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*Counsel to the Official Committee of Unsecured Creditors
 of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF MISSOURI
 EASTERN DIVISION

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In re:	: Chapter 11
	:
MIDWEST CHRISTIAN VILLAGES, INC.	: Case No. 24-42473-659
<i>et al.</i> , ¹	:
	: (Jointly Administered)
	:
Debtors.	:
	:
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FEE APPLICATION SUMMARY SHEET

¹ The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141 - 7390. The last four digits of the Debtors' federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living, LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice of Southern Illinois, LLC [7209], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].



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**SECOND INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
MIDWEST CHRISTIAN VILLAGES INC., ET AL. FOR THE PERIOD FROM
NOVEMBER 1, 2024 THROUGH AND INCLUDING FEBRUARY 28, 2025**

Name of Applicant:	Cullen and Dykman LLP
Authorized to Provide Professional Services as:	Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., <i>et al.</i>
Name of Client:	The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., <i>et al.</i>
Petition Date:	July 16, 2024
Date of Retention:	September 23, 2024, effective as of August 12, 2024
Date of Order Approving Employment:	September 23, 2024
Blended Rate in this Application for all Timekeepers:	\$715.95
Period for which Compensation and Expense Reimbursement is Requested:	November 1, 2024 – February 28, 2025
Total Interim Compensation Requested:	\$141,113.50
Total Requested Expense Reimbursement	\$176.59
Number of Professionals Included in this Application:	5
Total Compensation and Expenses Previously Requested:	\$298,379.05
Total Compensation and Expenses Previously Awarded:	\$298,379.05
Name, Billing Rate, and Department of Professionals Included in this Application:	<i>See Exhibit E.</i>

Total Hours: 197.10

This is a(n) : ___ monthly **X** interim ___ final application

CULLEN AND DYKMAN LLP

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*Counsel to the Official Committee of Unsecured Creditors
of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC.
et al.,¹

Debtors.

x
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: Chapter 11
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: Case No. 24-42473-659
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: (Jointly Administered)
:
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:
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x

¹ The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141 - 7390. The last four digits of the Debtors' federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living, LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice of Southern Illinois, LLC [7209], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].

**SECOND INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
MIDWEST CHRISTIAN VILLAGES INC., ET AL. FOR THE PERIOD FROM
NOVEMBER 1, 2024 THROUGH AND INCLUDING FEBRUARY 28, 2025**

Cullen and Dykman LLP (“**C&D**”), counsel to The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”), hereby submits this second interim application (the “**Second Interim Application**”) seeking entry of an order, substantially in the form attached hereto as **Exhibit A**, (i) granting allowance of compensation and reimbursement of actual and necessary expenses, pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rules 2016-1 and 2016-2 of the Local Bankruptcy Rules for the Eastern District of Missouri, Eastern Division (the “**Local Rules**”), and the *United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “**U.S. Trustee Guidelines**”) for the period from November 1, 2024 through and including February 28, 2025 (the “**Compensation Period**”). In support of this Application, C&D respectfully states as follows:

Jurisdiction and Venue

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested

herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rules 2016-1 and 2016-2.

Background

2. On July 16, 2024 (the “**Petition Date**”), Midwest Christian Villages Inc., *et al.*, (the “**Debtors**”) filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code. This chapter 11 filing was precipitated by, among other things, the impact of COVID-19 on the Debtors’ facilities, in addition to material additional costs related to employee wages, agency staffing costs, increased food and other vendor costs, and increased construction/capital expenditure costs.

3. The Court granted joint administration of the Debtors’ cases on July 19, 2024. *See* Dkt. No. 59.

4. The Debtors remain in possession of their property and continue to operate and manage their businesses as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. On August 8, 2024, the Office of the United States Trustee (the “**U.S. Trustee**”) appointed the Committee (Dkt. No. 121). The Committee is currently comprised of the following members: (i) Donald H., (ii) Select Rehabilitation, LLC, (iii) Michael C. and Jacqueline B., (iv) Sentinel Technologies, Inc., and (v) Penny F.

A. Retention of C&D as Counsel to the Committee

6. On August 28, 2024, C&D filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Pursuant to 11 U.S.C. § 1103 Authorizing and Approving the Employment and Retention of Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of August 12, 2024* (Dkt. No. 202) (the

“**Retention Application**”). On September 23, 2024, effective as of August 12, 2024, the Court approved the Retention Applications and entered the *Order Pursuant to 11 U.S.C. § 1103 Authorizing and Approving the Employment and Retention of Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of August 12, 2024* (Dkt. No. 336) (the “**Retention Order**”).

7. The Retention Order authorized the Debtors to compensate and reimburse C&D in accordance with the Bankruptcy Code, Bankruptcy Rules, the Local Rules, and any other applicable order or procedures of the Court, at the ordinary and customary hourly rates charged for services of the type rendered in connection with these chapter 11 cases. The Retention Order also authorized the Debtors to reimburse C&D for its actual and necessary expenses incurred.

B. C&D’s First Interim Fee Application

8. On November 15, 2024, C&D filed its *First Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from August 12, 2024 Through and Including October 31, 2024* (Dkt. No. 453) (the “**First Interim Fee Application**”). On December 17, 2024, the Court entered an Order approving C&D’s First Interim Fee Application (Dkt. No. 525) (the “**First Interim Fee Order**”).

9. The First Interim Fee Order, among other things, awarded C&D compensation in the amount of \$295,684.00 for professional services rendered, and reimbursement of actual and necessary expenses incurred in connection with the services in the amount of \$2,695.05.²

C. C&D’s Monthly Fee Statements During the Compensation Period

² C&D submitted monthly fee statements in accordance with the Local Rules, for services rendered during the period which comprised the First Interim Fee Application compensation period.

10. Pursuant to Rule 2016-2 B of the Local Rules, C&D has submitted four (4) monthly fee statements for services rendered in the months of November 2024, December 2024, January 2025, and February 2025 (*i.e.*, the Compensation Period) (each a “**Monthly Fee Statement**”, and collectively, the “**Monthly Fee Statements**”), pursuant to which C&D has received 80% of its fees and 100% of its expenses incurred during those months. A summary of C&D’s Monthly Fee Statements for the Compensation Period is annexed hereto as **Exhibit B**.

11. On or about December 2, 2024, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in November 2024 (the “**November Fee Statement**”) to Kurtzman Carson Consultants, LLC, d/b/a Verita Global (“**Verita**”) for service upon the master service list, seeking (i) interim allowance of (i) \$66,350.49 for the total amount of fees and expenses related to C&D’s work during the period from November 1, 2024 through and including November 30, 2024; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$39.99 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the November Fee Statement.

12. On or about January 2, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in December 2024 (the “**December Fee Statement**”) to Verita for service upon the master service list, seeking (i) interim allowance of (i) \$26,502.00 for the total amount of fees and expenses related to C&D’s work during the period from December 1, 2024 through and including December 31, 2024; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual and necessary costs and expenses incurred

by C&D in connection with such services during the Compensation Period. No objections were received with respect to the December Fee Statement.

13. On or about February 4, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in January 2025 (the “**January Fee Statement**”) to Verita for service upon the master service list, seeking (i) interim allowance of (i) \$24,559.00 for the total amount of fees and expenses related to C&D’s work during the period from January 1, 2025 through and including January 31, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the January Fee Statement.

14. On or about March 4, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in February 2025 (the “**February Fee Statement**”) to Verita for service upon the master service list, seeking (i) interim allowance of (i) \$23,878.60 for the total amount of fees and expenses related to C&D’s work during the period from February 1, 2025 through and including February 28, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$136.60 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the February Fee Statement.

15. C&D now submits its Second Interim Application requesting interim approval and allowance of professional fees in the amount of \$141,113.50 for services rendered and reimbursement of expenses in the amount of \$176.59 incurred during this second Compensation

Period. This is C&D's second request for compensation and reimbursement of expenses in these cases. The Committee members have been provided with a copy of C&D's Second Interim Application. The Committee has approved C&D's Second Interim Application.

16. The amounts to be paid to C&D from any amount awarded will be reduced by payments previously received.

17. As set forth in the certification of Michael H. Traison, Esq. dated March 21, 2025, attached hereto as **Exhibit C**, this Second Interim Application complies with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the U.S. Trustee Guidelines.

Summary of Services Performed By C&D During the Compensation Period

18. As more fully described herein, C&D has provided substantial legal services to the Committee during the Compensation Period. In accordance with the Local Rules, a summary of the total time expended, and amount of compensation sought by project category is attached hereto as **Exhibit D**. A listing of the name, title, practice group, and first year of bar admission, if applicable, for each professional person who rendered services to the Committee is attached hereto as **Exhibit E**. Attached hereto as **Exhibit F** is a detailed computer-generated summary of the time expended by each professional and the services rendered by C&D as counsel to the Committee in each category during the Compensation Period. Indicated below is each category and the compensation sought by C&D for services performed on the Committee's behalf:

1. Case Administration (B110)	\$ 20,322.00
2. Asset Analysis and Recovery (B120)	\$ 14,229.00
3. Asset Disposition (B130)	\$ 57,121.00
4. Prepare for and Attend Hearings (B135)	\$ 6,292.50
5. Relief from Stay/Adequate Protection Proceedings (B140)	\$ 0.00

6. Meetings of & Communications with Creditor (B150)	\$ 11,771.50
7. Fee/Employment Applications (B160)	\$ 11,267.50
8. Fee/Employment Objections (B170)	\$ 161.00
9. Avoidance Action Analysis (B180)	\$ 390.00
10. Assumption/Rejection of Leases and Contracts (B185)	\$ 0.00
11. Non-Working Travel (B195)	\$ 0.00
12. Debtor In Possession Finance Issues (B205)	\$ 7,725.50
13. Business Operations (B210)	\$ 80.50
14. Employee Benefits/Pensions (B220)	\$ 0.00
15. Financing/Cash Collections (B230)	\$ 388.00
16. Tax Issues (B240)	\$ 0.00
17. Real Estate (B250)	\$ 0.00
18. Litigation, Contested Matters, & Adversary Proceedings (B280)	\$ 2,843.00
19. Claims Administration and Objections (B310)	\$ 7,436.00
20. Plan and Disclosure Statement (B320)	\$ 930.00
21. Budgeting (B330)	\$ 156.00
22. Reporting (B340)	\$ 0.00
23. Valuation (B450)	\$ 0.00
24. Corporate Governance (B470)	\$ 0.00

19. During the Compensation Period, C&D has expended a total of 197.10 hours in this matter for total requested compensation of \$141,113.50 at its usual customary hourly rates. The average blended hourly rate was \$715.95.

20. During the Compensation Period, C&D has incurred expenses totaling \$176.59. Attached hereto as **Exhibit G** is a summary of the expenses incurred during the First Application Period for which reimbursement is sought herein. C&D does not charge for incoming faxes. Instead, C&D charges \$1.00 per page for outgoing faxes, which C&D believes covers the expenses associated with facsimile usage. Copying charges are assessed at \$.10 per copy. Reimbursement for those costs, as well as all other disbursements in this case, is sought in accordance with the applicable Local Rules.

21. C&D has set forth below a narrative of the legal services provided to the Committee in order to inform the Court of the legal services rendered to the Committee by C&D during the First Application Period. The summary of services performed by C&D is only intended to highlight the general categories of services provided by C&D on the Committee's behalf. It is not intended to set forth each and every item of professional services that C&D performed for the Committee. All of the services for which compensation is sought herein were performed for, or on behalf of, the Committee.

Category 1
Case Administration

22. The first category of services rendered by C&D relates to services performed for the benefit of the Committee in furtherance of general case administration, including:

- Reviewing case docket and pleadings and evaluating same to update Committee regarding status of chapter 11 cases;
- Correspondence and discussion regarding DIP budget, variance report, and related issues;
- Reviewing insurance claims;
- Preparing and invoicing professional fees.

23. In rendering services relating to this category, C&D attorneys expended 32.0 hours for requested compensation at their customary and usual hourly rates for a total of \$20,322.00. C&D's blended hourly rate for services rendered in this category is \$635.06.

Category 2
Asset Analysis and Recovery

24. The second category of services performed by C&D relates to C&D's work analyzing the Debtors' business operations and estate assets so that it may maximize the value of the estates for the benefit of creditors.

25. Services rendered by C&D in the second category of services include the following:

- Drafting multiple correspondence to Debtors' lead and special counsel regarding information required for Committee to fulfill fiduciary duty to estates;
- Conferring with Committee's financial advisors regarding documentation required to obtain understanding of financial condition of estate;
- Conferring with financial advisors regarding bidding, auctions, and strategy to maximize return for creditors;
- Reviewing and analyzing reports on cash and budgets;
- Reviewing asset purchase agreement(s), causes of action, possible recoveries, avoidance actions possibilities, and other avenues for the benefit of unsecured creditors.

26. In rendering services relating to this category, C&D attorneys expended 18.20 hours for requested compensation at their customary and usual hourly rates for a total of \$14,229.00.00. C&D's blended hourly rate for services rendered in this category is \$781.81.

Category 3
Asset Disposition

27. The third category of services provided by C&D relates to potential sale or disposition of estate assets in the Debtors' chapter 11 cases.

28. Services rendered by C&D in the third category of services include the following:

- Communications regarding auction processes and details;
- Reviewing and analyzing sale orders, proposed allocation of sale proceeds, APAs, and assumption issues;
- Reviewing bid summaries;
- Preparation for and participation in bidding and auction process;
- Confer and update Committee on sale process.

29. In rendering services relating to this category, C&D attorneys expended 75.60 hours for requested compensation at their customary and usual hourly rates for a total of \$57,121.00. C&D's blended hourly rate for services rendered in this category is \$755.57.

Category 4
Preparation For/Attend Court Hearings

30. During the Compensation Period, C&D performed services on the Committee's behalf to prepare for and attend multiple Court hearings and status conferences, including virtual and telephonic hearings on the auction and sale of the Debtors' assets, and other motions submitted by the Debtors.

31. In rendering services relating to this category, C&D attorneys expended 8.10 hours for requested compensation at their customary and usual hourly rates for a total of \$6,292.50. C&D's blended hourly rate for services rendered in this category is \$776.85.

Category 5
Relief from Stay/Adequate Protection Proceedings

32. C&D did not incur any time or expense in this category during the Compensation Period.

Category 6
Meetings of & Communications with Creditor

33. The sixth category of services relates to C&D's preparing for and attending, conducting, and participating in meetings with the Committee. C&D prepared for and attended weekly teleconferences with the Committee, as needed, during which C&D advised the Committee concerning the status of the chapter 11 cases, particularly concerning the auction and sale processes, finalize updates, and recommended strategies to maximize the value thereof.

34. In rendering services relating to this category, C&D attorneys expended 14.90 hours for requested compensation at their customary and usual hourly rates for a total of \$11,771.50. C&D's blended hourly rate for services rendered in this category is \$790.03.

Category 7
Fee/Employment Applications

35. During the Compensation Period, C&D performed services in this category, specifically to compile and prepare data for the first and second interim fee applications, and draft said applications.

36. In rendering services relating to this category, C&D attorneys expended 22.90 hours for requested compensation at their customary and usual hourly rates for a total of \$11,267.50. C&D's blended hourly rate for services rendered in this category is \$492.03.

Category 8
Fee/Employment Objections

37. In this category, a single C&D attorney expended .2 hours at an hourly rate of \$805, for a total of \$161.00 to review the fee statements of professionals involved in this case..

Category 9
Avoidance Action Analysis

38. In this category, a single C&D attorney expended .5 hours at an hourly rate of \$780 for a total of \$390.00, to analyze preferential transfers and possible recoveries.

Category 10
Assumption/Rejection of Leases & Contracts

39. C&D did not incur any time or expense in this category during the Compensation Period.

Category 11
Non-Working Travel

40. C&D did not incur any time or expense in this category during the Compensation Period.

Category 12
Debtor in Possession Finance Issues

41. The twelfth category of services relates to C&D's review and analysis of debtor-in-possession financing issues and correspondence with professionals regarding the same, including with respect to pleadings, claim objections, pharmacy sales, and Hope settlement.

42. In rendering services relating to this category, C&D attorneys expended 9.60 hours for requested compensation at their customary and usual hourly rates for a total of \$7,725.50. C&D's blended hourly rate for services rendered in this category is \$804.74.

Category 13
Business Operations

43. The thirteenth category relates to C&D's general monitoring of the Debtors' business operations and correspondence with key professionals, including Province, regarding the same. Specifically, 0.1 hours were expended by a C&D attorney at an hourly rate of \$780 for a total of \$80.50 in discussing and conferring with Committee regarding approval of DIP requests.

Category 14
Employee Benefits/Pensions

44. C&D did not incur any time or expense in this category during the Compensation Period.

Category 15
Financing/Cash Collections

45. The fifteenth category relates to C&D's review of financing documents and specifically, review of the extended DIP budget and DIP amendment.

46. In rendering services relating to this category, C&D attorneys expended 0.5 hours for requested compensation at their customary and usual hourly rates for a total of \$388.00. C&D's blended hourly rate for services rendered in this category is \$776.00.

Category 16
Tax Issues

47. C&D did not incur any time or expense in this category during the Compensation Period.

Category 17
Real Estate

48. C&D did not incur any time or expense in this category during the Compensation Period.

Category 18
Litigation/Contested Matters and Adversary Proceedings

49. The eighteenth category relates to C&D's review of proposed orders on extensions of exclusivity, section 365 and sale of WTC assets, correspondence with Debtors' counsel and UMB regarding resolution of reservation of rights in sale motion, and analysis of potential objections to the sale.

50. In rendering services relating to this category, a single C&D attorney expended 3.70 hours for requested compensation at the customary and usual hourly rate for a total of \$2,843.00.

Category 19
Claim Administration and Objections

51. The nineteenth category relates to review and examination of omnibus objections to claims, review of insurance and wage priority claims, and conferring with Committee to explore possible objections to maximize recovery and prepare response to objection.

52. In rendering services relating to this category, C&D attorneys expended 9.40 hours for requested compensation at their customary and usual hourly rates for a total of \$7,436.00. C&D's blended hourly rate for services rendered in this category is \$791.06.

Category 20
Debtors' Plan and Disclosure Statement

53. The twentieth category of services relates to strategizing regarding various sources of recovery and funding under a plan, and correspondence with professionals regarding the same.

54. In rendering services relating to this category, C&D attorneys expended 1.20 hours for requested compensation at their customary and usual hourly rates for a total of \$930.00. C&D's blended hourly rate for services rendered in this category is \$775.00

Category 21
Budgeting

55. In this category, a single C&D attorney expended .2 hours at an hourly rate of \$780 for a total of \$156.00 to discuss future budgeting needs with Debtors' counsel.

Category 22
Reporting

56. C&D did not incur any time or expense in this category during the Compensation Period.

Category 23
Valuation

57. C&D did not incur any time or expense in this category during the Compensation Period.

Category 24
Corporate Governance

58. C&D did not incur any time or expense in this category during the Compensation Period.

Summary of Application

59. C&D submits that compensation for the services rendered and reimbursement of expenses incurred as set forth in this Second Interim Application is reasonable based on: (i) the time and labor required; (ii) the complexity of the legal questions presented; (iii) the skill required to perform the legal services; (iv) the customary compensation for bankruptcy professionals in New York; and (v) the experience and ability of the attorneys providing services. With respect to each of these standards, C&D submits that the compensation requested is reasonable and appropriate.

Applicable Legal Standards

60. Section 330(a) of the Bankruptcy Code provides for the compensation of reasonable and necessary services rendered by professionals retained under section 327 of the Bankruptcy Code, as follows:

(1)(A) reasonable compensation for actual, necessary services rendered by the . . . attorney and by any paraprofessional person employed by any such person; and

(B) reimbursement for actual, necessary expenses.

* * *

(3) In determining the amount of reasonable compensation to be awarded to ...a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a).

61. Additionally, the Fifth Circuit elaborated on the necessary considerations in determining the award of attorneys' fees, noting that the court should consider the request in light of the following twelve (12) factors: (1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of the

professional relationship with the client; and (12) awards in similar cases. *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 715, 718-19 (5th Cir. 1974).

62. C&D respectfully submits that the hours worked by C&D's personnel were reasonable and necessary given the numerous and oftentimes complex legal issues which arose during these chapter 11 cases. Further, C&D believes that the time spent was justified by the results that have been achieved thus far.

63. The rates being charged by C&D are commensurate with, if not less than, those typically charged by other firms in this District, as well as those of other nationally recognized firms specializing in bankruptcy.

64. C&D submits that the professional services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Second Interim Application were necessary and appropriate to assist the Committee and maximize the benefit to the creditors of the Debtors.

65. The services rendered were performed within a reasonable amount of time by professionals with the seniority and skill level commensurate with the complexity, importance, and nature of the problem, issue or task addressed. Whether reviewed individually as to each of the tasks described above or collectively as a whole, the professional services were performed expediently and efficiently to accomplish the needs of the Committee in these chapter 11 cases.

66. C&D submits that the compensation sought in this Second Interim Application is reasonable and necessary under the applicable standards. Approval of the compensation for professional services and reimbursement of expenses sought herein is warranted. C&D therefore respectfully requests that the Court grant the Second Interim Application.

Notice

67. Notice of this Second Interim Application has been provided in accordance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and U.S. Trustee Guidelines. C&D respectfully submits that further notice of this Second Interim Application is neither required nor necessary.

Conclusion

68. Through C&D's efforts, the Committee has made significant progress in these chapter 11 cases, including reviewing and examining all possible avenues to maximize recovery for creditors. C&D has worked diligently during the Compensation Period to help the Committee address an array of issues in these cases. Accordingly, C&D submits that its services have provided substantial value to the Committee, and requests that this Second Interim Application be approved in its entirety.

WHEREFORE, for the reasons set forth herein, C&D respectfully requests that the Court enter an Order (a) approving C&D's interim fees in the amount of **\$141,113.50** and reimbursement of expenses in the amount of **\$176.59**, in connection with this Second Interim Application; (b) authorizing and directing the Debtors' to remit payment of such sums to C&D within five (5) business days of entry of an order approving this Application; and (c) granting such other relief as the Court deems is just and proper.

Dated: New York, New York
March 21, 2025

CULLEN AND DYKMAN LLP

By: /s/ Michael H. Traison
Michael H. Traison, Esq.
Michelle McMahon, Esq.
Elizabeth M. Aboulafia, Esq.
Kyriaki Christodoulou, Esq.
Kelly McNamee, Esq.
One Battery Park Plaza, 34th Floor

New York, New York 10004

*Counsel to the Official Committee of
Unsecured Creditors of Midwest Christian
Villages Inc., et al.*

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC. *et al.*,

Debtors.

Chapter 11

Case No. 24-42473-659

(Jointly Administered)

**ORDER APPROVING SECOND INTERIM APPLICATIONS FOR ALLOWANCE
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
MIDWEST CHRISTIAN VILLAGES INC. ET AL.**

Cullen and Dykman LLP (“C&D”), having filed its *Second Interim Application For Allowance Of Compensation For Professional Services Rendered And Reimbursement Of Expenses Incurred By Cullen And Dykman LLP As Counsel To The Official Committee Of Unsecured Creditors Of Midwest Christian Villages Inc., Et Al. For The Period From November 1, 2024 Through And Including February 28, 2025* (the “Application”)¹; and the Court having reviewed the Application; and all applicable requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules having been satisfied; and it appearing that the compensation earned and expenses incurred by C&D during the Compensation Period were actual, reasonable and necessary; and sufficient notice of the Application having been provided and no other or further notice being required; and all persons with standing having been afforded an opportunity to be heard on the Application at a hearing held to consider approval of the

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

Application; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED** that:

1. The Application is **GRANTED** as set forth herein.
2. C&D is allowed, on an interim basis, compensation in the amount of \$141,113.50 for professional services rendered during the Compensation Period as counsel to The Official Committee of Unsecured Creditors (the “Committee”).
3. C&D is allowed the reimbursement of actual and necessary expenses incurred during the Compensation Period in connection with its services to the Debtors in the amount of \$176.59.
4. The Debtors are authorized and directed to remit payment to C&D in the amount of \$141,290.09, less all amounts that the Debtors previously paid to C&D on account of such fees and expenses.
5. Any payment made or to be made pursuant to this Order, and all authorization contained herein, shall be in compliance with and subject to the Final DIP Order [Docket No. 377] and the DIP Budget attached as Exhibit 1 thereto.
6. This Order shall be effective immediately upon entry.
7. Not later than two (2) business days after the date of this Order, C&D shall serve a copy of the Order and shall file a certificate of service no later than twenty-four (24) hours after service.

Proposed Order submitted by:

CULLEN AND DYKMAN LLP

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– and –

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– and –

Counsel to The Official Committee of Unsecured Creditors

SCHMIDT BASCH, LLC

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Local Counsel to The Official Committee of Unsecured Creditors

Exhibit B

Summary of Monthly Fee Statements

Second Interim Fee Application

Date Served	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Requested
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees	Expenses	
12/4/2024	11/1/2024-11/31/2024	\$66,310.50	\$39.99	\$53,048.40	\$39.99	\$53,048.40	\$39.99	\$13,262.10
1/7/2025	12/1/2024-12/31/2024	\$26,502.00	\$0	\$21,201.60	N/A	\$21,201.60	N/A	\$5,300.40
2/5/2025	1/1/2025-1/31/2025	\$24,559.00	\$0	\$19,647.20	N/A	\$19,647.20	N/A	\$4,911.80
3/4/2025	2/1/2025-2/28/225	\$23,742.00	\$136.60	\$18,993.60	\$136.60	\$18,993.60	\$136.60	\$4,748.40
Total for Second Interim Fee Application		\$141,113.50	\$176.59	\$112,890.80	\$176.59	\$112,890.80	\$176.59	\$28,222.70

Summary of Any Objections to Monthly Fee Statements: None.

Compensation Sought in this Application Not Yet Paid: None.

Exhibit C

Traison Declaration

CULLEN AND DYKMAN LLP

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*Counsel to the Official Committee of Unsecured Creditors
of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

-----	X
In re:	: Chapter 11
	:
MIDWEST CHRISTIAN VILLAGES, INC.	: Case No. 24-42473-659
<i>et al.</i> , ¹	:
	: (Jointly Administered)
	:
Debtors.	:
	:
-----	X

**CERTIFICATION IN SUPPORT OF SECOND INTERIM APPLICATION FOR
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP**

¹ The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141 - 7390. The last four digits of the Debtors' federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living, LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice of Southern Illinois, LLC [7209], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].

**AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
MIDWEST CHRISTIAN VILLAGES INC., ET AL. FOR THE PERIOD FROM
NOVEMBER 1, 2024 THROUGH AND INCLUDING FEBRUARY 28, 2025**

I, Michael H. Traison, hereby certify that:

1. I am a partner with the applicant firm, Cullen and Dykman LLP (“**C&D**”), which serves as counsel to The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”) in these chapter 11 cases. As such, I am fully familiar with the facts and circumstances set forth herein.

2. I have reviewed the *Second Interim Application For Allowance of Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred By Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. For the Period From November 1 2024, Through and Including February 28, 2025* (the “**Second Interim Application**”)², filed contemporaneously herewith. To the best of my knowledge, information, and belief, the statements contained in the Second Interim Application are true and correct. In addition, I believe the Second Interim Application complies with the Local Bankruptcy Rules.

3. In connection therewith, I also hereby certify that:

- i. to the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought in the Second Interim Application are permissible under the relevant rules, court orders and bankruptcy Code provisions;
- ii. the fees and disbursements sought in this Second Interim Application are billed at rates and are in accordance with practices customarily employed by C&D and are generally accepted by C&D’s clients;
- iii. in providing reimbursable service, C&D does not make a profit in its performance of reimbursable services, whether the service is performed in-house or through a third party;

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Second Interim Application.

- iv. during the Compensation Period, C&D increased its hourly rates and submitted a notice notifying all parties of said professional fee rate increase (Dkt. No. 545); and
- v. the Second Interim Application includes approximately 15 hours for reviewing or revising C&D's time records and invoices.

4. With respect to Section B.2 of the Local Rules, I hereby certify that the Committee chair, the Debtors' counsel and the U.S. Trustee, have been provided a copy of the Second Interim Application, including statements of fees and out-of-pocket expenses, lists of professionals providing services, their respective billing rates, the work hours expended by each individual, descriptions of services rendered, and a reasonably detailed breakdown of out-of-pocket expenses incurred, at least twenty-one (21) days prior to the hearing on the Second Interim Application. I further certify that in accordance with the Local Rules, C&D submitted monthly fee statements for November through February during this Compensation Period and was paid 80% of the requested fees and expenses in accordance with the Debtors' budget.

5. The following table demonstrates the amounts C&D has requested and received, which, pursuant to Local Rule 2016-2 C, are subject to approval, modification or disgorgement on interim application:

<u>Monthly Fee Statement</u>	<u>Total Compensation Requested³</u>	<u>Compensation Actually Received⁴</u>	<u>Expenses Requested</u>	<u>Expenses Actually Received (100%)</u>
Nov. 1, 2024 – Nov. 30, 2024	\$66,350.49	\$66,350.49	\$39.99	\$39.99
Dec. 1, 2024 – Dec. 31, 2024	\$26,502.00	\$21,201.60	\$0.00	--
Jan. 1, 2025 – Jan. 31, 2025	\$24,559.00	\$19,647.20	\$0.00	--
Feb. 1, 2025 – Feb 28, 2025	\$23,878.60	\$18,993.60	\$136.60	\$136.60

³ This amount includes expenses.

⁴ This amount includes expenses, if applicable.

6. In accordance with Section B.3 of the Local Rules, I hereby certify to the best of my knowledge, information, and belief, and my participation in the status conferences and review and monitoring of the docket, that the information contained in the Second Interim Application regarding the general administrative status of the Debtors' chapter 11 cases, is true and correct.

7. In accordance with Section B.4 of the Local Rules, I hereby certify to the best of my knowledge, information, and belief, that the information contained in the Second Interim Application regarding the twelve factors set forth by the Fifth Circuit in *Johnson v. Georgia Highway Express, Inc.*, have been identified and sufficiently satisfied with a summary of significant events which have occurred in these chapter 11 cases and a summary of major activities under each project category.

8. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, I certify that no agreement or understanding exists between C&D and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with the above cases except as authorized pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules. All services for which compensation is sought were professional services on behalf of the Committee and not on behalf of any other person.

Dated: New York, New York
March 21, 2025

CULLEN AND DYKMAN LLP

By: /s/ Michael H. Traison
Michael H. Traison, Esq.
Michelle McMahon, Esq.
Elizabeth M. Aboulafia, Esq.
Kyriaki Christodoulou, Esq.
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New York, New York 10004

*Counsel to the Official Committee of Unsecured
Creditors of Midwest Christian Villages Inc., et
al.*

Exhibit D

Compensation By Project Category

Matter No.	Project Category	Hours	Fees
B110	Case Administration	32.00	\$ 20,322.00
B120	Asset Analysis and Recovery	18.20	\$ 14,229.00
B130	Asset Disposition	75.60	\$ 57,121.00
B135	Prepare for and Attend Hearings	8.10	\$ 6,292.50
B150	Meetings of & Communications with Creditor	14.90	\$ 11,771.50
B160	Fee/Employment Applications	22.90	\$ 11,267.50
B170	Fee/Employment Objections	0.20	\$ 161.00
B180	Avoidance Action Analysis	0.50	\$ 390.00
B205	Debtor In Possession Finance Issues	9.60	\$ 7,725.50
B210	Business Operations	0.10	\$ 80.50
B230	Financing/Cash Collections	0.50	\$ 388.00
B280	Litigation, Contested Matters, and Adversary Proceedings	3.70	\$ 2,843.00
B310	Claims Administration and Objections	9.40	\$ 7,436.00
B320	Plan and Disclosure Statement	1.20	\$ 930.00
B330	Statement	<u>0.20</u>	<u>\$ 156.00</u>
Grand Total		197.10	\$ 141,113.50

Exhibit E

Information for Professionals Rendering Services During Compensation Period

CULLEN AND DYKMAN LLP
Information for Professionals Rendering Services During Compensation Period

<u>Professional</u>	<u>Timekeeper No.</u>	<u>Title</u>	<u>Group</u>	<u>Bar Admission</u>	<u>Billing Rate¹</u>	<u>Hours</u>	<u>Total</u>
Michael H. Traison	9130	Partner	Bankruptcy and Restructuring	1983	\$780/ \$805	96.40	\$76,142.00
Michelle K. McMahon	9091	Partner	Bankruptcy and Restructuring	2000	\$765/ \$790	64.40	\$49,711.00
Elizabeth M. Aboulafia	2210	Partner	Bankruptcy and Restructuring	2009	\$765	1.30	\$994.50
Kyriaki A. Christodoulou	9492	Associate	Bankruptcy and Restructuring	2021	\$410	33.60	\$13,776.00
Taylor Gorman	9384	Associate	Banking and Financial Services	2022	\$350	1.40	\$490.00
Total Hours Billed:	197.10						
Total Fees Billed:	\$141,113.50						

¹ Effective January 1, 2025, the hourly rates of Cullen and Dykman LLP professionals increased, as indicated by the second Billing Rate noted herein. The Court was apprised of said fee rate increases by *Notice of Professional Fee Hourly Rates* dated December 17, 2024 ([Doc. No. 545](#)).

Exhibit F

Detailed Computer-Generated Summary of Time Expended During Compensation Period

Date	Category	Name	Hours	Amount	Narrative
Case Administration					
11/04/2024	B110	MICHAEL H TRAISSON	0.50	390.00	Attention to administrative matters, recording of time entries, and billings
11/04/2024	B110	MICHAEL H TRAISSON	0.20	156.00	Correspondence with court regarding appearance at status conference, and hearing
11/04/2024	B110	KYRIAKI CHRISTODOULOU	0.30	123.00	Confer with M.Traisson re: status of matter, fee application, and fee statements.
11/04/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with Chambers to obtain dial-in instructions for upcoming hearings for M.Traisson.
11/05/2024	B110	MICHAEL H TRAISSON	0.30	234.00	Attention to administrative matters and fees submissions;
11/05/2024	B110	MICHAEL H TRAISSON	0.10	78.00	Receipt and review and coordinate via correspondence with local counsel
11/05/2024	B110	KYRIAKI CHRISTODOULOU	0.30	123.00	Reviewing October fee statement. Send to Verita for service.
11/05/2024	B110	KYRIAKI CHRISTODOULOU	0.40	164.00	Reviewing spreadsheets with time entry data to incorporate into fee application.
11/05/2024	B110	KYRIAKI CHRISTODOULOU	0.40	164.00	Reviewing case docket for recent significant filings.
11/05/2024	B110	KYRIAKI CHRISTODOULOU	0.10	41.00	Correspondence with M.Traisson re: the same.
11/06/2024	B110	MICHAEL H TRAISSON	0.40	312.00	Calendar fee objection deadline.
11/06/2024	B110	MICHAEL H TRAISSON	0.40	312.00	Prepare for and attend court hearings and status conference. Actual time 1.0 less courtesy reduction of .60. Net .40
11/06/2024	B110	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Debtor in Possession legal counsel regarding proposed omnibus hearings and responses
11/06/2024	B110	KYRIAKI CHRISTODOULOU	0.70	287.00	Correspondence with M.Traisson re: logistics of first interim fee application and working with Province to set joint hearing date. Draft email to Province to provide draft application.
11/08/2024	B110	KYRIAKI CHRISTODOULOU	1.60	656.00	Conferring with M.Candela throughout day several times re: organizing spreadsheet and preparing exhibit for fee application. Reviewing spreadsheet and identifying duplicative entries and several other issues and inconsistencies. Work with M.Candela and accounting to correct.
11/08/2024	B110	KYRIAKI CHRISTODOULOU	1.60	656.00	Reviewing time entries and reconciling numbers/differences in totals among differently categorized spreadsheets. Input numbers into fee application.
11/13/2024	B110	KYRIAKI CHRISTODOULOU	0.40	164.00	Preparing local form to submit to debtors' counsel for joint notice.

Date	Category	Name	Hours	Amount	Narrative
11/14/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Discuss finishing touches on fee motion with M.Traison. Send to local counsel for filing.
11/15/2024	B110	KYRIAKI CHRISTODOULOU	0.50	205.00	Managing, reviewing, communicating re: Province's fee application to ensure timely filed.
11/20/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Correspondence with debtors' counsel re: payment of fees.
11/25/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with team regarding bills and deadlines. Calendar objection deadline for first interim fee application.
12/02/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Reviewing monthly fee statement. Submit to Verita for service. Calendar objection deadline.
12/04/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer internally and with courtroom deputy to register C&D appearances for upcoming hearing.
12/10/2024	B110	MICHAEL H TRAISSON	0.50	390.00	Multiple correspondence and preparation and attention to upcoming hearings and correspondence regarding omnibus hearings to be scheduled and phone call with DIP counsel
12/10/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with team re: objections to fee application, pay rate increases in 2025 and related items. Review docket to confirm no objections to fee app were filed.
12/11/2024	B110	KYRIAKI CHRISTODOULOU	0.50	205.00	Reviewing fee application, amount requested and received to respond to M.Traison's inquiry regarding fees to be received as a result of first fee application.
12/12/2024	B110	MICHAEL H TRAISSON	0.40	312.00	Correspondence from MCV legal counsel regarding submission of order; follow up on order and approval and correspondence with local counsel.
12/12/2024	B110	MICHAEL H TRAISSON	0.10	78.00	Correspondence from David Sosne regarding Aetna claims and follow up with legal counsel for MCV
12/12/2024	B110	MICHAEL H TRAISSON	0.40	312.00	Review of docket and items for presentation at hearing on Monday and prepare
12/12/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with M.Traison and local counsel regarding fee order and submission of the same.
12/12/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with M.Traison re: fees still owed and expected to be paid on interim application.
12/13/2024	B110	MICHAEL H TRAISSON	0.20	156.00	Receipt and review of notice of resolution stipulation regarding claim of United Healthcare services
12/13/2024	B110	MICHAEL H TRAISSON	0.10	78.00	Call with DIP legal counsel regarding court hearing and awards scheduled for Monday and claim objections
12/16/2024	B110	MICHAEL H TRAISSON	0.20	156.00	Corresponded with financial advisor regarding preparations for Creditor committee meeting tomorrow

Date	Category	Name	Hours	Amount	Narrative
12/17/2024	B110	MICHAEL H TRAISSON	0.40	312.00	Exchanges of correspondence with committee financial advisor regarding assets available, liquidation of estate, and other issues pertaining to wind down budget
12/17/2024	B110	MICHAEL H TRAISSON	0.40	312.00	Receipt and review of orders entered by court
12/17/2024	B110	KYRIAKI CHRISTODOULOU	0.40	164.00	Drafting notice of 2025 professional rate increases. Confer with team to obtain list of rates. Revising initial draft after receiving M.McMahon feedback.
12/18/2024	B110	MICHAEL H TRAISSON	0.50	390.00	Conference call with committee professionals re liquidating trust, causes of action, etc.
12/18/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with M.Traisson re: inquiring about fee distributions. Correspondence with debtors' counsel re: the same.
12/23/2024	B110	TAYLOR GORMAN	0.20	70.00	Internal correspondences re sharing pre-petition loan documents with committee financial advisors.
12/23/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Conferring with Province and team internally regarding loan documents and employee retention tax credits to ascertain whether they carry any value or are otherwise encumbered by lender's interest.
12/23/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Conferring with accounting team re: application of funds received and outstanding bills.
12/24/2024	B110	TAYLOR GORMAN	1.20	420.00	Gathered pre-petition loan documents and shared same with committee financial advisors.
12/24/2024	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Reviewing emails and SharePoint files compiled by T.Gorman in response to Province's request for loan documents.
12/26/2024	B110	MICHAEL H TRAISSON	1.10	858.00	Receipt and review of debtor variance report, revised DIP budget and revise DIP budget overlay as well as notices regarding backup bidders, net revenue, and operating expenses facility index and other reports regarding debtor to Creditor committee
12/26/2024	B110	MICHAEL H TRAISSON	0.20	156.00	Correspondence to financial advisor regarding budgeting for debtor in possession expenses of reorganization
12/27/2024	B110	MICHAEL H TRAISSON	0.20	156.00	Correspondence to legal counsel Debtor in Possession regarding plan of reorganization
12/30/2024	B110	MICHELLE K MCMAHON	0.20	153.00	Review and correspond regarding notice of rate increase and teleconference with Debtors' counsel.
12/30/2024	B110	MICHAEL H TRAISSON	0.10	78.00	Correspondence and exchanges and consideration regarding plan of organization
12/30/2024	B110	KYRIAKI CHRISTODOULOU	0.30	123.00	Confer with M.McMahon re: final approval of rate increase notice. Confer with local counsel re: monthly fee statement inquiry and for filing of rate increase notice.

Date	Category	Name	Hours	Amount	Narrative
01/01/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receive and review notice of self reporting affidavit
01/01/2025	B110	MICHAEL H TRAISSON	0.80	644.00	Prepare presentation to Debtor in Possession regarding meeting scheduled to discuss wind down
01/02/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Review December fee statement. Correspondence with Verita re: service of the same.
01/02/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with team/review invoices and accounting records re: fees to provide debtor's counsel with expected payment numbers.
01/06/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to committee re case administration
01/07/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Attention to administrative matters, including responding to debtor in possession request for budget estimates
01/07/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to Debtor in Possession legal counsel Mr. Richards regarding administrative matters and his response re budgeting .2
01/07/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with M.Traisson and debtor's attorney re: amounts expected to be paid on first interim application and for December's time.
01/09/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Mr. Richards with key documents related to the 457B plan
01/09/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Mr. Taylor regarding claim 132 incorrectly filed against wrong Debtor and filed as a secured claim regarding Lincoln Illinois facility
01/10/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of notice of filing of monthly compensation report of healthcare management partners
01/10/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to committee regarding issues raised by debtor in possession, including exclusive. Extension and Aetna claim
01/13/2025	B110	MICHAEL H TRAISSON	0.10	80.50	Correspondence from and to Mr. Richard regarding extension of exclusivity date
01/14/2025	B110	MICHAEL H TRAISSON	0.70	563.50	Participate in consultation with professionals for debtor and committee and follow up
01/15/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Mr. Richards with notifications regarding closing and approval of sale
01/19/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence to committee and to financial advisor regarding preparation for regular creditor committee call
01/22/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to Mr. Richards and response regarding administrative fees
01/22/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Mr. Thompson financial advisor to the committee regarding administrative items and budgeting and response.

Date	Category	Name	Hours	Amount	Narrative
01/23/2025	B110	MICHAEL H TRAISSON	0.10	80.50	Attention to administrative matters and correspondence with Mr. Sosne
01/27/2025	B110	MICHAEL H TRAISSON	0.10	80.50	Correspondence from office of clerk of court regarding hearing tomorrow
01/27/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Correspondence and attached notices regarding agenda items for hearing and prepare for hearing
02/03/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Attention to creditor committee matters, reporting and analysis and notifications to committee regarding recent developments and committee meeting
02/04/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Reviewing January invoice. Send to Verita for service upon master service list.
02/05/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Review MSL service (made by email). Calendar deadline to object to fee statement.
02/06/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Call to Laura regarding insurance claims
02/06/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receive and review Correspondence from Eric Blythe re cap
02/10/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Responses to Mr. Richards regarding various pending issues and committee position; and proposal for motion to settle escrow issue
02/11/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Mr. Richards requesting confirmation of plan proposal and response to same
02/13/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Attention to fee application
02/19/2025	B110	MICHAEL H TRAISSON	0.50	402.50	NOTICE OF FILING OF MONTHLY COMPENSATION REPORT OF HEALTHCARE MANAGEMENT PARTNERS, LLC FOR THE PERIOD OF JANUARY 1, 2025 THROUGH AND INCLUDING JANUARY 31, 2025 AND OTHER PLEADINGS
02/20/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with team and subsequently with healthcare management team re: payment of January fees.
02/21/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Review fee statement and confer with MT re: payment for January time and outstanding amounts owed.
02/24/2025	B110	MICHAEL H TRAISSON	2.00	1,610.00	Preparation work on second interim application for reimbursement of expenses and professional fees
02/25/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from financial advisor to committee and review of slide deck
02/25/2025	B110	MICHAEL H TRAISSON	0.10	80.50	Correspondence to and from legal counsel to the debtor regarding omnibus hearing

Date	Category	Name	Hours	Amount	Narrative
02/25/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Telephone conference call with Eric Blythe, representing bondholders and discussion of so-called escrow funds; consider consideration of communication communications to claimant; conversation with lawyer for claimant conveying the message of proposal request from the bondholder commit
02/26/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receipt in review of certificate of service and omnibus objection claims review
02/26/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Review order granting relief from the automatic stay and review motion regarding extension of exclusivity and order
02/28/2025	B110	MICHELLE K MCMAHON	0.60	474.00	Review correspondence from Debtors regarding pending pleadings and correspond with Committee professionals regarding these documents.
02/28/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Receipt and review of docket and pleadings on various matters
02/28/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Email correspondence with debtors' counsel regarding outstanding balance on first interim fee award.
	B110 Total		32.00	20,322.00	
Asset Analysis and Recovery					

Date	Category	Name	Hours	Amount	Narrative
11/03/2024	B120	MICHAEL H TRAISSON	0.10	78.00	Time for 10/30/24 - Correspondence from counsel re reservation of rights
11/03/2024	B120	MICHAEL H TRAISSON	0.20	156.00	Time for 10/30/24 - Review correspondence to be sent to counsel concerning sale assets distribution
11/05/2024	B120	MICHELLE K MCMAHON	0.20	153.00	Review Province weekly update presentation.
11/05/2024	B120	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Debtor in Possession legal counsel regarding logistics for auction sale on November 12
11/06/2024	B120	MICHAEL H TRAISSON	0.20	156.00	Correspondence from and correspondence to Mr. Richards regarding overbids and bidding process coordination
11/06/2024	B120	MICHAEL H TRAISSON	0.20	156.00	Attention to proposed sale order revisions and intersection with reservation of rights to enhance recovery for committee.
11/08/2024	B120	MICHAEL H TRAISSON	0.40	312.00	Receipt of correspondence from Debtor in Possession legal counsel with auction, bid summary and review summary and updated summary
11/08/2024	B120	MICHAEL H TRAISSON	0.30	234.00	Attend and participate in consultation conference call with Debtor in Possession regarding bidding
11/08/2024	B120	MICHAEL H TRAISSON	0.20	156.00	Conference call with Province financial advisors to the committee regarding process and preparations for bidding
11/11/2024	B120	MICHAEL H TRAISSON	0.30	234.00	Receipt of correspondence from Debtor in Possession legal counsel with auction script and response
11/11/2024	B120	MICHAEL H TRAISSON	0.10	78.00	Correspondence and further exchanges between financial advisor and committee Council regarding auction
11/11/2024	B120	MICHAEL H TRAISSON	0.10	78.00	Correspondence with debtor, regarding separate sale of assets being included in some bids
11/11/2024	B120	MICHAEL H TRAISSON	0.20	156.00	Conference call with financial advisor regarding strategy for bidding and auction to maximize results for creditor committee
11/26/2024	B120	MICHELLE K MCMAHON	0.40	306.00	Review Province report on cash and Debtors' budgets.
12/10/2024	B120	MICHAEL H TRAISSON	1.00	780.00	Exchanges of correspondence and discussion with financial advisor regarding possible recoveries to enhance return and analysis of several issues including correspondence to committee chairperson regarding possible causes of action
12/10/2024	B120	MICHAEL H TRAISSON	0.30	234.00	Receive and review asset purchase agreement, Crown Point Christian, Village and Hoosier

Date	Category	Name	Hours	Amount	Narrative
12/11/2024	B120	MICHAEL H TRAISSON	1.20	936.00	Review of possible recoveries for unsecured creditors and consider logistics and strategy and correspondence to counsel for debtor in possession regarding same and response.
12/12/2024	B120	MICHAEL H TRAISSON	0.20	156.00	Receipt and review of back up APA for Pharmacy and correspondence from DIP legal
12/16/2024	B120	MICHAEL H TRAISSON	0.80	624.00	Review causes of action, possible recoveries, avoidance actions possibilities and other possibilities to recover for unsecured creditors
12/18/2024	B120	MICHELLE K MCMAHON	1.60	1,224.00	Review analysis of potential avoidance actions and defenses and teleconference and correspond with M. Traisson, P. Navid and H. Thompson regarding same and sources of plan funding.
12/20/2024	B120	MICHELLE K MCMAHON	0.20	153.00	Teleconference with B. Richards regarding rights to and use of insurance proceeds.
12/20/2024	B120	MICHELLE K MCMAHON	0.60	459.00	Review Debtors' analysis regarding insurance proceeds and competing claims to the funds.
12/24/2024	B120	MICHELLE K MCMAHON	1.40	1,071.00	Review prepetition lien analysis regarding UMB lien on insurance proceeds and correspond with M. Traisson regarding analysis.
12/26/2024	B120	MICHELLE K MCMAHON	0.60	459.00	Review Province asset analysis and overview (.2); teleconference and correspond with M. Traisson regarding asset analysis and case status (.4).
12/27/2024	B120	MICHAEL H TRAISSON	0.50	390.00	Consultation and consideration regarding action items, relevant to collection for unsecured creditors
12/27/2024	B120	MICHAEL H TRAISSON	0.20	156.00	Correspondence from financial advisor regarding assets available and not secured
01/02/2025	B120	MICHELLE K MCMAHON	0.30	237.00	Review correspondence from Debtors' counsel and outline for call with Debtors' counsel regarding plan funding.
01/02/2025	B120	MICHAEL H TRAISSON	0.40	322.00	Correspondence from legal counsel for Debtor in Possession itemize issues being examined by Debtor in Possession and its advisors and consider list and address other areas of concern
01/02/2025	B120	MICHAEL H TRAISSON	0.20	161.00	Letter to Debtor in Possession regarding assets and possible causes of action
01/02/2025	B120	MICHAEL H TRAISSON	0.20	161.00	Correspondence to Creditor's committee, list of issues to be focused upon and request for additional questions or inquiries by committee members

Date	Category	Name	Hours	Amount	Narrative
01/03/2025	B120	MICHAEL H TRAISSON	0.50	402.50	Correspondence from Province with inquiry regarding assets available for unsecured creditors; update on conversation with DIP; multiple exchanges and discuss meeting schedule as well as Mr. Richards request for update on Province fees and committee council fees
01/06/2025	B120	MICHAEL H TRAISSON	0.20	161.00	Correspondence to and correspondence from Richards regarding professionals' analysis and omnibus meeting
01/10/2025	B120	MICHELLE K MCMAHON	1.60	1,264.00	Review information and documents provided by Debtors regarding potential sources of funding for plan(s) of reorganization.
01/10/2025	B120	MICHAEL H TRAISSON	0.20	161.00	Correspondence to financial consultants on consolidation of debtor information regarding preparation for calls with debtor professionals, and with committee
01/13/2025	B120	MICHELLE K MCMAHON	1.10	869.00	Prepare for and teleconference with Committee Professionals regarding sources of plan funding.
01/13/2025	B120	MICHAEL H TRAISSON	1.00	805.00	Prepare for and participate in conference call meeting among community professionals regarding assets available for recovery; working with DIP and possible liquidation trust or liquidation plans
01/14/2025	B120	MICHELLE K MCMAHON	0.80	632.00	Review claims and asset information provided b the Debtors in preparation for call (.3); teleconference with Debtors' professionals regarding potential plan funding (.5).
01/24/2025	B120	MICHAEL H TRAISSON	0.10	80.50	Attention to case status and address sale issues.
	B120 Total		18.20	14,229.00	
Asset Disposition					

Date	Category	Name	Hours	Amount	Narrative
11/05/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from committee financial advisor regarding auction
11/05/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Werkheiser re draft sale order
11/05/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Review correspondence regarding reservation of rights with respect to disposition and disbursement of proceeds of sale of some assets
11/06/2024	B130	ELIZABETH M ABOULAFIA	0.60	459.00	Review and analysis of proposed revisions to sale order and exchange emails with M McMahon re same; review and analysis of Lument-raised issue re allocation of sale proceeds and related assumption issues and prepare email to team with analysis of same
11/07/2024	B130	MICHAEL H TRAISSON	0.90	702.00	Preparation for auction; correspondence from and to Debtor in Possession legal counsel (.4); correspondence from Financial Advisors and respond (.4); correspondence to chair of committee (.1)
11/08/2024	B130	MICHELLE K MCMAHON	3.70	2,830.50	Review bids summary and video conference with Debtors' counsel regarding bids and auction process (.9); review bid documents (2.6).
11/12/2024	B130	ELIZABETH M ABOULAFIA	0.30	229.50	Review and analysis of bid summaries prepared by Province and impact on sale reservation of rights
11/12/2024	B130	MICHELLE K MCMAHON	5.50	4,207.50	Review draft script for auction and correspond with Debtors' counsel regarding draft (.3); review updated summaries of bids and correspond with M. Traisson regarding bids (.3); represent client at auction (4.9).
11/12/2024	B130	MICHAEL H TRAISSON	0.80	624.00	Preparation for bidding and auction and consultation with financial advisor in advance of bidding process commencing
11/12/2024	B130	MICHAEL H TRAISSON	10.00	7,800.00	Attend and participate in bidding process and interaction with bidders and creditors; keep committee informed; consultation with bidders and creditors and debtors
11/12/2024	B130	MICHAEL H TRAISSON	0.00	0.00	NO CHARGE - Work on fee app preparation and correspondence with committee. No charge
11/13/2024	B130	MICHELLE K MCMAHON	1.40	1,071.00	Teleconference with B. Richards and M. Traisson regarding auction and bids (.5); review revised sale order and revised APAs (.9).
11/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Receipt and review of correspondence from financial advisor regarding bidding process overview
11/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Examination of causes of action and possible recovery for unsecured creditors through actions unrelated to bond holders' sale proceeds

Date	Category	Name	Hours	Amount	Narrative
11/13/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Breakfast meeting with legal Counsel to bondholders and discussion of history and possible causes of action to be examined by creditors committee
11/13/2024	B130	MICHAEL H TRAISSON	0.40	312.00	Draft and prepare advisory to creditors committee with summary regarding sale process, current status, and next steps
11/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Prepare for today's credit tour committee meeting
11/13/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Telephone call from legal counsel to the debtors regarding qualifications of bidders and possible regulatory problems
11/13/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Creditor committee meeting and update on sales
11/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Multiple telephone calls from legal counsel to debtor in possession regarding progress on sealed bids and the bidding process
11/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Receipt and review of charts from financial advisor, outlining sales and bids.
11/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Telephone call from Province regarding status and contemplation of offering of bids and follow up to recommendations to the committee
11/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Review memo to committee with status report
11/13/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Correspondence from Mr. Richards regarding Ziegler sending out revised APA to the applicable buyer and other APAs as revised subject to review of the Debtors and the Consulting Parties given the timetable and examine amended and restated as set purchase agreements
11/14/2024	B130	MICHELLE K MCMAHON	2.60	1,989.00	Review revised APAs and correspond with Debtors' counsel regarding certain revisions (.8); correspond with Debtors' counsel regarding revised Sale Order (.1); review transcript of auction (.9); review HUD objection to sale motion (.6); review Province summary of auction results (.2).
11/14/2024	B130	MICHAEL H TRAISSON	0.40	312.00	Working on filing of fee application, notices and charts and completing process for first interim application
11/14/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Review of issues regarding daily pay and order and modifications and response regarding same
11/14/2024	B130	MICHAEL H TRAISSON	0.40	312.00	Receipt of correspondence from DIP legal counsel regarding bidding and submission of modified order to court for confirmation of sale
11/15/2024	B130	MICHELLE K MCMAHON	0.30	229.50	Review objections to sale.

Date	Category	Name	Hours	Amount	Narrative
11/15/2024	B130	MICHELLE K MCMAHON	0.50	382.50	Teleconference with Consultation Parties regarding Auction bids and sale hearing.
11/15/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from council to HUD as to intention of purchasers to sell a sign or transfer Medicare agreements
11/15/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Review of correspondence from legal counsel for the debtor in possession and transcript of the auction proceedings
11/15/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Review of sale order and review of comments
11/15/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Work on and attention to filing of court application and notices and correspondence to and from local counsel
11/15/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Correspondence from DIP legal counsel regarding conference call and pre-meeting attendance regarding upcoming hearing
11/15/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Debtor in Possession legal counsel regarding need for preliminary hearing today and final hearing next week and response
11/15/2024	B130	MICHAEL H TRAISSON	0.30	234.00	TC from Hunter Thompson of province re status of various sales and issues
11/15/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Multiple correspondence from Province and review of fee application and respond to questions regarding filing. Actual time .5 less courtesy reduction of .4 for net of 0.10.
11/15/2024	B130	MICHAEL H TRAISSON	0.70	546.00	Attend and participate in court, hearing telephonically, no travel involved, regarding confirmation of sales on preliminary basis and other pending issues. Actual time 1.4 less courtesy reduction of .70 for net of .70
11/17/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Karen Jordan representing Casa Kesser with APA covering Crownpoint in Indiana examining changes .2
11/17/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Kerri Coniglio regarding modifications to the APA and response from legal counsel to the company
11/17/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Thomas Vandiver regarding five property APA by BH and explanation of purchase price calculations
11/17/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Van Diver, with APA, covering Iowa and Missouri

Date	Category	Name	Hours	Amount	Narrative
11/17/2024	B130	MICHAEL H TRAISSON	0.50	390.00	Examination of first interim application of Ziegler; review notice of hearing and summary of application for compensation; examine first interim application of Summers Compton Wells, examine notice of hearing and summary of application; examine first interim application of Denton; review notice of hearing regarding same
11/17/2024	B130	MICHAEL H TRAISSON	0.00	0.00	NO CHARGE - Review and examination of correspondence from Province regarding the application and noticing and process. No charge.
11/18/2024	B130	MICHELLE K MCMAHON	2.70	2,065.50	Review revised APAs (1.9); video conferences with consultation parties regarding bids (.8).
11/18/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Telephone call from financial advisor regarding details of auction process, and discussion of status
11/18/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence to financial advisor and preparation for presentation sheet to committee regarding auction bids between among bids and status
11/18/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from HUD counsel with redlines of the BEH led 5-property APA marked against (i) the HP Developers APA and (ii) the original template APA.
11/18/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Karen Jordan with preliminary final version of the HP Developers APA covering the Washington Village Estates. Wabash Estates and Wabash Christian Village Apartments.
11/18/2024	B130	MICHAEL H TRAISSON	0.50	390.00	Conference call with Debtor in Possession legal counsel and bankers re contracts for sales of assets status and negotiations
11/18/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Follow up and summary for creditors committee
11/18/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Debtor in Possession legal counsel with pleading schedule re issue re whether Arcadia/Aperion are entitled to a credit against the purchase price for the breakup fee
11/18/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Evening conference call with the consulting parties and the Debtor in possession regarding sale of assets.
11/19/2024	B130	MICHELLE K MCMAHON	1.60	1,224.00	Review correspondence regarding bids and revisions to sale order.
11/19/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence with financial advisor in preparation of summary report for committee analysis
11/19/2024	B130	MICHAEL H TRAISSON	0.00	0.00	NO CHARGE - Correspondence to committee regarding today's committee meeting

Date	Category	Name	Hours	Amount	Narrative
11/19/2024	B130	MICHAEL H TRAISSON	0.40	312.00	Participate, attend, and conduct meeting of unsecured creditors
11/19/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Debtor in Possession legal counsel regarding HUD experience of the BEH group
11/19/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from creditors committee member regarding today's meeting
11/19/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Further correspondence to committee regarding summary of discussions and negotiations yesterday
11/19/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Receipt and review from Province presentation outlining the two sale options and further preparation for Creditor committee meeting
11/19/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Debtor in Possession legal counsel with proposed Ziegler affidavit and request to review
11/19/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Update correspondence from Mr. Richards and review offer of increased bids
11/20/2024	B130	MICHELLE K MCMAHON	2.40	1,836.00	Review correspondence regarding bids and revised APAs (.5); teleconference with consultation parties regarding bids, potential objections and continued process (.9); review objections to sale and draft pleadings in response and prepare summary to Committee Professionals regarding objections (1).
11/20/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Receive and review additional correspondence from debtor in possession regarding sales of assets
11/20/2024	B130	MICHAEL H TRAISSON	0.50	390.00	Prepare for and attend Conference Call meeting with consulting parties at request of debtor in possession
11/20/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Receipt and review of correspondence from Mr. Richards and amended and restated asset purchase agreement regarding Risen Son Christian Village and Spring River Christian Village as sellers and Ocean Healthcare Services as buyers
11/20/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Examine filing of asset purchase agreement selling by Crownpoint Village, and purchased by Kesser property
11/20/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Participate in evening conference call regarding status of sales and submissions of bids is called by the Debtor in possession
11/20/2024	B130	MICHAEL H TRAISSON	0.00	0.00	NO CHARGE - Attention to payday claim priorities and multiple correspondence. No charge.
11/20/2024	B130	MICHAEL H TRAISSON	0.00	0.00	NO CHARGE - Attention to a Perian and Arcadia arguments regarding bidding procedures and correspondence from counsel

Date	Category	Name	Hours	Amount	Narrative
11/20/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from HP developers bidding for Washington Estates, Wabash Estates, and Wabash facilities
11/20/2024	B130	MICHAEL H TRAISSON	0.00	0.00	NO CHARGE - Correspondence from Ryan Anders outlining PEH position that it was the highest and best bidder
11/20/2024	B130	MICHAEL H TRAISSON	0.40	312.00	Conference call with consulting parties and Debtor in Possession and legal counsel are bidding review
11/20/2024	B130	KYRIAKI CHRISTODOULOU	0.40	164.00	Reviewing Stalking Horse Bidder's limited objection to sale motion and considering assertion of right to credit for bid protections and bid procedures.
11/21/2024	B130	MICHELLE K MCMAHON	2.90	2,218.50	Review final APAs and pleadings supporting sale approval.
11/21/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Receive Federal Express packages regarding notice of designation of Kesser, designation of Cardon and designation of Ocean Healthcare as successful bidders
11/21/2024	B130	MICHAEL H TRAISSON	1.00	780.00	Ongoing, all day exchanges of correspondence and reports from debtor and from bidding parties monitoring process and preparing for tomorrow's hearing
11/21/2024	B130	KYRIAKI CHRISTODOULOU	0.60	246.00	Confer with M.McMahon re: Arcadia objections to sale motion and related issues.
11/22/2024	B130	MICHELLE K MCMAHON	1.00	765.00	Review revised APAs, pleadings and correspondence regarding the sale hearing.
11/22/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Receipt and review of correspondence from Mr. Richards regarding correspondence from Mr. Gordon, Re BEH and Bet din ruling
11/22/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Telephone call and discussion with Mr. Richards concerning same
11/22/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Review correspondence from Mr. Werkheiser regarding sale order
11/22/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Prepare for hearing confirming sales of assets
11/22/2024	B130	MICHAEL H TRAISSON	3.00	2,340.00	Attend hearing on confirmation of sales via teleconference (avoiding travel time and expense) and correspondence and consultation during hearing; including BEH bid dispute; correspondence from Mr. Werkheiser regarding possible errors; side bar consultation re new offer and consideration of acceptability; resume court hearing
11/22/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Telephone call from financial advisor Province to discuss results of hearings and further discussion regarding possible recoveries for unsecured creditors

Date	Category	Name	Hours	Amount	Narrative
11/22/2024	B130	KYRIAKI CHRISTODOULOU	0.30	123.00	Reviewing debtors' objection to Arcadia's response.
11/22/2024	B130	KYRIAKI CHRISTODOULOU	2.80	1,148.00	Telephonic hearing on sale motion and related issues (including recess time).
11/25/2024	B130	MICHELLE K MCMAHON	1.20	918.00	Review sale orders and correspond with M. Traison and Debtors' counsel regarding proposed orders.
11/25/2024	B130	MICHAEL H TRAISSON	0.40	312.00	Receipt from Mr. Richards of two packages re confirmation of sales and respond to request for comments after review
11/25/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence and documentation and request for approval of purchaser, BEH documents; review and consider; review and consider changes made by Lument
11/27/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from and reply to debtor counsel re approval of sales
12/03/2024	B130	MICHELLE K MCMAHON	1.10	841.50	Review revised back up bid APAs and sale orders.
12/03/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Receive and review use from Jordan clean and redline is the APA from Hometown Development for River Birch.
12/03/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Jordan and clean and redline is a modified version of the APA from MDA Capital for the Indiana Communities.
12/03/2024	B130	MICHAEL H TRAISSON	0.80	624.00	Attention to potential recovery areas for the unsecured creditors, including issues, raised and analyzed by the financial advisor to the committee and consideration of plan attributes and recovery of assets, such as receivables, tax credits, etc.
12/03/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Telephone call from chairperson of the committee and brief discussion regarding strategy and committee meeting
12/04/2024	B130	MICHELLE K MCMAHON	0.20	153.00	Review amended APAs for back up bids.
12/04/2024	B130	MICHAEL H TRAISSON	0.40	312.00	Multiple correspondence with debtor counsel and with HUD regarding hearings and closings and strategy and preparing for appearance
12/11/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Review draft of the back-up sale order for the MDA bid.
12/12/2024	B130	MICHELLE K MCMAHON	0.90	688.50	Review back up bids and proposed orders.
12/12/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Receive and review contract from legal counsel for DIP regarding properties to be sold, including Hickory Point
12/13/2024	B130	MICHELLE K MCMAHON	0.20	153.00	Review revised back up bid APAs and orders.
12/13/2024	B130	MICHAEL H TRAISSON	0.10	78.00	Correspondence from DIP legal counsel with Back-Up APA for the Iowa and Missouri only bids.

Date	Category	Name	Hours	Amount	Narrative
12/13/2024	B130	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Debtor in Possession legal counsel with the forms of orders they intend to submit on Monday on the First interim Fee Apps of Dentons and Ziegler.
12/13/2024	B130	MICHAEL H TRAISSON	0.30	234.00	Further investigation of escrow money being held for benefit of unsecured creditors
12/16/2024	B130	MICHAEL H TRAISSON	0.90	702.00	Receipt and review of backup filings from DIP legal counsel (.20) and review of correspondence with counsel for HUD (.20); preparation for hearing and review of all items listed on agenda and review revised agenda (.50)
12/16/2024	B130	MICHAEL H TRAISSON	0.50	390.00	Attend hearing on sales of assets and professional fees
01/29/2025	B130	MICHELLE K MCMAHON	0.60	474.00	Teleconference with Debtors' counsel and M. Traisson regarding pharmacy sale and review information regarding pharmacy options.
01/29/2025	B130	MICHAEL H TRAISSON	0.50	402.50	Attention to sale of pharmacy and call with Mr. Richards re same
01/30/2025	B130	MICHAEL H TRAISSON	0.80	644.00	Attention to pharmacy sales; correspondence from Debtor in Possession legal counsel re agreement; review of purchaser's counsel responses.
01/31/2025	B130	MICHELLE K MCMAHON	0.50	395.00	Review correspondence from Debtors' counsel regarding pending sales.
02/03/2025	B130	MICHELLE K MCMAHON	2.30	1,817.00	Review correspondence and documents from Debtors regarding sale closing issues and review Committee financial advisor analysis of such issues.
02/04/2025	B130	MICHELLE K MCMAHON	0.90	711.00	Prepare for and teleconference with Debtors' counsel regarding sale issues (.5); draft correspondence to Committee regarding sale issue and potential resolution (.4).
02/05/2025	B130	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Mr. Richards re Risen Son (Iowa) and Spring River (Joplin) sales closing today. And response.
02/06/2025	B130	MICHELLE K MCMAHON	0.30	237.00	Review correspondence from Debtors' counsel regarding sale issues.
02/11/2025	B130	MICHELLE K MCMAHON	0.30	237.00	Review correspondence from Debtors' counsel regarding sale closings and claims of stalking horse bidders for reimbursement.
02/12/2025	B130	MICHELLE K MCMAHON	0.70	553.00	Review correspondence and analysis and teleconference with Debtors' counsel regarding negotiations with service provider (.5); teleconference with M. Traisson regarding claims related to insurance proceeds (.2).

Date	Category	Name	Hours	Amount	Narrative
02/13/2025	B130	MICHELLE K MCMAHON	0.20	158.00	Review correspondence and documents form Debtors' counsel regarding agreement related to pending closing.
02/20/2025	B130	MICHAEL H TRAISSON	0.40	322.00	Receipt and review of order approving debtor motion to approve asset, purchase agreement and authorizing sale of all assets of Washington Wabash, Spring River Christian village, and other estates
02/21/2025	B130	MICHELLE K MCMAHON	0.10	79.00	Review correspondence regarding sale closures.
	B130 Total		75.60	57,121.00	
Prepare for and Attend Hearings					

Date	Category	Name	Hours	Amount	Narrative
11/06/2024	B135	MICHELLE K MCMAHON	0.70	535.50	Review revised sale order and correspond with Committee professionals and Debtors' counsel regarding order (.2); represent Committee at hearing (.5).
11/15/2024	B135	MICHELLE K MCMAHON	1.10	841.50	Represent Committee at Sale Hearing.
11/22/2024	B135	MICHELLE K MCMAHON	2.60	1,989.00	Represent Committee at Sale Hearing.
12/16/2024	B135	MICHELLE K MCMAHON	1.00	765.00	Review fee applications in preparation for hearing; review client at hearing.
01/28/2025	B135	MICHELLE K MCMAHON	0.50	395.00	Represent client at hearing.
01/28/2025	B135	MICHAEL H TRAISSON	0.50	402.50	Attend Midwest Christian Villages omnibus hearing and participate re objections to claims, Aetna stipulation
02/23/2025	B135	MICHAEL H TRAISSON	0.50	402.50	Notice of agenda and review matters scheduled for omnibus hearing and prepare for same
02/24/2025	B135	MICHAEL H TRAISSON	0.40	322.00	Examine correspondence to and from court, and prepare for omnibus hearing and review most recent submissions
02/25/2025	B135	MICHELLE K MCMAHON	0.30	237.00	Represent Committee at hearing.
02/25/2025	B135	MICHAEL H TRAISSON	0.50	402.50	Preparation for and attending hearing
	B135 Total		8.10	6,292.50	
Meetings of & Communications with Creditor					

Date	Category	Name	Hours	Amount	Narrative
11/04/2024	B150	MICHAEL H TRAISSON	0.20	156.00	Receipt of notice of agenda
11/04/2024	B150	MICHAEL H TRAISSON	0.20	156.00	Preparation for status conference, and review of correspondence to committee regarding same.
11/05/2024	B150	MICHELLE K MCMAHON	0.30	229.50	Correspondence to Committee regarding changes to WTC sale order.
11/06/2024	B150	MICHELLE K MCMAHON	0.40	306.00	Communicate with Committee regarding hearing and revised sale order, reservation of rights, and bid deadline.
11/13/2024	B150	MICHELLE K MCMAHON	1.20	918.00	Review correspondence with Committee regarding auction and summaries of auction results and draft agenda for Committee meeting (.2); Committee meeting (.2); prepare correspondence to Committee regarding closing bids and objection to the Sale Motion (.8).
11/19/2024	B150	MICHELLE K MCMAHON	0.10	76.50	Draft agenda for Committee meeting and correspond with Committee professionals regarding agenda (.1); Prepare for and meet with Committee (.).
11/25/2024	B150	MICHAEL H TRAISSON	0.20	156.00	Correspondence with chair of committee and preparation for committee meetings and attention to administrative matters
11/25/2024	B150	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Creditor committee member and response regarding developments
11/26/2024	B150	MICHAEL H TRAISSON	0.40	312.00	Receiving review deck and report from financial advisor and prepare for Creditor meeting
11/26/2024	B150	MICHAEL H TRAISSON	0.20	156.00	Correspondence to share of the committee and consideration of postponement of meeting and noticed a committee members
12/16/2024	B150	MICHELLE K MCMAHON	0.40	306.00	Prepare summary of hearing and cancelation of Committee meeting.
12/26/2024	B150	MICHAEL H TRAISSON	0.30	234.00	Correspondence to committee financial updates and examine highlights in report regarding issues on conclusions regarding preference, recovery extension of maturity, date of GIP loans retention tax credits, and liquidation trust
12/26/2024	B150	MICHAEL H TRAISSON	0.30	234.00	Correspondence from Creditor counsel asking for update and potential for recovery and respond to same
01/10/2025	B150	MICHELLE K MCMAHON	0.70	553.00	Draft communication to Committee regarding pending issues for Committee input.
01/13/2025	B150	MICHELLE K MCMAHON	0.20	158.00	Prepare agenda for Committee meeting and correspondence to Committee regarding meeting.

Date	Category	Name	Hours	Amount	Narrative
01/14/2025	B150	MICHELLE K MCMAHON	1.80	1,422.00	Prepare summary of call with Debtors' professionals for Committee (.7); prepare for and teleconference for Committee meeting (1.1).
01/14/2025	B150	MICHAEL H TRAISSON	0.80	644.00	Prepare for and conduct creditors committee meeting; review agenda
01/27/2025	B150	MICHELLE K MCMAHON	0.40	316.00	Correspond with Committee professionals regarding Committee meeting, prepare agenda for meeting and correspond with Committee regarding meeting.
01/27/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Review of agenda in preparation regarding committee meeting
01/28/2025	B150	MICHELLE K MCMAHON	1.00	790.00	Prepare for and attend Committee meeting.
01/28/2025	B150	MICHAEL H TRAISSON	0.80	644.00	Correspondence from Mr. Hunter at Province Financial advisor to committee and review presentation in preparation for committee meeting
01/28/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Mr. Richards re disposition of assets and purchase status regarding one of the debtor companies and respond.
01/28/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Attend and conduct Midwest Christian Villages committee meeting
01/30/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Correspondence from and to creditor seeking explanations regarding lack of payment on personal injury judgments
01/31/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Multiple correspondence from member of Creditor committee and Conference Call regarding Creditor claim and request for explanation regarding payment and priorities
02/07/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Telephone creditor counsel and discuss claims of client and Conference Call with client explaining priorities and status of case
02/10/2025	B150	MICHELLE K MCMAHON	0.70	553.00	Prepare update for Committee on sale closings.
02/10/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Attention to Creditor committee meeting and preparation; reports to committee
02/17/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Receipt and review of motion and proposed order re extension of exclusivity period and report to creditors committee
02/17/2025	B150	MICHAEL H TRAISSON	0.20	161.00	Attention to prep for meeting of unsecured creditors committee
02/24/2025	B150	MICHELLE K MCMAHON	0.10	79.00	Draft agenda for meeting with Committee.
02/25/2025	B150	MICHELLE K MCMAHON	0.40	316.00	Prepare for and meeting with Committee.

Date	Category	Name	Hours	Amount	Narrative
02/25/2025	B150	MICHAEL H TRAISSON	0.50	402.50	Correspondence from into Creditor committee member; preparation for committee meeting.
	B150 Total		14.90	11,771.50	
<u>Fee/Employment Applications</u>					

Date	Category	Name	Hours	Amount	Narrative
11/01/2024	B160	MICHAEL H TRAISSON	0.20	156.00	Attention to fee application issues and reports regarding debtor and committee professional fees
11/05/2024	B160	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with M.Candela to discuss organizing data for fee application.
11/05/2024	B160	KYRIAKI CHRISTODOULOU	1.60	656.00	Drafting attorney certification in support of first interim fee application.
11/05/2024	B160	KYRIAKI CHRISTODOULOU	2.00	820.00	Finalizing first draft of interim fee application, including elaborating on service descriptions per category and preparing exhibits. Send to team for review.
11/06/2024	B160	MICHAEL H TRAISSON	0.40	312.00	Attention to the application preparation, including correspondence from and to Mr. Richards Debtor in Possession legal counsel regarding format and notice.
11/06/2024	B160	MICHAEL H TRAISSON	0.10	78.00	Correspondence and conference call with committee financial advisors regarding preparation of applications and professional fee issues
11/06/2024	B160	KYRIAKI CHRISTODOULOU	2.30	943.00	Amend application to track same application period as debtors' counsel. Input totals and finalize exhibits.
11/07/2024	B160	MICHAEL H TRAISSON	0.30	234.00	Work on fee applications and calculations and presentation for filing.
11/07/2024	B160	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Debtor in Possession legal counsel re noticing and applications
11/07/2024	B160	KYRIAKI CHRISTODOULOU	0.30	123.00	Review exhibit provided by MC. Confer with debtors' team regarding joint notice. Consider modifying language in draft application to account for 20% holdback per Local Rules.
11/08/2024	B160	MICHAEL H TRAISSON	0.10	78.00	Work on preparation of the application.
11/12/2024	B160	ELIZABETH M ABOULAFIA	0.40	306.00	Review and revise first interim fee application; email exchanges with K Christodoulou re same
11/12/2024	B160	KYRIAKI CHRISTODOULOU	2.20	902.00	Correspondence with team members to finalize all portions of and content of fee application, including to obtain Committee approval and address any inconsistencies in numbers. Prepare email and send draft application to Committee for approval.
11/12/2024	B160	KYRIAKI CHRISTODOULOU	0.50	205.00	Reviewing E.Aboulafia's proposed changes to motion. Confer with E.Aboulafia re: the same. Revise accordingly.
11/13/2024	B160	KYRIAKI CHRISTODOULOU	0.70	287.00	Finalize fee application matters. Send to local counsel for filing.
11/15/2024	B160	MICHELLE K MCMAHON	0.40	306.00	Review Province Fee Application and correspond with Province regarding comments.

Date	Category	Name	Hours	Amount	Narrative
12/09/2024	B160	MICHAEL H TRAISSON	1.50	1,170.00	Reviews of fee applications and due diligence and attention to committee interests and administrative items including previously unrecorded time
12/13/2024	B160	MICHELLE K MCMAHON	0.10	76.50	Review fee application orders for revisions.
12/13/2024	B160	MICHAEL H TRAISSON	0.10	78.00	Receipt in review of monthly fee statement of HMP
12/13/2024	B160	MICHAEL H TRAISSON	0.30	234.00	Receipt and review of monthly statement for legal counsel for debtor in Possession
12/13/2024	B160	MICHAEL H TRAISSON	0.20	156.00	Attention to applications and proposed orders
12/13/2024	B160	KYRIAKI CHRISTODOULOU	0.70	287.00	Reviewing internal correspondence and conferring with team re: changes to order. Revising order approving fee application to track Denton's form order. Send out for approval and submission.
12/20/2024	B160	MICHAEL H TRAISSON	0.10	78.00	Receiving review of pleading and orders answered and confirm accuracy and comparison
12/24/2024	B160	MICHAEL H TRAISSON	0.60	468.00	Attention to professional fee issues
02/26/2025	B160	KYRIAKI CHRISTODOULOU	4.80	1,968.00	Draft second interim application for allowance of compensation. Review numbers and create spreadsheet to decipher payments received and amounts owed.
02/27/2025	B160	MICHAEL H TRAISSON	0.20	161.00	Preparation of fee application
02/27/2025	B160	KYRIAKI CHRISTODOULOU	2.50	1,025.00	Continue drafting second interim fee application and deciphering numbers.
	B160 Total		22.90	11,267.50	
Fee/Employment Objections					

Date	Category	Name	Hours	Amount	Narrative
01/10/2025	B170	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of healthcare management partners, December fee statement and receipt and review of Summers Compton Wells, December fee statement
	B170 Total		0.20	161.00	
<u>Avoidance Action Analysis</u>					

Date	Category	Name	Hours	Amount	Narrative
12/18/2024	B180	MICHAEL H TRAISSON	0.30	234.00	Correspondence from Debtor in possession counsel, and analysis of preferential, transfers and response to DIP legal counsel
12/18/2024	B180	MICHAEL H TRAISSON	0.20	156.00	Follow up to discussion and respond regarding preferential transfer recoveries raise questions as to whether they are de minimus
	B180 Total		0.50	390.00	
Debtor in Possession Finance Issues					

Date	Category	Name	Hours	Amount	Narrative
11/05/2024	B205	MICHAEL H TRAISSON	0.10	78.00	Correspondence from Debtor in Possession legal counsel regarding Mintz/bondholders request that all net sales proceeds after costs of sale be tendered to apply to DIP loan instead of being used for operations
01/01/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Receive and review notice of first amendment to Debtor in Possession financing order
01/09/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Mr. Richard's re extending exclusive period; correspondence to committee chair considering same and respond to Debtor in Possession legal counsel
01/09/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Debtor in Possession legal counsel with responses to questions regarding assets, avoidance, actions, and possible claims satisfaction for unsecured creditors.
01/30/2025	B205	MICHAEL H TRAISSON	0.60	483.00	Multiple correspondence from financial team and Debtor in Possession legal counsel re two Indiana facilities (Hoosier and Crown Point) subject to management agreement and related agreements with Jackson County Schneck Memorial Hospital
01/31/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Debtor in Possession legal counsel and updated calculation of what would be owed from Schneck per the Management Agreement workpapers
02/01/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of correspondence from Kuba financial advisor; review analysis regarding Schneck management Contract
02/04/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Conference call meeting with debtor regarding recent debtor transactions and briefing for counsel and committee financial advisor
02/04/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from legal counsel to Debtor in Possession re resolving closing of the two Illinois SLFs (Washington and Wabash Estates)
02/06/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Telephone call from dip legal counsel regarding resolution of cases, wind up, issue of escrow insurance money
02/06/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Debtor in Possession legal counsel re Ocean fees and expenses and reply
02/06/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from legal counsel Debtor in Possession re ambassador fee request.

Date	Category	Name	Hours	Amount	Narrative
02/07/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Receipt of correspondence from legal counsel to Debtor in Possession regarding various wind down issues, including cross, employment issues; response to same with further inquiry and follow up with counsel
02/07/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Debtor in Possession regarding separate closings and review and respond as requested
02/10/2025	B205	MICHAEL H TRAISSON	0.10	80.50	Correspondence from legal counsel Debtor in Possession re-accruals and response
02/11/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Multiple correspondence from DIP regarding various closings and transactions and plan of re organization
02/12/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Debtor in Possession legal counsel re Schneck Discussion and CHI Proposal for HCV and CPCV; request for review and discussion of settlement and for Conference Call
02/12/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Conference call with Thomas Vandiver and Robert Richards regarding various issues, including compromise and settlement discussions with Schneck and regarding interpleader regarding escrowed monies
02/12/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Attention to escrow issue and pose questions to the debtor regarding bondholder and secured claims to money being held, and where money was deposited; advice regarding handling by bondholders rather than a secured creditors; also discussion regarding budget
02/13/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Telephone call from Mr. Richards regarding upcoming two closings next week; contest regarding insurance proceeds and position of bond holders and debtor and committee; discuss the applications and detention to same; also request for consent regarding extension of exclusivity. Including follow up to same.
02/13/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Debtor in Possession legal counsel re status of documentation with Schneck.
02/14/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Receipt of correspondence from legal counsel Debtor in Possession and examination of motion end of proposed order regarding extension of exclusivity time and response responses to same
02/18/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Receipt and review of pleadings regarding extension of DIP budget and examine budget
02/23/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Receipt and review of Debtor in Possession legal January fee statement and receipt in review of Province January fee statement

Date	Category	Name	Hours	Amount	Narrative
02/23/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Review monthly operating report for debtors filed by debtor ending January 31
02/26/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Telephone call from Legal counsel Debtor in Possession re claim of Hope and follow up with Hope counsel
02/27/2025	B205	MICHAEL H TRAISSON	0.90	724.50	Correspondence from Debtor in Possession legal counsel re upcoming pleadings, claims objections, rejection of executory contracts, pharmacy sales, Hope settlement and attention to same
	B205 Total		9.60	7,725.50	
Business Operations					

Date	Category	Name	Hours	Amount	Narrative
01/13/2025	B210	MICHAEL H TRAISSON	0.10	80.50	Correspondence from Creditor committee member regarding response to request for approval of DIP requests
	B210 Total		0.10	80.50	
<u>Financing/Cash Collections</u>					

Date	Category	Name	Hours	Amount	Narrative
12/24/2024	B230	MICHELLE K MCMAHON	0.20	153.00	Review extended DIP budget.
12/30/2024	B230	MICHAEL H TRAISSON	0.20	156.00	Receipt in review of extension of DIP financing till end of February
01/02/2025	B230	MICHELLE K MCMAHON	0.10	79.00	Review DIP Amendment.
	B230 Total		0.50	388.00	
<u>Litigation, Contested Matters, & Adversary Proceedings</u>					

Date	Category	Name	Hours	Amount	Narrative
11/04/2024	B280	MICHELLE K MCMAHON	0.40	306.00	Review proposed orders on extensions of exclusivity, section 365 and sale of WTC assets.
11/05/2024	B280	MICHELLE K MCMAHON	0.80	612.00	Review draft WTC sale order and correspond with Debtors' correspondence regarding draft order.
11/06/2024	B280	MICHELLE K MCMAHON	1.30	994.50	Correspond with counsel for the Debtors and UMB regarding resolution of reservation of rights regarding sale motion (.2); teleconference with Lumant's counsel and correspond with Committee professionals regarding potential objections to the sale (1.1).
11/14/2024	B280	MICHELLE K MCMAHON	0.50	382.50	Review draft stipulation with DailyPay and first day prepetition wage order and correspond with Committee professionals and Debtors counsel regarding proposed revisions.
11/20/2024	B280	MICHELLE K MCMAHON	0.20	153.00	Correspond with Debtors' counsel and Dailypay's counsel regarding Dailypay stipulation.
01/13/2025	B280	MICHELLE K MCMAHON	0.20	158.00	Review revised motions and stipulation and correspond with Debtors' counsel regarding same.
02/25/2025	B280	MICHELLE K MCMAHON	0.30	237.00	Review stipulation and proposed motion and order.
	B280 Total		3.70	2,843.00	
Claims Administration and Objections					

Date	Category	Name	Hours	Amount	Narrative
12/13/2024	B310	MICHAEL H TRAISSON	0.30	234.00	Receive correspondence from Samantha Ruben and examine omnibus objections to claims and follow up with legal counsel
12/18/2024	B310	MICHAEL H TRAISSON	0.30	234.00	Correspondence from Debtor in Possession legal counsel regarding claim for escrowed funds and review of lawsuit pleadings and call from legal counsel for Debtor in Possession
12/19/2024	B310	MICHELLE K MCMAHON	0.10	76.50	Review summary of analysis of potential objection to administrative claim.
12/19/2024	B310	MICHAEL H TRAISSON	0.20	156.00	Correspondence from David Sosne reporting on analysis of priority, claims a circuit by Aetna and wage priority claims; consideration of same and response to counsel and follow up with committee
12/19/2024	B310	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Summers Compton wells with further information regarding priority claims.
12/20/2024	B310	MICHELLE K MCMAHON	0.50	382.50	Review summary and analysis of claims and potential objections.
12/20/2024	B310	MICHAEL H TRAISSON	0.90	702.00	Correspondence from Debtor in Possession and charts and analysis of claims and objections and correspondence from and correspondence to committee financial consultants regarding claims
12/22/2024	B310	MICHAEL H TRAISSON	0.20	156.00	Correspondence from Mr. Richards regarding insurance claim, deposit, pre-payment by insurance company and question of commingling
12/22/2024	B310	MICHAEL H TRAISSON	0.20	156.00	Review of pleadings filed by claimant for release of funds and scheduling for omnibus hearing
12/22/2024	B310	MICHAEL H TRAISSON	0.20	156.00	Correspondence to committee chair and request for input and comments on process and that committee will need to decide
12/22/2024	B310	MICHAEL H TRAISSON	0.30	234.00	Correspondence to Mr. Richards with questions regarding the asset and response from Mr. Richards
12/23/2024	B310	MICHAEL H TRAISSON	0.40	312.00	Further consideration of escrowed, monies and claims by secured and unsecured creditors and preparing response regarding objection potential and committee role
12/24/2024	B310	MICHAEL H TRAISSON	0.40	312.00	Attention to claims analysis and objections to claims and follow up
12/30/2024	B310	MICHAEL H TRAISSON	0.20	156.00	Telephone discussion with Mr. Richards regarding insurance payment escrow and competing interest, including claim of plaintiff, possible claim of other parties and claims of the unsecured creditors committee

Date	Category	Name	Hours	Amount	Narrative
01/02/2025	B310	MICHAEL H TRAISSON	0.20	161.00	Correspondence from David Sosne regarding Aetna priority claim and request for response and approval and consultation with Province
01/02/2025	B310	MICHAEL H TRAISSON	0.20	161.00	Reply to David Sosne correspondence and response from David regarding analysis of the Aetna priority claim
01/03/2025	B310	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Mr. Richards with updated claims report and analysis
01/07/2025	B310	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Mintz Levin regarding Aetna claim and concurring and research results
01/08/2025	B310	MICHAEL H TRAISSON	0.20	161.00	Letter from Mr. Sosne and Stipulation and Agreed Order for the Resolution of the Claims of AmerisourceBergen Drug Corporation and Smart-fill Management Group, Inc.
01/08/2025	B310	MICHAEL H TRAISSON	0.20	161.00	Review stipulation and respond regarding approval
01/09/2025	B310	MICHELLE K MCMAHON	0.70	553.00	Review stipulations allowing claims and correspond with Debtors' counsel and M. Traison regarding Committee position.
01/09/2025	B310	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Mr. Sosne with documents regarding resolution of the Aetna claim
01/13/2025	B310	MICHAEL H TRAISSON	0.10	80.50	Correspondence from Mr. Sosna with revised stipulation regarding Smartfill/ Amerisource; request for confirmation of committee approval
01/14/2025	B310	MICHAEL H TRAISSON	0.50	402.50	Correspondence from DIP legal counsel with revised claims register; preparation for consultation meeting with debtor in possession professionals
01/17/2025	B310	MICHAEL H TRAISSON	0.60	483.00	Telephone call from Jim Finnegan, regarding claim for personal injury, commingling of funds, payment by insurance company, consider consideration of claims of other parties, explanation of role of creditor committee versus individual creditors
01/17/2025	B310	MICHAEL H TRAISSON	0.20	161.00	Correspondence from counsel for debtor in possession regarding stipulation and agreed order on claim 132 filed by Charles Taylor
01/21/2025	B310	MICHELLE K MCMAHON	0.10	79.00	Review stipulation on claim and correspond with Debtors' counsel regarding revised stipulation.
01/21/2025	B310	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Mr. Sosne regarding Smart-Fill/Amerisource's counsel with regard to the proposed Stipulation and Agreed Order.; review of same and prepare response.
01/22/2025	B310	MICHAEL H TRAISSON	0.40	322.00	Multiple correspondence regarding Charles Taylor proof of claim and exchanges of correspondence with Clay Taylor

Date	Category	Name	Hours	Amount	Narrative
01/27/2025	B310	MICHAEL H TRAISSON	0.40	322.00	Multiple correspondence regarding claim of Taylor
	B310 Total		9.40	7,436.00	
<u>Plan and Disclosure Statement</u>					

Date	Category	Name	Hours	Amount	Narrative
12/13/2024	B320	MICHELLE K MCMAHON	0.90	688.50	Strategize regarding various sources of recovery and funding under a plan.
01/10/2025	B320	MICHAEL H TRAISSON	0.30	241.50	Correspondence from financial consultant regarding summary analysis of ERC and comments regarding healthcare management and prep for committee call
	B320 Total		1.20	930.00	
Budgeting					

Date	Category	Name	Hours	Amount	Narrative
12/26/2024	B330	MICHAEL H TRAISSON	0.20	156.00	Conference call with counsel to discuss strategy and future steps to be taken
	B330 Total		<u>0.20</u>	<u>156.00</u>	
	Grand Total		197.10	141,113.50	

Exhibit G

Expense Summary

Date	Description	Vendor	Amount
11/20/2024	ON-LINE RESEARCH	RELX INC. DBA LEXISNEXIS	7.40
11/20/2024	ON-LINE RESEARCH	RELX INC. DBA LEXISNEXIS	32.59
02/27/2025	OUT-OF-TOWN TRAVEL	MICHAEL TRAISSON	136.60
		Total:	176.59