com

Fed ID

53-0084704

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Summary

Professional Services

Less 15% Discount

Total Professional Services

Total Disbursements and Charges

Amount

USD

1,229,368.50

(184,405.28)

1,044,963.22

6,394.53

Subtotal

1,051,357.75

Total Due

1,051,357.75

Payment Details

Electronic payments should be sent to
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San Francisco, CA 94104

Account: Hogan Lovells US LLP – Operating Account
SWIFT code: WFBUS6S

Account No: 2000010688096

ABA #121000248 For Wire Transfers Only

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Hogan Lovells US LLP
P.O. Box 715890
Philadelphia, PA 19171-
5890

For US based clients, invoices can be paid online
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Please contact
ebillexpresshelp@hoganlovells.com
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Date	November 21, 2025
Invoice No	19600011856
Our Ref	795070.000001

Period September 30, 2025

Detail by jurisdiction	Professional Services	Disbursements & Charges	Total USD
Hogan Lovells US LLP	1,044,963.22	6,394.53	1,051,357.75
Total	1,044,963.22	6,394.53	1,051,357.75

Disbursements & charges	Charges USD
Court and Government Fees	179.80
Lit Support fees payable by HLUS LLP to HLTech Legal Tech LLC	4,256.80
Courier and Shipping Costs	237.84
Search Fees	146.00
Document Production	43.75
eDiscovery Data Storage Fees - Internal	1,530.34
Total	6,394.53

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Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Professional Services

01 - Substantive Consolidation

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/03/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Exchange correspondence regarding recovery analysis
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Emails with J Uffner regarding substantive consolidation motion
				Subtotal	0.60	699.00

02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Ann Chungsun Kim	HLUS	1,475.00	0.30	442.50	Review and analyze criminal filings in USA v. Mattson, and correspondence with client and Hogan Lovells team regarding same
09/03/25	Ann Chungsun Kim	HLUS	1,475.00	0.60	885.00	Analyze and assess issues regarding forfeiture and property sale, and criminal case impact, and correspondence with Hogan Lovells team regarding same (.5); correspondence with government regarding forfeiture issue meeting (.1)
09/03/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with A. Kim regarding various Mattson criminal issues
09/04/25	Ann Chungsun Kim	HLUS	1,475.00	0.80	1,180.00	Telephone conference with E. Brady to prepare for meeting with government
09/04/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Conference call with A. Kim regarding Mattson issues and call with government
09/05/25	Ann Chungsun Kim	HLUS	1,475.00	1.10	1,622.50	Telephone conference with Department of Justice regarding forfeiture issues

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/05/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Conference call with N. Bhagat, D. Countryman and A. Kim (.5); confer with K. Mattson bankruptcy counsel (.3); confer with S. Golden regarding same (.2)
09/08/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Review and analyze objection to Mattson preservation motion
09/08/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review and revise reply to K. Mattson motion to sell assets (.6); review correspondence regarding K. Mattson issues (.2)
09/09/25	Ann Chungsun Kim	HLUS	1,475.00	2.40	3,540.00	Review and analyze documents and pleadings filed in K. Mattson criminal case in furtherance of property claims issues
09/09/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Prepare correspondence regarding opposition to K. Mattson motion (.3); review and revise reply to K. Mattson motion to sell properties for criminal defense (.8)
09/10/25	Ann Chungsun Kim	HLUS	1,475.00	0.80	1,180.00	Attend meeting with E. Brady regarding criminal investigation and property issues (.3); draft statement regarding criminal authority's position regarding distribution of restitution order (.5)
09/10/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Confer with A. Kim regarding various criminal issues
09/12/25	Ann Chungsun Kim	HLUS	1,475.00	0.40	590.00	Review and analyze documents and communications regarding turnover motion and assess issues regarding same

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/15/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Conference with A. Kim regarding various issues to discuss with attorney general's office (.1); prepare summary of attorney general position (.6)
09/16/25	Ann Chungsun Kim	HLUS	1,475.00	0.70	1,032.50	Review and analyze revised statement regarding forfeiture issues, and internal and government correspondence regarding same
09/16/25	Erin Brady	HLUS	1,570.00	1.40	2,198.00	Analyze government coordination issues and draft summary of same (1.2); confer with A. Kim regarding same (.2)
09/17/25	Ann Chungsun Kim	HLUS	1,475.00	1.70	2,507.50	Attend pre-meeting with Hogan Lovells team to discuss government meeting strategy, and attend meeting with government regarding forfeiture issues (1.3); correspondence to R. Itkin regarding government request for information (.2); draft email to government regarding information requested (.2)
09/17/25	Erin Brady	HLUS	1,570.00	1.80	2,826.00	Confer with A. Kim and R. Wynne regarding Assistant U.S. Attorney meeting (.3); attend meeting with the Assistant U.S. Attorney regarding property (1.0); confer with R. Wynne regarding Assistant U.S. Attorney meeting (.4); prepare emails to R. Pollock regarding meeting at courthouse (.1)
09/17/25	Rick Wynne	HLUS	1,975.00	1.70	3,357.50	Telephone conference with E. Brady regarding Assistant U.S. Attorney forfeiture follow up (.2);

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						attend meeting with A. Kim and E. Brady regarding Assistant U.S. Attorney meeting on forfeiture properties (.3); attend meeting with Department of Justice, Assistant U.S. Attorney, N. Bhagat and D. Countryman (.9); review bill of particulars issues with forfeiture (.3)
09/18/25	Ann Chungsun Kim	HLUS	1,475.00	1.10	1,622.50	Review and analyze documents provided to government, calls with government regarding same, and internal correspondence regarding same
09/19/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Attend meeting with R. Pollock regarding various Mattson issues
09/25/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Confer with D. Silvera regarding Mattson issues (.2); prepare email to D. Grassgreen, D. Silvera, E. McNeilly and R. Wynne regarding same (.2); attend meeting with U.S. Attorney's Office and A. Kim regarding various Mattson issues (.5)
09/26/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Analyze issues regarding trustee appointment (.5); prepare email to Pachulski team regarding same and readout of meeting with Office of the U.S. Attorney (.3)
09/29/25	Ann Chungsun Kim	HLUS	1,475.00	0.50	737.50	Review correspondence regarding hearing in criminal matter, and review transcript from hearing on K. Mattson's motion regarding relief from preservation order to assess potential issues in

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02 - Criminal Case

Date	Name	LLP	Rate	Hours	Amount	Narrative
						criminal case
09/29/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review transcript regarding K. Mattson hearing for new motion
09/30/25	Ann Chungsun Kim	HLUS	1,475.00	1.80	2,655.00	Review motion to modify bond and call with E. Brady regarding same (1.1); emails with government regarding criminal filing (.1); review government's opposition, and internal correspondence regarding same (.6)
09/30/25	Erin Brady	HLUS	1,570.00	1.70	2,669.00	Confer with A. Kim regarding criminal filing (.4); review criminal filing (.2); prepare email to M. Nishikawa regarding criminal filing (.1); confer with S. Golden regarding Mattson issues (.7); review and respond to email from U.S. Attorney's Office (.1); conference with A. Kim regarding criminal issues (.2)
Subtotal				26.70	42,339.50	

03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/12/25	Danielle Ullo	HLUS	1,035.00	1.20	1,242.00	Attend LeFever Mattson hearing and prepare summary of same for Hogan Lovells team
09/18/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Prepare for September 19, 2025 hearing
09/18/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Prepare hearing outline and correspondence regarding same (1.2); telephone conference with R. Itkin regarding hearing preparation (.2)

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03 - Hearing

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review and comment on notes for hearing and questions
09/19/25	Erin Brady	HLUS	1,570.00	3.20	5,024.00	Conference call with LeFever Mattson and committee teams to prepare for hearing (.2); prepare for hearing (.5); attend hearing on DIP motion, status conference on plan, Oregon tax payment motion, Mattson conversion motion, Mattson preservation order relief motion and mediation motion (2.5)
09/19/25	Rick Wynne	HLUS	1,975.00	4.50	8,887.50	Attend hearing regarding DIP, plan status conference, mediation motion, including meetings before and after with committee, D. Grassgreen and Keller Benvenuti, and meeting with R.S. Pollock and E. Brady regarding open K. Mattson issues, including him vacating houses, providing information, government seized documents, etc.
			Subtotal	11.00	18,962.50	

B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/01/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Exchange correspondence regarding Northern District of California chapter 11 matters
09/02/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Attend bi-weekly Stapleton coordination call
09/02/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Revise call agenda (.3); attend video conference with Hogan Lovells and Stapleton teams and R.

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B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Itkin regarding key case issues (1.3)
09/02/25	Isolte Beal	HLUS	760.00	0.60	456.00	Attend to checklist and upcoming filings (.6); correspondence with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.3); telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.3)
09/02/25	Tracy Southwell	HLUS	655.00	4.30	2,816.50	Research opinions and orders regarding plan confirmation (1.6); request to research regarding judge's information and cases (.3); review and distribute same (.4); retrieval and organization of proofs of claims (1.0); upload same to NetDocs (.5); review instructions and correspondence regarding bar date service (.3); organize case documents (.1); review calendar (.1)
09/03/25	Isolte Beal	HLUS	760.00	0.40	304.00	Attend to checklist and upcoming filings (.3); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.1)
09/03/25	Tracy Southwell	HLUS	655.00	1.40	917.00	Review docket and order transcripts (.6); research good standing of KS Mattson (.4); prepare order from secretary of state regarding same (.5)
09/04/25	Danielle Ullo	HLUS	1,035.00	0.20	207.00	Exchange correspondence with committee counsel regarding conflicts list

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Date	Name	LLP	Rate	Hours	Amount	Narrative
09/04/25	Isolte Beal	HLUS	760.00	0.70	532.00	Review checklist and upcoming filings (.3); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.4)
09/04/25	Tracy Southwell	HLUS	655.00	2.20	1,441.00	Call to secretary of state regarding status of certificate of service (.5); organize documents in NetDocs (.8); distribution of case documents (.4); obtain ECF report on orders status (.3); email to D. Ullo regarding same (.2)
09/05/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Attend bi-weekly Stapleton call
09/05/25	Tom Boer	HLUS	1,400.00	0.30	420.00	Develop strategy and coordinate preparation of alternative analysis and talking points for Regional Water Quality Control Board outreach
09/05/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Participate in call with Hogan Lovells team regarding case issues
09/05/25	Isolte Beal	HLUS	760.00	1.30	988.00	Attend to checklist and upcoming filings (.5); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2); telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.6)
09/05/25	Henea Salehi	HLUS	450.00	2.60	1,170.00	Prepare PDFs of Douglas Elliman broker motion and declaration, review and revise accordingly, and file same (1.4); prepare PDFs of notice of filing of proposed final DIP order,

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B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
						review and revise accordingly, and file notice (1.2)
09/06/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Exchange correspondence regarding investor emails and upcoming filings
09/08/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend meeting with E. McNeilly, I. Beale and D. Ullo regarding various workstreams
09/08/25	Todd Schwartz	HLUS	1,925.00	0.80	1,540.00	Correspond with working group regarding Socotra debt issues (.2); correspondence with working group regarding DIP order comments (.4); correspondence with working group regarding DIP budget (.2)
09/08/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Attend bi-weekly Hogan Lovells call
09/08/25	Danielle Ullo	HLUS	1,035.00	1.20	1,242.00	Finalize and coordinate upload of broker orders (.7); call with Hogan Lovells team regarding chapter 11 upcoming filings and open items (.5)
09/08/25	Isolte Beal	HLUS	760.00	1.10	836.00	Review and revise checklist and upcoming filings (.5); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.1); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.5)
09/09/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Attend biweekly Stapleton call with Stapleton, Hogan Lovells and R. Itkin
09/09/25	Rick Wynne	HLUS	1,975.00	1.70	3,357.50	Telephone conference with E. Brady regarding K. Mattson house and rent,

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B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Assistant U.S. Attorney hearing, plan and disclosure statement (.5); telephone conference with R. Itkin and E. Brady regarding town hall and creditors committee preparation (.2); attend bi-weekly call with Stapleton and R. Itkin regarding multipart agenda, including (a) DIP and budget, (b) plan and substantive consolidation, (c) K. Mattson issues, (d) property sales, process and timing, (e) brokers process, and (f) tax issues (1.0)
09/09/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Attend check-in call with working group
09/09/25	Tom Boer	HLUS	1,400.00	0.80	1,120.00	Conduct research regarding draft 13267 Order, scope of Water Board's investigation and clean up demand for 49 Natoma Street (.2); exchange correspondence with H. Balfour, ERM regarding same, conflict search, and cost estimate for environmental work (.2); exchange correspondence with E. Suchomel, Geosyntec regarding conflicts, breakdown and scope of cost estimates for environmental work (.4)
09/09/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with Q. Brown regarding secured claims (.1); review call agenda (.2)
09/09/25	Danielle Ullo	HLUS	1,035.00	2.10	2,173.50	Prepare agenda for September 9, 2025 call (.5); attend bi-weekly check-in call with R. Itkin

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						and Stapleton (1.3); exchange correspondence with R. Itkin regarding committee appointment and committee members (.3)
09/09/25	Isolte Beal	HLUS	760.00	1.80	1,368.00	Correspondence with Hogan Lovells team regarding case developments and upcoming filings (.3); attend to checklist and upcoming filings (.5); telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.0)
09/10/25	Danielle Ullo	HLUS	1,035.00	1.50	1,552.50	Review and comment on motion to extend lease deadline and supporting declaration
09/10/25	Isolte Beal	HLUS	760.00	0.60	456.00	Correspondence with Hogan Lovells team regarding case developments and upcoming filings (.1); review and analyze checklist and upcoming filings (.5)
09/10/25	Leen Bukai	HLUS	760.00	0.40	304.00	Review proofs of claim for support regarding Socotra loans in preparation for mediation statement draft
09/10/25	Tracy Southwell	HLUS	655.00	1.00	655.00	Update tracking chart regarding investor communications about proofs of claims
09/11/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Confer with R. Itkin regarding various issues (.2); confer with E. McNeilly regarding various issues (.3); prepare email to E. McNeilly regarding status report (.1); prepare email to R. Auerbach

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B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding Mattson conversion motion (.1)
09/11/25	Todd Schwartz	HLUS	1,925.00	0.80	1,540.00	Attend working group meeting (.5); review and revise issues regarding DIP budget (.3)
09/11/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Review correspondence with investors
09/11/25	Isolte Beal	HLUS	760.00	1.40	1,064.00	Attend to checklist and upcoming filings (.4); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.4); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.6)
09/12/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend bi-weekly meeting with Stapleton and R. Itkin
09/12/25	Todd Schwartz	HLUS	1,925.00	1.50	2,887.50	Telephone conference with working group regarding status update (1.0); correspondence with working group regarding DIP motion (.5)
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Work on script
09/12/25	Isolte Beal	HLUS	760.00	2.00	1,520.00	Review and analyze checklist and upcoming filings (.8); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.1); telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.1)
09/14/25	Tom Boer	HLUS	1,400.00	0.20	280.00	Prepare correspondence to H. Balfour, ERM regarding

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B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
						request for quote on environmental investigation and remedial options for 49 Natoma property in Folsom, and information about KMCP
09/15/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend meeting regarding plan and status, and Socotra mediation brief issues
09/15/25	Isolte Beal	HLUS	760.00	0.70	532.00	Attend to checklist and upcoming filings (.4); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.3)
09/15/25	Leen Bukai	HLUS	760.00	0.70	532.00	Search and identify section 542 of Colliers on bankruptcy
09/16/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Attend biweekly call with Stapleton, Hogan Lovells and R. Itkin (1.0); conference call with E. McNeilly regarding various issues (.5)
09/16/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend bi-weekly meeting with R. Itkin, Stapleton and Hogan Lovells team
09/16/25	Edward Joseph McNeilly	HLUS	1,295.00	1.50	1,942.50	Review agenda (.2); attend weekly call (1.2); email with D. Marcoux regarding insurance certificates (.1)
09/17/25	Todd Schwartz	HLUS	1,925.00	0.50	962.50	Correspond with D. Ullo regarding DIP draw down notice
09/17/25	Isolte Beal	HLUS	760.00	0.80	608.00	Review and analyze checklist and upcoming filings (.6); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2)

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Date	Name	LLP	Rate	Hours	Amount	Narrative
09/18/25	Isolte Beal	HLUS	760.00	1.10	836.00	Review and revise checklist and upcoming filings (.4); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.5); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2)
09/18/25	Henaa Salehi	HLUS	450.00	1.80	810.00	Prepare PDFs of notice of filing proposed final DIP order, review and revise accordingly, and file notice
09/19/25	Isolte Beal	HLUS	760.00	1.00	760.00	Attend to checklist and upcoming filings (.7); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.3)
09/22/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Attend internal organizational call with I. Beale, T. Schwartz, E. McNeilly and D. Ullo
09/22/25	Isolte Beal	HLUS	760.00	1.40	1,064.00	Correspondence with Hogan Lovells team regarding case developments and upcoming filings (.3); attend to checklist and upcoming filings (.6); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.5)
09/22/25	Isolte Beal	HLUS	760.00	0.50	380.00	Telephone conference with Hogan Lovells team regarding case developments and upcoming filings
09/23/25	Todd Schwartz	HLUS	1,925.00	1.20	2,310.00	Attend check in call with working group (1.0);

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B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
						correspondence with working group regarding DIP order (.2)
09/23/25	Isolte Beal	HLUS	760.00	2.60	1,976.00	Telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.2); attend to checklist and upcoming filings (.9); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.5)
09/23/25	Henaa Salehi	HLUS	450.00	1.00	450.00	Prepare PDFs of final DIP order, share with lead attorney for review, and upload order
09/24/25	Isolte Beal	HLUS	760.00	0.60	456.00	Review and analyze checklist and upcoming filings (.4); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2)
09/25/25	Isolte Beal	HLUS	760.00	1.00	760.00	Telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.5); attend to checklist and upcoming filings (.3); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2)
09/26/25	Isolte Beal	HLUS	760.00	1.50	1,140.00	Attend to checklist and upcoming filings (.2); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.4); telephone conference with

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B110 - Case Administration

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (.9)
09/29/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Confer with R. Wynne, E. McNeilly, I. Beale and D. Ullo regarding upcoming calendar and tasks
09/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Revise agenda
09/30/25	Isolte Beal	HLUS	760.00	1.10	836.00	Telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings
				Subtotal	68.30	73,184.00

B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Erin Brady	HLUS	1,570.00	2.20	3,454.00	Confer with R. Pollack regarding recovery of mail from Vacaville mailbox (.1); conference with R. Itkin regarding same (.1); confer with D. Marcoux regarding same (.1); analyze issues regarding mail recovery (.2); conference call with D. Kieffer, E. McNeilly, L. Arkow, T. Boer (partial), and M. Nishikawa (partial) regarding Natoma and Driver RFS motions and related tenant in common issues (1.6); analyze issues regarding retention of PURE (.1)
09/02/25	Loryn Dunn Arkow	HLUS	1,515.00	3.10	4,696.50	Review analysis relating to tenant in common interests in preparation for telephone conference (.7); extended telephone conference regarding Natoma properties and

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						First Street properties, both held as tenants in common, and strategy for dealing with multiple issues (1.6); conference relating to research on tenant in common treatment under California law and in bankruptcy (.5); review correspondence related to properties (.3)
09/02/25	Megan Nishikawa	HLUS	1,630.00	4.60	7,498.00	Prepare for and attend call with Hogan Lovells team to discuss outstanding tenant in common issues regarding plan submission (1.5); review legal research regarding available remedies relating to intentional violation of bankruptcy stay and prepare draft letter to potential violator seeking damages (3.1)
09/02/25	Tom Boer	HLUS	1,400.00	1.00	1,400.00	Review Central Regional Water Quality Control Board draft order, prepare for and participate in telephone conference with Hogan Lovells team and JS Held regarding strategy for environmental issues at Natoma property
09/02/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with D. Ullo regarding tenant in common research (.1); email with Hogan Lovells team regarding tenant in common issues (.1); emails regarding tenant in common issues (.1)
09/02/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Exchange correspondence regarding property agreements and property manager retention
09/02/25	Isolte Beal	HLUS	760.00	0.50	380.00	Review proofs of claim

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Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Katie M. Chacho	HLUS	855.00	5.20	4,446.00	Attend meeting regarding tenant in common discussion with L. Arkow, E. McNeilly, E. Brady, M. Nishikawa, T. Boer, D. Ullo and D. Keiffer (1.5); confer with L. Arkow regarding research status (.5); conduct research regarding tenant in common loan liability (3.2)
09/03/25	Erin Brady	HLUS	1,570.00	1.60	2,512.00	Analyze rent values and issues for Castle Rock and Rachael Road properties (.4); draft email to R. Pollock regarding rent due from Mattsons (1.2)
09/03/25	Loryn Dunn Arkow	HLUS	1,515.00	1.10	1,666.50	Confirm PURE executed final owner's version of property management agreement without changes (.1); provide for updating of final documents with proper titles and dates for execution and various work on document execution (.7); address handling of Ocean Front contracts given government forfeiture notice including correspondence regarding same with various parties (.3)
09/03/25	Megan Nishikawa	HLUS	1,630.00	1.20	1,956.00	Further draft and revise letter to entity that potentially violated bankruptcy stay and communicate regarding same to Hogan Lovells team and client
09/03/25	Megan Nishikawa	HLUS	1,630.00	2.50	4,075.00	Review relevant proofs of claim (2.2); review recent media regarding K. Mattson (.3)

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Date	Name	LLP	Rate	Hours	Amount	Narrative
09/03/25	Katie M. Chacho	HLUS	855.00	2.10	1,795.50	Continue to conduct research regarding tenant in common loan liability (.8); prepare memorandum regarding tenant in common loan liability (1.0); confer with D. Ullo regarding tenants in common as signatories (.1); confer with L. Arkow regarding borrower on the loans (.2)
09/04/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Conference call with E. McNeilly, M. Bennett and D. Taylor regarding Natoma (.8); analyze need for property management agreements (.2)
09/04/25	Loryn Dunn Arkow	HLUS	1,515.00	1.00	1,515.00	Finalize execution details, including dates, for property agreements and various correspondence regarding same (.7); draft analysis relating to authority to execute property documents where tenants in common have interests (.3)
09/04/25	Megan Nishikawa	HLUS	1,630.00	1.10	1,793.00	Review e-mail correspondence from Hogan Lovells team and client regarding status of potential real property litigation
09/04/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Telephone conference with M. Bergthold, Stapleton regarding substantive consolidation, recovery analysis and his concerns
09/04/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Call with Home Tax team regarding Natoma
09/04/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Conduct research to determine if section 363(h) is available to a plan trustee post-confirmation (1.2); conduct research

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding applicability of turnover provisions to K. Mattson personal bankruptcy estate (.8)
09/04/25	Katie M. Chacho	HLUS	855.00	3.60	3,078.00	Continue to prepare memorandum regarding tenant in common loan liability (1.6); conduct research regarding how tenant in common non title interests are treated in bankruptcy (2.0)
09/05/25	Megan Nishikawa	HLUS	1,630.00	2.00	3,260.00	Review additional relevant proofs of claim (1.2); coordinate site visit for 210 La Salle (.8)
09/05/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Attend video conference with M. Jorgensen regarding Natoma issues
09/05/25	Maia Jorgensen	HLUS	1,115.00	5.50	6,132.50	Review background materials regarding 47-49 Natoma Street property (2.5); prepare for and participate in internal strategy discussion regarding strategies for outreach to Regional Water Board in connection to same (.5); draft options analysis for outreach to Regional Water Board (2.5)
09/05/25	Danielle Ullo	HLUS	1,035.00	4.40	4,554.00	Prepare agenda for bi-weekly case status call with Stapleton and R. Itkin (.4); attend bi-weekly case status call with Stapleton and R. Itkin (1.0); call with E. Brady, R. Wynne and J. Uffner regarding KS Mattson Partners tax issues (.7); finalize and file Douglas Elliman broker motion (.4); revise and upload final broker order for Kidder Mathews (.3); Compass (.3); Premiere

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						Estates (.3); W Real Estate (.3); prepare motion to extend deadline to assume or reject real property leases (.7)
09/05/25	Katie M. Chacho	HLUS	855.00	0.60	513.00	Continue to prepare memorandum regarding tenant in common Interests with respect to tenant in common loan obligations
09/06/25	Tom Boer	HLUS	1,400.00	0.10	140.00	Exchange correspondence with E. McNeilly and R. Itkin regarding coordination with respect to next steps on environmental issues
09/07/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Prepare strategy regarding K. Mattson rental payments (.6); confer with R. Itkin by email regarding same (.1); prepare email to D. Marcoux regarding Spain Street property (.1)
09/07/25	Loryn Dunn Arkow	HLUS	1,515.00	0.90	1,363.50	Correspondence with Stapleton regarding net valuation of properties with cross-collateralized debt (.2); study documentation relating to unrecorded tenant in common interests (.7)
09/07/25	Maia Jorgensen	HLUS	1,115.00	1.20	1,338.00	Draft talking points for discussion with R. Itkin regarding options for potential outreach to Regional Water Board in connection with draft 13267 Order for 47-49 Natoma property
09/07/25	Katie M. Chacho	HLUS	855.00	1.00	855.00	Finalize memorandum regarding tenant in common interests
09/08/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with T. Boer, D. Kieffer, E. McNeilly and R.

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						Itkin regarding Natoma
09/08/25	Megan Nishikawa	HLUS	1,630.00	0.80	1,304.00	Communicate with Hogan Lovells team regarding research required with respect to 363(h) sales post plan confirmation
09/08/25	Tom Boer	HLUS	1,400.00	1.40	1,960.00	Conduct research and review memorandum regarding background on Natoma property ownership, environmental contamination and outline potential costs of environmental claims, and investigation (.6); prepare for and participate in telephone conference with R. Itkin, E. McNeilly, E. Brady regarding same and strategy (.8)
09/08/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Call with R. Itkin and Hogan Lovells team regarding Natoma
09/08/25	Maia Jorgensen	HLUS	1,115.00	3.40	3,791.00	Revise talking points for discussion with R. Itkin regarding options for potential outreach to Regional Water Board in connection with draft 13267 order for 47-49 Natoma property, and prepare for and participate in same
09/08/25	Isolte Beal	HLUS	760.00	2.50	1,900.00	Draft motion and supporting declaration to extend deadline to assume or reject unexpired leases of nonresidential real property
09/09/25	Erin Brady	HLUS	1,570.00	0.20	314.00	Confer with R. Itkin regarding K. Mattson strategy
09/09/25	Megan Nishikawa	HLUS	1,630.00	4.50	7,335.00	Review and consider e-mail correspondence regarding Socotra

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						accounting (1.4); research regarding 363(h) and review and consider plan provisions regarding same (3.1)
09/10/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Confer with E. McNeilly regarding rejection lease extension deadline (.1); confer with G. Albert regarding sale issues (.3)
09/10/25	Megan Nishikawa	HLUS	1,630.00	5.00	8,150.00	Review Socotra mediation statement and confirm litigation related details (2.2); further legal research regarding availability of 363(h) and plan provisions addressing same (2.8)
09/10/25	Todd Schwartz	HLUS	1,925.00	2.80	5,390.00	Review and revise sale procedures motion (2.0); correspondence with D. Ullo regarding same (.3); review and analyze issues regarding DIP budget (.5)
09/10/25	Isolte Beal	HLUS	760.00	0.80	608.00	Review documentation with respect to tenants in common
09/11/25	Megan Nishikawa	HLUS	1,630.00	2.30	3,749.00	Legal research regarding use of 363(h) to compel sale of property following plan confirmation
09/11/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Call with E. Brady regarding Oregon property issues (.1); call with E. Brady regarding petitions and Oregon property issue (.3)
09/12/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with E. McNeilly regarding broker issues
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Attend video conference with Hogan Lovells and Stapleton teams and R. Itkin regarding case issues and tasks especially regarding property issues

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09/12/25	Danielle Ullo	HLUS	1,035.00	1.40	1,449.00	Prepare agenda for weekly team check in call (.4); attend weekly team check in call with Stapleton and R. Itkin (1.0)
09/13/25	Loryn Dunn Arkow	HLUS	1,515.00	0.40	606.00	Review correspondence relating to G. Young interest in 8340-50 Auburn, Citrus Heights (.2); draft correspondence with comments to G. Young regarding nature of her rights against KS Mattson Partners (.2)
09/13/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Telephone conference with Q. Young regarding Socotra loans
09/15/25	Ann Chungsun Kim	HLUS	1,475.00	1.10	1,622.50	Telephone conference with E. Brady regarding strategy for turnover motion related to KS Mattson Partners records (.6); review and analyze legal research regarding turnover motion (.5)
09/15/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Confer with G. Albert and R. Auerbach regarding Commerce personal property (.3); analyze lis pendens and plan strategy (.6)
09/15/25	Megan Nishikawa	HLUS	1,630.00	2.90	4,727.00	Further legal research regarding availability of 363(h) post plan confirmation and communicate with Hogan Lovells team regarding same
09/15/25	Tom Boer	HLUS	1,400.00	0.60	840.00	Develop strategy and prepare correspondence to I. Hagopian, Central Valley Water Board regarding request for meeting and status of 49 Natoma property (.5); exchange correspondence with J.

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						Clark, ERM regarding request for investigation and clean up estimates (.1)
09/15/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Emails regarding broker issues
09/15/25	Maia Jorgensen	HLUS	1,115.00	0.30	334.50	Correspond internally regarding bankruptcy details in connection with outreach to Regional Water Quality Control Board
09/15/25	Danielle Ullo	HLUS	1,035.00	1.80	1,863.00	Review complaint and materials regarding 415 Pacific Ave and exchange correspondence with counsel regarding same (.8); call with counsel regarding 415 Pacific Ave lis pendens (1.0)
09/16/25	Ann Chungsun Kim	HLUS	1,475.00	1.70	2,507.50	Review and analyze research regarding turnover motions, and internal correspondence regarding same (1.0); review criminal filings in furtherance of turnover motion (.7)
09/16/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Review and comment on motion to redeem Oregon property
09/16/25	Loryn Dunn Arkow	HLUS	1,515.00	0.90	1,363.50	Review materials relating to M. Lair claim to ownership interest in home
09/16/25	Megan Nishikawa	HLUS	1,630.00	3.20	5,216.00	Review new litigation related papers and discuss same with Hogan Lovells Team
09/16/25	Todd Schwartz	HLUS	1,925.00	2.50	4,812.50	Conference with working group regarding DIP issues (.5); attend bi-weekly check-in call (1.0); correspond with D. Ullo regarding DIP draw down notice (.2); correspond

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Date	Name	LLP	Rate	Hours	Amount	Narrative
						with I. Beal regarding CAR modifications (.3); correspond with E. Brady and D. Ullo regarding CAR modifications (.5)
09/16/25	Tom Boer	HLUS	1,400.00	0.70	980.00	Prepare for and participate in call with J. Clark and H. Balfour of ERM regarding cost estimate and scope of work (.6); exchange correspondence with E. Suchomel, Geosyntec regarding questions on cost estimate (.1)
09/16/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Call with Stapleton team and R. Itkin regarding First Bank account status (.3); call with E. Brady and M. Nishikawa regarding litigation and section 363(h) issues (.4)
09/16/25	Danielle Ullo	HLUS	1,035.00	4.30	4,450.50	Review complaint and related materials for partition action (1.4); Prepare summary of status of property (.4); respond to questions from secured lender counsel for 405 London Way property (.4); prepare task list ahead of bi-weekly all hands videoconference (.4); attend videoconference with Hogan Lovells team, R. Itkin and Stapleton team regarding asset disposition and case administration (1.2); provide comments to chapter 11 checklist (.5)
09/16/25	Isolte Beal	HLUS	760.00	2.10	1,596.00	Correspondence with Hogan Lovells team regarding case developments and upcoming filings (.2); attend to checklist and upcoming filings (.7);

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						telephone conference with Hogan Lovells and Stapleton teams regarding case developments and upcoming filings (1.2)
09/17/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Analyze question and prepare email to L. Arkow regarding dual agency issues (.1); research ownership splits on tenant in common properties (.2)
09/17/25	Loryn Dunn Arkow	HLUS	1,515.00	1.20	1,818.00	Review materials relating to unrecorded alleged ownership interests (.3); conference to address actions with respect to disposition of certain properties and related claims (.9)
09/17/25	Megan Nishikawa	HLUS	1,630.00	0.80	1,304.00	Prepare for and attend conference with Hogan Lovells team to discuss outstanding litigation tasks
09/17/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Telephone conference with R. Itkin regarding ideas with respect to how to deal with forfeiture properties (.3); review and revise status conference statement (.6)
09/17/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Call with E. Brady, M. Nishikawa, D. Ullo and L. Arkow regarding real estate litigation tasks
09/17/25	Danielle Ullo	HLUS	1,035.00	1.40	1,449.00	Call with litigation team regarding property issues
09/18/25	Ann Chungsun Kim	HLUS	1,475.00	0.60	885.00	Draft letter to Fennemore regarding records request, and correspondence with Hogan Lovells team regarding same (.5); internal correspondence regarding research regarding turnover motion (.1)

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09/18/25	Loryn Dunn Arkow	HLUS	1,515.00	1.70	2,575.50	Prepare for call regarding 415 Pacific (.3); attend extended call regarding 415 Pacific with counsel for Nielsen, D. Ullo and D. Marcoux (.9); follow up call with D. Ullo and D. Marcoux regarding strategy vis a vis Nielsen (.3); correspondence with working group regarding bankruptcy court treatment of Nielsen claims and ability to sell 415 Pacific (.2)
09/18/25	Megan Nishikawa	HLUS	1,630.00	2.50	4,075.00	Communicate with Hogan Lovells team regarding response to Socotra mediation statement and review documents related to same (1.8); communicate with Hogan Lovells team regarding property located at 415 Pacific Ave (.7)
09/18/25	Tom Boer	HLUS	1,400.00	0.50	700.00	Prepare for and participate in call with E. Suchomel and L. Foot of Geosyntec regarding estimate and scope of work, and respond to questions
09/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Call with E. Brady and M. Nishikawa regarding property litigation (.5); call with E. Brady regarding litigation (.2); call with M. Jorgensen regarding Natoma (.1)
09/18/25	Maia Jorgensen	HLUS	1,115.00	0.30	334.50	Participate in internal discussion regarding Natoma property ownership percentages
09/19/25	Megan Nishikawa	HLUS	1,630.00	4.70	7,661.00	Visit 210 La Salle property (1.6); review materials relevant to response to Socotra's mediation statement (3.1)

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09/19/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Emails with S. Golden regarding bank account information (.2); emails with banks regarding subpoenas and account information (.1)
09/19/25	Danielle Ullo	HLUS	1,035.00	1.50	1,552.50	Prepare turnover motion based on section 542(e)
09/21/25	Megan Nishikawa	HLUS	1,630.00	4.90	7,987.00	Review draft Socotra mediation reply and related materials and revise same
09/22/25	Ann Chungsun Kim	HLUS	1,475.00	0.20	295.00	Email to government regarding correspondence with K. Mattson's counsel and property related issues
09/22/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Revise sale procedures
09/22/25	Megan Nishikawa	HLUS	1,630.00	0.90	1,467.00	Further review and revise response to Socotra mediation statement
09/23/25	Erin Brady	HLUS	1,570.00	4.80	7,536.00	Revise sale procedures (2.5); conference call with D. Kieffer, D. Marcoux, D. Ullo, E. McNeilly and R. Itkin regarding sale issues (1.1); attend meeting with Stapleton and Hogan Lovells teams to discuss various issues, largely focused on property sales (1.2)
09/23/25	Danielle Ullo	HLUS	1,035.00	2.50	2,587.50	Prepare task list for call with R. Itkin and Stapleton (.5); call with Stapleton team regarding property sales and marketing strategy (1.0); call with R. Itkin regarding property sales (1.0)
09/24/25	Ann Chungsun Kim	HLUS	1,475.00	0.60	885.00	Review research regarding turnover motion in furtherance of document collection

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09/24/25	Erin Brady	HLUS	1,570.00	0.90	1,413.00	Confer with T. Schwartz and D. Ullo regarding CAR form (.1); review sale procedures markup (.3); confer with L. Arkow regarding counteroffer on Ocean Front property (.3); review information regarding 210 LaSalle offer (.1); prepare email to M. Nishikawa regarding same (.1)
09/24/25	Loryn Dunn Arkow	HLUS	1,515.00	2.20	3,333.00	Provide input regarding natural hazard disclosure statement (.3); begin review of sale agreement, addendum and counteroffer for 1834-1836 Ocean Front, Del Mar (1.8); conference with E. Brady regarding same (.1)
09/24/25	Megan Nishikawa	HLUS	1,630.00	2.60	4,238.00	Review offer for 210 La Salle by current owner and prepare e-mail to E. Brady summarizing property visit and offer
09/24/25	Todd Schwartz	HLUS	1,925.00	0.20	385.00	Correspondence with E. Brady and D. Ullo regarding DIP properties
09/25/25	Ann Chungsun Kim	HLUS	1,475.00	1.30	1,917.50	Correspondence with Hogan Lovells and LeFever Mattson counsel regarding potential bankruptcy termination issue and government outreach related to same (.4); prepare for and attend telephone conference with U.S. Attorney's Office regarding investigation (.9)
09/25/25	Loryn Dunn Arkow	HLUS	1,515.00	4.80	7,272.00	Complete review of sale agreement, addendum and counteroffer for sale of 1834-1836 Ocean Front, Del Mar (1.6); draft questions to working

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						group and correspondence regarding same (.6); complete draft of addendum and markup of counteroffer (2.6)
09/25/25	Megan Nishikawa	HLUS	1,630.00	1.80	2,934.00	Review legal research regarding propriety of 363(h) action without pending legal dispute
09/26/25	Ann Chungsun Kim	HLUS	1,475.00	0.30	442.50	Review emails with counsel regarding K. Mattson potential bankruptcy termination issues
09/26/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Prepare for and attend bi-weekly call with Stapleton team
09/26/25	Loryn Dunn Arkow	HLUS	1,515.00	3.90	5,908.50	Telephone conference with title company regarding recordation of notice of bankruptcy proceedings (.2); prepare correspondence with questions regarding deal points for 1834-1836 Ocean Front sale (.7); telephone conference with E. Brady regarding bankruptcy approvals and timing of sale (.3); revise provisions of addendum relating to bankruptcy elements of sale, and other revisions to addendum (2.2); address issues relating to buyer's incorrect designation of seller in DocuSign agreement (.4)
09/26/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Attend meeting with Stapleton, R. Itkin and Hogan Lovells team regarding property issues, Mattson, and Socotra settlement
09/26/25	Edward Joseph	HLUS	1,295.00	0.10	129.50	Organize call with tenants

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	McNeilly					in common regarding 47-49 Natoma
09/26/25	Danielle Ullo	HLUS	1,035.00	4.30	4,450.50	Revise conflicts list (.5); draft Rule 2004 examination motion (1.6); coordinate call regarding tenants in common for 456c (.4); prepare task list for bi-weekly check in call (.5); attend bi-weekly check in call with Stapleton and R. Itkin (1.3)
09/27/25	Loryn Dunn Arkow	HLUS	1,515.00	1.10	1,666.50	Final overview of property sale addendum and circulate to working group (.3); review natural hazard disclosure statement representations with related statutes, and draft correspondence to R. Itkin and D. Kieffer regarding limitations on representations in natural hazard disclosure and transfer disclosure statement (.6); overview of listing agreement and related forms for 856 4th Street, Sonoma per request from R. Itkin (.2)
09/27/25	Tom Boer	HLUS	1,400.00	0.20	280.00	Exchange correspondence with H. Balfour, ERM and E. Suchomel, Geosyntec regarding status of proposals for investigation and remediation at 49 Natoma (.2); check GeoTracker online database to confirm status of draft investigation order from Regional Water Board (.1)
09/28/25	Ann Chungsun Kim	HLUS	1,475.00	0.20	295.00	Review correspondence regarding obtaining KS Mattson Partners property and tasks

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/28/25	Tom Boer	HLUS	1,400.00	0.80	1,120.00	Exchange correspondence with H. Balfour, ERM regarding proposal for environmental services for 49 Natoma (.1); review proposals from ERM and Geosyntec regarding environmental consulting support for 49 Natoma and develop strategy regarding same (.4); develop strategy and prepare correspondence to E. McNeilly, M. Nishikawa, E. Brady, and L. Arkow regarding next steps for 49 Natoma environmental issues and update on Regional Water Board outreach (.3)
09/29/25	Loryn Dunn Arkow	HLUS	1,515.00	2.00	3,030.00	Review comments on addendum to sale agreement for 1834-1836 Ocean Front, Del Mar (1.1); call regarding comments (.3); review and further revisions (.3); review revised counteroffer for 1834-1836 Ocean Front and provide comments (.2); call with working group regarding 1834-1836 Ocean Front and 415 Pacific claims of ownership (.1)
09/29/25	Megan Nishikawa	HLUS	1,630.00	1.10	1,793.00	Review Fidelity complaint and discuss potential dismissal with Hogan Lovells team
09/29/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Attend meeting with Hogan Lovells team regarding entire to do list and follow up correspondence regarding focus on Socotra
09/29/25	Tom Boer	HLUS	1,400.00	0.30	420.00	Exchange correspondence with C. Moskal, Water

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Board counsel and I. Hagopian, Regional Water Board regarding coordination on 49 Natoma (.2); coordinate with Hogan Lovells team regarding preparation and strategy for meeting with Water Board (.1)
09/29/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Call with Hogan Lovells team regarding task list and property sales (.9); telephone conference with L. Arkow regarding sale motions for 1834-36 and 415 Pacific (.4)
09/29/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Attend internal call with Hogan Lovells team regarding legal strategy
09/29/25	Isolte Beal	HLUS	760.00	1.50	1,140.00	Review and revise checklist and upcoming filings (.3); telephone conference with Hogan Lovells team regarding case developments and upcoming filings (.9); correspondence with Hogan Lovells team regarding case developments and upcoming filings (.3)
09/30/25	Loryn Dunn Arkow	HLUS	1,515.00	2.30	3,484.50	Correspondence regarding draft form of sale order (.2); revise addendum and full sale package for 1834-1836 Ocean Front to prepare for distribution to potential buyer in response to buyer offer (2.0); correspondence regarding title to properties recordation of notice of bankruptcy proceedings (.1)
09/30/25	Megan Nishikawa	HLUS	1,630.00	2.20	3,586.00	Review briefing related to K. Mattson motion to modify bail in preparation

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B120 - Asset Analysis/Recovery & Real Estate

Date	Name	LLP	Rate	Hours	Amount	Narrative
						for hearing on same motion and discuss same with E. Brady
09/30/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Attend bi-weekly meeting with R. Itkin and Stapleton regarding full open agenda, including property sale issues, Socotra, relief from stay, and tenant in common disputes
09/30/25	Edward Joseph McNeilly	HLUS	1,295.00	1.40	1,813.00	Draft certificate of no objection and revise order on residential lease extension motion (.4); weekly call regarding property issues (1.0)
09/30/25	Maia Jorgensen	HLUS	1,115.00	0.50	557.50	Internal correspondence regarding Water Board outreach and coordinate strategy call in connection with same
09/30/25	Danielle Ullo	HLUS	1,035.00	5.10	5,278.50	Prepare task list and revise property dashboard (1.2); call with Stapleton and R. Itkin regarding asset sales and other issues (1.2); conduct research regarding tenant in common interest in 415 Pacific Ave and exchange correspondence with committee counsel regarding same (1.6); review deeds of trust for DIP credit agreement and exchange correspondence regarding same (1.1)
09/30/25	Katie M. Chacho	HLUS	855.00	0.20	171.00	Correspondence regarding recording bankruptcy notice
			Subtotal	188.50	260,821.50	

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Review 363(h) issues for tenant in common sales
09/02/25	Danielle Ullo	HLUS	1,035.00	6.20	6,417.00	Revise Douglas Elliman broker motion and declaration and prepare for filing (1.4); conduct research and prepare email memorandum regarding interplay of section 363(h) and section 544 (2.3); conduct research regarding turnover and eviction proceedings (.8); attend internal call with real estate and litigation teams regarding tenant in common properties (1.7)
09/08/25	Danielle Ullo	HLUS	1,035.00	4.10	4,243.50	Review collateral list with D. Marcoux and prepare sales strategy (.6); draft bid procedures motion and exchange correspondence regarding same (3.5)
09/09/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Call with Hogan Lovells and Stapleton teams regarding sale and property issues
09/09/25	Danielle Ullo	HLUS	1,035.00	0.30	310.50	Prepare email to R. Itkin regarding broker listing agreements and agent fees
09/10/25	Danielle Ullo	HLUS	1,035.00	2.70	2,794.50	Finalize DIP order and credit agreement and deliver drafts to committee counsel (.5); exchange correspondence regarding DIP budget and scenarios (.5); review and revise sale procedures motion per comments from T. Schwartz (1.7)
09/11/25	Danielle Ullo	HLUS	1,035.00	1.30	1,345.50	Revise sale procedures motion per comments from T. Schwartz and exchange correspondence regarding same

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/12/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Exchange correspondence with secured lender counsel regarding tenant issues
09/15/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to D. Ullo and T. Schwartz regarding CAR forms
09/15/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Conduct research regarding motions to compel turnover (1.5); prepare Douglas Elliman proposed order for upload and coordinate upload of same (.5)
09/16/25	Erin Brady	HLUS	1,570.00	0.30	471.00	Confer with G. Albert regarding CAR forms (.1); confer with D. Ullo and T. Schwartz regarding same (.1); review and comment on 22 Boyes flyer (.1)
09/16/25	Edward Joseph McNeilly	HLUS	1,295.00	6.00	7,770.00	Review sale procedures motion (.7); telephone conference with D. Ullo regarding sale procedures motion (.1); draft redemption motion, declarations, request for judicial notice(1.0); work on status conference statement (.2); call with R. Itkin regarding Oregon motion (.3); revise status report (.2); work on redemption motion (.8); work on status conference report (.3); emails regarding Fidelity complaint (.2); finalize redemption motion for filing (1.7)
09/17/25	Danielle Ullo	HLUS	1,035.00	1.70	1,759.50	Review and revise sale procedures and exchange correspondence regarding same (1.4); respond to ownership questions regarding certain properties (.3)

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/18/25	Erin Brady	HLUS	1,570.00	1.60	2,512.00	Review and comment on sale notice motion (1.4); confer with D. Ullo regarding sale procedures motion (.2)
09/18/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Draft declaration and revise sale procedures motion
09/18/25	Danielle Ullo	HLUS	1,035.00	2.60	2,691.00	Review complaint and other materials regarding 415 Pacific Ave (1.0); prepare for and attend call with L. Arkow and counsel to M. Nielson, purported tenant in common, and follow up with L. Arkow and D. Marcoux regarding same (1.6)
09/19/25	Edward Joseph McNeilly	HLUS	1,295.00	1.40	1,813.00	Call with B. Albert regarding sale motion (.2); review motion to limit (.4); call with E. Brady regarding motion to limit (.3); call with D. Ullo regarding sale procedures (.2); work on Kieffer declaration (.3)
09/19/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Prepare exhibit of properties for sale procedures motion
09/20/25	Edward Joseph McNeilly	HLUS	1,295.00	2.50	3,237.50	Work on motion and Kieffer declaration (.8); work on motion and Kieffer declaration (1.1); revise and finalize Kieffer and Itkin declarations (.6)
09/21/25	Edward Joseph McNeilly	HLUS	1,295.00	7.10	9,194.50	Research and draft mediation brief
09/22/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Call with Hogan Lovells team regarding sales
09/22/25	Danielle Ullo	HLUS	1,035.00	2.90	3,001.50	Revise sale procedures motion (1.4); prepare and revise exhibit to sale procedures motion and exchange correspondence

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
						with Stapleton team regarding same (1.2); deliver draft motion to DIP lender (.1); exchange correspondence regarding broker representations for certain properties (.2)
09/22/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Finalize DIP credit agreement for execution and upload final DIP order
09/23/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Call with Hogan Lovells and Stapleton teams and R. Itkin regarding property sales
09/23/25	Danielle Ullo	HLUS	1,035.00	2.20	2,277.00	Revise sale procedures motion per comments from E. McNeilly and E. Brady (1.2; update Hogan Lovells property dashboard (1.0)
09/24/25	Edward Joseph McNeilly	HLUS	1,295.00	4.30	5,568.50	Revise sale motion (.9); revise sale procedures (1.5); revise CAR bankruptcy addendum for residential sales (1.1); revise declarations (.8)
09/24/25	Danielle Ullo	HLUS	1,035.00	3.10	3,208.50	Review and provide comments to CAR addendum (1.7); calls and correspondence with L. Arkow regarding same (.8); revise exhibit for sale procedures motion per E. McNeilly comments (.3); exchange correspondence regarding 1834-1836 Ocean Front offer (.3)
09/25/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Review sale procedures redline between KS Mattson Partners and LeFever Mattson
09/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Emails regarding sale procedures
09/25/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Attend internal call regarding open legal items

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/26/25	Erin Brady	HLUS	1,570.00	2.40	3,768.00	Analyze 363(h) legal issues (.6); revise sale procedures (.9); confer with L. Arkow regarding CAR form (.4); review CAR form (.2); analyze issues regarding filing and service of sale procedures (.3)
09/26/25	Edward Joseph McNeilly	HLUS	1,295.00	6.00	7,770.00	Email regarding sale motion (.1); call with L. Arkow regarding CAR form (.2); attend property meeting (1.0); work on sale procedures motion and supporting declarations (4.7)
09/27/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Prepare form of individual sale motion
09/28/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Prepare form of individual sale motion
09/29/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Review CAR addendum and provide additional comments to same (.9); conference call with E. McNeilly and L. Arkow regarding CAR form and sale process (.3)
09/29/25	Edward Joseph McNeilly	HLUS	1,295.00	1.20	1,554.00	Draft 1834-1836 Ocean Avenue sale order (1.0); emails regarding sale order (.2)
09/29/25	Danielle Ullo	HLUS	1,035.00	5.80	6,003.00	Draft form of individual sale motion (4.0); revise ordinary course professionals motion (1.0); prepare Itkin declaration in support of ordinary course professionals motion (.8)
09/30/25	Erin Brady	HLUS	1,570.00	1.60	2,512.00	Attend biweekly call with Stapleton, with focus on sales issues (tenants in common, property listings, sale process, property status) (1.2); revise CAR

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B130 - Asset Disposition

Date	Name	LLP	Rate	Hours	Amount	Narrative
						form to address bankruptcy timing issues (.2); analyze sale issues (.2)
09/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Revise 1834-1836 sale order (.1); email with L. Arkow regarding 1834-1836 sale order (.1)
				Subtotal	79.90	95,828.50

B140 - Relief from Stay/Adequate Protection Proceedings

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Edward Joseph McNeilly	HLUS	1,295.00	3.60	4,662.00	Revise tenant in common proposal regarding Natoma stay relief (.4); video conference with Hogan Lovells and Stapleton teams regarding Natoma and First Street Properties (1.6); follow-up email regarding go-forward proposal on Natoma and First Street Properties (.4); work on stay relief violation letter (1.2)
09/03/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Confer with E. McNeilly regarding stay violation action (.3); research issues regarding K. Mattson (1.2)
09/03/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Emails regarding Golf Terrace letter
09/05/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Email with R. Itkin regarding Natoma (.2); update proposal to attorney Gomez regarding Natoma and First Street Properties (.4); Telephone conference with E. Brady regarding stay relief motions (.5)
09/06/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Email with R. Itkin regarding Natoma (.2); update proposal to

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B140 - Relief from Stay/Adequate Protection Proceedings

Date	Name	LLP	Rate	Hours	Amount	Narrative
						attorney Gomez regarding Natoma and First Street Properties (.4)
09/08/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Confer with E. McNeilly and A. Gomez regarding pending relief from stay motions (.5); follow up call with E. McNeilly regarding same (.3)
09/08/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Email with A. Gomez regarding Natoma (.3); call with A. Gomez regarding Natoma and First Street stay relief motions (.5)
09/09/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Analyze issue regarding K. Mattson relief from stay
09/10/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Email with R. Itkin regarding Golf View Terrace
09/11/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Revise and finalize Gomez stipulation (.3); email with T. Southwell regarding same (.1)
09/11/25	Tracy Southwell	HLUS	655.00	1.20	786.00	Prepare Gomez order regarding stipulation regarding relief from stay (.7); prepare stipulation and order for ECF filing and file same (.5)
09/12/25	Tracy Southwell	HLUS	655.00	1.70	1,113.50	Prepare notice regarding motion to extend relief from stay motion (7); revised motion and proposed or (.4); prepare calendar notice (.3); coordinate update to email distribution list (.3)
09/20/25	Edward Joseph McNeilly	HLUS	1,295.00	1.60	2,072.00	Emails regarding foreclosure letter received (.1); draft stay violation letter regarding 531-533 Camino Del Mar foreclosure (1.5)
09/23/25	Edward Joseph	HLUS	1,295.00	0.90	1,165.50	Revise SBS letter (.5); call

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B140 - Relief from Stay/Adequate Protection Proceedings

Date	Name	LLP	Rate	Hours	Amount	Narrative
	McNeilly					with D. Marcoux regarding SBS letter (.1); call with I. Beal regarding SBS letter (.3)
09/26/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Analyze issues regarding foreclosure threat
09/29/25	Erin Brady	HLUS	1,570.00	1.50	2,355.00	Confer with L. Arkow and E. McNeilly regarding 415 stay relief issues (.2); analyze 415 stay relief threat and issues (1.1); confer with R. Wynne regarding same (.2)
09/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with G. Albert regarding stay relief stipulation
09/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Call with R. Ripin regarding Camino Del Mar (.2); correspondence regarding Camino Del Mar (.2); call with E. Brady regarding Camino Del Mar (.1)
Subtotal				17.60	22,256.00	

B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Confer with E. McNeilly regarding town hall (.2); prepare notice of town hall (.2); prepare email to R. Itkin regarding town hall post (.1); coordination with committee, K. Katari and R. Itkin regarding town hall (.1)
09/02/25	Rick Wynne	HLUS	1,975.00	1.60	3,160.00	Attend meeting with LeFever Mattson debtor, creditors committee and KS Mattson Partners regarding plan, disclosure statement, mediation motion, Socotra brief and facts, and tax issue timing

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/03/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Revise town hall notice (.3); coordinate with B. Wilson regarding town hall meeting (.1); coordinate with Stapleton regarding town hall meeting (.1)
09/03/25	Edward Joseph McNeilly	HLUS	1,295.00	2.50	3,237.50	Prepare script for creditor town hall
09/04/25	Erin Brady	HLUS	1,570.00	2.80	4,396.00	Meeting with K. Katari, R. Wynne, D. Grassgreen, B. Wilson, and R. Itkin regarding town hall (1.0); confer with R. Itkin and E. McNeilly regarding town hall and script (.5); confer with E. McNeilly regarding town hall (.5); telephone conference with B. Wilson regarding town hall (.3); review draft script (.5)
09/04/25	Edward Joseph McNeilly	HLUS	1,295.00	6.80	8,806.00	Revise script for town hall (4.2); call with committee chair, Pachulski team, E. Brady and R. Itkin regarding town hall (1.0); telephone call with E. Brady regarding town hall (.5); telephone conference with E. Brady and B. Wilson regarding town hall (.3); correspondence regarding script (.2); email with Brooke regarding notice of town hall (.1); call with R. Itkin and E. Brady regarding script preparation (.5)
09/05/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Telephone conference with D. Grassgreen regarding plan, status conference, disclosure statement and motion on claims timing, and Socotra
09/05/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Emails with R. Itkin, Hogan Lovells and committee teams regarding responses to

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
						creditor and investor inquiries
09/06/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Emails with R. Itkin, Hogan Lovells and committee teams regarding responses to creditor and investor inquiries
09/08/25	Erin Brady	HLUS	1,570.00	1.30	2,041.00	Prepare for and attend meeting of creditors
09/08/25	Rick Wynne	HLUS	1,975.00	1.80	3,555.00	Telephone conference with R. Itkin regarding 341(a) preparation (.2); attend 341(a) meeting and follow up call regarding same (.9); telephone conference with R. Itkin regarding town hall agenda and task list (.2); attend Hogan Lovells team coordination call regarding full agenda (.5)
09/08/25	Edward Joseph McNeilly	HLUS	1,295.00	1.70	2,201.50	Prepare for and attend 341 meeting (1.0); telephone conference with E. Brady regarding investor communications (.4); work on update email to investors (.3)
09/09/25	Edward Joseph McNeilly	HLUS	1,295.00	3.60	4,662.00	Work on script and sample questionnaire (2.9); work on creditor response email (.2); respond to creditor claims (.5)
09/10/25	Erin Brady	HLUS	1,570.00	3.80	5,966.00	Attend town hall practice walk through (1.5); attend committee call (1.1); prepare email to B. Wilson regarding R. Itkin call with K. Katari (.2); confer with R. Itkin regarding same (.1); prepare email to E. McNeilly regarding creditors committee reporting (.2); confer with E. McNeilly regarding

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
						town hall and related issues (.6); confer with R. Wynne regarding creditors' committee meeting (.1)
09/10/25	Rick Wynne	HLUS	1,975.00	1.50	2,962.50	Review Golf View Terrace foreclosure and creditors committee agenda issues to cover (.2); telephone conference with R. Itkin and D. Grassgreen regarding town hall and agenda for creditors committee meeting (.3); review and revise town hall script (.4); multiple calls with E. Brady regarding town hall and creditors committee agenda (.6)
09/10/25	Edward Joseph McNeilly	HLUS	1,295.00	4.00	5,180.00	Review Brooke call script (.2); investor call preparation (1.8); call with E. Brady regarding case issues including creditor town hall (.5); research and draft letter to R. Auerbach regarding post-petition insurance proceeds (.8); call with Brooke regarding questionnaire (.3); respond to investor inquiries (.4)
09/11/25	Edward Joseph McNeilly	HLUS	1,295.00	3.00	3,885.00	Respond to investor inquiries (.5); work on script (1.0); review and further revise script (1.5)
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Work on investor script (1.2); telephone conference with creditor regarding proof of claim (.1)
09/13/25	Edward Joseph McNeilly	HLUS	1,295.00	1.20	1,554.00	Revise script
09/14/25	Edward Joseph McNeilly	HLUS	1,295.00	1.70	2,201.50	Revise script (1.2); further revise script to reflect input from committee

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
						chair (.5)
09/15/25	Ann Chungsun Kim	HLUS	1,475.00	0.50	737.50	Attend investor town hall in furtherance of negotiations with government regarding forfeiture claims
09/15/25	Erin Brady	HLUS	1,570.00	3.60	5,652.00	Attend town hall preparation call (1.9); confer with R. Itkin regarding town hall call (.2); attend town hall meeting (1.5)
09/15/25	Rick Wynne	HLUS	1,975.00	2.20	4,345.00	Telephone conference with E. McNeilly regarding town hall questions (.2); review town hall script (.6); attend town hall (1.4)
09/15/25	Edward Joseph McNeilly	HLUS	1,295.00	5.20	6,734.00	Emails regarding creditor inquiries (.4); prepare for creditor town hall meeting (2.5); revise script (.8); prepare for and participate in town hall (1.5)
09/17/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Call with creditor regarding proof of claim process
09/18/25	Edward Joseph McNeilly	HLUS	1,295.00	4.00	5,180.00	Respond to investor inquiries (1.8); work on investor script (.4); review and revise town hall script (1.2); call with investors regarding claims (.6)
09/19/25	Erin Brady	HLUS	1,570.00	0.40	628.00	Attend meeting with members of creditors committee ahead of hearing
09/19/25	Edward Joseph McNeilly	HLUS	1,295.00	3.70	4,791.50	Prepare for and record investor seminar with Brooke (2.0); revise script (.7); respond to investor inquiries (.5); respond to investor (.5)
09/23/25	Edward Joseph McNeilly	HLUS	1,295.00	1.00	1,295.00	Respond to creditor inquiries

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B150 - Meetings of and Communications with Creditors

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/24/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Call with creditor regarding proof of claim
09/25/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Emails regarding response to creditor questions
09/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Call with creditor regarding claims
09/29/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Respond to creditor questions regarding proof of claim process
09/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Emails responding to creditor claim inquiries
09/30/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Call with creditor regarding claim
				Subtotal	65.60	93,785.00

B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Review and comment on Douglas Elliman retention motion
09/03/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Exchange correspondence regarding fee estimate (.3); exchange correspondences regarding property manager retention (.1); revise Douglas Elliman broker motion and exchange correspondence regarding same (.4)
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Telephone conference with B. Albert regarding broker motions (.1); telephone conference with D. Ullo regarding same (.4); telephone conference with E. Brady regarding same (.4)
09/26/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review and revise June and July fee applications
09/29/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Revise draft ordinary course professionals

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B160 - Fee/Employment Applications

Date	Name	LLP	Rate	Hours	Amount	Narrative
						motion
09/29/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Prepare fee application, including review of June and July time
09/29/25	Danielle Ullo	HLUS	1,035.00	1.40	1,449.00	Review unlawful detainer counsel retainer agreement (.4); review real estate counsel retainer agreement (.5); review and revise August bill (.5)
09/30/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Revise engagement letter for M. Zyromski (.3); review Dinesmore retention letter (.3)
			Subtotal	6.50	9,440.00	

B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/01/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Email with Verita regarding bar date documents
09/02/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Confer with D. Kieffer regarding mediation with Socotra
09/02/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review preservation order objection
09/03/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Work on motion to appoint trustee
09/08/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Review mediation brief
09/08/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Review bar date publication notice (.1); review mediation motion (.7); email R. Itkin publication notice (.1) email with Verita regarding publication notice (.1); emails regarding status conference (.1)
09/09/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Confer with M. Nishikawa

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						regarding 363(h) litigation (.4); prepare comments to R. Itkin declaration on mediation motion (.3); prepare comments to mediation motion (.2); further comments on mediation motion (.2)
09/09/25	Edward Joseph McNeilly	HLUS	1,295.00	2.00	2,590.00	Work on lease extension motion (1.1); revise mediation motion and declaration (.9)
09/10/25	Erin Brady	HLUS	1,570.00	1.10	1,727.00	Prepare email to R. Wynne regarding mediation brief (.3); review mediation brief (.2); prepare emails to M. Nishikawa regarding 363(h) issues (.4); confer with R. Wynne regarding Socotra (.2)
09/10/25	Rick Wynne	HLUS	1,975.00	3.90	7,702.50	Review and revise mediation motion (.2); review draft mediation statement, and correspondence to Hogan Lovells team regarding to do list and items to focus on in draft mediation statement, including review of cases cited and others not cited, timeline memoranda and other exhibits, as well as Ponzi scheme book cases (3.7)
09/10/25	Edward Joseph McNeilly	HLUS	1,295.00	1.10	1,424.50	Emails regarding Socotra (.2); finalize mediation declaration (.4); revise extension motion and declaration (.5)
09/11/25	Rick Wynne	HLUS	1,975.00	3.00	5,925.00	Telephone conference with D. Tracey regarding mediation (.2); prepare correspondence regarding mediation statement, including review of EPD case and articles, significant edits and

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						comments (2.8)
09/11/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Revise lease extension motion
09/12/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend mediation preparation (.4); prepare email to A. Kim regarding turnover issues (.1)
09/12/25	Rick Wynne	HLUS	1,975.00	4.10	8,097.50	Review and revise mediation brief, and prepare correspondence to R. Itkin and mediation group, including disclosure statement summary and Socotra equity (1.4); review D. Katz correspondence regarding mediation and correspondence regarding same to group (.1); review documents produced by Fennemore to creditors committee and correspondence regarding same, and need for full production (.8); telephone conference with E. McNeilly regarding reply brief (.4); telephone conference with Judge Bogdanoff regarding mediation and his initial questions (.3); telephone conference with D. Grassgreen regarding our mediation brief (.2); attend meeting with Keller Benvenuti and Pachulski regarding Socotra mediation preparation (.9)
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Finalize and file lease assumption extension motion
09/13/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with R. Wynne regarding mediation (.1); emails regarding mediation (.2)

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/14/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Draft status conference statement (1.1); review mediation brief (.2)
09/15/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Confer with A. Kim regarding turnover of Mattson-held property (.3); prepare email to D. Ullo regarding same (.1); prepare email to L. Bukai regarding same (.1)
09/15/25	Rick Wynne	HLUS	1,975.00	3.00	5,925.00	Prepare correspondence regarding Socotra mediation brief revisions, review of exhibits, and partial review of cited cases (2.5); telephone conference with E. Brady regarding Socotra issues and mediation preparation, including briefs and issues to respond to (.5)
09/15/25	Edward Joseph McNeilly	HLUS	1,295.00	2.10	2,719.50	Draft redemption motion, declarations, request for judicial notice
09/16/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Conference call with M. Nishikawa regarding various litigation issues
09/16/25	Rick Wynne	HLUS	1,975.00	2.20	4,345.00	Review Socotra mediation brief and cases cited and prepare outline, including review of key case quotes (1.8); review equity analysis (.4)
09/17/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Attend meeting with M. Nishikawa and E. McNeilly regarding litigation issues
09/17/25	Rick Wynne	HLUS	1,975.00	1.00	1,975.00	Review cases from mediation brief of Socotra (.8); prepare correspondence to L. Bogdanoff (.2)
09/17/25	Edward Joseph McNeilly	HLUS	1,295.00	2.20	2,849.00	Revise status report (1.9); email with court regarding shorten time motion (.1);

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						call with R. Itkin regarding status report (.1); call with D. Marcoux regarding status report (.1)
09/18/25	Erin Brady	HLUS	1,570.00	4.30	6,751.00	Attend meeting with mediator and plaintiff team on Socotra litigation (1.0); follow up call with Pachulski, Keller Benvenuti and Hogan Lovells teams regarding mediation meeting (.5); conference call with M. Nishikawa regarding reply brief (.5); prepare summary of reply brief issues (.4); review materials for reply brief (.9); prepare list of materials for E. McNeilly and M. Nishikawa to prepare reply brief (.4); research regarding Socotra properties (.6)
09/18/25	Rick Wynne	HLUS	1,975.00	1.90	3,752.50	Telephone conference with S. Golden regarding Socotra reply brief, facts and investigative report (.3); review S. Golden Socotra discovery documents (.6); attend mediation meeting with L. Bogdanoff, Hogan Lovells, Keller Benvenuti and Pachulski regarding preparation, including issues with respect to reply brief (1.0)
09/18/25	Edward Joseph McNeilly	HLUS	1,295.00	2.10	2,719.50	Research regarding Socotra mediation (1.2); call with R. Itkin and Cathy regarding Oregon taxes (.3); call regarding Oregon tax (.3); emails with E. Brady regarding Socotra (.1); review Socotra stipulation (.2)

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/19/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with L. Bogdanoff regarding mediation reply he would like and issues he wants us to cover
09/19/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Email with Jackson County, Oregon regarding redemption amount
09/20/25	Edward Joseph McNeilly	HLUS	1,295.00	2.40	3,108.00	Work on mediation brief
09/21/25	Rick Wynne	HLUS	1,975.00	3.70	7,307.50	Initial review of mediation reply brief (.9); correspondence to Judge Bogdanoff regarding 502(h) prepared by J. Rosell (.5); review correspondence from J. Rosell regarding mediation reply brief points to emphasize (.2); review new file from S. Fleming, PwC regarding property analysis of each Socotra loan (.5)
09/22/25	Erin Brady	HLUS	1,570.00	6.20	9,734.00	Revise Socotra mediation brief (4.5); attend conference call with Pachulski and Keller Benvenuti regarding Socotra mediation teams regarding brief and mediation (.5); revise relief from stay letter (1.2)
09/22/25	Rick Wynne	HLUS	1,975.00	5.60	11,060.00	Attend meeting with FTI, B. Sharp, DSI, R. Itkin, K. Katari, E. Brady, E. McNeilly and Pachulski regarding mediation preparation (.7); call with E. McNeilly regarding review of mediation briefs (.2); correspondence to S. Fleming, PwC regarding outlining what we need for reply brief exhibits (.8); revise Socotra reply brief, including review of

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						multiple comments by others, preparation of new section, substantial revisions and introduction work, and review Ponzi scheme book materials for other cases to cite (3.9)
09/22/25	Edward Joseph McNeilly	HLUS	1,295.00	7.30	9,453.50	Participate in call with Hogan Lovells and Pachulski teams regarding brief (.8); revise mediation brief (1.2); further review and revise mediation brief (3.2); call with R. Wynne regarding brief (.2); email regarding mediation brief (.1); further revise mediation brief (1.8)
09/23/25	Erin Brady	HLUS	1,570.00	1.00	1,570.00	Review revised mediation brief (.4); provide comments to same (.2); review further revised brief (.3); confer with R. Wynne regarding same (.1)
09/23/25	Rick Wynne	HLUS	1,975.00	1.90	3,752.50	Review Socotra transcripts from depositions for additional cites or exhibits (.6); review two rounds of exhibits prepared by PwC for Socotra reply brief, and call and correspondence regarding revisions needed (.8); final review of reply brief for mediation (.5)
09/23/25	Rick Wynne	HLUS	1,975.00	6.60	13,035.00	Attend meeting with S. Fleming, E. Brady and E. McNeilly regarding brief exhibits, Socotra settlement scenarios, netting numbers, and follow up correspondence and Zoom meetings regarding same (1.9); call with Stapleton, E. Brady and E. McNeilly regarding all open items and to do list (1.2); review and revise

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						multiple rounds of reply brief, and review Socotra brief and certain key cases, including First Alliance, EPD, and Nielson vs. Union Bank (3.5)
09/23/25	Edward Joseph McNeilly	HLUS	1,295.00	5.30	6,863.50	Review and revise mediation brief (1.3); call with C. Mackle regarding brief (.1); further revise mediation brief (3.4); call with E. Brady regarding property litigation (.5)
09/24/25	Erin Brady	HLUS	1,570.00	9.10	14,287.00	Attend and participate in mediation (8.9); confer with R. Itkin regarding unlawful detainer issues (.2)
09/24/25	Rick Wynne	HLUS	1,975.00	10.50	20,737.50	Attend mediation, including calls before and after with L. Bogdanoff, D. Grassgreen, L. Miller and R. Itkin regarding same
09/25/25	Erin Brady	HLUS	1,570.00	7.80	12,246.00	Attend and participate in mediation, and related discussions, including call with R. Wynne regarding preparation for mediation session
09/25/25	Rick Wynne	HLUS	1,975.00	9.50	18,762.50	Calls prior to mediation with D. Grassgreen, R. Itkin, E. Brady, and L. Bogdanoff, then attend meditation including follow up correspondence regarding settlement structure, and call with Pachulski team regarding same
09/25/25	Edward Joseph McNeilly	HLUS	1,295.00	1.50	1,942.50	Participate in mediation
09/26/25	Rick Wynne	HLUS	1,975.00	2.20	4,345.00	Review first draft of settlement agreement by Pachulski (.9); review correspondence regarding

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B190 - Other Contested Matters (excluding assumption/rejection moti

Date	Name	LLP	Rate	Hours	Amount	Narrative
						T. LeFever issues and replies (.3); correspondence with L. Bogdanoff, B. Sharp, R. Itkin, Pachulski and Keller Benvenuti teams regarding settlement follow up (.4); review Socotra article and correspondence regarding same (.2); review final Socotra settlement spreadsheets (.4)
09/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Email with Hogan Lovells, Keller Benvenuti and Pachulski teams regarding chapter 7 trustee election
09/28/25	Edward Joseph McNeilly	HLUS	1,295.00	2.70	3,496.50	Draft 9019 motion to approve Socotra settlement
09/29/25	Erin Brady	HLUS	1,570.00	1.90	2,983.00	Review and comment on settlement agreement (.9); confer with J. Rosell regarding same (.2); further revisions of settlement agreement (.3); confer with R. Wynne regarding settlement agreement (.2); analyze tenant in common issues in settlement agreement (.3)
09/29/25	Rick Wynne	HLUS	1,975.00	1.20	2,370.00	Review and revise settlement agreement with Socotra (.8); review further changes to Socotra settlement agreement (.4)
09/29/25	Edward Joseph McNeilly	HLUS	1,295.00	1.80	2,331.00	Revise Socotra 9019 motion (1.0); call with M. Nishikawa regarding Fidelity (.4); review Socotra settlement agreement comments (.1); emails regarding Fidelity complaint (.3)
Subtotal				131.80	221,473.50	

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B195 - Non-Working Travel

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/18/25	Erin Brady	HLUS	1,570.00	2.20	3,454.00	Travel to San Francisco for hearings (charged at 50%)
09/18/25	Rick Wynne	HLUS	1,975.00	2.20	4,345.00	Travel to Oakland for hearing, including review of materials en route (charged at 50%)
09/19/25	Erin Brady	HLUS	1,570.00	2.60	4,082.00	Travel back from hearing (charged at 50%)
09/19/25	Rick Wynne	HLUS	1,975.00	1.20	2,370.00	Return travel to Los Angeles after hearing (charged at 50%)
				Subtotal	8.20	14,251.00

B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/03/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Telephone conference with E. Brady regarding task list (.2); telephone conference with Q. Brown regarding schedules (.2)
09/11/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Emails regarding monthly operating reports (.2); attend video conference with Hogan Lovells team regarding key case tasks (.5)
09/18/25	Edward Joseph McNeilly	HLUS	1,295.00	1.30	1,683.50	Review monthly operating report (.9); attend call with Hogan Lovells team regarding task list (.4)
09/19/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Review monthly operating report
09/22/25	Danielle Ullo	HLUS	1,035.00	2.10	2,173.50	Finalize and coordinate filing of monthly operating report (1.2); prepare for and attend call with Hogan Lovells team regarding legal tasks (.7)
09/22/25	Isolte Beal	HLUS	760.00	1.40	1,064.00	Revise monthly operating report

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B210 - Business Operations

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/26/25	Isolte Beal	HLUS	760.00	1.00	760.00	Prepare supplemental tax letters
09/29/25	Isolte Beal	HLUS	760.00	0.70	532.00	Finalize supplemental tax letters
			Subtotal	7.90	8,026.00	

B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Danielle Ullo	HLUS	1,035.00	0.90	931.50	Revise order on stipulation to continue hearing on final DIP order and exchange correspondence with court clerk regarding same (.5); review DIP reconciliation report and exchange correspondence regarding same (.4)
09/02/25	Tracy Southwell	HLUS	655.00	0.90	589.50	Review and research rejected DIP motion extension order (.4); emails with D. Ullo and E. McNeilly regarding contents of e-orders; prepare revised court service list per clerk's comments (.2); prepare and reupload order (.3)
09/03/25	Todd Schwartz	HLUS	1,925.00	0.70	1,347.50	Correspondence with working group regarding DIP budget and DIP credit agreement
09/03/25	Danielle Ullo	HLUS	1,035.00	4.40	4,554.00	Review and incorporate comments to DIP credit agreement (1.2); review and incorporate comments to DIP final order (.6); exchange correspondence with asset manager regarding DIP budget (.2); review credit agreement for stay provision (.2); exchange correspondence regarding certificate of good standing (.2); conduct research regarding

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						use of turnover provisions in K. Mattson personal bankruptcy (2.0)
09/04/25	Todd Schwartz	HLUS	1,925.00	0.80	1,540.00	Correspondence with working group regarding DIP Budget and DIP credit agreement
09/04/25	Danielle Ullo	HLUS	1,035.00	2.00	2,070.00	Call with T. Schwartz regarding DIP (.2); exchange correspondence with asset manager regarding budget and schedules (.6); review and provide comments to final DIP order (1.2)
09/05/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Conference call with M. Scherneck, T. Schwartz, R. Wynne and D. Ullo regarding credit agreement and DIP budget
09/05/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Review final DIP order (.4); prepare questions for hearing (.2); attend meeting with Stapleton, E. Brady and D. Ullo regarding DIP budget review (.5)
09/05/25	Todd Schwartz	HLUS	1,925.00	1.00	1,925.00	Telephone conference with Stapleton regarding DIP budget
09/05/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with D. Ullo regarding DIP and other issues (.2) emails regarding DIP (.1)
09/05/25	Danielle Ullo	HLUS	1,035.00	5.00	5,175.00	Draft notice of filing of proposed final DIP order (.5) call with Hogan Lovells and Stapleton team to walk through DIP budget (1.2); prepare DIP documents for filing and coordinate filing of same (1.2) ; review DIP credit agreement regarding time restrictions on draws and

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						budget variance (.8); call with DIP lender counsel regarding changes to DIP credit agreement (.2); exchange correspondence with DIP lender regarding deeds of trust (.3); review reservation of rights filed by Socotra (.3); review and provide comments to DIP budget (.5)
09/08/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Review DIP budget, and call with R. Wynne and Stapleton team regarding issue items
09/09/25	Erin Brady	HLUS	1,570.00	0.70	1,099.00	Analyze issues regarding budget
09/09/25	Todd Schwartz	HLUS	1,925.00	0.70	1,347.50	Review and analyze issues regarding revisions to DIP budget
09/09/25	Danielle Ullo	HLUS	1,035.00	2.40	2,484.00	Review revised DIP budget (.5); call with T. Schwartz regarding revised DIP budget (1.0); exchange correspondence regarding DIP budget and professional fees (.9)
09/11/25	Danielle Ullo	HLUS	1,035.00	1.00	1,035.00	Prepare schedules to DIP credit agreement (.5); review DIP budget comparison and email with DIP lender regarding same (.5)
09/12/25	Danielle Ullo	HLUS	1,035.00	0.90	931.50	Review committee comments to final DIP order and credit agreement (.5); exchange correspondence regarding same and extension of objection deadline (.4)
09/15/25	Todd Schwartz	HLUS	1,925.00	0.60	1,155.00	Correspondence with E. McNeilly regarding DIP credit agreement (.1); correspondence with D. Ullo regarding DIP schedules

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.2); correspondence with D. Ullo regarding DIP budget (.3)
09/15/25	Danielle Ullo	HLUS	1,035.00	2.60	2,691.00	Review and incorporate DIP committee comments and exchange correspondence regarding same (.8); prepare schedules to DIP credit agreement (1.2); exchange correspondence with DIP lender regarding open items (.6)
09/16/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to D. Ullo regarding cash collateral stipulations
09/16/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Attend meeting with D. Ullo and T. Schwartz regarding open issues
09/16/25	Danielle Ullo	HLUS	1,035.00	3.50	3,622.50	Review DIP credit agreement and proposed final order to determine impact of filing other entities and redeeming property (.8); prepare schedules to DIP credit agreement (1.2); exchange correspondence regarding same (.4); call with T. Schwartz and DIP lender regarding revised DIP credit agreement (.5); exchange correspondence with committee counsel regarding same (.3); call with J. Rosell regarding comments to DIP credit agreement (.2)
09/17/25	Danielle Ullo	HLUS	1,035.00	2.40	2,484.00	Negotiate final DIP order and credit agreement and finalize same including schedules and exhibits
09/18/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Prepare email to J. Rosell regarding DIP order and hearing agenda

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/18/25	Todd Schwartz	HLUS	1,925.00	2.50	4,812.50	Attend Hogan Lovells bi-weekly check-in (1.0); correspond with D. Ullo regarding DIP budget and notice of filing revised proposed final DIP order (.5); prepare for DIP hearing (2.0)
09/18/25	Danielle Ullo	HLUS	1,035.00	5.50	5,692.50	Negotiate and finalize DIP final order and credit agreement (2.2); draft notice of revised DIP final order and credit agreement (.5); call with DIP lender and Stapleton regarding DIP credit agreement (1.0); finalize schedules and exhibits to credit agreement (1.0); coordinate filing of revised DIP final order and credit agreement (.3); revise Socotra cash collateral stipulation (.5)
09/19/25	Todd Schwartz	HLUS	1,925.00	4.50	8,662.50	Attend final DIP hearing and status conference (1.0); correspond with D. Ullo regarding hearing outline for final DIP order (.5); prepare for same (3.0)
09/19/25	Danielle Ullo	HLUS	1,035.00	3.00	3,105.00	Prepare talking points for DIP hearing (1.2); prepare outline of cited cases for DIP hearing and assist in preparation (1.8)
09/22/25	Todd Schwartz	HLUS	1,925.00	2.20	4,235.00	Attend working group call (.5); correspondence with working group regarding DIP credit agreement (.3); review and analyze issues regarding DIP budget (.5); review and revise sale motion procedures (.9)
09/24/25	Danielle Ullo	HLUS	1,035.00	0.50	517.50	Exchange correspondence with E. Brady regarding Socotra properties serving as DIP collateral

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B230 - Financing/Cash Collections

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/25/25	Todd Schwartz	HLUS	1,925.00	0.20	385.00	Correspondence with D. Ullo regarding DIP order
09/26/25	Danielle Ullo	HLUS	1,035.00	2.10	2,173.50	Compile final DIP credit agreement for execution and review deeds of trust
Subtotal				54.40	69,853.00	

B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Jeff Uffner	HLUS	1,975.00	2.10	4,147.50	Telephone conference with FTI, B. Sharpe and R. Wynne regarding tax analysis and tax filings (.8); telephone conference with R. Wynne regarding potential strategies for approaching taxing authorities (.3); review emails and tax calculations from A. Raisdana (.7); review emails from E. McNeilly regarding tenant in common interests (.3)
09/02/25	Rick Wynne	HLUS	1,975.00	1.50	2,962.50	Attend meeting with J. Uffner, B. Sharp and A. Raisdana regarding need to file returns and K-1s by 9/15 (1.0); follow up telephone conference with J. Uffner regarding how to sell gain on sale issues (.5)
09/03/25	Jeff Uffner	HLUS	1,975.00	3.10	6,122.50	Review diligence material from A. Raisdana (.4); review plan of reorganization and related issues (1.2); research regarding tax treatment of Ponzi scheme (.8); email to R. Wynne and E. Brady regarding comments to plan (.7)
09/04/25	Jeff Uffner	HLUS	1,975.00	1.40	2,765.00	Review Dropbox files and related diligence materials from A. Raisdana and L. Collins (1.2); emails with

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
						R. Wynne regarding tax issues (.2)
09/05/25	Jeff Uffner	HLUS	1,975.00	1.60	3,160.00	Review PFI plan and disclosure statement (1.2); analysis of tax impact of Ponzi considerations (.4)
09/08/25	Jeff Uffner	HLUS	1,975.00	1.30	2,567.50	Discussion with C. Koo regarding tax aspects of transaction (.4); review revised plan (.6); review emails with tax return attachments from A. Raisdana (.3)
09/08/25	Caroline Koo	HLUS	1,115.00	2.10	2,341.50	Review and analyze plan (1.5); discuss next steps with J. Uffner (.6)
09/09/25	Jeff Uffner	HLUS	1,975.00	1.40	2,765.00	Discussion with C. Koo regarding issues for plan and disclosure statement (.3); review and comments regarding tax return and K-1 disclosures (.6); discussion with R. Wynne regarding tax treatment to investors (.2); diligence review of additional Dropbox materials (.3)
09/09/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Telephone conference with J. Uffner regarding KS Mattson Partners and LeFever Mattson tax return issues for 9/15 (.3); call with FTI regarding taxes (.5)
09/09/25	Caroline Koo	HLUS	1,115.00	0.50	557.50	Discuss open research points with J. Uffner
09/10/25	Jeff Uffner	HLUS	1,975.00	1.50	2,962.50	Review additional documentation and diligence (.7); research regarding substantive consolidations and tax considerations (.6); discussion with R. Wynne regarding tax matters (.2)

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/11/25	Jeff Uffner	HLUS	1,975.00	3.20	6,320.00	Review plan provisions (.4); review and further comments regarding LeFever Mattson tax filings (.4); discussions with R. Wynne regarding tax issues (.3); email to R. Itkin, Shield team and R. Wynne regarding explanation of tax issues and attaching form tax returns for filing (1.8); email to D. Grassgreen regarding tax issues and analysis (.3)
09/11/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Telephone conference with R. Itkin regarding tax issues (.2); review K-1 disclosure by LeFever Mattson (.2); review sample LeFever Mattson partnership return (.2); telephone conference with J. Uffner regarding to do issues on tax return (.2); review substantive consolidation for tax purposes research and article (.6)
09/11/25	Caroline Koo	HLUS	1,115.00	1.00	1,115.00	Research and analyze tax issues in connection with plan
09/12/25	Jeff Uffner	HLUS	1,975.00	3.00	5,925.00	Discussions with C. Koo regarding tax issues (.3); review plan documentation (.4); telephone conference with R. Wynne and D. Grassgreen regarding tax strategy (.6); follow up call with D. Grassgreen and C. Koo regarding tax issues and structuring (1); emails regarding tax return filings for KS Mattson Partners, including review of same (.7)
09/12/25	Rick Wynne	HLUS	1,975.00	2.40	4,740.00	Attend meeting with Keller

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Benvenuti, J. Uffner, E. McNeilly and Pachulski regarding tax issues (.8); prepare correspondence regarding LeFever Mattson taxable gain on sale for 2024, and LeFever Mattson tax documents (.4); telephone conference with J. Uffner regarding 9/15 tax return and K-1s (.2); attend meeting with J. Uffner and D. Grassgreen regarding complex tax issues, and prepare follow up correspondence and outline for R. Itkin regarding same (1.0)
09/12/25	Caroline Koo	HLUS	1,115.00	7.00	7,805.00	Conference call with D. Grassgreen (1.0); discuss proposed approach and matter documents and materials with J. Uffner (1.5); research and analyze tax issues in connection with proposed approach and disclosure schedule (3.5); review matter documents and materials (1.0)
09/14/25	Jeff Uffner	HLUS	1,975.00	0.70	1,382.50	Review C. Koo's email regarding tax strategy (.3); preliminary review of substantive consolidation motions (.4)
09/15/25	Jeff Uffner	HLUS	1,975.00	4.30	8,492.50	Telephone conferences with C. Koo regarding plan and tax issues (.4); review revised disclosure statement (.4); review substantive consolidation filings (.3); telephone conference with R. Wynne and Pachulski regarding tax issues relating to plan (.7); further discussions with R. Wynne regarding plan issues and tax filings

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.4) review KS Mattson Partners tax return filings (.3); draft outline of tax strategy for addressing investor tax issues and request additional diligence information (1.8)
09/15/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Attend meeting with J. Uffner, D. Grassgreen and J. Rosell regarding tax issues with respect to plan and partner interests (.5); review tax return and revisions to explanatory statement, and call and correspondence with J. Uffner, R. Itkin and E. McNeilly regarding same (.7); telephone conference with J. Uffner regarding tax issues (.2)
09/15/25	Caroline Koo	HLUS	1,115.00	5.80	6,467.00	Conference call with D. Grassgreen (1.0); review and analyze plan (1.5); research and analyze tax issues in connection with substantive consolidations and closing agreements (3.3)
09/16/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Attend conference call with J. Uffner, D. Grassgreen, J. Rosell, and R. Wynne regarding tax issues
09/16/25	Jeff Uffner	HLUS	1,975.00	2.50	4,937.50	Review and revise tax strategy outline (.6); discussion with S. Schneider regarding tax issues (.2); discussions with C. Koo regarding tax strategy (.4); telephone conference with R. Wynne, D. Grassgreen, C. Koo and others regarding proposed tax strategy and next steps (.6); finalize tax memorandum and circulate same to DSI and

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
						FTI (.7)
09/16/25	Rick Wynne	HLUS	1,975.00	1.70	3,357.50	Review tax strategy memorandum and cases, and attend meeting with Pachulski regarding same (.8); attend meeting with B. Sharp and FTI regarding taxes, and follow up correspondence regarding same (.5); review sample filed tax return (.4)
09/16/25	Caroline Koo	HLUS	1,115.00	2.70	3,010.50	Research and analyze tax issues in connection with plan (1.1); conference call with Hogan Lovells and Pachulski teams to discuss plan (.5); update draft proposed tax approach outline (.4); research and analyze issues in connection with proposed tax approach outline (.7)
09/17/25	Jeff Uffner	HLUS	1,975.00	1.30	2,567.50	Telephone conference with FTI, Keller Benvenuti, Pachulski and Hogan Lovells regarding tax strategy (.5); review entity tax returns (.8)
09/17/25	Rick Wynne	HLUS	1,975.00	1.60	3,160.00	Review tax materials (.6); call with FTI, Pachulski and Keller Benvenuti regarding taxes (1.0)
09/17/25	Caroline Koo	HLUS	1,115.00	2.10	2,341.50	Call regarding LeFever Mattson IRS settlement (1.1); research and analyze tax issues in connection with points raised in discussion (1.0)
09/18/25	Jeff Uffner	HLUS	1,975.00	0.30	592.50	Review and respond to emails regarding tax filings
09/18/25	Caroline Koo	HLUS	1,115.00	1.00	1,115.00	Research and analyze tax issues in connection with plan

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/18/25	Edward Joseph McNeilly	HLUS	1,295.00	0.60	777.00	Correspondence regarding K-1s (.1); research regarding Socotra mediation (.5)
09/19/25	Jeff Uffner	HLUS	1,975.00	1.60	3,160.00	Telephone conference with S. Golden, D. Grassgreen and C. Koo regarding 1031 transactions (.6); review related party transaction issues (.4); review additional tax diligence (.4); discussions with C. Koo regarding tax diligence (.2)
09/19/25	Caroline Koo	HLUS	1,115.00	2.70	3,010.50	Telephone conference with D. Grassgreen and S. Golden to discuss 1031 transactions (.5); prepare for call with Pachulski (.5); review and analyze open tax issues regarding plan (1.0); review documents provided in data room (.2)
09/22/25	Jeff Uffner	HLUS	1,975.00	1.30	2,567.50	Review additional diligence materials (.8); attend biweekly call with FTI and DSI (.5)
09/22/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Attend meeting with J. Uffner, A. Raisdana, B. Sharp, D. Taylor, E. Hold and S. Cuff regarding tax update (.5); review A. Raisdana pro forma financial statement, and correspondence and exhibit regarding acquisition costs (.4); review gain on sale calculations from A. Raisdana (.4)
09/22/25	Caroline Koo	HLUS	1,115.00	0.10	111.50	Discuss status updates with J. Uffner
09/25/25	Jeff Uffner	HLUS	1,975.00	0.60	1,185.00	Call with R. Wynne (.2); review additional gain calculations (.4)

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/25/25	Rick Wynne	HLUS	1,975.00	0.20	395.00	Telephone conference with J. Uffner regarding next steps required
09/25/25	Caroline Koo	HLUS	1,115.00	1.90	2,118.50	Research and analyze tax practice and procedure in connection closing agreements
09/26/25	Jeff Uffner	HLUS	1,975.00	0.90	1,777.50	Review additional tax return materials (.4); review and respond to emails regarding IRS meeting with respect to tax issues (.3); review and comments regarding K-1 submissions (.2)
09/26/25	Rick Wynne	HLUS	1,975.00	1.40	2,765.00	Prepare outline of tax issues for DSI to handle, and tax correspondence to IRS regarding same (.6); prepare summary of settlement for J. Uffner to evaluate any tax issues on cancellation of debt income or otherwise (.8)
09/26/25	Caroline Koo	HLUS	1,115.00	3.40	3,791.00	Research and analyze tax issues regarding plan
09/28/25	Jeff Uffner	HLUS	1,975.00	1.10	2,172.50	Review email from R. Wynne and documentation regarding Socotra settlement (.7); prepare email to Hogan Lovells, FTI and DSI regarding tax consequences of proposed settlement (.4)
09/29/25	Jeff Uffner	HLUS	1,975.00	0.40	790.00	Discussion with C. Koo regarding tax issues and diligence review
09/29/25	Caroline Koo	HLUS	1,115.00	4.90	5,463.50	Research and analyze tax issues in connection with Socotra settlement and plan (4.4); discuss same with J. Uffner (.5)
09/29/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Review K-1 letters

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B240 - Tax Issues

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/30/25	Jeff Uffner	HLUS	1,975.00	1.10	2,172.50	Discussions with C. Koo regarding tax analysis (.4); telephone conference with R. Wynne and C. Koo (.3); review Socotra settlement materials (.4)
09/30/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Attend meeting with J. Uffner and C. Koo regarding B. Sharp request with respect to tax process, method to obtain old filed returns we do not have, and issues regarding Socotra settlement creating gain (.5); follow up call with R. Itkin regarding tax issues, and Socotra settlement agreement (.4); call with B. Sharp regarding to do items with respect to tax meeting with IRS and Assistant U.S. Attorney (.2)
09/30/25	Caroline Koo	HLUS	1,115.00	3.80	4,237.00	Conference call with J. Uffner and R. Wynne regarding next steps (.3); research and analyze closing agreement and tax return request procedures (3.5)
Subtotal				89.90	143,225.50	

B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/05/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Call with Verita regarding bar date issues
09/09/25	Erin Brady	HLUS	1,570.00	2.20	3,454.00	Confer with E. McNeilly regarding bar date notice (.3); prepare comments to town hall script (1.9)
09/11/25	Edward Joseph McNeilly	HLUS	1,295.00	0.50	647.50	Correspondence regarding voluntary questionnaire and publication notice

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B310 - Claims Administration and Objections

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	0.20	259.00	Emails with Verita regarding claims
09/13/25	Edward Joseph McNeilly	HLUS	1,295.00	0.80	1,036.00	Telephone conference with S. Golden regarding creditor claim issue (.4); draft email to creditor regarding claim issues (.4)
09/16/25	Erin Brady	HLUS	1,570.00	0.50	785.00	Respond to investor emails and questions
09/17/25	Isolte Beal	HLUS	760.00	4.00	3,040.00	Correspondence with Hogan Lovells team regarding investor inquiries (1.8); review and revise petition materials (2.2)
09/22/25	Isolte Beal	HLUS	760.00	0.90	684.00	Correspondence with Hogan Lovells team regarding investor inquiries (.3); revise and compile exhibits to stay violation letter (.6)
09/23/25	Isolte Beal	HLUS	760.00	1.20	912.00	Attend to investor inquiries (.3); prepare stay violation letter (.9)
09/24/25	Isolte Beal	HLUS	760.00	1.00	760.00	Revise petition resolutions (.6); prepare supplemental tax letters (.4)
Subtotal				12.10	12,613.50	

B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/02/25	Erin Brady	HLUS	1,570.00	5.00	7,850.00	Review and comment on disclosure statement insert (2.7); attend conference call with Keller Benvenutti (D. Taylor, T. Ruff), Pachulski (S. Golden, D. Grassgreen, J. Rosell) and R. Wynne and E. McNeilly regarding plan and disclosure statement issues and timing (1.5); analyze tenant in common issues

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						(.8)
09/02/25	Rick Wynne	HLUS	1,975.00	2.70	5,332.50	Telephone conference with D. Grassgreen regarding plan and Socotra mediation (.4); multiple calls with E. Brady regarding substantive consolidation and plan, investor class treatment, property values, liquidity analysis, and tax issues (.6); telephone conference with R. Itkin regarding tax and corporate governance issues for plan (.3); prepare correspondence to E. Brady and R. Itkin regarding plan and Socotra mediation (.4); telephone conference with R. Itkin regarding plan and substantive consolidation (.5); attend meeting with Stapleton and R. Itkin regarding plan, substantive consolidation and property values (.5)
09/02/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Prepare summary for R. Itkin regarding plan issues (.5); review L. Miller plan comments (.6)
09/02/25	Edward Joseph McNeilly	HLUS	1,295.00	2.30	2,978.50	Attend Zoom meeting with Hogan Lovells, Pachulski and Keller Benvenuti teams regarding plan (1.6); review and comment on chapter 11 plan (.7)
09/03/25	Erin Brady	HLUS	1,570.00	3.70	5,809.00	Conference call with S. Golden, D. Taylor, D. Silvera, E. McNeilly, J. Rosell, R. Wynne and D. Grassgreen regarding PwC analysis (1.6); review and analyze plan (2.1)
09/03/25	Rick Wynne	HLUS	1,975.00	3.50	6,912.50	Review plan and comments, including from

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						L. Miller and E. McNeilly, and prepare comments from R. Itkin and R. Wynne (1.4); attend plan review meeting regarding all open issues with LeFever Mattson, debtors and creditors committee (1.9); telephone conference with B. Sharp regarding plan issues (.2)
09/03/25	Edward Joseph McNeilly	HLUS	1,295.00	2.30	2,978.50	Review and comment on chapter 11 plan (.5); attend video conference with Hogan Lovells, Pachulski and Keller Benvenuti teams regarding plan (1.8)
09/04/25	Erin Brady	HLUS	1,570.00	7.50	11,775.00	Conference call with Pachulski and Stapleton teams, R. Wynne and R. Itkin regarding recovery analysis (1.5); conference call with J. Rosell, T. Rupp, D. Grassgreen, R. Wynne, E. McNeilly and D. Taylor regarding plan (.6); follow up conference call with J. Rosell, T. Rupp, D. Grassgreen, R. Wynne, E. McNeilly and D. Taylor regarding plan (.7); research and draft 363(h) plan insert (2.5); conference call with R. Wynne and E. McNeilly regarding plan (.6); analyze plan issues and revised plan drafts (1.1); review case law on investor classification (.5)
09/04/25	Rick Wynne	HLUS	1,975.00	7.80	15,405.00	Review R. Itkin plan comments, and preliminary replies (.4); telephone conference with E. Brady and R. Itkin regarding plan changes to one class for all investors, including review of 9th

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Circuit and other circuit cases (1.2); review Trinh decision (.4); review Ritter decision, and Donell case (.6); review recovery analysis and attend meeting with PwC, Pachulski, Stapleton, R. Itkin, E. Brady and E. McNeilly regarding substantive consolidation and options (1.0); review EPD, First Alliance and other Ponzi cases, including Neilson, etc. (1.9); attend two meetings with Pachulski and Keller Benvenutti regarding plan issues and changes to one class (1.8); multiple calls with R. Itkin regarding plan issues and changes (.5)
09/04/25	Edward Joseph McNeilly	HLUS	1,295.00	4.20	5,439.00	Telephone conference with E. Brady and R. Wynne regarding plan (.6); attend plan and recovery analysis meeting with Pachulski, Keller Benvenutti, PwC, Hogan Lovells and Stapleton teams (1.5); attend plan call with Pachulski, Hogan Lovells and Keller Benvenutti teams (.6); review Ninth Circuit Kowell case regarding plan classification issues (.3); attend further plan call with Pachulski, Hogan Lovells and Keller Benvenutti teams (.7); research section 363(h) plan precedent (.5)
09/05/25	Erin Brady	HLUS	1,570.00	5.70	8,949.00	Conference call with J. Rosell, S Golden, D. Grassgreen, E. McNeilly, T. Rupp, D. Silvera, D. Taylor, B. Wilson and R.

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						Wynne regarding plan revisions (.5); review revised plan drafts (1.3); attend to issue regarding finalizing plan for filing (1.3); revise global settlement insert for disclosure statement (2.6)
09/05/25	Rick Wynne	HLUS	1,975.00	3.40	6,715.00	Review and revise plan introduction (.2); review PFI plan and disclosure statement (.6); review revised plan (.6); review and finalize plan, and call with LeFever Mattson and creditors committee regarding same (1.5); telephone conference with E. Brady regarding plan issues (.3); telephone conference with R. Itkin regarding follow up on plan issues (.2)
09/05/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Prepare correspondence to LeFever Mattson and creditors committee regarding plan, K. Mattson motion, chapter 7 conversion for K. Mattson, and status conference statement (.3); attend weekly meeting with Stapleton and R. Itkin (1.0)
09/05/25	Edward Joseph McNeilly	HLUS	1,295.00	0.40	518.00	Attend Zoom conference with Hogan Lovells, Pachulski and Keller Benvenutti teams regarding plan
09/08/25	Erin Brady	HLUS	1,570.00	3.20	5,024.00	Revise disclosure statement and global settlement insert
09/08/25	Rick Wynne	HLUS	1,975.00	0.40	790.00	Review Keller Benvenutti comments regarding draft global settlement outline
09/09/25	Erin Brady	HLUS	1,570.00	6.30	9,891.00	Revise disclosure statement insert

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
09/09/25	Rick Wynne	HLUS	1,975.00	0.50	987.50	Review correspondence from creditors committee to secured lender group (.2); telephone conference with B. Sharp and P. Taylor regarding T. LeFever raising issues with respect to plan, substantive consolidation, and progress of chapter (.3)
09/10/25	Erin Brady	HLUS	1,570.00	0.10	157.00	Confer with S. Golden regarding filing new entities
09/10/25	Rick Wynne	HLUS	1,975.00	0.60	1,185.00	Review property and equity road map analysis by Stapleton for plan and disclosure statement and mediation and Socotra list, and correspondence regarding same
09/10/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Emails regarding plan confirmation and stipulation
09/11/25	Erin Brady	HLUS	1,570.00	2.90	4,553.00	Revise disclosure statement insert (2.7); analyze substantive consolidation issues (.2)
09/11/25	Rick Wynne	HLUS	1,975.00	0.80	1,580.00	Review investor claim settlement motion (.3); prepare correspondence to D. Grassgreen regarding plan and timing issues (.2); review draft plan summary and investor frequently asked questions (.3)
09/12/25	Edward Joseph McNeilly	HLUS	1,295.00	0.30	388.50	Telephone conference with S. Golden regarding petitions (.2); work on script (.5); email with S. Golden regarding petitions (.1)
09/15/25	Erin Brady	HLUS	1,570.00	1.40	2,198.00	Confer with B. Wilson, J. Rosell, D. Grassgreen, J. Kim, E. McNeilly, T. Rupp,

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						D. Silvera, D. Taylor and R. Wynne regarding plan documents for filing (.5); review KSM Mattson Partners organizational chart (.2); revise disclosure statement (.7)
09/15/25	Rick Wynne	HLUS	1,975.00	0.70	1,382.50	Review timeline, disclosure statement and motions (.5); review Umpqua Bank questions for lender meeting (.2)
09/15/25	Edward Joseph McNeilly	HLUS	1,295.00	0.90	1,165.50	Emails regarding petitions (.7); office conference with E. Brady regarding petitions (.2)
09/15/25	Isolte Beal	HLUS	760.00	0.60	456.00	Review petition materials and revise draft petition consents
09/16/25	Erin Brady	HLUS	1,570.00	5.60	8,792.00	Revise disclosure statement (3.5); revise plan summary (1.1); revise claims procedures motion (.6); confer with R. Wynne regarding disclosure statement exhibits and related issues (.4)
09/16/25	Rick Wynne	HLUS	1,975.00	1.30	2,567.50	Review and revise status report (.5); review and revise plan summary (.8)
09/16/25	Danielle Ullo	HLUS	1,035.00	0.80	828.00	Provide comments to factual sections of disclosure statement regarding KS Mattson Partners properties
09/17/25	Erin Brady	HLUS	1,570.00	1.20	1,884.00	Prepare email to D. Taylor regarding KS Mattson Partners org chart (.1); prepare email to B. Wilson regarding plan documents (.3); prepare comments to plan summary regarding calculation for investor claims (.3); confer with R. Wynne regarding open

	Date	November 21, 2025
KS Mattson Partners, LP	Invoice No	19600011856
	Our Ref	795070.000001

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
						documents (.2); prepare email to R. Itkin regarding plan documents (.1); prepare email to J. Rosell regarding plan documents (.1); prepare email to R. Itkin regarding plan summary comments (.1)
09/17/25	Rick Wynne	HLUS	1,975.00	1.10	2,172.50	Review and revise plan summary (.3); review disclosure statement motion (.4); review claims procedure motion (.4)
09/17/25	Edward Joseph McNeilly	HLUS	1,295.00	0.10	129.50	Call with E. Brady regarding outstanding tasks on petitions
09/18/25	Erin Brady	HLUS	1,570.00	1.30	2,041.00	Work on disclosure statement insert
09/22/25	Rick Wynne	HLUS	1,975.00	1.20	2,370.00	Attend meeting with lender group regarding plan, and follow up call and correspondence regarding same
09/23/25	Rick Wynne	HLUS	1,975.00	0.30	592.50	Review PowerPoint for lender plan negotiations, and call and correspondence regarding same
09/25/25	Danielle Ullo	HLUS	1,035.00	0.40	414.00	Exchange correspondence with Stapleton and committee counsel regarding disclosure statement
09/26/25	Erin Brady	HLUS	1,570.00	0.60	942.00	Analyze issues regarding filing additional debtors for inclusion in plan
09/26/25	Rick Wynne	HLUS	1,975.00	0.90	1,777.50	Review plan open issues, then attend meeting with Pachulski, Keller Benvenuti and DSI regarding plan changes needed and 10/15 filing preparation
09/26/25	Edward Joseph	HLUS	1,295.00	0.50	647.50	Attend call regarding KS

	Date	November 21, 2025
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	Our Ref	795070.000001

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

B320 - Plan and Disclosure Statement (including Business Plan)

Date	Name	LLP	Rate	Hours	Amount	Narrative
	McNeilly					Mattson Partners plan
09/26/25	Edward Joseph McNeilly	HLUS	1,295.00	0.70	906.50	Work on petitions (.4); emails regarding KS Mattson Partners petitions (.3)
09/30/25	Erin Brady	HLUS	1,570.00	0.80	1,256.00	Attend lender call regarding plan
			Subtotal	86.50	142,610.00	
Total Professional Services				855.50		USD 1,229,368.50
Less 15% Discount						(184,405.28)
Total Professional Services Charged						USD 1,044,963.22

	Date	November 21, 2025
KS Mattson Partners, LP	Invoice No	19600011856
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Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Summary

Timekeeper Name	Hours	Rate	Fees
Jeff Uffner	34.70	1,975.00	68,532.50
Rick Wynne	136.70	1,975.00	269,982.50
Todd Schwartz	24.50	1,925.00	47,162.50
Megan Nishikawa	51.60	1,630.00	84,108.00
Erin Brady	155.60	1,570.00	244,292.00
Loryn Dunn Arkow	26.60	1,515.00	40,299.00
Ann Chungsun Kim	18.70	1,475.00	27,582.50
Tom Boer	6.90	1,400.00	9,660.00
Edward Joseph McNeilly	158.50	1,295.00	205,257.50
Caroline Koo	39.00	1,115.00	43,485.00
Maia Jorgensen	11.20	1,115.00	12,488.00
Danielle Ullo	119.20	1,035.00	123,372.00
Katie M. Chacho	12.70	855.00	10,858.50
Isolte Beal	40.40	760.00	30,704.00
Leen Bukai	1.10	760.00	836.00
Tracy Southwell	12.70	655.00	8,318.50
Henaa Salehi	5.40	450.00	2,430.00
Total Professional Services	855.50		USD 1,229,368.50
Less 15% Discount			(184,405.28)
Total Professional Services Charged			USD 1,044,963.22

	Date	November 21, 2025
KS Mattson Partners, LP	Invoice No	19600011856
	Our Ref	795070.000001

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Summary

Task	Task Code Description	Hours	Fees
01	Substantive Consolidation	0.60	699.00
02	Criminal Case	26.70	42,339.50
03	Hearing	11.00	18,962.50
B110	Case Administration	68.30	73,184.00
B120	Asset Analysis/Recovery & Real Estate	188.50	260,821.50
B130	Asset Disposition	79.90	95,828.50
B140	Relief from Stay/Adequate Protection Proceedings	17.60	22,256.00
B150	Meetings of and Communications with Creditors	65.60	93,785.00
B160	Fee/Employment Applications	6.50	9,440.00
B190	Other Contested Matters (excluding assumption/rejection moti	131.80	221,473.50
B195	Non-Working Travel	8.20	14,251.00
B210	Business Operations	7.90	8,026.00
B230	Financing/Cash Collections	54.40	69,853.00
B240	Tax Issues	89.90	143,225.50
B310	Claims Administration and Objections	12.10	12,613.50
B320	Plan and Disclosure Statement (including Business Plan)	86.50	142,610.00
Total Professional Services		855.50	USD 1,229,368.50

	Date	November 21, 2025
KS Mattson Partners, LP	Invoice No	19600011856
	Our Ref	795070.000001

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Disbursement and Charges

ESCRIBERS, LLC - hearing transcript	142.10
ESCRIBERS, LLC - hearing transcript	37.70
HL TECH LEGAL TECHNOLOGY & CONSULTING LLC - Services for the month of August 2025	4,256.80
ACE ATTORNEY SERVICE INC - Messenger service pick-up and drop off documents.	91.91
ACE ATTORNEY SERVICE INC - Messenger service pick up and drap off documents.	145.93
Computer Research - Pacer	146.00
Word Processing	43.75
eDiscovery Data Storage Fees - Internal	1,530.34
Total for Other Charges	<u>USD 6,394.53</u>

	Date	November 21, 2025
KS Mattson Partners, LP	Invoice No	19600011856
	Our Ref	795070.000001

Advise Independent Manager in Role w/r/t Chapter 11 Bankruptcy

Outstanding Invoices

Paid-in-full invoices and corresponding payments are not shown below.
This summary reflects payments received through November 21, 2025
This statement includes the current invoice.

Invoice No.	Date	Fees	Other Charges	Total	Payments	Date Last Payment	Balance USD
19600011855	11/21/25	1,007,885.80	8,020.58	1,015,906.38	0.00		1,015,906.38
19600011730	11/21/25	1,537,413.70	4,101.65	1,541,515.35	0.00		1,541,515.35
19600011856	11/21/25	1,044,963.22	6,394.53	1,051,357.75	0.00		1,051,357.75
Outstanding Invoices:							3,608,779.48

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Exhibit G
Biographies

Richard L. Wynne

Partner, Los Angeles | New York

Richard Wynne has a national reputation for successfully representing company and creditor clients in complex restructurings in a wide variety of industries. He focuses on solving clients' most challenging problems by designing and implementing negotiations and litigation strategy, and serving as lead restructuring and trial counsel.

One Chambers USA Bankruptcy and Restructuring respondent said, "It was hard to see a goal line rather than a direction; being able to maneuver through that complex process was one of the skills few lawyers have, and Richard is on that short list...He is an absolute master in what he does and provides excellent strategic advice..." Both company and creditor clients in Chambers have praised him as a 'fantastic' lawyer who 'does exceptionally well in court... Judges really respect him..."

After a decisive trial victory, SDNY Bankruptcy Judge Wiles ordered Netflix to pay Relativity Media \$800,000 in attorneys fees overruling the objection that "Relativity should not be allowed to recover the cost of a Cadillac (or a Ferrari) if a Honda Civic would have done the job" by ruling that "A complicated, fast-paced 'bet the company' litigation requires counsel of higher caliber and expense than a routine case with little at stake. A party may not need a Ferrari to go to the corner grocery store, but winning a Grand Prix race is a different matter."

Richard's representations span a large variety of industries and positions. He is currently representing the City of Los Angeles in the pending Oceanwide Plaza ("Graffiti Towers") case, the largest pending chapter 11 case in Los Angeles, a large REIT in renegotiating its secured working capital facility, the independent board of a diversified social media company engaged in a complex multi-party alternative restructuring as well as



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richard.wynne@hoganlovells.com

Practices

Restructuring and Special Situations

Industries

Financial Institutions

Private Capital

Areas of focus

Media and Entertainment

Sports

Education and admissions

Education

J.D., Columbia Law School, 1982

B.A., Indiana University, 1979

Admissions

California

New York

New Jersey

the independent directors of such chapter 11 debtors as the hedge fund Highland Capital.

Representative Experience

- Currently representing the City of Los Angeles in the Oceanwide Plaza “Graffiti Towers” case, the largest pending Chapter 11 case in Los Angeles.
- Currently representing the independent board of a social media company in restructuring its secured and unsecured debt and major contractual obligations.
- Currently representing REIT with US\$500m of secured debt and over US\$1.5bn in assets in negotiating a restructuring with its main working capital lender.
- Currently representing independent directors for this large and diversified hedge fund that filed for chapter 11 in the Northern District of Texas, Dallas division.
- Currently representing Gryphon Digital Mining, Inc. with respect to the chapter 11 case of Core Scientific, Inc and in ongoing District Court litigation with Sphere 3D Corp.
- Represented Palisades Growth Capital in acting as DIP Lender and plan sponsor in the purchase of medical technology data service company Hart, Inc through a Chapter 11 plan sale.
- Represented Conseco, Inc. in the then third largest U.S. bankruptcy filing, with reported assets of over US\$60bn. Sold Conseco Finance and confirmed a Chapter 11 plan in nine months.*
- Represented Fleming Companies Inc., the nation's largest distributor of consumable packaged goods, with sales of over US\$17bn.
- Represented Relativity Media in its 2015 SDNY Chapter 11 case, selling Relativity Television, confirming a plan of reorganization and restructuring approximately US\$1bn in creditor claims.*
- Represented American Apparel, Inc. as lead debtors' and trial counsel in its 2015 Chapter 11 case, confirming contested debt/equity conversion plan within initial exclusivity period.
- Represented publicly traded “superbug” biotech company Achaogen Inc. in its Chapter 11 bankruptcy case, selling the company’s assets in a complex regulatory environment.
- Represented All American Oil and Gas in its Chapter 11 bankruptcy filing and company sale, in the Bankruptcy Court for the Western District of Texas.
- Represented Mattel in the Toys R Us Chapter 11 case, obtaining critical trade agreement of over US\$100m as well as global settlement facilitating chapter 11 plan.

- Represented FGIC, lending creditor owed over \$2 Billion and committee chair in the ResCap Chapter 11 case, leading successful global settlement negotiations.
- Represented 400 member committee of non-agent lenders owed US\$4.3bn in senior secured debt by Adelphia Communications, obtained full recovery.
- Represented the Official Committee of Unsecured Creditors of Wave, a Silicon Valley processor tech company. Pursuant to the confirmed plan, unsecured creditors received a 98% recovery.
- Represented Synopsys in the AtopTech Chapter 11 case, obtaining full recovery on pre-petition judgment obtained by Synopsys as well as enforcement of permanent injunction binding on buyer.*
- Represented Sprint Nextel Corp. with respect to the out-of-court restructuring and financing of its majority-owned subsidiary Clearwire Corp.
- Represented Fox and Universal as rescue and DIP financiers to Rhythm & Hues, which filed for Chapter 11 just before winning an Oscar for Life of Pi.*
- Represented Creditors Committee in Chapter 11 cases of major land developer Bruce Elieff and six entities, successfully subordinating claim of senior secured creditor under Bankruptcy Code § 510(b).

Awards and rankings

2025, Band 1, Bankruptcy/Restructuring (California), *Chambers USA*

2006-2024, Bankruptcy/Restructuring (California), *Chambers USA*

2019-2024, Finance: Restructuring (Including Bankruptcy): Corporate, Recommended, *Legal 500 US*

2025, 500 Leading Global Restructuring & Insolvency Lawyers, *Lawdragon*

2020, Restructuring and Insolvency, Highly Regarded - State, *IFLR1000*

2006-2024, Bankruptcy/Restructuring (USA), *Chambers Global*

Erin N. Brady

Partner, Los Angeles | New York

With over two decades of experience, Erin Brady has fast become one of California's leading lawyers representing clients in critical moments of distress.

Erin represents corporate debtors, lenders, investors, independent directors, creditors' committees, individual creditors, and others in high-stakes corporate restructurings and bankruptcy litigation. While she has extensive experience across all industry sectors, she has exceptional expertise in the life sciences and retail sectors. Clients rely on her strategic insights, pragmatic approach, and exceptional advocacy.

She has played a key role in many of the most high-profile and complex chapter 11 cases over the past 25 years, including Steward Health, Invitae, American Apparel, Toys R Us, Achaogen, Adelphia Communications, Chemtura, Fleming Companies, All American Oil & Gas, CarbonLite, Quiznos, Rescap, Relativity Media, Consecro, Golfsmith, and Thornburg Mortgage.

As a leader in the California restructuring community (as well as New York's, where she is licensed to practice), Erin is highly active in improving diversity in the restructuring community, leading the Pipeline Subcommittee for the American Bankruptcy Institute's Diversity & Inclusion Working Group. She also plays a leading role in HL Inclusion initiatives in the U.S. and takes pride in serving as a mentor for the women in her practice.

Erin's wide-spanning knowledge of the finance sector and commitment to excellence for her clients have been recognized with many of the legal industry's most prestigious awards. In 2020, Finance Monthly recognized her as "Finance Lawyer of the Year". She has also been recommended in The Legal 500 and Chambers rankings for corporate restructuring and was



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Practices

Restructuring and Special Situations
Crisis Leadership Team

Industries

Consumer
Financial Institutions
Private Capital

Areas of focus

Fashion and Luxury Brands
Food and Beverages
Retail and Consumer Goods

Education and admissions

Education

J.D., Pepperdine University School of Law, 2001
B.A., Cardinal Stritch University, 1998

Admissions

California
New York
District of Columbia

among the Global Restructuring Review's and Law360's "Top 40 Under 40" restructuring lawyers.

Representative Experience

- Representing Orlando Health in its section 363 acquisition of the "Space Coast Hospitals" from Steward Health in the context of Steward's chapter 11 bankruptcy cases.
- Representing CHRISTUS Health in its section 363 acquisition of the Wadley Hospital from Steward Health in the context of Steward's chapter 11 bankruptcy cases.
- Representing a Fortune 500 company in its section 363 acquisition of Invitae Genetics in the context of Invitae's chapter 11 bankruptcy cases.
- Representing the independent board of Acorda Therapeutics in its restructuring and chapter 11 cases.
- Representation of publicly traded biotech company Achaogen Inc. in its Chapter 11 bankruptcy filing, currently pending in Delaware Bankruptcy Court.
- Representing the City of Los Angeles in the Oceanwide bankruptcy case — i.e., the "Graffiti Towers" bankruptcy — pending in the Central District of California.
- Representing Mattel Inc. as largest unsecured creditor and co-chair of the creditors' committee in the Toys 'R' Us Chapter 11 cases.
- Represented American Apparel as lead debtors' counsel in its 2015 Chapter 11 case, which resulted in a plan effectuating a debt/equity conversion in less than four months.*
- Represented American Apparel in its second Chapter 11 case in 2016, which resulted in the sale of substantially all of the company's assets to Gildan Activewear.*
- Represented Fleming Companies in the sale of substantially all of its grocery store distribution business.*
- Represented Consumer Capital Partners and related individuals in their defense against threatened claims by Avenue Capital Management regarding Quiznos' restructuring.*
- Representation of All American Oil and Gas Inc. in its Chapter 11 bankruptcy filing, currently pending in the Bankruptcy Court for the Western District of Texas.
- Represented the Post Confirmation Trust of Fleming Companies in nearly all facets of its wind-down in bankruptcy.*
- Represented Financial Guarantee Insurance Co. as one of the largest unsecured creditors of Residential Capital and its affiliated debtors appointed in the Chapter 11 cases.*

- Obtained the dismissal of 22 out of 31 claims for The Royal Bank of Scotland PLC filed by the Chapter 11 trustee in the Chapter 11 case of Thornburg Mortgage Inc.*
- Represented Sprint Nextel Corp. with respect to the out-of-court restructuring and equity raise of Clearwire Corp. and Clearwire LLC.*
- Successfully represented the Los Angeles Metropolitan Transportation Authority in resolving a seven-year battle over its use of eminent domain powers.*
- Successfully represented an ad hoc committee of bondholders in the Chemtura bankruptcy case.*

Awards and rankings

2023-2025, Bankruptcy/Restructuring (California), *Chambers USA*

2019-2023, Finance: Restructuring (Including Bankruptcy): Corporate, *Legal 500 US*

2021-2022, Bankruptcy/Restructuring (California), Up and Coming, *Chambers USA*

2025, 500 Leading Global Restructuring & Insolvency Lawyers, *Lawdragon*

2020, Restructuring and insolvency, Highly Regarded - State, *IFLR1000*

2020, Finance Lawyer of the Year (USA), *Finance Monthly 2020*

2018, Restructuring and Insolvency, Notable Practitioner, *IFLR1000*

2008, 2010-2017, Bankruptcy, *Southern California Super Lawyers*

2016, Top 10 Rising Stars Under 40, Bankruptcy, *Law360*

2016, 40 Under 40, *Global Restructuring Review*

2025, Sec. 363 Sale of the Year (over \$100m), Key Partner, *M&A Advisor*

Todd Schwartz

Partner, Silicon Valley

Todd Schwartz advises companies and private equity and venture capital funds with respect to their end-to-end capital solution needs, from raising capital to deployment and management. He advises clients on mergers and acquisitions; private equity and venture capital fund formation; minority, co-investment, structured preferred, and venture capital investments; and restructurings, workouts, and distressed investments.

His work has spanned a number of the firm's key industry sectors, including technology and telecommunications, financial services, energy, and automotive and mobility. Schwartz also has extensive experience in the aerospace and defense, and real estate industries.

Todd has been noted for his "incredible professionalism and ability," for being a "terrific" lawyer, and his "extremely hard" work. He has further been noted for "creative, out-of-the-box thinking" and follow-on execution. His work has been recognized by the Turnaround Management Association for doing an "incredible job" resulting in an "extraordinary achievement" for his client.

Schwartz received a B.A. in Integrative Biology and Legal Studies from the University of California, Berkeley. He received his J.D. from the University of Illinois College of Law, where he graduated magna cum laude and was a member of the University of Illinois Law Review.

Representative Experience

- Orlando Health in its section 363 acquisition of the "Space Coast Hospitals" from Steward Health in the context of Steward's chapter 11 bankruptcy cases.
- CHRISTUS Health in its section 363 acquisition of the Wadley Hospital from Steward Health in the context of Steward's chapter 11 bankruptcy cases.
- Redmile Group in connection with many investments in medical device, therapeutic, and healthcare related



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Practices

Private Equity

Mergers and Acquisitions

Education and admissions

Education

J.D., University of Illinois College of Law, 2007

B.A., University of California, Berkeley, 2003

Admissions

California

Illinois

Ohio

Texas

platforms, including ElevateBio, Zeno Pharmaceuticals, EmployerDirect Healthcare, Stoke Therapeutics, Immunovant, Inc., Repare Therapeutics, ImmunoGen, Inc., Pliant Therapeutics, Akeru Therapeutics, Hookipa Pharma, Neurogene, MedAvail, Neoleukin Therapeutics

- Seno, a medical imaging company formed to commercialize a new modality in cancer screening and diagnosis called opto-acoustic imaging
- Structurlam Mass Timber, a mass timber production company, in connection with its chapter 11 filing and 363 sale (Winner of “Materials Deal of the Year” by M&A Advisors 2023).
- Global Cloud Xchange, a subsea telecommunications and network service provider, in connection with its chapter 11 filing.*
- Charming Charlie, a teen jeweler and women's accessory retail chain, in connection with its chapter 11 filing.*
- Gradalis, a late stage biotechnology company focused on the development and commercialization of novel personalized therapeutics to treat cancer.
- Celenova, a design and develop proprietary medical device coating technologies
- Refocus Group, the maker of the visibility micro insert system
- OnPoint, the developer of intraocular lens technology to improve post-cataract surgery vision
- Performance Health, the manufacturer and marketer of topical analgesics, therapy bands, and other healthcare products
- G-Con Manufacturing, the designer and producer of portable clean rooms
- Counsyl, a provider of genetic testing for family planning
- PLDevelopment, who develop packaging solutions for private-label and over-the-counter pharmaceuticals
- One Aviation Corporation, an aircraft design and manufacturing company, in connection with its chapter 11 reorganization.*
- Vanguard Natural Resources, a publicly traded limited liability company focused on acquisition, production, and development of oil and natural gas properties, in connection with its chapter 11 reorganization.*
- Atlas Resource Partners, a publicly traded exploration and production master limited partnership.*
- Innkeepers USA Trust, the owner and operator of an extensive portfolio of extended-stay and select-service hotels, in connection with its chapter 11 reorganization.*

- GGPLP L.L.C., the owner and manager of more than 200 regional shopping centers and other properties, in connection with its chapter 11 reorganization and sale of real property.*
- Visteon Corporation, a Fortune 500 global automotive supplier, in connection with its chapter 11 reorganization and numerous 363 sales.*
- SIRVA, Inc., a leader in the global relocation industry, in connection with its prepackaged chapter 11 case.*
- Portola Packaging, Inc., a leading designer, manufacturer, and marketer of tamper-evident plastic closures, in connection with its prepackaged chapter 11 case.*
- Calpine Corporation, the world's largest producer of geothermal electricity, in connection with its chapter 11 case.*
- Roaring Fork Energy Partners, a Dallas, Texas based exploration and production company in connection with potential 363 sale transactions.*
- Platinum Equity Capital Partners, in connection with potential 363 sale transactions.*
- Sorrento Therapeutics, in connection with the acquisition of BioServ through a 363 sale transaction.*
- Victory Park Capital, in connection with its acquisition of Mi Pueblo, a Latino supermarket chain with 21 locations and approximately 3,000 employees, through chapter 11 plan process.*
- Parallax Capital, in connection with a potential 363 sale transaction.*
- Firsthand Technology Value Fund, in connection with its acquisition of IntraOp Medical Care, a medical device company based in Sunnyvale, California, through a 363 sale process.*
- Power purchase providers in connection with the PG&E chapter 11 bankruptcy filing*

Awards and rankings

2025, Sec. 363 Sale of the Year (over \$100m), Key Partner, *M&A Advisor*

2024, Sec. 363 Sale of the Year (over \$100m), Leading Lawyer, *M&A Advisor*

Edward McNeilly

Senior Associate, Los Angeles

Edward McNeilly offers clients exceptional legal counsel as they navigate the complex process of restructuring and insolvency.

Edward draws upon his experience of practicing in the United Kingdom and in the United States to help debtors and creditors resolve their most complex stateside and international issues. Clients recognize Edward's tenacity and ability to develop practical solutions to their most complex matters.

Edward has represented clients in a range of areas in both the United Kingdom and the United States, including bankruptcy proceedings, out-of-court restructurings, and finance deals.

Notably, Edward has taken on a number of pro bono cases, helping clients with issues surrounding immigration and foreclosure.

Representative Experience

- Represented the Official Committee of Unsecured Creditors and subsequent Liquidating Trust of Wave Computing, Inc. in its chapter 11 case, resulting in a 98% recovery to unsecured creditors.
- Represented the Ad Hoc Committee of Noteholders in the multi-jurisdictional financial restructuring of Atento Luxco 1 through an English restructuring plan.
- Represented Official Creditors' Committee of Virgin Orbit Holdings, Inc., commercial space company founded by Richard Branson's Virgin Group, in its chapter 11 case
- Representing the Official Committee of Unsecured Creditors in the chapter 11 case of Unconditional Love, Inc. (dba Hello Bello).
- Represent an ad hoc group of secured noteholders of Brazilian airline GOL Linhas Aereas Inteligentes in its chapter 11 case.
- Represented Official Creditors' Committee of CarbonLite Holdings LLC in its chapter 11 case
- Represented Official Creditors' Committee in chapter 11 case of Kfir Gavrieli, co-founder of Tieks shoe brand, which culminated in a full-pay chapter 11 plan



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Practices

Restructuring and Special Situations

Industries

Financial Institutions

Education and admissions

Education

Legal Practice Course, BPP Law School, 2012

Graduate Diploma in Law, BPP Law School, 2011

Ph.D., University of Cambridge, 2011

M.Phil., University of Cambridge, 2007

M.A., University of St Andrews, 2006

Admissions

California

Washington

Solicitor, England and Wales

Languages

Spanish

French

- Represented a term lender in restructuring a specialty agriculture company through its restructuring, with the client acquiring majority ownership in the company*
- Represent a major counterparty in The Weinstein Company's chapter 11 cases
- Represented the Official Creditors Committee of Sears Holding Corporation*
- Represented administrators in the UK administrations of London-listed companies: Afren plc, Africa-focused oil E&P company, and African Minerals Ltd, a company with mining interests in Sierra Leone*
- Represented Creditors Committee in chapter 11 cases of land developer Bruce Elieff and six entities, successfully subordinating claim of senior secured creditor under Bankruptcy Code § 510(b)

Danielle Ullo

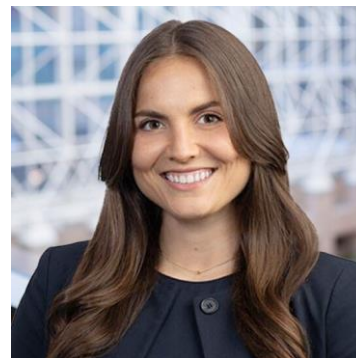
Associate, New York

Danielle is an associate in the Restructuring & Special Situations group. She advises debtors, creditors, and other stakeholders in a wide range of complex chapter 11 cases, cross-border insolvencies, and out-of-court restructurings.

Danielle's experience includes representing key stakeholders across various industries on distressed debt investments, international restructurings, and insolvency proceedings. Danielle is committed to the development of young lawyers within the restructuring and insolvency space and is an active member of the American Bankruptcy Institute and sits on the NextGen Committee for the Turnaround Management Association.

Representative Experience

- Represented the Official Committee of Unsecured Creditors and Liquidating Trustee in the chapter 11 case of Reverse Mortgage Investment Trust, Inc.*
- Represented the Official Committee of Unsecured Creditors and Liquidating Trustee in the chapter 11 case of Pear Therapeutics, Inc Pear Therapeutics, Inc.*



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Practices

Restructuring and Special Situations

Industries

Technology

Sports, Media and Entertainment

Energy

Real Estate

Life Sciences and Health Care

Education and admissions

Education

Bachelor of Arts, Political Science,
Italian Literary Studies, University of
Connecticut Honors College,

Admissions

New York

Languages

Italian

Isolte Beal

Associate, Silicon Valley

Isolte's practice is centered on advising both public and private companies in high-stakes, complex domestic and cross-border mergers and acquisitions.

Isolte earned her Juris Doctor, cum laude, from The George Washington University Law School, where she specialized in international business law. She has been recognized with several prestigious awards, including the President's Gold Volunteer Service Award, the George Washington University Pro Bono Service Award, and the Dean's Commendation for Advanced Professional Development. During her time at law school, Isolte contributed to the George Washington International Law Review as a staff member, served as the Senior Managing Blog Moderator for the Intellectual Property & Entertainment Law Brief, and held the role of President of the Art Law and Entertainment Society. Before pursuing her legal studies, Isolte graduated cum laude from the University of Michigan, where she studied international relations, linguistic anthropology, and music.



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Education and admissions

Education

Juris Doctor, The George Washington University Law School, 2024

BA in International Relations, University of Michigan, 2020

Admissions

California

Dennis H. Tracey, III

Partner, New York

Dennis Tracey is a trial lawyer and a problem solver. Dennis advises boards, CEOs, and corporate general counsels on how to resolve disputes through business and legal solutions. When a dispute cannot be resolved, he's a seasoned litigator who tries cases in court and in arbitration. Dennis achieves results in and out of the courtroom.

Dennis is on the leading edge of client service and innovation in dispute resolution. He has championed bold, emerging approaches to dispute resolution, including the extensive use of technology and alternative legal service delivery methods, making litigation more cost-effective for clients.

Dennis serves as the co-chair of the firm's Global Enforcement Team, which focuses on asset tracing and enforcement of judicial and arbitral awards. The Global Enforcement Team represents liquidators, receivers, investors, hedge funds, corporates, and sovereigns in large-scale, cross-border enforcement of judgments, investigation of asset location, analysis and identification of sources of assets and funds, and the full range of enforcement tools, including worldwide freezing orders, pre- and post-judgment attachment, and execution.

Dennis' clients include some of the world's largest global organizations, including General Electric, Amcor, and Dell Computers. He also represents a number of the largest accounting firms, universities, and hedge funds. His practice includes both civil litigation and regulatory proceedings, including enforcement proceedings before the U.S. Securities and Exchange Commission and the Public Company Accounting Oversight Board.

Representative Experience

- Trial counsel for Ford Motor Company in multijurisdictional contract dispute.



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Practices

Corporate and Securities Litigation
Litigation Services
Commercial Litigation
Insolvency Litigation

Industries

Automotive and Mobility
Manufacturing and Industrials
Private Capital

Areas of focus

Accountants' Liability
Global Asset Recovery and Enforcement
Aviation Litigation

Education and admissions

Education

J.D., New York University School of Law, 1981

B.A., Cornell University, 1978

Admissions

New York

- Representation of global accounting firm in disputes arising from Madoff fraud.
- Advised a major Scandinavian airline in the first airline lawsuit to be filed against Boeing stemming from the grounding of the 737 MAX, for damages in excess of US\$1bn.
- Advised various airlines and lessors with over US\$50bn in MAX orders in claims against Boeing for losses incurred due to the grounding of the 737 MAX.
- Advised an aircraft leasing company on claims against engine equipment manufacturers arising from damage to aircraft engines.
- Trial counsel for a leading offshore oil drilling contractor in US\$400m bondholder dispute.
- Representation of a Latin American sovereign in securities claims arising out of restructuring of US\$17bn in sovereign debt.
- Representation of a multinational manufacturer in US\$400m post-acquisition dispute.
- Trial counsel for a hedge fund in U.S. bankruptcy proceeding to recover for losses on US\$2bn of credit default swaps.
- Representation of an international fashion brand in US\$60m contract claim against a global logistics company.
- Representation of claimants and respondents in international and domestic arbitrations, including ICC, LCIA, AAA, SIAC, and ICDR.
- Representation of auditors in Securities and Exchange Commission enforcement proceedings.
- Representation of a university in a dispute arising out of testamentary bequest.

Awards and rankings

2019-2020, Dispute Resolution: General Commercial Disputes, Recommended, *Legal 500 US*

2018-2020, Dispute Resolution: International Litigation, Recommended, *Legal 500 US*

2017-2018, Antitrust: Civil Litigation/Class Actions, *Legal 500 US*

Ann C. Kim

Partner, Los Angeles

Ann strategically draws upon her wealth of knowledge from her past experience working as a federal prosecutor and SEC enforcement division senior counsel to advise clients and provide insight on how to navigate civil regulatory and criminal government probes.

During her five years at the U.S. Attorney's Office and seven years at the SEC, Ann investigated and prosecuted numerous high-profile fraudulent schemes in parallel DOJ/SEC actions, including violations of federal securities laws, fraudulent investment schemes by broker-dealers and investment advisors, violations of the Foreign Corrupt Practices Act, and insider trading cases that involved Fortune 500 companies.

Ann represents clients from the earliest stages of an investigation through trial during criminal and civil regulatory matters, and handles complex civil business litigation. Ann represents Audit Committees, corporations, and individuals in independent and internal investigations and SEC investigations, including with respect to allegations of financial fraud, books and records violations, insider trading, disclosure issues, and workplace misconduct. She leverages her legal acumen and trial experience to advise clients across various industries, including public companies, financial institutions, investment funds, and health care organizations.

Before joining the government, Ann spent six years as an associate and counsel at a multinational law firm.

Representative Experience

- Conducted an independent investigation for the Audit and Finance Committee of a public company concerning allegations of financial misconduct, and leadership and tone at the top issues.
- Conducted an internal investigation for the Audit Committee of a public company concerning potential violation of Regulation FD and potential insider trading.



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Practices

Investigations, White Collar, and Fraud

Litigation Services

Commercial Litigation

Banking and Finance Litigation

Technology Litigation

Industries

Financial Institutions

Life Sciences and Health Care

Areas of focus

Anti-money Laundering

Bribery and Corruption

Financial Services Regulatory
Investigations and Enforcement

Government Investigations

Anti-Corruption Compliance and Due
Diligence

Education and admissions

Education

J.D., Pepperdine University School of
Law, 2000

B.A., University of California, Los
Angeles, 1992

Admissions

California

Languages

English

Korean

- Conducting an independent investigation for a US-based venture-capital fund regarding allegations of fraudulent misrepresentations and misuse of company funds.
- Investigated and prosecuted investment adviser related to misleading clients regarding advisory fee rates.
- Investigated and prosecuted a Section 16 officer and his broker for insider trading.
- Investigated, prosecuted, and obtained a guilty verdict in an investment fraud scheme with losses over \$100 million.
- Investigated and prosecuted a former employee for embezzling over \$1.2 million from his employer.
- Represented a professional services company in an SEC investigation concerning potential revenue recognition issues, and obtained a termination letter without recommending any enforcement action.
- Counseled a professional services company in a year-long SEC investigation concerning potential revenue recognition issues, obtaining a termination letter without recommending any enforcement action.
- Investigated a Fortune 500 company for FCPA violations related to the hiring of relatives of Chinese government officials, which ultimately led to a settled action with the SEC.

Megan Nishikawa

Office Managing Partner, San Francisco

Recognized as one of the “Top 40 Under 40” lawyers in California by the Daily Journal, Megan Nishikawa skillfully guides clients through high-stakes commercial and product liability matters thanks to her extensive case management, discovery, deposition, dispositive motion, and trial experience. Megan represents energy, chemical, consumer, and pharmaceutical clients in complex disputes in both state and federal courts across the United States.

Having represented a variety of clients in their most complex disputes, Megan understands the need for innovative legal strategies that complement her client’s business goals. She is a skilled negotiator who achieves effective settlements, and has the necessary skill set to prepare a case for trial when needed. With significant briefing experience at the trial and appellate levels, she efficiently leads large case teams through complicated and extensive discovery.

Prior to joining Hogan Lovells, Megan served in several leadership roles at an international law firm and assisted oil and chemical companies in their toughest disputes.

Representative Experience

- Represented a publicly traded company against claims of tortious interference and unfair competition and trade practices in state court.*
- Defended a global automotive manufacturer against a government investigation and civil lawsuits brought as a result of allegedly defective emissions technology.*
- Defended a multinational chemical corporation against breach of contract and other commercial claims relating to an allegedly defective component part.*
- Defended a multinational chemical company in a docket of drinking water contamination cases brought by California water purveyors relating to the use of agricultural and industrial chemicals.*
- Defended a multinational energy corporation in numerous actions filed by over 30,000 community



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Practices

Commercial Litigation
Litigation Services
Environment and Natural Resources

Industries

Energy
Manufacturing and Industrials
Consumer
Life Sciences and Health Care

Areas of focus

Appellate and Supreme Court
Litigation
State Attorneys General

Education and admissions

Education

J.D., University of Colorado Boulder,
2010
B.A., Macalester College, 2006

Admissions

California

residents alleging personal injuries and other damages in connection with a refinery fire.*

- Prosecuted idea theft, breach of implied contract, and other claims against a publicly traded company on behalf of one of that company's co-founders
- Defended a manufacturer against personal injury and wrongful death claims relating to alleged air emissions
- Defended a telecommunications company against product liability and other claims
- Defended a chemical manufacturing company against design defect and manufacturing defect claims nationwide

Awards and rankings

2020, Named in the Top 40 Under 40 in California, *Daily Journal*

Leen Bukai

Associate, San Francisco

Leen's practice focuses on intellectual property issues including trademark litigation, patent litigation, and copyright litigation.

While at UCLA Law, Leen focused on IP studies and trial advocacy. She participated in several moot court competitions including the prestigious Giles Sutherland Rich IP Moot Court competition, where she won Best Brief and placed second nationally. During law school, Leen also externed for the Honorable Ann H. Park in the Los Angeles County Superior Court.



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Practices

Intellectual Property

IP Litigation, Arbitration, and
Alternative Dispute Resolution

Litigation Services

Trademarks and Brands

Education and admissions

Education

J.D., University of California, Los
Angeles School of Law, 2024

B.A., Political Science, University of
California, Irvine, 2021

Admissions

California

Languages

Arabic

Tom Boer

Partner, San Francisco | Los Angeles

Clients turn to Tom for his insightful strategies and deep industry knowledge when seeking representation in high-stakes environmental litigation and enforcement actions and to resolve complex environmental disputes. As Global Co-Chair of the environmental practice, Tom works with partners across the firm to find solutions for complex regulatory issues and resolve high-stakes environmental disputes. He also serves on the Firm's ESG Board, which coordinates cross-boundary and cross-practice solutions to ESG risk and disputes.

With a combined decade of experience working as a trial lawyer at the U.S. Department of Justice (DOJ) Environmental Enforcement Section and in the Environmental Protection Agency's (EPA) Office of General Counsel, Tom uses his government experience to effectively counsel clients as they navigate complex environmental matters.

Tom represents clients in federal and state environmental litigation, in defense of environmental enforcement actions and citizen suits, in response to catastrophic environmental emergencies and chemical releases, and in connection with site cleanup and cost recovery. He has advised clients on the vast array of environmental statutes in the U.S. including the Clean Air Act; Resource Conservation and Recovery Act; the Clean Water Act; the Endangered Species Act; the Oil Pollution Act; the Federal Insecticide, Fungicide, and Rodenticide Act; and the Comprehensive Environmental Response, Compensation, and Liability Act. He routinely represents clients in environmental cases filed in federal district courts and California superior courts.

Tom is recognized for his Environment practice by The Legal 500 United States and Chambers USA.

Prior to joining Hogan Lovells, he spent 12 years in private practice and 10 years with the federal



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Practices

Environment and Natural Resources
Energy Disputes
Climate Change

Industries

Energy

Areas of focus

Environmental Litigation
Clean Water Act
Clean Air
Natural Resource Management

Education and admissions

Education

J.D., The George Washington
University Law School, 1998
B.A., Occidental College, 1995

Admissions

California
District of Columbia

government. Tom previously served as Co-Lead for the Chemicals and Industrial Products industry sector group at Hogan Lovells before stepping into his role as Co-Chair of the environmental practice.

Representative Experience

- Represent a Fortune 100 manufacturing company in defending multiple lawsuits in federal and state courts alleging damages due to PFAS contamination, with claimed damages nearing \$1 billion.
- Represent multiple clients, in the utility, manufacturing, mining, and waste sectors, in response to Clean Water Act citizen suits.
- Represent a manufacturing client in resolving RMP/PSM enforcement actions brought by EPA and CalOSHA involving an ammonia refrigeration system with a charge in excess of 100,000 pounds.
- Represented California utility in response to a Clean Water Act and Resource Conservation and Recovery Act citizen suit in the Central District of California involving more than two dozen facilities.
- Represented a joint venture in federal district court challenging EPA's special case determination claiming Clean Water Act jurisdiction over nearly 1,500 acres.
- Represented heavy industrial manufacturer in resolving air district enforcement actions for multiple facilities in southern California.
- Represented an oil and gas company in resolving Resource Conservation and Recovery Act and associated common law claims associated with petroleum releases filed in the Central District of California.
- Represented an oil and gas company in assessment of Clean Air Act permitting requirements for decommissioning of offshore oil platforms and on challenges to EPA action in federal appellate court.
- Represented a California utility in the successful dismissal of an Endangered Species Act citizen suit, filed in the Northern District of California.*
- Represented a client in response to a fire incident at a waste transfer station and recycling facility resulting in an Air District investigation.*
- Represented an oil services company in response to a tanker truck incident resulting in the release of a hazardous substance on an interstate freeway.*
- Pursued cost recovery in federal district court against former owners and operators for a chlorinated solvent cleanup.*

- Resolved EPA enforcement action at an industrial facility due to alleged violations of Spill Prevention, Control, and Countermeasure (SPCC) and Facility Response Plan (FRP) requirements.*
- Represented multiple clients seeking emergency variances from California Air Districts.*
- Represented a large West Coast municipality in response to a Clean Water Act enforcement action pursued by the United States with threatened injunctive relief in excess of \$1 billion.*
- Represented clients responding to catastrophic environmental incidents, and resolving associated liabilities, including an ammonia release in South San Francisco and multiple ethanol tank explosions.*

Awards and rankings

2019-2025, Environment (California), *Chambers USA*

2023-2024, Environment: Regulatory, Leading Lawyer, *Legal 500 US*

2019-2021, Environment: Litigation, *Legal 500 US*

2017-2021, Environment: Regulation, *Legal 500 US*

2024, Editorial Advisory Boards, Environmental, *Law360*

Maia H. Jorgensen

Senior Associate, San Francisco

Maia helps clients navigate complex environmental regulatory compliance, enforcement and litigation matters.

Maia's practice focuses on regulatory counseling, enforcement and litigation matters under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), the Clean Water Act (CWA), and other federal and state laws governing environmental issues. With active licenses in both Canada and the United States, Maia also has experience navigating enforcement and litigation matters under Canadian environmental laws.

Before joining Hogan Lovells, Maia practiced at a top business law firm in Toronto, Canada where her practice encompassed environmental and bankruptcy matters.

While in law school, Maia specialized in international, comparative, and transnational law and interned with the Chambers Legal Support Section of the International Residual Mechanism for Criminal Tribunals in Arusha, Tanzania.



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maia.jorgensen@hoganlovells.com

Practices

Environment and Natural Resources

Education and admissions

Education

Bachelor of Kinesiology, University of Toronto, 2014

Juris Doctor, York University,
Osgoode Hall Law School, 2019

Admissions

California

Ontario

Languages

French

Loryn Dunn Arkow

Partner, Los Angeles

Loryn Dunn Arkow is a partner in the Real Estate Practice Group. She has extensive experience handling acquisition, disposition and development transactions; joint ventures and preferred equity, capital raises, and debt finance transactions; recapitalizations and workouts.

Clients turn to Loryn for counsel on structuring complex transactions and ownership vehicles, and in finding creative strategies to get deals done.

Her client list includes institutional investment advisors, private equity funds and other investors, sponsors, and developers in sectors including multifamily, office, industrial, studio, retail, medical, and mixed-use projects.

She speaks Japanese and Spanish, and has been recognized by Chambers, Super Lawyers and The Legal 500.

"Loryn is brilliant: an ace attorney who proves that kind, empathetic people are often the best deal makers, as they can read the other side, craft creative solutions and move projects forward," Chambers USA reports. Clients also say Loryn is "a fantastic negotiator."

Representative Experience

- Represented television network in the sale of a twenty-five acre iconic Los Angeles studio and office complex and studio operations business for US\$750m*
- Represented Civitas Capital Group in closing a US\$150m senior construction loan to finance the development of a new Hilton-branded oceanfront hotel on the Hawaiian island of Kauai.
- Represented a foreign institutional asset manager in a platform venture to invest in industrial and multifamily properties across the United States.*
- Represented multiple clients in apartment acquisitions and related debt financings and joint ventures, from stand-alone projects to a several-hundred-million-dollar portfolio.*



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Practices

Real Estate

Industries

Real Estate

Education and admissions

Education

J.D., Stanford Law School, 1996

M.A., The Johns Hopkins University
School of Advanced International
Studies, 1996

B.A., Harvard University, 1990

Admissions

California

Languages

Spanish

Japanese

- Represented foreign institutional asset manager in the recapitalization of a Boston trophy apartment complex valued at over US\$250m.*
- Represented pension fund in US\$125m purchase of partnership interest in core San Francisco office building, structuring and negotiating partnership rights and obligations.*
- Represented public REIT in US\$400m acquisition of San Francisco office building.*
- Represented public company in joint venture for development of retail outlet mall.*
- Represented life insurance company in origination of US\$120m construction loan for a 600-unit apartment building in San Diego, California.*
- Handled entity structuring and complex joint venture documentation for an investment vehicle to acquire two hotels in the Western United States through a bankruptcy auction process.*
- Negotiated, documented and executed acquisition by developer of portfolio of retail properties through a bankruptcy Section 363 sale.*
- Represented pension fund advisor in negotiation and documentation of joint venture and debt financing with major national developer of high rise apartments and condominiums in Southern California.*
- Structured buy-out, equity infusion and reorganization transactions to minimize transfer tax and reassessment consequences under California law.*

Awards and rankings

2021-2024, Southern, Real Estate, *Chambers California*

2023, 2023 Women of Influence, *Los Angeles Business Journal*

2023-2024, Best Lawyers in America, *Real Estate Law*

2023, Women of Influence in Commercial Real Estate, *Globe St. - Real Estate Forum*

2019, Leaders in Law Honoree, Real Estate Attorney of the Year for 2019, *Los Angeles Business Journal*

2017-2019, Nationally recommended, *The Legal 500 United States*

Katie M. Chacho

Associate, Los Angeles

Katie Chacho is an associate in the Real Estate Practice Group where she advises on complex real estate transactions.

Katie assists on a wide range of real estate transactions, including acquisitions, dispositions, financing, development, and joint ventures across various asset classes. She represents institutional investors, developers, and sponsors in navigating the legal complexities of commercial real estate deals.

Prior to her current role, Katie developed specialized experience in structuring real estate joint ventures and advising on tax-efficient real estate investments. Her background includes work on partnership tax matters, Section 1031 exchanges, and joint venture agreements, giving her a strong foundation for addressing the financial and operational nuances of real estate investments.



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katie.chacho@hoganlovells.com

Practices

Real Estate

Industries

Real Estate

Education and admissions

Education

J.D., University of Virginia School of Law, 2023

B.A. in Philosophy, Loyola University Chicago, 2018

Admissions

California

Jeffrey D. Uffner

Partner, New York



New York, +1 212 918 3122
jeffrey.uffner@hoganlovells.com

Jeffrey Uffner represents prominent securities, real estate, distressed debt and infrastructure fund sponsors, and global, national and regional private funds, in all aspects of domestic, foreign, and cross-border tax planning.

Jeffrey has extensive experience in a wide range of transactional and commercial tax matters, having structured highly complex, tax-efficient investment platforms for taxable and tax-exempt institutions, high-net-worth individuals, and non-U.S. investors. He advises clients on the taxation of partnership entities; real estate investment trusts; qualified opportunity zone funds; cross-border acquisitions and investments; mergers and acquisitions; investment and energy tax credits; real estate investment and exchanges; and the investment activities of pension plans, tax-exempt organizations, venture capital funds, and non-U.S. investors such as sovereign and sovereign wealth funds.

Jeffrey also advises debtors' and creditors' committees, individual lending institutions, and distressed debt funds on the tax aspects of bankruptcy proceedings and workouts.

Jeffrey is regularly listed in Chambers USA and has been nationally recommended by The Legal 500 US. According to Chambers, "Jeff's knowledge and experience with tax law is invaluable to our business." He has also been recognized by Super Lawyers and Best Lawyers.

Awards and rankings

2023-2024, Tax (New York), *Chambers USA*

2017-2019, 2023, Tax: U.S. Taxes: Non-Contentious, *Tax: U.S. Taxes: Non-Contentious, Legal 500 US*

2017-2019, Tax: Financial Products, *Legal 500 US*

2023, Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law, *Best Lawyers*

2023, Tax Law Derivatives and Futures Law, *Best Lawyers*

Practices

Tax

Investment Funds

Real Estate

Sovereigns

Private Equity

Mergers and Acquisitions

REITs

Joint Ventures

Industries

Private Capital

Real Estate

Financial Institutions

Education and admissions

Education

LL.M. in Taxation, New York
University School of Law, 1980

J.D., The University of Chicago Law
School, 1976

B.A., The State University of New
York, Binghamton University, 1973

Admissions

New York

2006-2010, 2013-2023, , *Super Lawyers*

2021, Turnaround of the Year: Mid-Size Company for
American Addiction Centers, *Turnaround Management
Association*

Caroline Koo

Senior Associate, Washington, D.C.

Caroline Koo focuses her practice on the tax aspects of a wide range of domestic and cross-border transactions. Prior to joining Hogan Lovells, Caroline was an attorney in the Financial Institutions and Products Division of the Internal Revenue Service (IRS) Office of Chief Counsel, where she drafted guidance on the taxation of complex financial transactions.

Before joining the IRS, Caroline worked as a tax associate at a global law firm and served as a law clerk to the Honorable Ronald L. Buch of the United States Tax Court.

Representative Experience

- Blackrock Infrastructure, Banco Bilbao Vizcaya Argentaria Colombia S.A., JPMorgan Chase Bank, N.A., Financiera de Desarrollo Nacional S.A. and Unión para la Infraestructura – UPI in connection with the COP 2.6 billion (~US\$560 million) long-term financing of the Bogotá - Girardot toll road in Colombia.*
- Lenus Capital Partners on the acquisition finance of 100% of the Medicadiz Hospital in Ibagué, Colombia, making Lenus one of the largest healthcare operators in Colombia.*
- Watermark Lodging Trust, Inc. on its proposed US\$3.8 billion merger with private real estate funds managed by Brookfield.



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caroline.koo@hoganlovells.com

Practices

Tax, Pensions & Benefits

Education and admissions

Education

J.D. / Tax LLM Georgetown
University Law Center, 2018

B.A., University of Southern
California, 2014

Admissions

California

New York

Washington, D.C.

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Exhibit H
Letter to Responsible Individual



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November 21, 2025

By Electronic Mail

Robbin L. Itkin
Responsible Individual
KS Mattson Partners, LP

Re: In re KS Mattson Partners, LP (jointly administered with In re LeFever Mattson, a California Corporation, et al.): First Interim Fee Application of Hogan Lovells US LLP

Dear Ms. Itkin:

Enclosed please find the interim fee application (the "Application") that Hogan Lovells US LLP filed on November 21, 2025. The Bankruptcy Court's Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees provide that a debtor in possession, a trustee, or an official committee must exercise reasonable business judgment in monitoring the fees and expenses of the bankruptcy estate's professionals. I am providing this Application to you in your capacity as Responsible Individual of KS Mattson Partners, LP, in its chapter 11 case that is being jointly administered with the cases of LeFever Mattson, a California Corporation, and its affiliated debtors and debtors in possession.

We invite you to discuss with us any objections, concerns, or questions you have regarding the Application and the related invoices. The Office of the United States Trustee similarly will accept your comments. The Bankruptcy Court will consider at the hearing on this Application, currently set for December 12, 2025, any timely-filed objections by any party in interest in these chapter 11 cases.

Should you have any questions or would like to discuss, please do not hesitate to contact me.

Sincerely,

/s/ Richard L. Wynne

Richard L. Wynne

Partner
richard.wynne@hoganlovells.com
D (310) 785-4602

Enclosures

Hogan Lovells US LLP is a limited liability partnership registered in the state of Delaware. "Hogan Lovells" is an international legal practice that includes Hogan Lovells US LLP and Hogan Lovells International LLP, with offices in: Alicante Amsterdam Baltimore Beijing Berlin Birmingham Boston Brussels Colorado Springs Denver Dubai Dublin Dusseldorf Frankfurt Hamburg Hanoi Ho Chi Minh City Hong Kong Houston London Los Angeles Luxembourg Madrid Mexico City Miami Milan Minneapolis Monterrey Munich New York Northern Virginia Paris Philadelphia Riyadh Rome San Francisco São Paulo Shanghai Silicon Valley Singapore Tokyo Washington, D.C. For more information see www.hoganlovells.com.

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Exhibit I
Proposed Order

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Erin N. Brady (Bar No. 215038)
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Edward J. McNeilly (Bar No. 314588)
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HOGAN LOVELLS US LLP
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Attorneys for Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTA ROSA DIVISION

In re
LEFEVER MATTSON, a California
corporation, *et al.*²²
Debtors.

In re
KS MATTSON PARTNERS, LP,
Debtor.

Case No. 24-10545 CN (Lead Case)
(Jointly Administered)

**[PROPOSED] ORDER GRANTING FIRST
INTERIM FEE APPLICATION OF HOGAN
LOVELLS US LLP AS COUNSEL TO KSMP
FOR ALLOWANCE AND PAYMENT OF FEES
AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM JUNE 9, 2025 THROUGH
AND INCLUDING SEPTEMBER 30, 2025**

Date: December 12, 2025
Time: 11:00 a.m. (Pacific Time)
Place: (In Person or Via Zoom)
United States Bankruptcy Court
1300 Clay Street, Courtroom 215
Oakland, CA 94612

Objection Deadline: December 5, 2025

²² The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of KSMP and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of KSMP's claims and noticing agent at <https://veritaglobal.net/LM>. entities in these Chapter 11 Cases, a complete list of KSMP and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of KSMP's claims and noticing agent at <https://veritaglobal.net/LM>.

1 Upon consideration of the *First Interim Application of Hogan Lovells US LLP for*
2 *Allowance and Payment of Compensation and Reimbursement of Expenses for the Period June 9,*
3 *2025 Through September 30, 2025* [Dkt. No. ____] (the “Fee Application”), filed by Hogan Lovells
4 US LLP (“Hogan Lovells”), counsel to debtor and debtor in possession KS Mattson Partners, LP
5 (“KSMP”) in the above-captioned bankruptcy cases, and upon the declaration filed in support of
6 the Fee Application [Dkt No. ____]; and this Court having jurisdiction over this matter pursuant to
7 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy
8 Judges, General Order 24 (N.D. Cal.), and the Bankruptcy Local Rules; and this Court having found
9 that this is a core proceeding and that this Court may enter a final order consistent with Article III
10 of the United States Constitution; and this Court having found that venue of this proceeding and
11 the Fee Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court
12 having found that the relief requested in the Fee Application is in the best interests of KSMP’s
13 estate, its creditors, and other parties in interest; and this Court having found that Hogan Lovells’
14 notice of the Fee Application having been given; and it appearing that no other notice need be
15 given; and this Court having determined that the legal and factual bases set proceedings had before
16 this Court; and after due deliberation and sufficient cause appearing therefor,

17 **IT IS HEREBY ORDERED THAT:**

- 18 1. The Fee Application is granted as provided herein.
- 19 2. Hogan Lovells’s fees in the amount of \$3,590,262.73 and expenses in the amount of
- 20 \$18,516.76 are hereby approved on an interim basis.
- 21 3. KSMP is authorized to pay Hogan Lovells a total of \$3,608,779.49.

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23 **** END OF ORDER ****

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