

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:)
) Chapter 11
OTB HOLDING LLC, *et al.*,¹)
) Case No. 25-52415 (SMS)
) (Jointly Administered)
Debtors.)
)
) Obj. Deadline: October 21, 2025, 4:00 p.m. (ET)
) Hearing Date: November 4, 2025, 2:45 p.m. (ET)

**NOTICE OF FILING OF SECOND INTERIM AND FINAL APPLICATION FOR
ALLOWANCE OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES
INCURRED BY KING & SPALDING LLP, COUNSEL TO THE DEBTORS, AND
DEADLINE TO OBJECT AND HEARING**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On September 30, 2025, King & Spalding LLP (the "Applicant") filed the *Second Interim and Final Application for Allowance of Attorneys' Fees and Reimbursement of Expenses Incurred by King & Spalding LLP, Counsel to the Debtors* (the "Application")² with the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the "Court").

2. Pursuant to the *Fifth Amended and Restated General Order No. 24-2018*, dated September 29, 2025, the Court may consider this matter without further notice or hearing if no party in interest files a response or objection within twenty-one (21) days from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk** at Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta Georgia 30303, and serve a copy on the Debtors' counsel, King & Spalding LLP, 1180 Peachtree Street, NE, Atlanta, Georgia 30309, Attention: Jeffrey R. Dutson, Esq. (email: jdutson@kslaw.com) and Brooke L. Bean, Esq. (email: bbean@kslaw.com) and any other

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: OTB Holding LLC (3213), OTB Acquisition LLC (8500), OTB Acquisition of New Jersey LLC (1506), OTB Acquisition of Howard County LLC (9865), Mt. Laurel Restaurant Operations LLC (5100), OTB Acquisition of Kansas LLC (9014), OTB Acquisition of Baltimore County, LLC (6963). OTB Holding LLC's service address is One Buckhead Plaza, 3060 Peachtree Road, NW, Atlanta, GA 30305.

² Capitalized terms used but not otherwise defined herein shall have their meanings ascribed in the Application.



appropriate persons by **4:00 p.m. (prevailing Eastern Time) on October 21, 2025** (the “Objection Deadline”). The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the Objection Deadline.

3. A hearing on the Application has been scheduled for **2:45 p.m. (prevailing Eastern Time) on November 4, 2025, in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which must be attended in person, unless the Court orders otherwise.

4. If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the Objection Deadline, the Court may grant the relief requested without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the relief requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

5. **Your rights may be affected. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

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Date: September 30, 2025
Atlanta, GA

Respectfully submitted,

KING & SPALDING LLP

/s/ Jeffrey R. Dutson

Jeffrey R. Dutson

Georgia Bar No. 637106

Brooke L. Bean

Georgia Bar No. 764552

Alice Kyung Won Song

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Counsel for the Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:)
) Chapter 11
OTB HOLDING LLC, *et al.*,¹) Case No. 25-52415 (SMS)
) (Jointly Administered)
Debtors.)
)
)
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**SUMMARY OF SECOND INTERIM AND FINAL APPLICATION FOR
ALLOWANCE OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES
INCURRED BY KING & SPALDING LLP, COUNSEL TO THE DEBTORS**

Name of Applicant:	King & Spalding LLP
Services Provided to:	Debtors and Debtors in Possession
Name of Certifying Professional:	Jeffrey R. Dutson
Date of Application to Employment:	March 7, 2025 [Docket No. 44]
Date of Order Authorizing Employment:	March 10, 2025, effective as of March 4, 2025 [Docket No. 88]
Period for Second Interim Application:	July 1, 2025 through September 16, 2025
Amount of Compensation Sought for the Second Interim Application Period:	\$884,864.50

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: OTB Holding LLC (3213), OTB Acquisition LLC (8500), OTB Acquisition of New Jersey LLC (1506), OTB Acquisition of Howard County LLC (9865), Mt. Laurel Restaurant Operations LLC (5100), OTB Acquisition of Kansas LLC (9014), OTB Acquisition of Baltimore County, LLC (6963). OTB Holding LLC's service address is One Buckhead Plaza, 3060 Peachtree Road, NW, Atlanta, GA 30305.

Amount of Expense Reimbursement Sought for the Second Interim Application Period:	\$497.38
Period for Final Application:	March 4, 2025 through September 16, 2025
Amount of Compensation Sought for the Final Application Period:	\$3,922,887.50 ²
Amount of Expense Reimbursement Sought for the Final Application Period:	\$23,009.66
Amount of Original Retainer:	\$425,030.00
Current Balance of Retainer:	\$11,750.00
Blended Hourly Rate for Attorneys in this Application (for the Second Interim Application Period):	\$1,058.58
This is an Interim / Final Application	Interim and Final

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² In addition to the request for compensation in the amount of \$3,904,887.50, K&S is requesting compensation in the amount of \$18,000.00 (for a total sum of compensation in the amount of \$3,922,887.50), representing estimated fees and expenses to be incurred by K&S in connection with preparation and prosecution of this Application and the fee applications of other professionals of the Debtors.

Payment of Monthly Fee Statements

Time Period	Fees Requested	Expenses Requested	Date of Payment	Fees Paid	Expenses Paid
March 4, 2025 through March 31, 2025	\$1,010,491.50	\$13,812.92	April 22, 2025	\$1,010,491.50	\$13,812.92
April 1, 2025 through April 30, 2025	\$586,182.00	\$4,927.87	May 21, 2025	\$586,182.00	\$4,927.87
May 1, 2025 through May 31, 2025	\$927,547.00	\$3,658.78	June 20, 2025	\$927,547.00	\$3,658.78
June 1, 2025 through June 30, 2025	\$495,802.50	\$112.71	July 29, 2025	\$495,802.50	\$112.71
July 1, 2025 through July 31, 2025	\$403,676.50	\$251.92	August 27, 2025, September 3, 2025	\$403,676.50	\$251.92
August 1, 2025 through August 31, 2025	\$348,912.00	\$82.43	September 24, 2025	\$347,467.00	\$82.43
September 1, 2025 through September 16, 2025	\$132,276.00	\$163.03	N/A	N/A	N/A
Total	\$3,904,887.50	\$23,009.66	<i>N/A</i>	\$3,771,166.50	\$22,846.63

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:)	Chapter 11
)	
OTB HOLDING LLC, <i>et al.</i> ,)	Case No. 25-52415 (SMS)
)	
)	
Debtors.)	(Jointly Administered)
_____)	

**SECOND INTERIM AND FINAL APPLICATION FOR
ALLOWANCE OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES
INCURRED BY KING & SPALDING LLP, COUNSEL TO THE DEBTORS**

King & Spalding LLP (“K&S”), counsel to the above captioned debtors and debtors in possession (collectively, the “Debtors”) in these Chapter 11 Cases (as defined below), hereby files this *Second Interim and Final Application for Allowance of Attorneys’ Fees and Reimbursement of Expenses Incurred by King & Spalding LLP, Counsel to the Debtors* (this “Application”) seeking allowance of compensation and reimbursement of expenses pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”). K&S submits this Application for (a) allowance of reasonable compensation for professional services rendered by K&S to the Debtors in the aggregate amount of \$3,922,887.50 (\$884,864.50 of which relates to the Second Interim Application Period and \$18,000.00 of which is the estimated fees and expenses to be incurred by K&S in connection with the preparation and prosecution of this Application and the fee applications of other professionals

of the Debtors), and (b) reimbursement of actual and necessary charges and disbursements incurred by K&S in the rendition of required professional services on behalf of the Debtors in the aggregate amount of \$23,009.66 (\$497.38 of which relates to the Second Interim Application Period). This Application meets all of the requirements set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted on January 30, 1996 (the “UST Guidelines”). In support of this Application, K&S respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”) has jurisdiction over these cases and this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The predicates for the relief requested herein are sections 105, 327(a), and 331 of the Bankruptcy Code, Rule 2016 of the Bankruptcy Rules, Rule 9013-2 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”), and Procedure J of the Complex Case Procedures.

BACKGROUND

3. On March 4, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the Court (collectively, the “Chapter 11 Cases”). The Debtors have continued in possession of their properties and have continued to operate and manage their business as debtors in possession pursuant to sections 1107(a) and 1108 of the

Bankruptcy Code. No request has been made for the appointment of a trustee or examiner in these cases.

4. The factual background relating to the Debtors' commencement of these cases is set forth in the *Declaration of Jonatham M. Tibus in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 18] (the "First Day Declaration") filed on or about the Petition Date and incorporated herein by reference.

5. On March 7, 2025, the Court entered the *Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 45] (the "Joint Administration Order") authorizing the joint administration and procedural consolidation of the Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b).

6. On March 17, 2025, the United States Trustee (the "U.S. Trustee") appointed the official committee of unsecured creditors (the "Committee"). *See Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [Docket No. 111].

7. The Debtors have filed their monthly operating reports for all periods through July 31, 2025 and have paid all quarterly U.S. Trustee fees to date.

8. On July 21, 2025, the Debtors filed the *Debtors' Amended Joint Chapter 11 Plan as of July 21, 2025* filed on July 21, 2025 [Docket No. 522] (the "Plan") and the *Disclosure Statement with Respect to the Amended Joint Chapter 11 Plan Dated as of July 21, 2025* [Docket No. 523] (the "Disclosure Statement") with the Court.

9. On September 8, 2025, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming the Debtors' Amended Joint Chapter 11 Plan as of July 21, 2025* [Docket

No. 607] confirming the Plan and approving the Disclosure Statement on a final basis. The Effective Date (as defined in the Plan) occurred on September 16, 2025. *See Docket No. 620.*

10. On August 8, 2025, K&S filed the *First Interim Application for Allowance of Attorneys' Fees and Reimbursement of Expenses Incurred by King & Spalding LLP, Counsel to the Debtors, for the Period of March 4, 2025 Through June 30, 2025* [Docket No. 551] (the "First Interim Fee Application"). The Court entered an order approving the First Interim Fee Application on September 8, 2025 (the "First Interim Fee Order"). *See Docket No. 601.* Pursuant to the First Interim Fee Order, K&S was allowed, on an interim basis, compensation in the amount of \$3,020,023.00 and reimbursement of expenses in the amount of \$22,512.28 for the period from March 4, 2025 through July 31, 2025 (the "First Interim Application Period").

11. K&S hereby incorporates by reference the First Interim Fee Application and the supporting detail included therein.

12. This Application has been prepared in accordance with the UST Guidelines.

13. K&S represents that the Debtors have received and reviewed this Application. The Debtors have found that this Application accurately represents the work done by K&S on its behalf and approve the request for interim approval of the compensation and reimbursement sought in this Application.

RETENTION OF K&S

14. On March 7, 2025, the Debtors filed the *Debtors' Application for Authority to Retain King & Spalding LLP as Counsel to the Debtors-in-Possession, Effective as of the Petition Date* [Docket No. 44] (the "Retention Application") to perform legal services necessary to enable

the Debtors to maximize the value of their estates through the Chapter 11 Cases.¹ On March 10, 2025, the Court entered the *Order Authorizing the Debtors to Retain King & Spalding LLP as Counsel to the Debtors-in-Possession, Effective as of the Petition Date* [Docket No. 88] authorizing the Debtors to retain K&S as their counsel under the terms set forth in the Retention Application.

15. The terms and conditions of employment and compensation are set forth in the engagement letter attached as Exhibit A to the Retention Application.

COMPENSATION PAID AND ITS SOURCES

16. All services for which K&S seeks compensation were performed for or on behalf of the Debtors.

17. There is no agreement or understanding between K&S and any other person except for the partners of K&S for the sharing of compensation to be received for the services rendered in this case.

REQUESTED FEES AND REIMBURSEMENT OF DISBURSEMENTS

18. In this Application, K&S seeks final allowance of (a) the interim compensation and expense reimbursements previously approved by this Court by the First Interim Order and (b) additional \$884,864.50 in fees and reimbursement of \$497.38 charges and disbursements of actually and necessarily expenses incurred by K&S while providing services to the Debtors during the period from July 1, 2025 through September 16, 2025 (the “Second Interim Application”).

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

Period”). Thus, in total, K&S seeks final allowance of \$3,922,887.50 in fees and reimbursement of \$23,009.66 in expenses in connection with these cases.²

19. Pursuant to the terms of the Complex Case Procedures, K&S has submitted monthly statements for services rendered during the Second Interim Application Period and has received payments in respect of such monthly statements totaling \$751,477.85, of which \$751,143.50 has been applied to fees and \$334.35 has been applied to expenses.

20. Prior to the Petition Date, K&S received a retainer from the Debtors in connection with this representation. A portion of such retainer was applied to K&S’s pre-petition fees and expenses associated with this representation and the balance of the retainer is currently \$11,750.00 (the “Remaining Retainer Amount”). By this Application, K&S also seeks the authority to apply the Remaining Retainer Amount toward the amounts sought in this Application.³

21. **Exhibit A** attached hereto sets forth the time spent and the work performed by each attorney and paraprofessional for the Second Interim Application Period. To the best of K&S’s knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the UST Guidelines, and the Complex Case Procedures.

² In addition to the request for compensation in the amount of \$3,904,887.50, K&S is requesting compensation in the amount of \$18,000.00 (for a total sum of compensation in the amount of \$3,922,887.50), representing estimated fees and expenses to be incurred by K&S in connection with preparation and prosecution of this Application and the fee applications of other professionals of the Debtors.

³ In preparing to file these Chapter 11 Cases, K&S coordinated with a vendor to run standard lien searches. The cost of the lien searches was \$3,505.00 (“Lien Search Costs”). The invoice for the lien searches was not processed prior to filing and, accordingly, remains outstanding. In this Application, K&S is requesting authority to apply the Remaining Retainer Amount to (x) first, the outstanding Lien Search Costs and (y) second, the other amounts sought in this Application that remain unpaid by the Debtors.

22. K&S's charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services in a case other than under the Bankruptcy Code.

ACTUAL AND NECESSARY EXPENSES

23. A summary of the actual and necessary expenses incurred by K&S for the Second Interim Application Period is attached hereto as **Exhibit B**. K&S submits that all such expenses were necessarily incurred, are reasonable in amount, and represent only the actual costs incurred.

24. K&S's charges for expenses to the Debtors are determined in the same manner as for clients in non-bankruptcy cases. Out-of-pocket expenses incurred by K&S are charged to a client if the expenses incurred for the client are otherwise necessary in connection with services rendered for such particular client. K&S does not factor general overhead expenses into disbursements charged to clients in connection with Chapter 11 cases.

25. K&S customarily charges \$0.75 per page for color photocopies and \$0.10 per page for greyscale photocopies. K&S's operational team which handles photocopy requests records the number of copies made and summarizes each client's photocopying charges on a daily basis.

26. K&S charges its clients for the actual expenses related to business meals and travel. In these Chapter 11 Cases, this is generally comprised of the transportation costs between K&S's Atlanta office and the Court to attend and present at scheduled hearings.

27. K&S believes the foregoing rates are the market rates generally employed by the majority of law firms when charging their clients for such services.

28. K&S has made every effort to minimize its expenses in these Chapter 11 Cases. All of the expenses for which allowance and payment are requested by K&S in this Application are reasonable and necessary and were incurred during the Second Interim Application Period.

PROFESSIONAL SERVICES RENDERED

29. In accordance with the UST Guidelines, all K&S professionals kept a contemporaneous record of time spent rendering services and separated tasks in billing increments of one-tenth (0.10) of an hour.

30. **Exhibit C** attached to this Application is a summary of the legal services which K&S rendered to the Debtors during the Second Interim Application Period divided by project category. The services rendered by K&S during the Second Interim Application Period can be grouped into the categories set forth in **Exhibit C**. K&S attempted to place the services performed in the category that best relates to the services provided. However, because certain services may relate to more than one category, services pertaining to one category may in fact be included in another category. The actual detailed daily time entries for all work performed by the attorneys and paraprofessionals who rendered services during the Second Interim Application Period are attached as **Exhibit D**. Such time entries are organized by subject matter category as required by the UST Guidelines.

31. K&S has represented the Debtors with respect to various matters arising in the Debtors' Chapter 11 Cases. Among other things, during the Second Interim Application Period, K&S has advised the Debtors with respect to (a) the negotiation and confirmation of its Plan and Disclosure Statement; (b) the wind-down of their estates; (c) the resolution of several contested

matters; (d) the reconciliation of various claims; and (e) the sale of their liquor licenses and certain *de minimis* assets.

INDEXING OF TASKS BY PROJECT CATEGORY

32. As annexed to this Application, K&S has organized its time records by activity codes in accordance with the UST Guidelines. Generally, each of the time entries of the attorneys and paralegals of K&S have been indexed into one of the following categories:⁴

- B110 Case Administration:** Coordination and compliance activities not specifically covered by another category.
- B130 Asset Disposition:** Preparation of documents and pleadings for and negotiations in relation to the bidding procedures, de minimis asset sales, leases, amendments, abandonment, and transaction work related to asset disposition.
- B140 Relief from Stay/Adequate Protection Proceedings:** Matters relating to termination or continuation of automatic stay under 11 U.S.C. 362 and motions for adequate protection under 11 U.S.C. 361.
- B160 Fee/Employment Applications:** Preparation of employment, fee statements and fee applications.
- B185 Assumption/Rejection of Leases and Contracts:** Analyses of leases and executory contracts, preparation of motions and pleadings to assume or reject the same, and negotiations with respect to cure costs.
- B240 Tax Issues:** Analysis of tax issues and preparation of federal and state tax returns.
- B310 Claims Administration and Objections:** Attention to specific claim inquiries, including with respect to the analyses, objections and allowances of various claims.
- B320 Plan and Disclosure Statement:** Draft, review, revise and negotiate the Plan and Disclosure Statement and corresponding exhibits and attachments.

⁴ The following task codes and time categories are the primary categories in which time was billed by K&S during the Second Interim Application Period and may not reflect every single time category in which time was billed during such time as reflected on **Exhibit C**.

B510 Hearings: Preparation for, attendance and presentation at scheduled hearings.

DESCRIPTION OF SERVICES

Case Administration (Task Code B110)

33. During the Second Interim Application Period, K&S assisted and counseled the Debtors on matters concerning all aspects of the administration of these cases, and conducted numerous conferences with the Debtors' representatives, including Jonathan Tibus as Chief Restructuring Officer (the "CRO") and Alvarez & Marsal North America, LLC ("A&M" and together with the CRO, the "Debtors' Advisors").

34. K&S assisted the Debtors with the preparation and filing of various pleadings and responded to multiple inquiries from creditors and interested parties regarding the filing and status of the Chapter 11 Cases. K&S regularly communicated with Kurtzman Carson Consultants LLC d/b/a Verita Global ("Verita"), the Debtors' claims, noticing, solicitation and administrative agent, regarding service issues in these cases, and conducted discussions relating to the status of open issues.

35. K&S assisted the Debtors with the review and filing of their monthly operating reports and conducted discussions with the Debtors' representatives, counsel for the Purchaser (as defined in the Plan), and counsel for the Committee regarding various open issues related to the administration of these Chapter 11 Cases. K&S further conducted research regarding various issues and engaged in discussions regarding, and assisted with the preparation of, various motions and orders during the Second Interim Application Period.

36. K&S expended **100.5** hours in this category during the Second Interim Application Period and is requesting **\$111,723.00** for the services rendered in this category.

Asset Disposition (Task Code B130)

37. During the Second Interim Application Period, K&S (i) assisted the Debtors in their efforts to sell certain of their liquor licenses, (ii) facilitated the Debtors' negotiations with various counterparties on the terms of the sale of certain liquor licenses, and (iii) conducted research on related issues in the process. K&S engaged in frequent communications with the Debtors' Advisors, the Committee's counsel, and the purchasers regarding the liquor license sales.

38. During the Second Interim Application Period, K&S also advised the Debtors regarding the sale of furniture, fixtures, and equipment at certain closed store locations (the "De Minimis Asset Sale"). K&S prepared and filed the *First Notice of Sale of Certain of the Debtors' De Minimis Assets Free and Clear of Liens, Claims, Encumbrances, and Interests Pursuant to Section 363 of the Bankruptcy Code* [Docket No. 534] to provide notice of the consummation of the De Minimis Asset Sale.

39. K&S expended **68.0** hours in this category during the Second Interim Application Period and is requesting **\$71,414.50** for the services rendered in this category.

Relief from Stay/Adequate Protection Proceedings (Task Code B140)

40. During the Second Interim Application Period, K&S reviewed multiple motions for relief from the automatic stay filed by Kristina Ferrell, Individually and as Representative of the Estate of Jonathan Ferrell, and J.D. Ferrell [Docket No. 319], Hector Francisco Vancini, Jr., Individually and as Next Friend of Hector Vancini, Sr.; Delilah Vancini, Individually; Bianca Vancini, Individually; and Julietta Vanizini, Individually [Docket No. 409], Emily Izaguirre [Docket No. 463], and Liberty Fruit Inc. [Docket No. 569], and assisted the Debtors with negotiating resolutions and/or preparing responses to the same.

41. During the Second Interim Application Period, K&S assisted the Debtors with successfully negotiating resolutions with respect to each motion for relief from the automatic stay. K&S held multiple conference calls with each claimant's counsel to discuss such stay motions, conducted legal research, and communicated with the Committee's counsel, the Debtors' Advisors, and other related parties with respect to the same. K&S prepared and filed agreed orders resolving each stay relief motion. *See Docket Nos. 569, 570, 599, and 600.*

42. K&S expended **23.8** hours in this category during the Second Interim Application Period and is requesting **\$25,902.00** for the services rendered in this category.

Fee/Employment Applications (Task Code B160)

43. During the Second Interim Application Period, K&S (i) prepared monthly fee and expense statements in compliance with the UST Guidelines and Complex Case Procedures and (ii) filed fee applications and corresponding orders approving such applications, including, without limitation, with respect to K&S, Hilco Corporate Finance LLC, as the Debtors' investment banker, and A&M.

44. K&S expended **100.0** hours in this category during the Second Interim Application Period and is requesting **\$89,791.00** for the services rendered in this category.

Assumption/Rejection of Leases and Contracts (Task Code B185)

45. During the Second Interim Application Period, K&S prepared and filed supplemental cure notices and worked with counterparties to resolve outstanding cure objections. *See, e.g., Docket No. 498.* Specifically, K&S continued to interface with counsel for certain landlords and contract counterparties and the Purchaser in response to inquiries regarding, *inter*

alia, the assumption or rejection of the respective contracts or leases, disputed cure amounts, and other related questions.

46. K&S also prepared motions and various orders seeking to either reject or assume certain executory contracts and unexpired leases. *See Docket No. 513, 531, 532, 577, and 602.*

47. K&S expended **27.0** hours in this category during the Second Interim Application Period and is requesting **\$25,772.00** for the services rendered in this category.

Tax Issues (Task Code B240)

48. During the Second Interim Application Period, K&S provided the Debtors with (i) analysis regarding tax issues in relation to the Plan and Plan Supplement, (ii) advice with respect to priority claims filed by various taxing authorities, (iii) assistance with filing relevant tax returns, and (iv) drafted declarations in connection with resolving certain priority tax claims.

49. K&S expended **47.8** hours in this category during the Second Interim Application Period and is requesting **\$59,164.50** for the services rendered in this category.

Claims Administration and Objections (Task Code B310)

50. During the Second Interim Application Period, K&S (i) communicated with A&M on numerous occasions regarding the claims reconciliation process, (ii) prepared multiple omnibus objections to claims, (iii) corresponded with creditors regarding their alleged claims and (iv) spent time reviewing, analyzing and conducting research with respect to such claims.

51. K&S expended **130.8** hours in this category during the Second Interim Application Period and is requesting **\$126,613.50** for the services rendered in this category.

Plan and Disclosure Statement (including Business Plan) (Task Code B320)

52. During the Second Interim Application Period, K&S negotiated, revised, and filed the Plan and corresponding Disclosure Statement, the Plan Supplement (as defined in the Plan), the form of Confirmation Order (as defined in the Plan) and participated in several conference calls with the Debtors' Advisors, the Committee's counsel, various creditors, and the Liquidating Trustee (as defined in the Plan) regarding the same. K&S drafted, negotiated, and filed (i) the *Consolidated Reply to Objection and Memorandum of Law in Support of Confirmation of Debtors' Amended Joint Chapter 11 Plan as of July 21, 2025* [Docket No. 591], (ii) certain affidavits in support of the confirmation of the Plan, and (iii) other related documents.

53. K&S also communicated with the Debtors' claim agent on numerous occasions during the Second Interim Application Period regarding the solicitation and voting process.

54. K&S expended **271.1** hours in this category during the Second Interim Application Period and is requesting **\$289,932.00** for the services rendered in this category.

Hearings (Task Code B510)

55. During the Second Interim Application Period, K&S prepared for, attended and presented at several hearings.

56. K&S expended **30.0** hours in this category during the Second Interim Application Period and is requesting **\$33,977.50** for the services rendered in this category.

VALUATION OF SERVICES

57. Attorneys and professionals of K&S expended a total of **835.8** hours in connection with this case during the Second Interim Application Period. The reasonable value of those services is **\$884,864.50** based on the hourly rates set forth on **Exhibit A**.

58. This is K&S's second request for an award of interim compensation in this case and first request for an award of final compensation in this case. No previous application has been made to this or any other court for the relief requested herein.

59. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by K&S is fair and reasonable given (a) the initial posture of this case and the nature of this reorganization; (b) the issues arising in connection with the sale of the Debtor's assets and the objections raised in connection with the sale; (c) the time and labor required to represent the Debtor effectively; (d) the nature and extent of services rendered; (e) K&S's experience, reputation and ability; (f) the value of K&S's services; and (g) the cost of comparable services other than in a case under the Bankruptcy Code.

60. The compensation sought herein is based on the customary compensation charged by comparably skilled practitioners in cases other than cases under the Bankruptcy Code.

61. K&S has reviewed the requirements of the UST Guidelines and believes that this Application complies in all material respects with those requirements. To the extent this Application does not comply in every respect with the requirements of such guidelines, K&S respectfully requests a waiver for any such technical non-compliance.

COMPLIANCE WITH RULE 2016 OF THE BANKRUPTCY RULES

62. In accordance with Rule 2016 of the Federal Rules of Bankruptcy Procedure, K&S hereby states that (a) all services for which compensation is sought herein were rendered to the Debtors solely in connection with its Chapter 11 Cases and not on behalf of any committee, individual creditor or other person; (b) to date on a post-petition basis K&S has received only those payments made to it by the Debtors pursuant to the Complex Case Procedures; (c) no agreement

or understanding exists between K&S and any other person for the sharing of compensation to be received for services rendered in or in connection with this case; and (d) no division of compensation will be made by K&S, except as between partners of K&S, and no agreement prohibited by 18 U.S.C. § 155 or section 504 of the Bankruptcy Code has been made.

NOTICE

63. Notice of this Application has been provided to the Limited Service List. In light of the nature of the relief requested, the Debtors submit that no further notice is necessary.

NO PRIOR REQUEST

64. No prior request for the relief sought in this Application has been made to this or any other court.

CONCLUSION

WHEREFORE, K&S respectfully requests that the Court enter an Order substantially in the form attached hereto as **Exhibit E**: (i) providing that K&S be allowed, on a final basis, an aggregate amount of \$3,922,887.50 in compensation and \$23,009.66 in reimbursement of expenses for the Final Application Period, which shall include (x) \$3,020,023.00 in compensation and \$22,512.28 in reimbursement of expenses for the First Interim Application Period, (y) \$884,864.50 in compensation and \$497.38 in reimbursement of expenses for the Second Interim Application Period, and (z) \$18,000.00 in estimated fees and expenses to be incurred by K&S in connection with the preparation and prosecution of this Application and the fee application of other professionals of the Debtors; (ii) providing K&S with authorization to apply the Remaining Retainer Amount (x) first, to the Lien Search Costs and (y) second, to any other amounts sought in this Application that remain unpaid; (iii) provide authorization to the Debtors to promptly pay

to K&S the remaining unpaid portion, if any, owed after application of the interim payment amounts and the Remaining Retainer Amount as set forth above; and (iv) for such other and further relief as this Court may deem just and proper.

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Date: September 30, 2025
Atlanta, GA

Respectfully submitted,

KING & SPALDING LLP

/s/ Jeffrey R. Dutson

Jeffrey R. Dutson

Georgia Bar No. 637106

Brooke L. Bean

Georgia Bar No. 764552

Alice Kyung Won Song

Georgia Bar No. 692753

KING & SPALDING LLP

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Atlanta, Georgia 30309

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Counsel for the Debtors in Possession

Exhibit A

OTB HOLDING LLC, et al.

**Second Interim Application Period
July 1, 2025 Through September 16, 2025**

Timekeeper	Year Admitted to Practice	Hours Billed	2025 Hourly Rate	Total Compensation
Partners				
Choy, Sam	1992	11.0	\$1,860.00	\$20,460.00
Dutson, Jeff	2010	53.5	\$1,655.00	\$88,543.50
Fishel, Michael	2012	1.4	\$1,540.00	\$2,156.00
Fontham, Jack	1996	3.7	\$1,620.00	\$5,994.00
Pressgrove, Wayne	1996	6.6	\$2,140.00	\$14,124.00
Primrose, Sarah	2012	2.3	\$1,500.00	\$3,450.00
Totals		78.5		\$134,726.50
Associates				
Adams, Christian	2024	56.1	\$805.00	\$45,160.50
Bean, Brooke	2021	287.1	\$1,210.00	\$347,391.00
Hilton, Kevin	2023	19.4	\$980.00	\$19,012.00
Kim, Taeyeong	2023	132.5	\$925.00	\$122,563.50
Neilson, R. Hale	2021	12.2	\$1,210.00	\$14,762.00
Song, Alice Kyung Won	2024	250.0	\$805.00	\$201,250.00
Totals		757.3		\$750,138.00

	Total Billed	
	Hours	Total Compensation
Total Attorneys	835.8	\$884,864.50
Blended Hourly Rate for Attorneys	\$1,058.58	

Exhibit B

OTB HOLDING LLC, *et al.*

Summary of Disbursements and Charges

**Application Period
July 1, 2025 Through September 16, 2025**

Disbursements	Amount
Cab Fare	\$420.33
Filing Fees	\$10.66
Document Delivery	\$66.39
TOTAL	\$497.38

Exhibit C

Project Categories

Application Period: July 1, 2025 Through September 16, 2025

<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
B110 Case Administration	100.5	\$111,723.00
B130 Asset Disposition	68.0	\$71,414.50
B140 Relief from Stay / Adequate Protection Proceedings	23.8	\$25,902.00
B150 Meetings of and Communications with Creditors	3.1	\$3,656.50
B160 Fee / Employment Applications	100.0	\$89,791.00
B185 Assumption / Rejection of Leases and Contracts	27.0	\$25,772.00
B190 Other Contested Matters (excluding assump / rej. motions)	5.7	\$6,775.50
B210 Business Operations	4.4	\$5,195.50
B220 Employee Benefits / Pensions	11.3	\$20,823.00
B240 Taxes	47.8	\$59,164.50
B310 Claims Administration and Objections	130.8	\$126,613.50
B320 Plan and Disclosure Statement (including Business Plan)	271.1	\$289,932.00
B410 General Bankruptcy Advice / Opinions	0.8	\$1,200.00
B510 Hearings	30.0	\$33,977.50
B520 UST Matters	0.4	\$492.00
B530 Reporting	1.5	\$1,207.50
B550 Sale Process	7.0	\$7,903.00
B560 Litigation / Adversary Proceedings	2.6	\$3,321.50
Total	835.8	\$884,864.50

Exhibit D

OTB HOLDING LLC, *et al.*

Detailed Time Entries

Application Period

Application Period: July 1, 2025 Through September 16, 2025

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No. 10823928
Invoice Date 08/11/25
Client No. 38110
Matter No. 230001

RE: OTB Restructuring

For questions, contact:
Jeff Dutson +1 404 572 2803

For Professional Services Rendered through 07/31/25:

Fees	\$	388,901.00
Expenses		251.92
Total this Invoice	\$	389,152.92

Payment is Due Upon Receipt

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 2

PROFESSIONAL SERVICES

Date	Timekeeper	Task	Description	Hours
07/01/25	C Adams	B130	Research status of entity in relation to liquor license sale and draft summary for B. Bean (1.0); strategize with B. Bean and J. Dutson regarding same (0.1)	1.1
07/01/25	B Bean	B130	Analyze C. Adam's summary of liquor club issue and confer with client and J. Dutson regarding the same	0.5
07/01/25	B Bean	B550	Review and comment on Bill of Sale and confer with client regarding the same	0.5
07/01/25	B Bean	B110	Confer with court regarding various administrative matters	0.3
07/01/25	B Bean	B320	Revise plan, disclosure statement and relevant pleadings and coordinate filing	2.0
07/01/25	B Bean	B140	Confer with client regarding stay relief motions (0.2); review filing version of claim objection and confer with J. Dutson regarding the same (0.4); confer with movant's counsel regarding stay relief motion (0.2)	0.8
07/01/25	B Bean	B310	Confer with client regarding claim outreach (0.2); call with creditor regarding claim (0.3)	0.5
07/01/25	J Dutson	B150	Respond to inquiries from creditors	0.4
07/01/25	T Kim	B130	Draft notice for de minimis asset sale (1.5); review precedent de minimis asset sale motions (0.5); correspondence with B. Bean regarding the same (0.1); review tax proof of claim for notice requirements (0.1)	2.2
07/01/25	T Kim	B320	Draft checklist for plan (1.2); review filed solicitation procedure motion, plan and disclosure statement in preparation for same (0.4)	1.6
07/01/25	R Neilson	B560	Coordinate with S. Primrose and court personnel regarding state court case filed against OTB	0.4
07/01/25	S Primrose	B410	Review and respond to emails re: creditor and stay issues (0.3); attention to next steps on stay issues (0.2)	0.5
07/01/25	A Song	B320	Attention to Plan, Disclosure Statement, and Solicitation Procedures Motion (1.0); revise Notice of Hearing for Solicitation Procedures Motion (0.6); correspondence with Verita on plan timeline (0.2)	1.8
07/01/25	A Song	B310	Revise and prepare Objection to Claim	0.5
07/01/25	A Song	B210	Attention to utilities bond and related claim	0.6
07/01/25	A Song	B110	Draft NOF for IMA and TSA	0.9
07/02/25	B Bean	B185	Review draft contract rejection motion and provide comments thereto (0.5); review and comment on	0.7

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 3

Date	Timekeeper	Task	Description	Hours
			notice of hearing (0.2)	
07/02/25	B Bean	B310	Confer with claimant regarding claim objection	0.2
07/02/25	B Bean	B110	Call with J. Dutson regarding numerous workstreams (0.2); revise workstream list and provide comments thereto (0.3); prepare agenda for bi-weekly professionals call (0.2)	0.7
07/02/25	B Bean	B550	Confer with client regarding Bill of Sale	0.2
07/02/25	B Bean	B140	Revise and revise draft proposed order for stay relief motions and confer with J. Dutson and Committee regarding the same	0.4
07/02/25	B Bean	B130	Review and comment on sale report	0.3
07/02/25	B Bean	B130	Review and comment on Purchase Agreement and confer with J. Dutson regarding the same	1.4
07/02/25	T Kim	B320	Continue drafting confirmation checklist (0.8); call with B. Bean regarding the same (0.1); review solicitation procedures motion (0.4)	1.3
07/02/25	T Kim	B130	Review and revise notice of sale of de minimis assets (0.3); correspondence with J. Dutson and B. Bean regarding the same (0.1)	0.4
07/02/25	T Kim	B160	Review precedent case on fee application (0.5); review complex case procedures regarding the same (0.3); call with B. Bean regarding the same (0.2); correspondence with J. Dutson regarding the same (0.1)	1.1
07/02/25	A Song	B110	Revise Notice of Filing TSA and IMA	0.4
07/02/25	A Song	B160	Attention to June fee application	2.7
07/02/25	A Song	B110	Confer with B. Bean on current workstreams and timelines	0.5
07/03/25	B Bean	B110	Prepare for and attend call with professionals	0.8
07/03/25	B Bean	B130	Revise Purchase Agreement in accordance with client's comments and confer with client and J. Dutson regarding the same	0.6
07/03/25	B Bean	B310	Confer with claimant regarding claim objection	0.1
07/03/25	B Bean	B110	Review and revise workstream tracker and provide comments thereto	0.4
07/03/25	J Dutson	B130	Review and comment on liquor license purchase agreement	1.0
07/03/25	T Kim	B130	Correspondence with J. Dutson, B. Bean and client regarding notice of de minimis asset sale	0.2
07/03/25	A Song	B110	Review existing workstreams, timelines, and docket, and confer with B. Bean re: same	0.5
07/03/25	A Song	B160	Attention to June fee application (1.0); draft June fee letter (0.2)	1.2

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 4

Date	Timekeeper	Task	Description	Hours
07/07/25	B Bean	B310	Confer with client and claimant regarding claim objection (0.2); review draft claims objection and provide comments thereto (1.3)	1.5
07/07/25	B Bean	B110	Prepare for and attend bi-weekly professionals call (0.9); confer with claims agent regarding service question (0.2); confer with A. Song regarding insurance coverage (0.1); review notice to TPA and provide comments thereto (0.3); confer with client regarding various workstreams (0.3)	1.8
07/07/25	B Bean	B140	Confer with Committee, claimants and A. Song regarding stay relief motions (0.5); review proposed agreed order and provide comments thereto to A. Song (0.8)	1.3
07/07/25	B Bean	B550	Review closing set and provide comments thereto (0.3); confer with liquor license counsel regarding APA (0.3)	0.6
07/07/25	T Kim	B160	Correspondence with J. Dutson regarding interim fee application	0.1
07/07/25	T Kim	B320	Review and revise confirmation checklist (0.3); review complex case procedures and bankruptcy rules (0.3); correspondence with J. Dutson regarding the same (0.1)	0.7
07/07/25	S Primrose	B410	Review and respond to emails re: matter updates and ongoing creditor issues	0.3
07/07/25	A Song	B110	Attention to cancellation of workers' compensation policy (0.4); revise Notice to GB regarding rejection of TPA (0.7)	1.1
07/07/25	A Song	B550	Review and revise Closing Set and confer with B. Bean re: same	1.2
07/07/25	A Song	B140	Draft Proposed Orders to stay relief motions	1.2
07/07/25	A Song	B110	Review workstreams and update tracker	0.3
07/08/25	C Adams	B130	Research liquor license sale motions and related filings and draft summary for B. Bean (2.5); review and discuss motion with B. Bean (0.2); research complex case procedures regarding sale motion (1.0)	3.7
07/08/25	B Bean	B110	Prepare for and meet with J. Dutson regarding various workstreams (0.4); confer with A. Song regarding insurance call (0.1); confer with A. Song regarding various workstreams (0.3); confer with J. Dutson regarding insurance issues (0.2)	1.0
07/08/25	B Bean	B140	Review stay relief order and confer with claimant regarding the same	0.5
07/08/25	B Bean	B320	Review and provide comments to liquidation analysis	1.8

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 5

Date	Timekeeper	Task	Description	Hours
07/08/25	B Bean	B160	Confer with T. Kim regarding interim fee application	0.2
07/08/25	B Bean	B130	Confer with C. Adams regarding sale motion (0.2); revise sale agreement and confer with S. Medley regarding the same (0.5)	0.7
07/08/25	B Bean	B310	Confer with claimants regarding claim objections	0.2
07/08/25	J Dutson	B320	Attention to open issues with committee	0.5
07/08/25	T Kim	B150	Review creditor matrix and creditor claim of creditor (0.1); review solicitation procedure timeline (0.1); call with creditor regarding inquiry (0.2); correspondence with B. Bean regarding the same (0.1)	0.5
07/08/25	S Primrose	B210	Review and respond to emails re: matter (0.2); attention to issues related to automatic stay and creditors (0.4)	0.6
07/08/25	A Song	B110	Review workstreams and update tracker (0.3); confer with health insurance provider (0.3); correspondence with insurance administrator regarding utilities (0.2)	0.8
07/08/25	A Song	B310	Revise Second Claims Objection	1.0
07/08/25	A Song	B160	Review and revise June fee application (2.2); draft June fee letter (0.3)	2.5
07/08/25	A Song	B140	Revise proposed order for stay relief	0.3
07/09/25	C Adams	B130	Draft Liquor License Sale Motion, notice of motion and proposed order (3.0); research caselaw regarding same (1.0)	4.0
07/09/25	B Bean	B140	Confer with claimants regarding stay relief motions and revise proposed orders in connection with the same	1.3
07/09/25	B Bean	B310	Confer with J. Dutson regarding claims objections	0.2
07/09/25	B Bean	B220	Confer with S. Choy regarding benefits issue	0.3
07/09/25	B Bean	B510	Confer with investment banker regarding fee hearing (0.1); confer with A. Song regarding hearing preparation (0.3)	0.4
07/09/25	B Bean	B320	Revise liquidation analysis in connection with J. Dutson's comments and confer with client regarding the same (1.5); review plan objection (0.2)	1.7
07/09/25	B Bean	B310	Revise claim objection and confer with J. Dutson and client regarding the same	0.4
07/09/25	B Bean	B110	Prepare for and attend meeting with insurance provider regarding cover and confer with insurance provider's counsel via e-mail regarding insurance related questions (0.8); confer with various parties regarding insurance issues (0.4); prepare agenda for bi-weekly call (0.2)	1.4

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 6

Date	Timekeeper	Task	Description	Hours
07/09/25	S Choy	B220	Review health and welfare plan administration and 401k termination matters	0.9
07/09/25	J Dutson	B320	Call with Committee counsel regarding status (0.5); review liquidation analysis (0.5); emails with committee counsel regarding outstanding issues (0.4)	1.4
07/09/25	T Kim	B160	Call with A. Song regarding the interim fee application (0.3); correspondence with B. Bean regarding the same (0.1); review complex case procedures (0.2); review appendix A and B for UST guidelines (0.2); correspondence with B. Bean regarding the same (0.2)	1.0
07/09/25	A Song	B510	Prepare for hearing	0.3
07/09/25	A Song	B160	Review and revise June fee application (0.8); research interim fee applications (0.8)	1.6
07/09/25	A Song	B320	Review and summarize Objection to Plan	0.5
07/09/25	A Song	B110	Prepare for and attend call with UHCS (0.4); confer with B. Bean, E. Rojas on payroll (0.2); update workstreams tracker (0.4); revise agenda (0.2)	1.2
07/09/25	A Song	B310	Review Second Omnibus Claims Objection and correspondence with A&M re: same	0.4
07/10/25	C Adams	B510	Draft hearing script for J. Dutson and review pleadings for same	1.6
07/10/25	C Adams	B130	Review and revise Liquor License Sale Motion, Notice of Motion, and Proposed Order	1.4
07/10/25	B Bean	B310	Confer with claimant regarding claim objection	0.1
07/10/25	B Bean	B130	Review and comments on sale motion and confer with C. Adams regarding the same	1.1
07/10/25	B Bean	B320	Revise liquidation analysis and confer with client regarding the same (0.5); confer with J. Dutson regarding liquidating trust agreement (0.2)	0.7
07/10/25	B Bean	B140	Confer with movants regarding stay relief motions	0.5
07/10/25	B Bean	B160	Confer with T. Kim regarding interim fee app (0.2); confer with C. Adams regarding final fee order (0.3)	0.5
07/10/25	B Bean	B110	Prepare for and attend bi-weekly professionals meeting (0.6); prepare for and meet with client regarding claims reconciliation (0.7); review and revise workstream lists (0.3); call with insurer regarding insurance related issues (0.5); review TPA Agreement and confer with J. Dutson regarding the same (0.2); confer with various parties regarding insurance related issues (0.2); confer with A. Song regarding various workstreams (0.3)	2.8
07/10/25	S Choy	B220	Review 401k termination matters and emails with administrator et al (0.4); review health and welfare	1.6

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 7

Date	Timekeeper	Task	Description	Hours
			administration matters (1.2)	
07/10/25	J Dutson	B110	Call with team regarding wind down matters (0.5); call regarding insurance wind down (0.3); correspondence regarding wind down of 401k (0.4)	1.2
07/10/25	T Kim	B160	Review precedent interim fee application (0.5); review complex case procedures (0.2); review appendix A of the UST guidelines regarding interim fee application (0.7); review appendix B regarding the same (0.3); call with A. Song regarding interim fee application (0.3); multiple correspondence with A. Song regarding the same (0.2)	2.2
07/10/25	T Kim	B320	Revise confirmation checklist (0.2); review correspondence regarding the same (0.1)	0.3
07/10/25	A Song	B520	Confer with the UST, UCC, and A&M on critical vendor payments	0.2
07/10/25	A Song	B160	Confer with T. Kim on interim fee application (0.4); attention to June fee application (1.2); draft Interim Fee Application (1.8)	3.4
07/10/25	A Song	B110	Update workstreams tracker and circulate same (0.4); prepare for hearing (0.8)	1.2
07/10/25	A Song	B310	Review amended claim and related correspondence (0.2); confer with Verita re: same (0.1); prepare for and attend call with A&M on claims analysis (0.4)	0.7
07/10/25	A Song	B320	Research in relation to plan objection (1.2); confer with A&M and B. Bean re: same (0.3)	1.5
07/11/25	C Adams	B130	Revise Sale Motion in accordance with B. Bean's comments	0.5
07/11/25	C Adams	B510	Review and revise hearing script and correspond with J. Dutson regarding same	0.5
07/11/25	C Adams	B160	Review HCF Final Fee Application and draft Final Fee Order (0.6); correspond with Hilco team regarding same (0.1)	0.7
07/11/25	B Bean	B140	Confer with claimants regarding stay relief motions and claim objections (0.2); confer with local counsel regarding stay relief motions (0.2)	0.4
07/11/25	B Bean	B110	Prepare for and attend call with client regarding and broker regarding insurance issues (0.5); revise agenda and confer with J. Dutson regarding the same (0.5); confer with US Trustee and Committee regarding bank accounts (0.1); review and comment on workstream list (0.3)	1.4
07/11/25	B Bean	B550	Confer with J. Dutson regarding interim management agreement and update interim management agreement accordingly (0.3); confer with Buyer regarding the same (0.1); prepare summary of indemnification provisions in the APA	0.9

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 8

Date	Timekeeper	Task	Description	Hours
			and related documents (0.5)	
07/11/25	B Bean	B160	Review and comments on draft final fee order	0.7
07/11/25	B Bean	B320	Confer with A. Song regarding Liquidating Trust Agreement	0.2
07/11/25	B Bean	B510	Review and comment on hearing script for J. Dutson	0.8
07/11/25	B Bean	B310	Prepare for and attend call with creditor regarding claim objection	0.7
07/11/25	J Dutson	B110	Call regarding insurance policies with client	0.4
07/11/25	J Dutson	B310	Call with DOJ regarding IRS claim and prepare for same	0.5
07/11/25	T Kim	B160	Correspondence with A. Song regarding interim fee application (0.1); review appendix A for fee application requirements (0.2); review and revise interim fee application (1.4)	1.7
07/11/25	A Song	B110	Review and update workstreams tracker (0.4); revise Agenda and correspondence re: same (0.5)	0.9
07/11/25	A Song	B320	Confer with B. Bean on plan objection (0.1) correspondence with Committee re: same (0.1); review Trust Agreement and plan and internal correspondence re: same (3.3)	3.5
07/11/25	A Song	B160	Draft Interim Application (1.2); attention to June fee application (1.0); attention to Interim Fee Application (0.6); confer with T. Kim on Interim Fee Application (0.4)	3.2
07/11/25	A Song	B310	Prepare for and attend call with claimant's counsel regarding claims and claims objection (0.4); revise omnibus claims objection (1.5); confer with Verita on amended claim (0.1)	2.0
07/12/25	T Kim	B160	Call with A. Song regarding fee application	0.3
07/13/25	B Bean	B150	Confer with committee regarding hearing status	0.2
07/13/25	B Bean	B110	Prepare agenda for bi-weekly call	0.2
07/13/25	B Bean	B320	Review and comment on Liquidating Trust Agreement (2.6); review and revise summary to Liquidating Trust Agreement (0.5)	3.1
07/14/25	C Adams	B160	Correspond with Hilco team regarding final fee application (0.2); prepare filing version of A&M completion fee order and circulate the same to K&S and A&M teams (0.2)	0.4
07/14/25	C Adams	B130	Review correspondence and documents related to trademark issue	0.2
07/14/25	B Bean	B110	Confer with client regarding various workstreams (0.5); prepare for and attend bi-weekly professionals call (0.5); prepare for and attend call with insurer's	2.0

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 9

Date	Timekeeper	Task	Description	Hours
			counsel regarding insurance questions (0.3); prepare for and attend call with tax account (0.5); revise and finalize agenda (0.2)	
07/14/25	B Bean	B160	Prepare for and attend call with T. Kim regarding retention application	0.7
07/14/25	B Bean	B140	Prepare for and attend call with claimant regarding stay relief motion	0.5
07/14/25	B Bean	B320	Confer with J. Dutson and client regarding Liquidating Trust Agreement (0.2); revise Liquidating Trust Agreement in accordance with J. Dutson's comments (0.6)	0.8
07/14/25	B Bean	B550	Confer with Buyer's counsel regarding assignment agreement (0.1); review assignment agreement and confer with client regarding the same (0.3)	0.4
07/14/25	B Bean	B510	Revise hearing script and confer with J. Dutson regarding the same	0.5
07/14/25	B Bean	B160	Confer with various parties regarding fee order and revise fee order as needed prior to hearing	1.1
07/14/25	B Bean	B310	Confer with client and claimants regarding claim objections	0.5
07/14/25	J Dutson	B110	Attend Wind Down Call	0.3
07/14/25	J Dutson	B510	Prepare for hearing	0.4
07/14/25	J Dutson	B150	Call with committee counsel	0.4
07/14/25	J Dutson	B310	Call with Tax advisor regarding IRS claim	0.3
07/14/25	T Kim	B160	Review precedent case regarding retention application (0.5); correspondence with B. Bean regarding procedures for conflict check and proposed order (0.2); review details regarding broker and declarant in support (0.2)	0.9
07/14/25	T Kim	B160	Review and revise interim fee application (1.7); correspondence and call with A. Song regarding the same (0.4); review precedent interim fee application (0.3); call with B. Bean regarding the same (0.3)	2.7
07/14/25	A Song	B160	Draft Interim Fee Application (3.0); confer with T. Kim re: same (0.7); attention to June fee application (1.2); confer with B. Bean re: same (0.1); attention to Interim Fee Application (0.5)	5.5
07/14/25	A Song	B110	Prepare July 15 Agenda (0.4); Confer with Bureau of Workers' Compensation regarding cancellation of policy (0.6); internal correspondence re: AFCO (0.1)	1.1
07/14/25	A Song	B510	Prepare for Hearing	0.6
07/14/25	A Song	B550	Attention to trademark assignment	0.2
07/15/25	C Adams	B160	Review correspondence related to A&M and HCF	0.6

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 10

Date	Timekeeper	Task	Description	Hours
			final fee apps and orders (0.3); revise fee order and file the HCF and A&M orders (0.3)	
07/15/25	C Adams	B510	Prepare for hearing	0.2
07/15/25	B Bean	B210	Confer with various parties regarding tax returns	0.6
07/15/25	B Bean	B550	Confer with Buyer regarding assignment agreement (0.2); review and revise notice to third party administrator (0.3)	0.5
07/15/25	B Bean	B320	Revise summary of the Liquidating Trust Agreement (0.5); confer with voting agent regarding solicitation related questions (0.3); review Committee Letter and provide comments thereto and confer with J. Dutson regarding the same (0.4)	1.2
07/15/25	B Bean	B110	Confer with client and various other parties regarding insurance related matters	0.3
07/15/25	B Bean	B510	Prepare for and attend omnibus hearing (2.6); review proposed final orders (0.5); confer with committee's counsel regarding certain rejection orders (0.1)	3.2
07/15/25	S Choy	B220	Review 401k termination matters	0.5
07/15/25	J Dutson	B510	Prepare for and attend omnibus hearing	1.8
07/15/25	T Kim	B160	Review precedent retention applications (0.8); draft CBRE retention application as liquor license broker (2.5); draft order for CBRE retention (1.0)	4.3
07/15/25	T Kim	B510	Attend hearing	0.1
07/15/25	A Song	B510	Prepare for and attend hearing	0.4
07/15/25	A Song	B160	Draft and revise Interim Fee Application (3.8); attention to fee application (2.0)	5.8
07/15/25	A Song	B320	Prepare exhibits and proposed order for Solicitation Procedures and Disclosure Statement Approval Motion (0.3); confer with B. Bean and T. Kim re: same (0.2)	0.5
07/15/25	A Song	B110	Revise and prepare orders for filing (0.8); update workstreams tracker and confer with B. Bean re: same (0.3); confer with Bureau of Worker's Compensation on cancellation of policy and internal correspondence re: same (0.4); attention to trademark assignment agreement (0.2)	1.7
07/16/25	C Adams	B160	Review correspondence with Hilco and A&M teams regarding orders authorizing payment	0.1
07/16/25	C Adams	B130	Review and revise Sale Motion in accordance with B. Bean's comments	0.5
07/16/25	C Adams	B185	Review correspondence regarding lease rejections (0.1); correspond with A. Song regarding lease rejection stipulation (0.1); and research the administrative expense issue (0.3)	0.5

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 11

Date	Timekeeper	Task	Description	Hours
07/16/25	B Bean	B160	Confer with client and Hilco regarding Fee Order	0.2
07/16/25	B Bean	B130	Review and revise sale motion and confer with C. Adams regarding the same	1.0
07/16/25	B Bean	B210	Confer with company regarding tax returns	0.2
07/16/25	B Bean	B130	Review broker agreement and provide comments thereto	0.5
07/16/25	B Bean	B310	Prepare for and attend call with client regarding claim objections	0.6
07/16/25	B Bean	B110	Prepare for and attend call with counterparty regarding insurance related issue (0.4); confer with client regarding insurance related issues (0.3); confer with chambers regarding fee order (0.1); review and comment on Agenda (0.5); review and comment on Notices of Filing (0.4)	1.7
07/16/25	B Bean	B320	Prepare and attend call with client regarding plan-related issues (0.6); confer with client and tax accountant regarding plan related documents (0.3); confer with tax counsel regarding Liquidating Trust Agreement (0.3); confer with Committee regarding Committee Letter (0.1); confer with A. Song and T. Kim regarding solicitation package (0.1)	1.4
07/16/25	J Dutson	B110	Call with insurance finance company	0.3
07/16/25	J Dutson	B310	Call with Committee counsel regarding IRS claim	0.4
07/16/25	J Dutson	B320	Call with client regarding trust agreement (0.3); review trust document (0.5)	0.8
07/16/25	K Hilton	B240	Review and revise liquidating trust agreement for tax (1.3); review and draft analysis related to tax treatment of liquidation and effect on debtors (1.3)	2.6
07/16/25	T Kim	B320	Update checklist for plan confirmation	0.3
07/16/25	T Kim	B160	Review and revise interim fee application (4.0); review N.D. Ga. local rules (0.3); review complex case procedures (0.3); review precedent interim fee applications for drafting purposes (1.5); correspondence with A. Song regarding the same (0.1)	6.2
07/16/25	T Kim	B160	Draft declaration in support of retention of CBRE (1.4); review and revise CBRE retention motion (0.5); review and revise CBRE retention order (0.5)	2.4
07/16/25	A Song	B320	Draft Notice of Filings (0.8); confer with B. Bean re: same (0.2)	1.0
07/16/25	A Song	B190	Review Application for Admin Expense and summarize same for internal review (0.2); review docket for potential hearing date (0.1)	0.3
07/16/25	A Song	B150	Prepare for and attend call with AFCO	0.2

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 12

Date	Timekeeper	Task	Description	Hours
07/16/25	A Song	B310	Attend call with A&M on claims analyses	0.4
07/16/25	A Song	B110	Review workstreams and correspondence with J. Dutson and B. Bean re: same (0.4); review docket and update timeline (0.2); confer with T. Kim on NDGA local rules and Complex Chapter 11 Case Procedures in preparation of pleadings (0.3); draft July 22 Agenda (0.8)	1.7
07/16/25	A Song	B160	Attention to Interim Fee Application (0.8); confer with T. Kim and B. Bean re: same (0.1); revise Interim Fee Application (1.5)	2.4
07/17/25	B Bean	B550	Confer with Buyer's counsel and client regarding liquor license reporting	0.1
07/17/25	B Bean	B320	Review and revise draft cover letter (0.3); prepare plan related documents for filing and confer with A. Song regarding the same (0.4); review global notes to liquidation analysis and make comments thereto (0.5); confer with voting agent regarding solicitation matters (0.2); review comments to Liquidating Trust Agreement and confer with client regarding the same (0.4)	1.8
07/17/25	B Bean	B110	Prepare for and attend call with client regarding wind-down tasks (0.5); prepare for and attend call with counterparty regarding insurance related issue (0.3); confer with client regarding Monthly Operating Report (0.1); confer with taxing authority regarding refund (0.1); send notice to third party administrator (0.1); revise broker agreement in accordance with client's comments and confer with client and J. Dutson regarding the same (0.6)	1.7
07/17/25	B Bean	B320	Confer with A. Song regarding hearing preparation	0.2
07/17/25	B Bean	B310	Confer with claimants regarding claim objections	0.4
07/17/25	S Choy	B220	Review 401k termination matters and form (0.4); emails to E. Rojas et al (0.1)	0.5
07/17/25	J Dutson	B320	Review updated trust agreement (0.4); correspondence regarding same (0.3)	0.7
07/17/25	J Dutson	B110	Attend Wind Down call	0.5
07/17/25	K Hilton	B240	Review and revise liquidating trust agreement for tax (0.6); review and draft analysis related to tax treatment of liquidation and effect on debtors (0.6)	1.2
07/17/25	T Kim	B320	Update plan confirmation checklist	0.3
07/17/25	T Kim	B510	Review solicitation procedures motion and all related exhibits in preparation for script (0.6); draft script in preparation for solicitation procedures hearing (3.7); review precedent script regarding solicitation procedures (0.5); review precedent solicitation procedures motion regarding the same	5.2

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 13

Date	Timekeeper	Task	Description	Hours
			(0.3); correspondence with B. Bean regarding the same (0.1)	
07/17/25	T Kim	B320	Draft and revise plan cover letter for content of packages for solicitation package (1.4); correspondence with B. Bean regarding revisions to the letter (0.1); correspondence with J. Dutson regarding comments to the draft (0.1)	1.6
07/17/25	T Kim	B160	Review and revise CBRE retention application, proposed order, and Miller declaration in support of retention application (0.8); correspondence with B. Bean regarding the same (0.1)	0.9
07/17/25	W Pressgrove	B240	Review bankruptcy analysis	1.3
07/17/25	A Song	B150	Respond to creditor inquires	0.5
07/17/25	A Song	B160	Review and revise interim Fee Application (0.7); confer with T. Kim re: same (0.1)	0.8
07/17/25	A Song	B320	Revise Notice of Filings of Liquidation Analysis and Committee Letter and prepare same for filing	1.2
07/17/25	A Song	B110	Revise Notice of Filing of TSA and IMA and prepare same for filing (0.4); revise July 22 Agenda (0.2); prepare payment instruction form (0.2); review and update workstreams tracker (0.4)	1.2
07/17/25	A Song	B185	Respond to creditors' inquiries in relation to assumption or rejection of contracts	0.5
07/17/25	A Song	B320	Prepare for July 22 Hearing	0.4
07/17/25	A Song	B110	Revise Notice of Filing of TSA and IMA and prepare same for filing (0.4); revise July 22 Agenda (0.2); prepare payment instruction form (0.2); review and update workstreams tracker (0.4)	1.2
07/17/25	A Song	B110	Confer with A&M and internally re: Critical Vendor reporting	0.1
07/18/25	C Adams	B185	Review correspondence related to contract and lease rejections (0.1); begin drafting and revising contract rejection motion (1.2); correspond with A&M team regarding contract (0.1)	1.4
07/18/25	B Bean	B185	Confer with client regarding lease rejection and review draft lease rejection motion (1.2); confer with landlord's counsel regarding lease rejection order (0.2)	1.4
07/18/25	B Bean	B110	Confer with client regarding broker agreement (0.3); confer with client regarding notary question (0.2); review agenda and provide comments thereto (0.5)	1.0
07/18/25	B Bean	B320	Confer with Buyer and Committee regarding proposed plan language (0.2); revise Liquidating Trust Agreement in accordance with J. Dutson's	2.3

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 14

Date	Timekeeper	Task	Description	Hours
			comments and confer with J. Dutson regarding the same (2.0); review revised cover letter (0.1)	
07/18/25	B Bean	B310	Confer with claimants regarding claim objections	0.2
07/18/25	B Bean	B140	Confer with J. Price regarding stay relief motions	0.2
07/18/25	S Choy	B220	Telephone conference with E. Rojas and E. Villanueva regarding 401k termination matters (0.2); review 401k information (0.4)	0.6
07/18/25	J Dutson	B320	Review and revise liquidating trust agreement (0.3); call with committee counsel regarding same (0.3)	0.6
07/18/25	T Kim	B160	Review and revise retention application and declaration in support based on revised exclusive liquor license sale agreement	0.3
07/18/25	T Kim	B160	Review and revise interim fee application and proposed order (1.0); correspondence with A. Song and B. Bean regarding the same (0.4)	1.4
07/18/25	T Kim	B320	Update confirmation checklist (0.3); review comments to Liquidating Trust Agreement (0.3)	0.6
07/18/25	A Song	B160	Review and revise fee application	2.8
07/18/25	A Song	B110	Update workstreams tracker (0.4); revise Agenda and confer with B. Bean re: same (0.4); correspondence with insurance carrier, K&S team, and A&M regarding treatment of utility claim (0.4); review insurance policies and draft notice letter regarding termination of same (0.9)	2.1
07/18/25	A Song	B310	Review claims registrar and confer with Verita and B. Bean re: same	0.1
07/19/25	B Bean	B320	Revise Liquidating Trust Agreement in accordance with J. Dutson's comments and confer with client and committee regarding the same	0.6
07/20/25	B Bean	B320	Review and revise hearing script on disclosure statement motion (1.2); revise Solicitation Procedures Order and confer with J. Dutson regarding the same (0.3); review revised Liquidating Trust Agreement and prepare issues list regarding the same (0.6)	2.1
07/20/25	B Bean	B110	Confer with S. Choy and J. Dutson regarding insurance related questions	0.2
07/20/25	B Bean	B160	Review and comment on broker retention application	1.5
07/20/25	S Choy	B220	Review health and welfare plan termination matters	0.3
07/20/25	A Song	B110	Draft letter to insurance carrier	0.5
07/21/25	C Adams	B185	Discuss hearing and orders with B. Bean (0.1); prepare and revise filing versions of orders on fourth lease rejection and fourth contract rejection motions (0.3)	0.4

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 15

Date	Timekeeper	Task	Description	Hours
07/21/25	B Bean	B320	Revise Plan, Disclosure Statement, Solicitation Procedures Order and related documents in advance of hearing and prepare the same for filing (4.2); confer with client, J. Dutson and various other parties regarding the same (1.3); revise Liquidating Trust Agreement and confer with J. Dutson and Committee regarding the same (0.9)	6.4
07/21/25	B Bean	B110	Revise and revise amended agenda (0.3); review and revise various notices of filing (0.5); confer with chambers regarding amended agenda and updated filings (0.2); prepare for and attend bi-weekly professionals call (0.7)	1.7
07/21/25	B Bean	B185	Review revised form of lease and contract rejection orders and confer with C. Adams regarding the same	0.3
07/21/25	B Bean	B320	Prepare hearing script for July 22nd Solicitation Procedures and Disclosure Statement Approval hearing and prepare for hearing	0.8
07/21/25	B Bean	B160	Review revised broker retention application and provide comments thereto	0.6
07/21/25	S Choy	B220	Review health and welfare plan termination matters, liquidation plan, 401k termination matters	1.4
07/21/25	J Dutson	B110	Prepare for and attend Wind Down Call	1.0
07/21/25	J Dutson	B320	Prepare for Solicitation Procedures and Disclosure Statement Approval hearing	1.7
07/21/25	T Kim	B185	Review data room documents regarding credit card processor agreement (0.2); correspondence with A. Song regarding the same (0.1)	0.3
07/21/25	T Kim	B320	Review and revise presentation script for solicitation procedures hearing	0.9
07/21/25	T Kim	B160	Review and revise CBRE retention application, order and declaration in support (1.4); correspondence with B. Bean regarding the same (0.2)	1.6
07/21/25	T Kim	B320	Review comments on liquidating trust agreement (0.5); update closing checklist (0.4); review revisions to chapter 11 plan and disclosure statement (0.5); revise approval order on interim approval of disclosure statement (0.5)	1.9
07/21/25	A Song	B110	Update workstreams tracker and circulate same internally (0.4); prepare July 22 Agenda for filing (0.2); revise payment instruction form and correspondence re: same (0.1); draft amended July 22 Agenda and prepare same for filing (0.9)	1.6
07/21/25	A Song	B320	Prepare for Solicitation Procedures and Disclosure Statement Approval hearing	0.8

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 16

Date	Timekeeper	Task	Description	Hours
07/21/25	A Song	B185	Correspondence with K&S team and A&M re: creditor inquiry on assumption or rejection of contract	0.3
07/21/25	A Song	B310	Draft and revise claims objection	0.7
07/21/25	A Song	B320	Draft and revise various Notice of Filings (1.7); prepare same and Amended Plan and Disclosure Statement for filing (0.7)	2.4
07/22/25	C Adams	B110	Prepare filing versions of orders and file same	0.3
07/22/25	C Adams	B320	Review and discuss liquidation chart with B. Bean (0.2); draft cash analysis and send to B. Bean for review (0.4); review correspondence with A&M team regarding same (0.1)	0.7
07/22/25	B Bean	B310	Review claim objection and provide comments thereto (0.5); confer with K. Hilton and C. Adams regarding claim objections (0.2)	0.7
07/22/25	B Bean	B130	Confer with client regarding liquor license sale	0.2
07/22/25	B Bean	B320	Review orders and finalize for upload (0.6); confer with claims agent regarding solicitation (0.2)	0.8
07/22/25	B Bean	B320	Prepare for, present at and attend disclosure statement hearing (3.0); confer with court and parties in interest regarding hearing date (0.2); confer with C. Adams regarding hearing preparation and review and comment on liquidation chart (0.4)	3.6
07/22/25	S Choy	B220	Review 401k termination and wind-down matters	0.4
07/22/25	J Dutson	B320	Prepare for and attend hearing on Disclosure Statement and other matters	5.5
07/22/25	K Hilton	B240	Review IRS priority claims for failure to pay FICA/FUTA and corporate taxes and file relevant returns	0.4
07/22/25	T Kim	B320	Update confirmation checklist (0.1); review comments to liquidating trust agreement (0.2); review revisions to plan and disclosure statement (0.2)	0.5
07/22/25	T Kim	B160	Review and revise fee application (0.2); correspondence with J. Dutson and B. Bean regarding the same (0.2)	0.4
07/22/25	A Song	B310	Review claims register and proofs of claim (1.2); draft claims objections (6.5); confer with B. Bean re: same (0.3)	8.0
07/22/25	A Song	B320	Prepare for Solicitation Procedures and Disclosure Statement Approval hearing	0.6
07/22/25	A Song	B110	Prepare payment instruction forms and correspondence internally and with the Company re: same (0.6); prepare orders for filing (0.1)	0.7

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 17

Date	Timekeeper	Task	Description	Hours
07/22/25	A Song	B320	Prepare updated exhibits to Approval Order (0.5); prepare order for filing (0.4)	0.9
07/23/25	C Adams	B310	Review and discuss IRS Tax claims and preparation of declarations with B. Bean (0.3); draft declaration (0.5)	0.8
07/23/25	C Adams	B320	Research and analyze plan-related issues and draft summary re: same	3.1
07/23/25	C Adams	B130	Review Liquor License Sale Motion with J. Dutson	0.1
07/23/25	B Bean	B110	Confer with insurance broker and client regarding insurance related matters (0.2); confer with insurer's counsel regarding claim access (0.2); confer with court regarding proposed orders (0.2); confer with creditor regarding insurance related matters (0.1)	0.7
07/23/25	B Bean	B310	Confer with client and claimants regarding claim objections (0.4); confer with K. Hilton regarding claim objections (0.3)	0.7
07/23/25	B Bean	B320	Review voting summary and provide comments thereto and confer with J. Dutson regarding the same (0.7); review plan related research and confer with C. Adams and J. Dutson regarding the same (1.4)	2.1
07/23/25	B Bean	B130	Confer with T. Kim regarding liquor license sale (0.5); review markup of purchase agreement and prepare summary for client (1.0); prepare for and attend call with client and local counsel regarding liquor license sale (0.5)	2.0
07/23/25	S Choy	B220	Review 401k termination matters	1.0
07/23/25	J Dutson	B320	Review voting spreadsheet (0.4); respond to inquiry from committee (0.2)	0.6
07/23/25	J Dutson	B310	Review claim objections	0.7
07/23/25	K Hilton	B240	Draft declarations in response to IRS priority claims for failure to pay FICA/FUTA and corporate taxes and file relevant returns	1.4
07/23/25	T Kim	B130	Call with B. Bean regarding liquor license purchase agreement (0.2); begin drafting purchase agreement (0.2)	0.4
07/23/25	T Kim	B320	Review revised order approving disclosure statement on interim basis (0.1); revise deadlines based on revisions to approved solicitation procedures order (0.2); correspondence with K&S team regarding the same (0.2); review voting amount spreadsheet (0.2)	0.7
07/23/25	A Song	B110	Update and revise workstreams tracker (0.4); confer with B. Bean re: same (0.1); correspondence with Truist and the Company (0.3); attention to cancellation of Ohio workers' compensation policy	1.3

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 18

Date	Timekeeper	Task	Description	Hours
			(0.5)	
07/23/25	A Song	B310	Revise claim objection (0.3); correspondence with Company and K&S (0.1)	0.4
07/23/25	A Song	B185	Respond to creditor inquiries re: assumption of contract	0.3
07/24/25	C Adams	B185	Review correspondence related to outstanding payment issues and rejected contracts/leases	0.2
07/24/25	B Bean	B110	Prepare for and attend call with creditor regarding insurance related issues (0.5); prepare for and attend bi-weekly call (0.7)	1.2
07/24/25	B Bean	B130	Prepare for and attend call with client regarding liquor license purchase agreement (1.3); conduct research regarding liquor license related matter and confer with client and J. Dutson regarding the same (1.2)	2.5
07/24/25	B Bean	B320	Confer with claims agent regarding solicitation and voting summary (0.4); review revised solicitation materials and confer with A. Song and claims agent regarding the same (0.9)	1.3
07/24/25	B Bean	B130	Confer with client regarding removal of equipment from stores	0.2
07/24/25	J Dutson	B110	Call with 1970s group regarding wind down	0.4
07/24/25	T Kim	B130	Review term sheet regarding liquor license sale (0.5); review precedent purchase and escrow agreement regarding the same (0.5); draft purchase and escrow agreement regarding liquor license sale (4.7); correspondence with B. Bean regarding the same (0.1)	5.8
07/24/25	S Primrose	B560	Review and respond to emails re: outstanding litigation	0.2
07/24/25	A Song	B320	Prepare solicitation package (1.8); revise Plan and Disclosure Statement (0.9); correspondence with Verita and B. Bean re: same (0.5)	3.2
07/25/25	C Adams	B185	Review correspondence related to default and lease rejection (0.1); research lease rejection questions and draft summary for B. Bean (0.2); correspond with Porter Hedges team regarding same (0.1)	0.4
07/25/25	C Adams	B240	Call and correspondence with K. Hilton regarding OTB tax issue (0.5); correspond with B. Bean regarding same (0.1)	0.6
07/25/25	B Bean	B110	Confer with client and insurer's counsel regarding insurance related issues (0.2); confer with C. Adams regarding default notice (0.1); confer with Hilco real estate and landlord's counsel regarding lease-related questions (0.2)	0.5

38110 OTB Holding LLC
 230001 OTB Restructuring
 08/11/25

Invoice No. 10823928
 Page 19

Date	Timekeeper	Task	Description	Hours
07/25/25	B Bean	B130	Revise purchase agreement in accordance with client's comments	1.4
07/25/25	B Bean	B310	Confer with K. Hilton regarding tax claims	0.1
07/25/25	K Hilton	B240	Draft declarations in response to IRS priority claims for failure to pay FICA/FUTA and corporate taxes and file relevant returns	2.2
07/25/25	T Kim	B130	Review precedent Michigan purchase and sale agreements for liquor licenses (0.5); summary and analysis regarding the same (1.0); correspondence with B. Bean regarding the same (0.1); review and revise purchase and sale agreement based on comments from B. Bean (1.4)	3.0
07/25/25	S Primrose	B560	Attention to pending litigation and emails re: the same	0.2
07/25/25	A Song	B110	Review docket updates and confer with Company re: critical vendor reporting (0.1); prepare payment instruction forms (0.2)	0.3
07/25/25	A Song	B310	Review amended proof of claim and correspondence with Verita and K&S team re: same	0.2
07/26/25	T Kim	B130	Review comments on liquor license agreement (0.3) review and revise liquor license purchase agreement (0.7); correspondence with B. Bean regarding the same (0.2)	1.2
07/26/25	A Song	B310	Correspondence re: amended proof of claim	0.2
07/28/25	C Adams	B130	Research liquor license question for B. Bean (0.2); review Liquor License Sale Motion with J. Dutson and B. Bean (0.4); revise Sale Motion in accordance with J. Dutson's comments and updated Purchase Agreement (1.5)	2.1
07/28/25	C Adams	B310	Finalize draft of OTB Tax Declaration and send to B. Bean for review	0.7
07/28/25	B Bean	B110	Prepare for and attend bi-weekly professionals call	0.8
07/28/25	B Bean	B130	Prepare for and meet with J. Dutson and C. Adams regarding sale motion (0.5); provide comments to sale motion to C. Adams (0.3); confer with client regarding multiple liquor license sale agreements (0.3); confer with C. Adams regarding sale motion (0.3); review de minimis asset sale report (0.1)	1.5
07/28/25	B Bean	B310	Confer with DOJ regarding claim objection (0.1); review withdrawal of claim and confer with A. Song regarding the same (0.1); confer with Maryland regarding claim objection (0.2); review and comment on omnibus claims objections (5.0)	5.4
07/28/25	B Bean	B320	Confer with J. Dutson regarding Liquidating Trust Agreement	0.1

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 20

Date	Timekeeper	Task	Description	Hours
07/28/25	B Bean	B190	Confer with insurer regarding bond-related issue	0.1
07/28/25	J Dutson	B110	Communications regarding transition services issue	0.4
07/28/25	J Dutson	B520	Call with UST counsel regarding case	0.2
07/28/25	J Dutson	B320	Review liquidating trust revisions	0.5
07/28/25	K Hilton	B240	Draft declarations in response to IRS priority claims for failure to pay FICA/FUTA and corporate taxes and file relevant returns	1.0
07/28/25	T Kim	B130	Review and revise notice for sale of de minimis assets in preparation for filing (0.2); correspondence with B. Bean and J. Dutson regarding the same (0.2); correspondence with A&M team regarding the same for filing purposes (0.1)	0.5
07/28/25	T Kim	B160	Correspondence with J. Dutson and B. Bean regarding the interim fee application	0.1
07/28/25	A Song	B310	Review withdrawal to claim objections (0.4); draft and revise Notices of Withdrawal (1.9); confer with B. Bean and Company re: Claims Objections (0.3); correspondence with Committee re: same (0.1); revise Omnibus Claims Objections and confer with B. Bean re: same (0.8)	3.5
07/28/25	A Song	B110	Update workstreams tracker (0.4); attention to payment instruction forms (0.3); correspondence with the Company, Truist, and K&S team re: same (0.3); review and update case docket (0.3)	1.3
07/29/25	C Adams	B310	Review correspondence regarding amended proof of claim	0.1
07/29/25	C Adams	B130	Review correspondence with OTB regarding sale of liquor license	0.1
07/29/25	B Bean	B310	Prepare for and meet with A. Song regarding claims objections (0.5); confer with DOJ regarding claim objection (0.1); confer with A. Song regarding tax claim (0.1); review revised omnibus claim objections and provide comments thereto (1.5)	2.2
07/29/25	B Bean	B130	Confer with client regarding sale motion (0.2); confer with chambers regarding hearing related questions (0.2); review filing versions of pleadings and confer with A. Song regarding the same (0.1); review and revise liquor license sale agreement and confer with T. Kim regarding the same (0.6)	1.1
07/29/25	B Bean	B110	Confer with client, insurance provider and insurer's counsel regarding insurance related matters (0.7); discuss multiple workstreams with J. Dutson (0.2)	0.9
07/29/25	T Kim	B320	Review and update confirmation checklist (0.2); review comments to liquidation trust agreement (0.2)	0.4

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 21

Date	Timekeeper	Task	Description	Hours
07/29/25	T Kim	B185	Review filed rejection of executory contracts and leases	0.2
07/29/25	T Kim	B130	Revise notice of de minimis asset sale and correspondence with B. Bean regarding the same	0.2
07/29/25	A Song	B130	Prepare Notice of De Minimis Asset Sale for filing	0.3
07/29/25	A Song	B310	Correspondence with K&S and Verita re: claims (0.2); confer with B. Bean re: Omnibus Objection (0.4); revise Omnibus Objections and review claims register and proofs of claims in preparation for same (4.6); attention to withdrawal of objections (0.8); prepare claim objection (0.5)	6.5
07/30/25	C Adams	B130	Review correspondence related to liquor license sale issue from OTB and A&M teams	0.3
07/30/25	B Bean	B110	Confer with chambers and committee regarding hearing (0.2); confer with client regarding liquor license question (0.2); prepare for and attend call with insurance provider's counsel regarding insurance issue (0.3); review global notes to monthly operating reports and provide comments thereto (0.9)	1.6
07/30/25	B Bean	B190	Confer with creditor regarding claim objection (0.2); confer with A. Song regarding tax claim (0.1)	0.3
07/30/25	B Bean	B130	Confer with client and J. Dutson regarding sale motion	0.3
07/30/25	B Bean	B320	Confer with Verita regarding solicitation	0.1
07/30/25	S Choy	B220	Review 401k termination matters	0.2
07/30/25	T Kim	B130	Review and revise purchase and escrow agreement for liquor license sale (0.4); correspondence with B. Bean regarding the same (0.1); review comments to purchase agreement (0.2)	0.7
07/30/25	S Primrose	B560	Review and respond to emails re: litigation	0.2
07/30/25	A Song	B110	Update workstreams tracker	0.4
07/30/25	A Song	B310	Revise omnibus objection and confer internally re: same (0.3); draft omnibus objection (2.2); attention to withdrawal of objection (0.3); confer internally and with claimant re: proof of claim (0.8)	3.6
07/30/25	A Song	B160	Attention to fee applications	1.8
07/31/25	C Adams	B530	Review correspondence related to MORs (0.2); compile June MORs (0.3); and file the same (0.4)	0.9
07/31/25	B Bean	B110	Prepare for and attend bi-weekly professional calls (0.7); review and provide comments to revised global notes and monthly operating reports (2.4); confer with US Trustee regarding insurance policies (0.1); confer with J. Dutson regarding upcoming hearing (0.1)	3.3

38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 22

Date	Timekeeper	Task	Description	Hours
07/31/25	B Bean	B130	Prepare for and attend call with client regarding liquor license purchase agreement (0.8); confer with client regarding retention application (0.2); confer with Buyer's counsel regarding reporting obligations and tax allocation (0.2); revise purchase agreements for liquor licenses and confer with J. Dutson regarding the same (2.6)	3.8
07/31/25	B Bean	B310	Confer with creditor regarding claim objection (0.2); attend call with Committee and confer via e-mail regarding claim objections (0.4)	0.6
07/31/25	J Dutson	B310	Review claims objections	0.4
07/31/25	J Dutson	B240	Calls regarding tax issues	0.3
07/31/25	J Dutson	B150	Respond to creditor inquiries	0.4
07/31/25	J Dutson	B130	Review and comment on liquor purchase agreements	0.5
07/31/25	K Hilton	B240	Draft declarations in response to IRS priority claims for failure to pay FICA/FUTA and corporate taxes and file relevant returns	0.6
07/31/25	A Song	B310	Draft omnibus objection (5.9); correspondence with B. Bean re: same (0.4)	6.3
07/31/25	A Song	B160	Attention to fee applications	0.2
				<hr/> 371.4

TIMEKEEPER SUMMARY

Timekeeper	Status	Hours
Sam Choy	Partner	7.4
Jeff Dutson	Partner	24.5
Wayne Pressgrove	Partner	1.3
Sarah Primrose	Partner	2.0
Christian Adams	Associate	28.2
Brooke Bean	Associate	121.5
Kevin Hilton	Associate	9.4
Taeyeong Kim	Associate	59.6
R. Neilson	Associate	0.4
Alice Kyung Won Song	Associate	117.1
Total		<hr/> 371.4

Expenses Incurred

07/01/25	Filing Fees - VENDOR: FSX Holdings LLC dba File & ServeXpress INVOICE#: 202506000100401 DATE: 7/1/2025	10.66
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38110 OTB Holding LLC
230001 OTB Restructuring
08/11/25

Invoice No. 10823928
Page 23

Expenses Incurred

	e-file & serve June 2025	
07/15/25	Cabfare - VENDOR: Jeffrey R. Dutson INVOICE#: 7557030707161248 DATE: 7/16/2025 Uber from office to courthouse for OTB hearing	34.37
07/15/25	Cabfare - VENDOR: Jeffrey R. Dutson INVOICE#: 7557030707161248 DATE: 7/16/2025 Uber from courthouse to office for OTB hearing	35.17
07/15/25	Cabfare - VENDOR: Bean, Brooke INVOICE#: 7573325407231256 DATE: 7/23/2025 Uber from courthouse to office for OTB hearing	35.80
07/15/25	Cabfare - VENDOR: Bean, Brooke INVOICE#: 7573325407231256 DATE: 7/23/2025 Uber from office to courthouse for OTB hearing	36.35
07/17/25	Document Delivery - VENDOR: United Parcel Service (KY) INVOICE#: 329658-295DDF071925 DATE: 7/19/2025 Legal Department - Gallagher Bassett Services, Inc. - Rolling Meadows - IL	37.41
07/22/25	Cabfare - VENDOR: Bean, Brooke INVOICE#: 7573319707231256 DATE: 7/23/2025 Uber from office to courthouse for OTB hearing	36.10
07/23/25	Cabfare - VENDOR: Jeffrey R. Dutson INVOICE#: 7575903407301205 DATE: 7/30/2025 Uber from Courthouse to office	26.06
	Total Expenses	<hr/> 251.92

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No. 10823928
Invoice Date 08/11/25
Client No. 38110
Matter No. 230001

RE: OTB Restructuring

For questions, contact:
Jeff Dutson +1 404 572 2803

REMITTANCE

Please return this page with your remittance.

Amount Due This Invoice

\$389,152.92

Payment is Due Upon Receipt

KING & SPALDING

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Atlanta, GA 30368-6133

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SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No.	10823929
Invoice Date	08/11/25
Client No.	38110
Matter No.	230002

RE: Transition Services

For questions, contact:
Jeff Dutson +1 404 572 2803

For Professional Services Rendered through 07/31/25:

Fees	\$	14,775.50
Total this Invoice	\$	14,775.50

38110 OTB Holding LLC
 230002 Transition Services
 08/11/25

Invoice No. 10823929
 Page 2

PROFESSIONAL SERVICES

Date	Timekeeper	Task	Description	Hours
07/01/25	C Adams	B185	Review and revise Fifth Supplemental Cure Notice (0.3); correspond with C. Schotz regarding cure amount (0.2); correspond with Porter Hedges team regarding same (0.2); file the same (0.2); strategize with K&S team regarding same (0.3); correspond with other objectors regarding assumption issues (0.5)	1.7
07/01/25	M Fishel	B185	Review various cure updates and correspondence relating to same	0.3
07/02/25	C Adams	B185	Review and revise Fifth Cure Notice and file the same (0.4); draft Fifth Contract Rejection Motion (0.4); correspond with A&M and Porter Hedges team regarding cure notice and contract rejection motion (0.2); draft notice of hearing and revise in accordance with B. Bean's comments (0.3); discuss the same with B. Bean (0.1); file the fifth contract rejection motion (0.2)	1.6
07/02/25	B Bean	B185	Confer with K&S team and buyer's counsel regarding cure notice	0.5
07/02/25	J Fontham	B110	Review and comment on insurance endorsement	0.2
07/03/25	J Fontham	B110	Draft summary of insurance coverages (0.3); analyze insuring agreements in excess policies (0.5); draft summary of excess deficiency and suggested remedy (0.2)	1.0
07/07/25	C Adams	B185	Research service and key return-related issue (0.5); review correspondence and strategize with A&M and K&S teams regarding outstanding issues related to leases and closed locations (0.4)	0.9
07/07/25	B Bean	B185	Confer with client and landlord's counsel regarding key return	0.2
07/08/25	B Bean	B550	Confer with Buyer's counsel and client regarding trademark agreement	0.2
07/08/25	J Fontham	B110	Correspondence regarding insurance issues	0.2
07/09/25	J Dutson	B110	Attention to insurance resolution	0.7
07/09/25	J Fontham	B110	Prepare for and participate in teleconference regarding solution for insurance issues (0.3); correspondence regarding same (0.1); prepare proposed revision of Management Agreement (0.2)	0.6
07/11/25	C Adams	B185	Correspond with Kimco Lake Prairie team and Porter Hedges team regarding payment discrepancy	0.3
07/11/25	J Dutson	B110	Correspondence regarding Transition insurance (0.3); revisions to interim management agreement (0.3)	0.6

38110 OTB Holding LLC
230002 Transition Services
08/11/25

Invoice No. 10823929
Page 3

Date	Timekeeper	Task	Description	Hours
07/11/25	M Fishel	B185	Review cure updates	0.2
07/11/25	J Fontham	B110	Draft summary of insurance coverages (0.5); review edits to Interim Management Agreement (0.3); teleconference regarding insurance (0.3)	1.1
07/14/25	J Fontham	B110	Correspondence and analysis regarding cancellation of insurance	0.3
07/15/25	C Adams	B185	Review correspondence regarding outstanding post-petition payments and effective date of rejection (0.1); research contract rejection motion (0.1); correspond with Vestis/Pappas team regarding same (0.2)	0.4
07/15/25	M Fishel	B185	Review update to cure issues for certain landlords and correspondence from L. Heilman relating to same (0.2); review correspondence relating to assumption of certain lease and payment relating to same (0.1)	0.3
07/16/25	M Fishel	B185	Review additional updates relating to cure issues and certain invoices	0.2
07/17/25	C Adams	B185	Review correspondence related to rejected lease	0.1
07/17/25	M Fishel	B185	Review cure issues pertaining to assumed contract	0.1
07/25/25	M Fishel	B185	Review updates to various cure issues	0.1
07/25/25	M Fishel	B185	Review lease and cure updates from C. Adams	0.1
				<hr/> 11.9

TIMEKEEPER SUMMARY

Timekeeper	Status	Hours
Jeff Dutson	Partner	1.3
Michael Fishel	Partner	1.3
Jack Fontham	Partner	3.4
Christian Adams	Associate	5.0
Brooke Bean	Associate	0.9
Total		<hr/> 11.9

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FEDERAL I.D. 58-0520153

Remit To:
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Atlanta, GA 30368-6133

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ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No. 10823929
Invoice Date 08/11/25
Client No. 38110
Matter No. 230002

RE: Transition Services

For questions, contact:
Jeff Dutson +1 404 572 2803

REMITTANCE

Please return this page with your remittance.

Amount Due This Invoice

\$14,775.50

Payment is Due Upon Receipt

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No. 10830498
Invoice Date 09/09/25
Client No. 38110
Matter No. 230001

RE: OTB Restructuring

For questions, contact:
Jeff Dutson +1 404 572 2803

For Professional Services Rendered through 08/31/25:

Fees	\$	347,467.00
Expenses		82.43
Total this Invoice	\$	347,549.43

Payment is Due Upon Receipt

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 2

PROFESSIONAL SERVICES

Date	Timekeeper	Task	Description	Hours
08/01/25	C Adams	B240	Update internal chart regarding open/objected to tax claims (0.2); review correspondence with tax team regarding tax claims (0.1); review and revise tax declaration (0.3)	0.6
08/01/25	B Bean	B320	Confer with A. Song regarding plan briefing and review precedents in connection thereto	0.6
08/01/25	B Bean	B310	Confer with client regarding proof of claim	0.1
08/01/25	B Bean	B140	Confer with J. Dutson regarding the stay relief motions	0.1
08/01/25	B Bean	B320	Confer with T. Kim regarding Confirmation Order and confer with T. Kim regarding Confirmation Order (0.3); review several precedent Confirmation Orders (0.9)	1.2
08/01/25	B Bean	B110	Review notice of cancelled hearing and provide comments thereto	0.2
08/01/25	B Bean	B310	Review claims objection and provide comments thereto (1.5); confer with claimant's counsel regarding claim objection (0.2)	1.7
08/01/25	B Bean	B130	Confer with client regarding purchase agreements (0.6); revise purchase agreement in accordance with client's comments (0.5)	1.1
08/01/25	B Bean	B240	Confer with C. Adams regarding tax declarations	0.2
08/01/25	J Dutson	B310	Review and revise claims objections (0.4); respond to inquiries from creditors (0.3)	0.7
08/01/25	K Hilton	B240	Draft declarations in response to IRS priority claims for failure to pay FICA/FUTA and corporate taxes and file relevant returns and review common paymaster rules	0.9
08/01/25	T Kim	B320	Review precedent confirmation orders (1.0); summarize and analyze issues to raise in preparation for drafting (0.5); begin drafting confirmation order (0.1); call and correspondence with B. Bean regarding the same (0.4)	2.0
08/01/25	A Song	B110	Update case tracker (0.4); draft and revise Notice of Cancelled Hearing and correspondence internally and with Committee counsel re: same (0.9)	1.3
08/01/25	A Song	B310	Confer with tax claimant (0.4); correspondence internally and with the Company re: omnibus claims objections (0.6)	1.0
08/01/25	A Song	B320	Research confirmation briefs (1.0); confer with B. Bean re: same (0.4)	1.4

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 3

Date	Timekeeper	Task	Description	Hours
08/03/25	T Kim	B320	Draft confirmation order (3.5); review precedent confirmation order (0.5); review plan and disclosure statement in preparation for drafting confirmation order (0.5)	4.5
08/03/25	A Song	B320	Review various documents in preparation of Confirmation Memorandum	1.5
08/04/25	B Bean	B130	Confer with client regarding liquor licenses	0.3
08/04/25	B Bean	B210	Confer with S. Choy and J. Dutson regarding benefits question	0.2
08/04/25	B Bean	B310	Confer with A. Song regarding claim objections (0.5); confer with government agency regarding proofs of claims (0.4); confer with DOJ regarding tax claims (0.1); review claim objections and provide comments thereto (1.5)	2.5
08/04/25	B Bean	B320	Prepare for and meet with J. Dutson regarding liquidating trust agreement (0.3); prepare for and attend call with T. Kim regarding Confirmation Order (0.5); confer with claims agent regarding solicitation question (0.2)	1.0
08/04/25	B Bean	B110	Prepare for and attend bi-weekly professionals meeting	0.6
08/04/25	S Choy	B220	Review 401k trustee requirements	0.4
08/04/25	J Dutson	B210	Communications regarding 401(k) wind down	0.3
08/04/25	J Dutson	B320	Review revised liquidating trust agreement	0.7
08/04/25	T Kim	B320	Continue drafting confirmation order (5.1); call with B. Bean regarding the same (0.5)	5.6
08/04/25	A Song	B320	Draft Confirmation Memorandum	4.1
08/04/25	A Song	B310	Analyze claims and summarize same for review (0.9); research priority status in relation to claims analysis (0.9); confer with claimant re: claim (0.4); revise omnibus objections and correspondence with K&S team and the Company re: same (1.9)	4.1
08/04/25	A Song	B110	Update and revise workstreams tracker and confer with B. Bean re: same	0.5
08/05/25	B Bean	B320	Confer with claims agent regarding solicitation question	0.4
08/05/25	B Bean	B130	Prepare for and attend call with government agency regarding liquor license (0.4); confer with client regarding the same (0.2); confer with J. Dutson regarding the same (0.2)	0.8
08/05/25	B Bean	B110	Calls with A. Papai regarding ongoing workstreams (0.3); calls with S. Medley regarding ongoing workstreams (0.2); confer with counterparty	0.6

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 4

Date	Timekeeper	Task	Description	Hours
			regarding insurance cancellation (0.1)	
08/05/25	B Bean	B320	Confer with T. Kim regarding confirmation order (0.3); revise liquidating trust agreement in accordance with J. Dutson's comments and confer with committee and client regarding the same (0.4); begin review of Confirmation Order (2.0)	2.7
08/05/25	B Bean	B130	Confer with Buyer regarding liquor license	0.1
08/05/25	B Bean	B310	Confer with A. Song regarding claim objections (0.2); review revised claim objections (0.2)	0.4
08/05/25	B Bean	B240	Confer with A. Song regarding tax claim (0.2); confer with S. Medley regarding tax audit (0.2); revise tax declaration in accordance with K. Hilton's comments and confer with J. Dutson regarding the same; confer with DOJ regarding tax claims (0.2); confer with Buyer regarding tax returns (0.2)	0.8
08/05/25	J Dutson	B310	Communications regarding admin claims (0.4); communications regarding IRS claims (0.3)	0.7
08/05/25	K Hilton	B240	Review tax declaration	0.2
08/05/25	T Kim	B320	Continue drafting confirmation order (6.5); review precedent confirmation order regarding for drafting (0.7); correspondence with B. Bean regarding the same (0.1)	7.3
08/05/25	W Pressgrove	B240	Review revised declarations	0.8
08/05/25	A Song	B140	Review stay relief motion and summarize same for internal review (1.1); internal correspondence and strategize re: same (0.3)	1.4
08/05/25	A Song	B310	Confer with the Company and internally re: claims (0.4); revise various omnibus claims objections and internal correspondence re: same (2.3); prepare various objections for filing (0.8); review and analyze claim and correspondence with claimant and K&S team re: same (0.6)	4.1
08/05/25	A Song	B320	Research sections 1123, 1125, and 1126 (1.3); draft confirmation memorandum (1.0)	2.3
08/06/25	C Adams	B240	Review revised tax declaration and related correspondence (0.2); prepare for and attend call with K&S team regarding same (0.2); revise tax declaration in accordance with K. Hilton's comments (0.1)	0.5
08/06/25	B Bean	B310	Confer with A. Song regarding claim objections	0.2
08/06/25	B Bean	B140	Review summary of motion for stay relief and confer with client and A. Song regarding the same	0.3
08/06/25	B Bean	B240	Prepare for and attend internal call regarding tax declaration	0.4

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 5

Date	Timekeeper	Task	Description	Hours
08/06/25	B Bean	B240	Call with K. Hilton regarding tax declaration (0.2); confer with client, C. Adams and accountant regarding the same (0.3)	0.5
08/06/25	B Bean	B320	Confer with creditor regarding solicitation question	0.3
08/06/25	B Bean	B240	Prepare for and attend call with government agency regarding tax claim	0.4
08/06/25	B Bean	B110	Prepare for and attend call with insurer regarding insurance related issues (0.4); confer with counterparty and insurer regarding insurance related issues (0.2)	0.6
08/06/25	B Bean	B320	Finalize initial review of Confirmation Order and provide comments to T. Kim	2.0
08/06/25	B Bean	B130	Confer with Buyer's counsel regarding liquor license	0.3
08/06/25	J Dutson	B185	Communications regarding rejected agreements	0.8
08/06/25	J Dutson	B240	Attention to IRS declarations (0.8); attention to tax issues (0.9)	1.7
08/06/25	K Hilton	B240	Call with J. Dutson, B. Bean and C. Adams regarding tax declaration and tax structure of the debtors (0.3); call with J. Dutson and W. Pressgrove regarding tax declaration and tax structure of the debtors (0.2); review and revise tax declarations (0.3)	0.8
08/06/25	T Kim	B320	Review comments on confirmation order (0.5); revise and update confirmation checklist (0.2); review and revise confirmation order (3.3); correspondence with B. Bean regarding the same (0.1)	4.1
08/06/25	W Pressgrove	B240	Document review (0.2); conference call regarding tax liabilities (0.8)	1.0
08/06/25	A Song	B150	Confer with creditor on case	0.3
08/06/25	A Song	B140	Confer internally re: stay relief motion	0.2
08/06/25	A Song	B110	Correspondence with the Company in relation to insurance (0.3); update workstreams tracker (0.4)	0.7
08/06/25	A Song	B320	Research requirements under section 1129 (1.8); draft confirmation brief (3.9)	5.7
08/06/25	A Song	B310	Correspondence and calls with various claimant's counsel re: claims and objections (0.9); confer internally and with Company in relation to claims and audits (0.5); update claims objection tracker (0.3)	1.7
08/07/25	C Adams	B185	Research omnibus motions to assume certain contracts and internal correspondence re: same	1.0

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 6

Date	Timekeeper	Task	Description	Hours
08/07/25	B Bean	B185	Confer with C. Adams regarding assumption motion	0.4
08/07/25	B Bean	B240	Confer with DOJ regarding tax returns	0.3
08/07/25	B Bean	B110	Prepare for and attend bi-weekly professionals meeting (0.6); confer with Buyer regarding tax returns (0.2)	0.8
08/07/25	B Bean	B310	Prepare for and attend call with creditor regarding claim (0.5); confer with claimant regarding claim objection (0.2)	0.7
08/07/25	B Bean	B320	Revise confirmation order and confer with J. Dutson regarding the same	0.8
08/07/25	B Bean	B160	Revise fee application in connection with J. Dutson's comments	0.4
08/07/25	T Kim	B310	Review motion for order compelling payment of prepetition PACA claims (0.5); research on PACA claims (0.4)	0.9
08/07/25	T Kim	B320	Review outstanding tasks regarding confirmation (0.2); review comments to confirmation order (0.4)	0.6
08/07/25	A Song	B320	Draft and revise confirmation brief	6.0
08/07/25	A Song	B150	Review lease and store-related documents in response to landlord inquiry and correspondence re: same	0.2
08/07/25	A Song	B310	Prepare for and attend call with claimant's counsel and review documentation in relation thereto	0.5
08/07/25	A Song	B160	Attention to July fee applications	0.3
08/08/25	B Bean	B110	Confer with client regarding insurance related issues	0.2
08/08/25	B Bean	B160	Review fee application and confer with T. Kim and A. Song regarding the same	0.4
08/08/25	B Bean	B320	Begin review of confirmation briefing	0.6
08/08/25	B Bean	B310	Confer with client regarding tax claim	0.2
08/08/25	B Bean	B240	Confer with client and accountant regarding tax declaration	0.2
08/08/25	T Kim	B160	Review comments on fee application (0.3); review and revise interim fee application and order (2.0); correspondence with A. Song regarding the same (0.3); correspondence with C. Diaz from billing on payment dates for invoices (0.3); correspondence with J. Tibus and A. Papai regarding interim fee application (0.3); multiple correspondence with A. Song regarding proposed filing version (0.5)	3.7
08/08/25	T Kim	B130	Review comments on liquor license purchase and escrow agreement (0.1); correspondence with B. Bean regarding the same (0.1)	0.2

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 7

Date	Timekeeper	Task	Description	Hours
08/08/25	A Song	B310	Review and update tracker re: claims objections (0.2); prepare agreed order for duplicative claims (1.2); analyze claims and summarize same for internal review (1.7)	3.1
08/08/25	A Song	B320	Draft confirmation brief	1.4
08/08/25	A Song	B110	Update workstreams tracker (0.3); internal correspondence re: same (0.1)	0.4
08/08/25	A Song	B160	Attention to various fee applications	0.8
08/09/25	A Song	B110	Draft Notice of Hearing	0.5
08/10/25	B Bean	B320	Confer with client regarding various workstreams (0.3); continue review of plan confirmation briefing (0.8)	1.1
08/11/25	C Adams	B185	Review list of assumed and assigned contracts and correspond with Porter Hedges team regarding outstanding balance of NC location	0.3
08/11/25	B Bean	B310	Confer with several creditors regarding claim related issues (0.6); call with benefits provided regarding claim and confer with client regarding the same (0.6)	1.2
08/11/25	B Bean	B240	Prepare for and attend call with client and accountant regarding tax declaration (0.4); revise tax declaration and call with K. Hilton regarding the same (0.4)	0.8
08/11/25	B Bean	B140	Call with committee regarding stay relief motions	0.5
08/11/25	B Bean	B320	Confer with J. Dutson regarding Liquidating Trust Agreement	0.3
08/11/25	B Bean	B130	Prepare for and attend call with client and local counsel regarding liquor license sale (0.5); call with client and buyer regarding liquor license sale (0.5); revise PSA for liquor license sale and confer with client and local counsel regarding the same (1.1)	2.1
08/11/25	B Bean	B110	Prepare for and attend bi-weekly call (0.7); review notice of hearing and provide comments thereto (0.4)	1.1
08/11/25	J Dutson	B210	Attention to 401k winddown	0.2
08/11/25	J Dutson	B310	Communications regarding Texas claims	0.4
08/11/25	J Dutson	B240	Call regarding final tax returns	0.4
08/11/25	K Hilton	B240	Call with Smith Howard regarding tax declarations and tax reporting for the debtors (0.4); Confer with B. Bean and W. Pressgrove regarding tax declarations related to OTB Acquisition of Baltimore (0.4)	0.8
08/11/25	T Kim	B320	Review proposed confirmation order language from	1.4

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 8

Date	Timekeeper	Task	Description	Hours
			Texas assistant attorney general (0.2); update confirmation checklist (0.1); review memo in support of confirmation (0.3); draft notice of filing plan supplement (0.8)	
08/11/25	R Neilson	B240	Review correspondence and attachments to email from S. Medley	0.2
08/11/25	R Neilson	B240	Correspond with team regarding tax issues	0.3
08/11/25	W Pressgrove	B240	Document review regarding tax liabilities	0.8
08/11/25	A Song	B320	Update tracker in relation to Plan and Disclosure Statement (0.4); research confirmation orders in relation to claimant's rights (2.3); summarize same for internal review (0.6)	3.3
08/11/25	A Song	B160	Attention to fee applications	0.9
08/11/25	A Song	B110	Update workstreams tracker (0.3); revise Notice of Hearing and confer internally re: same (0.5); prepare same for filing (0.3)	1.1
08/11/25	A Song	B210	Attend call with Smith + Howard on tax returns and circulate notes thereafter	0.5
08/11/25	A Song	B310	Confer with the Company in relation to claim and response to objection (0.4); confer with various claimant's counsels and prepare responses to inquiries (0.5); review claims and analyze same (1.1); draft omnibus objection (0.8)	2.8
08/12/25	C Adams	B185	Finalize draft of assumption motion, prepare redlines and send to B. Bean for review	3.5
08/12/25	C Adams	B240	Review correspondence related to IRS declaration (0.1); review IRS declaration (0.1)	0.2
08/12/25	B Bean	B110	Call with claimant regarding case	0.3
08/12/25	B Bean	B320	Confer with Committee regarding Liquidating Trust Agreement (0.2); confer with A. Song and J. Dutson regarding research related to Plan (0.5); finalize draft Confirmation Order and confer with Committee and client regarding the same (0.9); review and revise proposed language for confirmation order and confer with J. Dutson regarding the same (1.2)	2.8
08/12/25	B Bean	B310	Confer with claimant and client regarding claim objection (0.2); confer with claimant regarding claim objection (0.2)	0.4
08/12/25	B Bean	B140	Revise proposed order and confer with stay relief movant regarding the same	0.3
08/12/25	T Kim	B320	Continue drafting notice of filing plan supplement (1.5); review updates and revise confirmation order (0.6); update confirmation checklist (0.1); review	2.4

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 9

Date	Timekeeper	Task	Description	Hours
			precedent case regarding declaration (0.2)	
08/12/25	R Neilson	B240	Coordinate with team regarding sharing tax payment documents	0.3
08/12/25	A Song	B310	Review claimant's responses to claims objection (0.3); update claims objection tracker (0.4); draft analyze claims (0.8) omnibus claims objection (1.0)	2.5
08/12/25	A Song	B320	Research termination language in plans (1.6); draft summary on same (0.4)	2.0
08/13/25	C Adams	B240	Review revised IRS tax declaration and correspondence with Smith & Howard related to same (0.2)	0.2
08/13/25	C Adams	B185	Review and revise Assignment Motion in accordance with B. Bean's comments (0.4); confer with J. Dutson regarding same (0.1)	0.5
08/13/25	B Bean	B310	Confer with claimants regarding claim objections	0.4
08/13/25	B Bean	B130	Prepare for and attend call with client regarding liquor license sale (0.5); confer with J. Dutson regarding sale agreement (0.2); revise liquor license PSA multiple times in accordance with client's comments and confer with client regarding the same (1.8)	2.5
08/13/25	B Bean	B320	Review and comment on notice of filing (0.3); confer with client and counterparty regarding proposed language for confirmation order (0.6); review committee's comments to liquidating trust agreement and confer with client and J. Dutson regarding the same (0.6)	1.5
08/13/25	B Bean	B140	Review comments to stay relief order and confer with client and claimant regarding the same	0.8
08/13/25	B Bean	B210	Confer with health benefits provider regarding open invoices and confer with client regarding the same	0.3
08/13/25	J Dutson	B130	Review and comment on liquor license purchase agreement	0.4
08/13/25	J Dutson	B310	Review and comment on claims objection	0.3
08/13/25	K Hilton	B240	Review and revise OTB Acquisition of Baltimore County, LLC tax declaration and related documentation of the company (0.9); confer with W. Pressgrove regarding tax declarations (0.2); confer with B. Bean regarding tax declarations (0.2); draft analysis regarding IRS claim (1.0); correspond with accountants regarding tax declaration (0.3)	2.6
08/13/25	T Kim	B320	Update confirmation checklist (0.1); review revised language for Texas Comptroller of public accounts	0.9

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 10

Date	Timekeeper	Task	Description	Hours
			for confirmation order (0.3); revise notice of filing plan supplement (0.3); correspondence with J. Dutson regarding the same (0.1); review comments to liquidating trust agreement (0.1)	
08/13/25	R Neilson	B240	Prepare for and attend call with Stephanie regarding tax issues	0.3
08/13/25	R Neilson	B240	Assess claim and client data numbers and coordinate with team regarding the same	1.9
08/13/25	R Neilson	B240	Review tax claims, opposing counsel contact information, client payment data, and coordinate with opposing counsel regarding the same	2.1
08/13/25	A Song	B310	Correspondence with the Company and K&S team re: various claim (0.4); prepare responses to various claimant's counsel and review claims and related documents thereto in preparation for same (0.5); update claims tracker (0.3)	1.2
08/13/25	A Song	B110	Update workstreams tracker (0.4); correspondence with B. Bean re: same (0.2)	0.6
08/14/25	C Adams	B240	Review correspondence and related documentation from Smith & Howard regarding tax declaration	0.3
08/14/25	C Adams	B185	Review Assumption and Assignment Motion with J. Dutson (0.1); confer with B. Bean regarding same (0.1); confer with A&M and OTB teams regarding same (0.1)	0.3
08/14/25	B Bean	B110	Prepare for and attend bi-weekly call (0.7); prepare for and attend call with insurer and 1970 Group regarding insurance issues (0.4); confer with A. Song regarding stipulation and agreed order (0.2)	1.3
08/14/25	B Bean	B140	Prepare for and attend call with claimant regarding PACA claim (0.5); review and revise agreed order for claim objection and confer with J. Dutson regarding the same (0.7); attention to resolving stay relief motions, including conversations with the committee (0.7); confer with client regarding PACA claim (0.2)	2.1
08/14/25	B Bean	B320	Review committee's comments to confirmation order	0.3
08/14/25	J Dutson	B320	Review of Confirmation Order (0.6); communications with client regarding trust agreement (0.4)	1.0
08/14/25	K Hilton	B240	Review and revise OTB Acquisition of Baltimore County, LLC tax declaration and related documentation of the company	0.5
08/14/25	T Kim	B320	Review comments on liquidating trust agreement	0.4

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 11

Date	Timekeeper	Task	Description	Hours
			(0.2); review PACA claim and correspondence with UCC counsel regarding the same (0.2)	
08/14/25	T Kim	B130	Draft purchase and escrow agreement for Allen Park liquor license	1.1
08/14/25	R Neilson	B240	Confer with team regarding status of tax issues	0.4
08/14/25	R Neilson	B240	Confer with taxing authority regarding payment history	1.3
08/14/25	W Pressgrove	B240	Conference call (0.2); document review regarding tax issues (0.8)	1.0
08/14/25	A Song	B320	Draft Agreed Order to extend exclusivity period and research thereto	0.6
08/14/25	A Song	B110	Update workstreams tracker and internal correspondence re: same (0.4); correspondence with UST and the Company re: July MOR (0.1); draft August 20 Agenda (1.0)	1.5
08/14/25	A Song	B310	Update claims related tracker (0.3); attention to various claims and correspondence thereto (0.8); draft agreed order in relation to claims objection (1.0); analyze claims and draft omnibus objection (1.0)	3.1
08/15/25	C Adams	B185	Confer with B. Bean regarding assignment motion (0.1); correspond with A&M and OTB teams regarding same (0.1); review correspondence from United regarding motion (0.1)	0.3
08/15/25	B Bean	B130	Review and comment on purchase agreement and confer with T. Kim regarding the same	0.4
08/15/25	B Bean	B320	Revise Confirmation Order and Liquidating Trust Agreement and prepare the same for filing (3.5); confer with client and committee regarding the same (0.5); review notices of filing and provide comments thereto (0.5)	4.5
08/15/25	B Bean	B110	Prepare for and attend call with insurer regarding related issues (0.4); review proposed stipulation and provide comments thereto (0.7); confer with J. Dutson and the Committee and client regarding the same (0.3)	1.4
08/15/25	J Dutson	B320	Attend to finalizing liquidating trust agreement	0.4
08/15/25	K Hilton	B240	Review and revise OTB Acquisition of Baltimore County, LLC tax declaration and related company documentation (0.9); review and draft analysis of PLR 19911033, PLR 200201024, Rev. Rul. 2004-77 and other related guidance (2.0)	2.9
08/15/25	T Kim	B130	Continue drafting purchase and escrow order (1.2); correspondence with B. Bean regarding the same	2.3

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 12

Date	Timekeeper	Task	Description	Hours
			(0.1); revise purchase and escrow order based on comments from B. Bean (0.8); correspondence with B. Bean regarding revisions (0.1); correspondence with J. Dutson regarding the same (0.1)	
08/15/25	T Kim	B320	Review comments on confirmation order from UCC (0.2); review filing version of confirmation order and revisions to notice (0.2)	0.4
08/15/25	A Song	B320	Draft and revise Agreed Order (1.5); research related issues re: same (0.6); draft and revise various notices of filings for plan related documents (1.2); confer with B. Bean re: same (0.2); prepare same for filing (0.5)	4.0
08/15/25	A Song	B310	Correspondence with various claimants' counsel (0.3); analyze numerous claims (2.2); draft omnibus claims objection (0.2)	2.7
08/16/25	B Bean	B320	Confer with U.S. Trustee regarding stipulation (0.1); review voting analysis and confer with J. Dutson regarding plan related issues (1.0)	1.1
08/17/25	C Adams	B320	Research court treatment of impaired classes of claims that do not vote under 1129(a)(10) and deemed acceptance issues and draft summary of findings for B. Bean and J. Dutson	2.9
08/17/25	B Bean	B320	Review C. Adam's research and confer with C. Adams and J. Dutson regarding the same	0.6
08/17/25	T Kim	B320	Begin drafting declaration in support of plan confirmation	0.5
08/18/25	C Adams	B320	Review 1129(a)(10) correspondence and analysis from B. Bean	0.2
08/18/25	C Adams	B185	Review correspondence related to outstanding mechanic's lien issue (0.1); review correspondence with UHC counsel regarding assignment and assumption motion (0.2); review and revise assumption motion in accordance with UHC comments (0.3); confer with B. Bean regarding same (0.1)	0.7
08/18/25	C Adams	B240	Review correspondence with Smith & Howard regarding outstanding tax issue (0.2); review revised draft of tax declaration (0.2)	0.4
08/18/25	B Bean	B320	Call with T. Kim regarding plan affidavit	0.3
08/18/25	B Bean	B130	Revise APA for MI liquor license and confer with S. Medley regarding the same	0.2
08/18/25	B Bean	B310	Confer with A. Song regarding claim objection	0.1
08/18/25	B Bean	B110	Prepare for and attend bi-weekly call (0.9); confer with J. Dutson regarding various insurance concerns	1.3

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 13

Date	Timekeeper	Task	Description	Hours
			(0.4)	
08/18/25	B Bean	B240	Prepare for and attend calls with committee regarding tax claims (0.6); prepare tax summary for committee (0.3); review and revise tax declaration and confer with client and DOJ in connection therewith (0.4); confer with claimants regarding tax objections (0.3)	1.6
08/18/25	B Bean	B140	Confer with claimants regarding stay relief motions and revise orders in connection thereto (3.0); confer with committee regarding the same (0.4)	3.4
08/18/25	B Bean	B185	Review comments to motion to assume and confer with C. Adams regarding the same	0.3
08/18/25	K Hilton	B240	Review and revise OTB Acquisition of Baltimore County, LLC tax declaration and related company documentation (0.3); review and draft analysis of PLR 19911033, PLR 200201024, Rev. Rul. 2004-77 and other related guidance (0.3)	0.6
08/18/25	T Kim	B320	Continue drafting declaration in support of plan confirmation (3.4); call with B. Bean regarding the same (0.4); revise confirmation checklist (0.1)	3.9
08/18/25	T Kim	B130	Correspondence with J. Dutson and B. Bean regarding purchase and escrow agreement (0.1); review comments and revise purchase and escrow agreement (0.3)	0.4
08/18/25	R Neilson	B240	Email to T. White requesting update on resolution of tax issue with Maryland Comptroller	0.1
08/18/25	W Pressgrove	B240	Review revised declarations	0.9
08/18/25	A Song	B140	Draft agreed order	0.2
08/18/25	A Song	B320	Review and revise Stipulation and Agreed Order and prepare same for filing	0.5
08/18/25	A Song	B310	Analyze claims and draft summary for internal review in relation to same (0.8); draft, review, and revise various omnibus objection and research in relation to same (3.9); internal correspondence re: same (0.2)	4.9
08/18/25	A Song	B510	Prepare for August 20 Hearing	0.2
08/18/25	A Song	B110	Update and revise workstreams tracker; attention to related tasks thereto (0.4); revise Agenda (0.2)	0.6
08/19/25	C Adams	B185	Review correspondence from UHC regarding claim amount related to the assumption motion	0.1
08/19/25	B Bean	B130	Review and revise purchase agreement and confer with client regarding the same	0.5
08/19/25	B Bean	B310	Confer with claimants regarding claim objections	2.0

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 14

Date	Timekeeper	Task	Description	Hours
			(0.6); review fifth omnibus claim objection and provide comments thereto (1.4)	
08/19/25	B Bean	B110	Calls with client regarding various workstreams (0.2); confer with Committee regarding upcoming hearing (0.2); confer with client regarding tax claims (0.4)	0.8
08/19/25	B Bean	B510	Review and revise agenda (0.6); prepare script and prepare for hearing (1.8)	2.4
08/19/25	B Bean	B320	Confer with claimant regarding proposed language for confirmation order	0.5
08/19/25	B Bean	B140	Attention to resolving several stay relief motions and confer with various constituencies regarding the same	1.5
08/19/25	J Dutson	B130	Review liquor license revisions	0.7
08/19/25	T Kim	B320	Continue drafting declaration in support of plan confirmation (3.3); review precedent declarations (1.0)	4.3
08/19/25	R Neilson	B560	Review status of McFarlin case and filings	0.4
08/19/25	R Neilson	B560	Coordinate with team regarding status of McFarlin litigation	0.2
08/19/25	S Primrose	B560	Attention to outstanding litigation and emails re: the same	0.3
08/19/25	A Song	B110	Update workstreams tracker (0.2); revise Agenda and prepare same for filing (0.2)	0.4
08/19/25	A Song	B210	Prepare closing related documents and correspondence with Smith + Howard	0.5
08/19/25	A Song	B510	Prepare for August 20 Hearing	0.8
08/19/25	A Song	B310	Draft and revise omnibus claims objection (1.7); correspondence internally and with Company re: same (0.2)	1.9
08/19/25	A Song	B140	Research various issues in relation to stay relief (1.5); summarize research for internal review (0.5); draft and revise various agreed orders for stay relief motions (1.5); confer internally re: same (0.3)	3.8
08/20/25	C Adams	B185	Confer with B. Bean regarding assumption and assignment motion (0.2); review correspondence with United regarding same (0.1)	0.3
08/20/25	B Bean	B140	Confer with J. Dutson and client regarding stay relief motions (0.5); confer with stay relief movant regarding agreed order (0.2)	0.7
08/20/25	B Bean	B310	Confer with claimant regarding claim objections (0.1); confer with DOJ regarding claim objection (0.1)	0.2

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 15

Date	Timekeeper	Task	Description	Hours
08/20/25	B Bean	B320	Confer with taxing authorities regarding comments to confirmation order	0.3
08/20/25	B Bean	B510	Prepare for, travel to and attend omnibus hearing, including preparing stay relief argument (4.5); review and finalize agreed order for upload (0.2)	4.7
08/20/25	B Bean	B210	Confer with S. Choy regarding 401(k) plan	0.1
08/20/25	B Bean	B130	Prepare and attend call with regarding liquor license asset purchase agreement (0.5); revise purchase agreement in accordance with client's comments (0.5)	1.0
08/20/25	B Bean	B190	Confer with client, committee and insurance provider regarding bond issue	0.3
08/20/25	S Choy	B220	Review 401k termination matters	0.2
08/20/25	J Dutson	B510	Prepare for and attend omnibus hearing	1.5
08/20/25	J Dutson	B140	Multiple calls with movant regarding stay relief	0.5
08/20/25	T Kim	B320	Continue drafting and revising declaration in support of confirmation (3.3); review precedent declaration, relevant statutes and documents for the same (1.0)	4.3
08/20/25	R Neilson	B310	Review docket, bankruptcy rules, and local rules for omnibus objection procedures to address tax claims	0.6
08/20/25	R Neilson	B240	Strategize with team regarding tax issues and inclusion of objections in omnibus objection	0.3
08/20/25	R Neilson	B240	Attempt to confer with opposing counsel regarding tax issues	0.1
08/20/25	A Song	B110	Review docket and update timeline and tracker accordingly	0.4
08/20/25	A Song	B320	Review claims agent's declarations in support of plan (0.5); confer with Verita and K&S team re: same (0.2); conduct research on issues related to confirmation hearing and tax claims in confirmation order (2.3); summarize findings for internal review (0.4)	3.4
08/20/25	A Song	B510	Prepare for August 20 Hearing	0.3
08/20/25	A Song	B140	Revise and prepare numerous agreed orders for filing	0.3
08/20/25	A Song	B310	Correspondence with claimants and confer internally re: same (0.4); update tracker in relation to claims (0.4)	0.8
08/21/25	B Bean	B320	Prepare for and attend call with Texas Comptroller regarding confirmation (0.4); revise confirmation order language for Texas and confer with J. Dutson, client and committee regarding the same (0.3)	0.7

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 16

Date	Timekeeper	Task	Description	Hours
08/21/25	B Bean	B110	Prepare for and attend bi-weekly call with client (0.5); confer with various parties regarding hearing date (0.1); prepare summary of insurance matters for J. Dutson (0.3)	0.9
08/21/25	B Bean	B320	Prepare for and attend call with client regarding transition (0.5); confer with committee and US Trustee regarding confirmation hearing (0.2); review and comment on voting declaration and confer with J. Dutson regarding the same (0.6)	1.3
08/21/25	B Bean	B310	Prepare for and attend call with claimant regarding claim objection (0.4); call with H. Neilson regarding claim objection (0.3); revise and finalize claim objection and prepare for filing (0.6)	1.3
08/21/25	S Choy	B220	Emails with 401k administration regarding termination status (0.1); review termination information (0.2)	0.3
08/21/25	J Dutson	B320	Call regarding confirmation order with Texas comptroller	0.4
08/21/25	R Neilson	B310	Review and respond to correspondence with B. Bean regarding omnibus objection	0.2
08/21/25	R Neilson	B310	Review and revise omnibus objection to claims to reflect tax claims	0.4
08/21/25	A Song	B110	Update workstreams tracker and action on related tasks thereto	0.5
08/21/25	A Song	B310	Update claims tracker (0.3); internal correspondence re: same (0.2); prepare for and attend call with Claimant (0.2); confer with the Company re: claims objections and prepare the same for filing (0.3); draft Agreed Order and Stipulation (1.3)	2.3
08/21/25	A Song	B140	Correspondence with the Company in relation to entry of Agreed Order	0.3
08/21/25	A Song	B510	Research timeline for evidentiary hearings and strategize re: same with B. Bean	0.7
08/22/25	C Adams	B185	Review correspondence with United Healthcare regarding motion (0.1); revise motion and prepare notice of hearing and circulate same to B. Bean (0.7)	0.8
08/22/25	B Bean	B320	Continue review of plan briefing and revise the same	1.8
08/22/25	B Bean	B185	Confer with insurer regarding assumption motion (0.4); confer with client regarding the same (0.2); revise and finalize assumption motion and prepare for filing (1.0)	1.6

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 17

Date	Timekeeper	Task	Description	Hours
08/22/25	B Bean	B320	Confer with Verita regarding service and voting matters (0.2); confer with court regarding hearing date (0.1); review hearing notices and provide comments thereto (0.2)	0.5
08/22/25	B Bean	B310	Confer with client and committee regarding claim objections	0.3
08/22/25	S Choy	B220	Review 401k termination matters	0.2
08/22/25	J Dutson	B310	Review objections and comment on same	0.4
08/22/25	T Kim	B320	Review and revise Tibus declaration in support of plan confirmation (1.2); correspondence with B. Bean regarding the same (0.1); review precedent declaration regarding the same (0.5); revise confirmation order (0.3); update confirmation checklist (0.2)	2.3
08/22/25	A Song	B110	Update workstreams tracker (0.2); action on related tasks thereto (0.2); revise and prepare for filing the assumption and assignment motion and confer with K&S team re: same (0.7); prepare notice of omnibus hearing and prepare same for filing (0.7)	1.8
08/22/25	A Song	B310	Update claims objection tracker (0.2); review claims objections and confer internally re: same (0.3); revise various stipulations and agreed orders (1.2); revise notice of hearing for claims objection (0.2)	1.9
08/23/25	B Bean	B320	Confer with Verita regarding voting matters (0.2); confer with committee regarding voting declaration (0.1)	0.3
08/24/25	B Bean	B320	Review and revise confirmation briefing	3.5
08/24/25	B Bean	B310	Start review of sixth omnibus claim objection	1.2
08/24/25	T Kim	B110	Review updated docket in connection with objections and upcoming hearing dates	0.3
08/25/25	C Adams	B185	Review correspondence related to outstanding utilities balance (0.1); review APA schedules and notice of assumed contracts to determine if locations are assumed and correspond with B. Bean regarding same (0.3)	0.4
08/25/25	B Bean	B110	Prepare for and attend bi-weekly professionals call (0.7); confer with court regarding remote declarant (0.2); confer with C. Adams and utility provider regarding invoices (0.2); confer with S. Choy regarding benefits question (0.1)	1.2
08/25/25	B Bean	B320	Finalize draft confirmation briefing (2.4); confer with client and J. Dutson regarding insurance related matters (0.2); review and revise draft Declaration in Support of Plan (2.0); revise voting	4.9

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 18

Date	Timekeeper	Task	Description	Hours
			declaration and confer with Claims Agent regarding the same (0.3)	
08/25/25	B Bean	B190	Confer with creditor regarding claim objection (0.2); confer with committee regarding stay relief orders (0.2)	0.4
08/25/25	B Bean	B550	Confer with Pappas regarding liquor license issue (0.1); confer with creditor regarding claim objection (0.2); confer with stay relief claimants regarding agreed orders (0.2)	0.5
08/25/25	S Choy	B220	Review long-term disability insurance requirements (0.4); review plan information (0.3)	0.7
08/25/25	T Kim	B320	Revise confirmation order (0.3); draft notice of debtors' witness and exhibit list for confirmation hearing (1.2); correspondence with B. Bean regarding the same (0.1); review revisions to memo in support of confirmation (0.2); update confirmation checklist (0.1)	1.9
08/25/25	R Neilson	B560	Attention to call with S. Primrose regarding McFarlin litigation in state court against OTB (.4)	0.4
08/26/25	C Adams	B320	Review filing version of Voting Declaration (0.1); file the same (0.2)	0.3
08/26/25	B Bean	B550	Review settlement agreement for liquor license surrender and confer with J. Dutson regarding the same (0.4)	0.4
08/26/25	B Bean	B320	Prepare for and attend meeting with committee and proposed Liquidating Trustee regarding plan transition (1.0); finalize voting declaration and prepare for filing (0.4); review exhibit and witness list and confer with T. Kim regarding the same (0.1); review informal comment to Confirmation Order and confer with J. Dutson regarding the same (0.2)	1.7
08/26/25	B Bean	B190	Prepare for and attend call with creditor regarding claim objection (0.4); revise and finalize draft of claim objection and confer with J. Dutson regarding the same (1.5)	1.9
08/26/25	B Bean	B110	Call with S. Choy regarding benefits question (0.2); confer with client regarding various workstreams (0.5)	0.7
08/26/25	S Choy	B220	Telephone conference with B. Bean regarding long-term disability claim requirements (0.3); review plan information (0.3)	0.6
08/26/25	J Dutson	B110	Meeting with committee regarding transition issues and prepare for same (0.7); communications with tax advisor regarding tax analysis (0.3)	1.0

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 19

Date	Timekeeper	Task	Description	Hours
08/26/25	T Kim	B130	Draft purchase and escrow agreement for liquor license for Auburn Hills (1.6); correspondence with B. Bean regarding the same (0.1)	1.7
08/26/25	T Kim	B320	Revise confirmation order (0.3); review revisions to voting declaration (0.1); update confirmation checklist (0.1); review proposed filing version of voting declaration (0.2); review and revise Notice of Debtors' Witness and Exhibit List (0.2); revise Tibus declaration in support of plan confirmation (0.1)	1.0
08/26/25	T Kim	B160	Correspondence with B. Bean regarding July invoice	0.1
08/27/25	C Adams	B310	Review Proof of Claim No. 631 and withdrawal (0.2); draft withdrawal of objection to Proof of Claim No. 631 and correspond with B. Bean regarding same (0.3); revise in accordance with B. Bean's comments and correspond with Company and A&M regarding same (0.2); prepare filing version and file the same (0.2)	0.9
08/27/25	B Bean	B110	Prepare for and attend call with client regarding various workstreams (0.7)	0.7
08/27/25	B Bean	B190	Confer with clint regarding claim objection (0.2); confer with stay relief claimant regarding agreed order (0.1); review withdrawal of claim objection and provide comment thereto (0.2); follow up with creditor regarding claim objection (0.1); confer with Committee regarding Agreed Order regarding certain claim objections (0.2)	0.8
08/27/25	B Bean	B550	Confer with Texas ABC regarding settlement agreements (0.4); confer with client regarding the same (0.1); confer with Pappas regarding the same (0.1); review and revise PSA for liquor license and confer with client regarding the same (0.4)	1.0
08/27/25	B Bean	B320	Confer with creditor and committee regarding informal comment to confirmation order (0.5); revise Confirmation Order in accordance with various comments and confer with J. Dutson regarding the same (0.8); revise confirmation briefing in accordance with J. Dutson's comments and confer with client regarding the same (0.7)	2.0
08/27/25	S Choy	B220	Review disability insurance matters	0.8
08/27/25	J Dutson	B110	Call with client regarding final tax return (0.5)	0.5
08/27/25	T Kim	B510	Review deadlines regarding hearing exhibits	0.1
08/27/25	T Kim	B320	Review objection to plan (0.1); correspondence with B. Bean regarding confirmation hearing script (0.1)	0.2

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/09/25

Invoice No. 10830498
 Page 20

Date	Timekeeper	Task	Description	Hours
08/27/25	R Neilson	B240	Coordinate with Maryland Comptroller's office regarding resolving tax claims (.4)	0.4
08/27/25	R Neilson	B240	Coordinate with team regarding updates on Maryland Comptroller tax claims (.4)	0.4
08/28/25	B Bean	B110	Prepare for and attend bi-weekly professionals call (0.7); confer with tax team regarding purchase price allocation (0.1); confer with Court regarding voting declarant (0.2)	1.0
08/28/25	B Bean	B320	Confer with Committee regarding confirmation briefing (0.2); confer with client regarding liquor license issue (0.3); confer with J. Dutson regarding Liquidating Trust Agreement (0.3)	0.8
08/28/25	B Bean	B190	Confer with creditor regarding claim objection (0.3); confer with creditor regarding plan objection (0.2)	0.5
08/28/25	B Bean	B550	Confer with client, Texas ABC and J. Dutson regarding settlement agreements (0.3)	0.3
08/28/25	S Choy	B220	Review disability insurance matters	0.2
08/28/25	J Dutson	B110	Communications with tax advisors regarding returns (0.4); review purchase price allocation (0.3)	0.7
08/28/25	K Hilton	B240	Review asset purchase agreement, review purchase price allocation, and review IRS Form 8594 (0.5)	0.5
08/28/25	T Kim	B320	Draft script for confirmation of plan and final approval of disclosure statement (2.4); review relevant pleadings regarding the same (0.5); revise confirmation order (0.4)	3.3
08/28/25	T Kim	B320	Review comments and revisions to confirmation order and informal objection from Tennessee Department of Revenue	0.1
08/29/25	C Adams	B240	Review and compile tax claims in preparation of hearing (0.1)	0.1
08/29/25	C Adams	B530	Review and compiled Global Notes and July MORs (0.3); file the same (0.3)	0.6
08/29/25	B Bean	B190	Call with client regarding Texas audit process (0.3); prepare response to Texas audit request (0.4); prepare for and attend call with Department of Justice regarding IRS claim objection (0.4)	1.1
08/29/25	B Bean	B110	Prepare and attend call with tax team regarding purchase price allocation (0.3); review and revise global notes and review monthly operating reports for filing (1.3); confer with C. Adams, J. Dutson and client regarding the same (0.3)	1.9
08/29/25	K Hilton	B240	Call with J. Dutson, W. Pressgrove, and B. Bean	0.2

38110 OTB Holding LLC
230001 OTB Restructuring
09/09/25

Invoice No. 10830498
Page 21

Date	Timekeeper	Task	Description	Hours
			regarding purchase price allocation among assets for tax purposes (0.2)	
08/29/25	T Kim	B320	Continue drafting script for confirmation of plan and final approval of disclosure statement (1.5); review precedent scripts and disclosure statement and confirmation order regarding the same (0.4)	1.9
08/29/25	W Pressgrove	B240	Document review (0.3); conference call (0.5)	0.8
08/31/25	T Kim	B320	Revise confirmation order, declaration in support of confirmation and confirmation approval script (0.4)	0.4
				<hr/> 330.8

TIMEKEEPER SUMMARY

Timekeeper	Status	Hours
Sam Choy	Partner	3.4
Jeff Dutson	Partner	13.7
Wayne Pressgrove	Partner	5.3
Sarah Primrose	Partner	0.3
Christian Adams	Associate	15.4
Brooke Bean	Associate	111.1
Kevin Hilton	Associate	10.0
Taeyeong Kim	Associate	64.5
R. Neilson	Associate	10.3
Alice Kyung Won Song	Associate	96.8
Total		<hr/> 330.8

Expenses Incurred

08/20/25	Cabfare - VENDOR: Jeffrey R. Dutson INVOICE#: 7631792608271241 DATE: 8/27/2025 Uber to Courthouse on 8/20	44.66
08/21/25	Cabfare - VENDOR: Jeffrey R. Dutson INVOICE#: 7631792608271241 DATE: 8/27/2025 Uber from Courthouse to K^S on 8/20	37.77
Total Expenses		<hr/> 82.43

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No. 10830498
Invoice Date 09/09/25
Client No. 38110
Matter No. 230001

RE: OTB Restructuring

For questions, contact:
Jeff Dutson +1 404 572 2803

REMITTANCE

Please return this page with your remittance.

Amount Due This Invoice

\$347,549.43

Payment is Due Upon Receipt

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No. 10830497
Invoice Date 09/09/25
Client No. 38110
Matter No. 230002

RE: Transition Services

For questions, contact:
Jeff Dutson +1 404 572 2803

For Professional Services Rendered through 09/08/25:

Fees	\$	1,445.00
Total this Invoice	\$	1,445.00

Payment is Due Upon Receipt

38110 OTB Holding LLC
230002 Transition Services
09/09/25

Invoice No. 10830497
Page 2

PROFESSIONAL SERVICES

Date	Timekeeper	Task	Description	Hours
08/08/25	C Adams	B185	Review correspondence from cure objector regarding lien issue and confer with B. Bean regarding same (0.2); review correspondence from Porter Hedges team regarding same (0.1)	0.3
08/08/25	C Adams	B185	Analyze contracts, policies and agreements included in assignment & assumption motion	0.7
08/08/25	M Fishel	B185	Review notice of default relating to lease	0.1
08/08/25	J Fontham	B210	Correspondence regarding insurance and document retention requirements	0.3
				<hr/> 1.4

TIMEKEEPER SUMMARY

Timekeeper	Status	Hours
Michael Fishel	Partner	0.1
Jack Fontham	Partner	0.3
Christian Adams	Associate	1.0
Total		<hr/> 1.4

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No.	10830497
Invoice Date	09/09/25
Client No.	38110
Matter No.	230002

RE: Transition Services

For questions, contact:
Jeff Dutson +1 404 572 2803

REMITTANCE

Please return this page with your remittance.

Amount Due This Invoice

\$1,445.00

Payment is Due Upon Receipt

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No. 10833517
Invoice Date 09/24/25
Client No. 38110
Matter No. 230001

RE: OTB Restructuring

For questions, contact:
Jeff Dutson +1 404 572 2803

For Professional Services Rendered through 09/16/25:

Fees	\$	132,276.00
Expenses		163.03
Total this Invoice	\$	132,439.03

Payment is Due Upon Receipt

38110 OTB Holding LLC
 230001 OTB Restructuring
 09/24/25

Invoice No. 10833517
 Page 2

PROFESSIONAL SERVICES

Date	Timekeeper	Task	Description	Hours
09/01/25	B Bean	B320	Revise Plan Confirmation Order in accordance with Committee's comments and confer with J. Dutson regarding the same (0.3); begin review of confirmation hearing script (0.3)	0.6
09/01/25	B Bean	B130	Confer with client regarding liquor license reporting	0.1
09/01/25	T Kim	B320	Review and revise script for confirmation of plan and final approval of disclosure statement (0.9); correspondence with B. Bean regarding the same (0.1)	1.0
09/02/25	C Adams	B240	Prepare tax-related exhibits and correspond with J. Dutson and B. Bean regarding same (0.3); review correspondence related to same (0.1)	0.4
09/02/25	C Adams	B185	Review correspondence related to utilities invoices and closure	0.1
09/02/25	B Bean	B320	Revise confirmation order in accordance with Committee's comments and confer with client regarding the same (0.4); review revised confirmation briefing and affidavit and provide comments thereto (0.7); confer with client and J. Dutson regarding the same (0.2)	1.3
09/02/25	B Bean	B240	Review exhibits for contested tax hearing and confer with K&S team, client, committee and counterparty regarding the same (0.9); prepare for and attend call with Committee regarding various tax claims (0.5); confer with client regarding declaration resolving tax claims (0.1)	1.5
09/02/25	B Bean	B110	Prepare for and attend bi-weekly professional call (0.7); confer with client regarding state registrations (0.1)	0.8
09/02/25	B Bean	B310	Confer with claimants in connection with agreed orders (0.1); confer with various claimants regarding respective claims objections (0.8)	0.9
09/02/25	B Bean	B130	Confer with Buyer regarding liquor license	0.2
09/02/25	J Dutson	B110	Attention to wind down issues	0.8
09/02/25	T Kim	B560	Review exhibit exchange requirements for evidentiary hearing (0.2); review court calendar and objection to claims (0.1)	0.3
09/02/25	T Kim	B320	Review committee comments on memo and declaration in support of confirmation (0.2); review relevant filing deadlines (0.2)	0.4
09/02/25	R Neilson	B240	Coordinate with B. Bean regarding sales tax dispute	0.1

38110 OTB Holding LLC
230001 OTB Restructuring
09/24/25

Invoice No. 10833517
Page 3

Date	Timekeeper	Task	Description	Hours
09/02/25	R Neilson	B240	Coordinate with Maryland Comptroller's office and team regarding sales tax payment issue	0.4
09/02/25	A Song	B310	Revise proposed order for Third Omnibus Claims Objection	0.3
09/02/25	A Song	B320	Revise Confirmation Memorandum and Declaration in Support of Plan	0.8
09/02/25	A Song	B310	Review Lease Rejection Orders, APA schedules, and Assumption and Rejection Notice in response to claimant's inquiries (0.3); correspondence with B. Bean re: same (0.2)	0.5
09/03/25	B Bean	B320	Review of confirmation hearing script and provide comments thereto	2.2
09/03/25	B Bean	B310	Confer with IRS regarding claim objection (0.2); confer with multiple claimants regarding claim objections (0.5); review revised claim objection order and confer with client regarding the same (0.4)	1.1
09/03/25	B Bean	B320	Revise confirmation briefing and confirmation order and prepare the same for filing (2.5); confer with various parties in interest regarding the same (0.7); review and revise Exhibit and Witness List (0.2)	3.4
09/03/25	J Dutson	B320	Review confirmation briefing and related documents	1.4
09/03/25	T Kim	B160	Draft script for interim fee application (1.6); review complex case procedures regarding fee application requirements (0.2); review K&S interim fee application (0.3); correspondence with B. Bean regarding the same (0.1)	2.2
09/03/25	T Kim	B320	Revise script for plan confirmation (1.2); review revisions to declaration in support and memo in support of plan confirmation (0.2); review filed versions in preparation for confirmation (0.1)	1.5
09/03/25	R Neilson	B240	Email to T. White regarding question on tax documents	0.2
09/03/25	A Song	B320	Prepare for Combined Hearing (0.7); draft and revised Combined Hearing Agenda (0.8); draft Notice of Filing of Modified Confirmation Order (0.6); prepare various documents for filing (0.7); confer with B. Bean re: preparation for Combined Hearing (0.3)	3.1
09/03/25	A Song	B240	Attention to execution of tax declaration	0.2
09/03/25	A Song	B130	Calls with New Jersey Township and New Jersey ABC regarding renewal of liquor licenses (0.7); summarize liquor license renewal process for	1.1

38110 OTB Holding LLC
230001 OTB Restructuring
09/24/25

Invoice No. 10833517
Page 4

Date	Timekeeper	Task	Description	Hours
			internal review (0.4)	
09/04/25	C Adams	B320	Prepare Witness and Exhibit List for Combined Hearing (0.5); correspond with B. Bean regarding same (0.1)	0.6
09/04/25	B Bean	B320	Revise Confirmation Order and confer with interested parties regarding the same (1.1); calls with objecting party regarding plan objection and confer with K&S team and client regarding the same (0.6)	1.7
09/04/25	B Bean	B185	Confer with J. Dutson and healthcare provider regarding assignment of contracts	0.2
09/04/25	B Bean	B320	Revise script for confirmation hearing, prepare for hearing and confer with T. Kim and J. Dutson regarding the same	2.1
09/04/25	B Bean	B110	Prepare for and attend bi-weekly professional call	0.7
09/04/25	B Bean	B310	Confer with IRS, client and committee regarding claim objection (0.3); negotiated revised claim objection order and confer with interested parties regarding the same (0.5); review response to claim objection and confer with J. Dutson regarding the same (0.2); revise agreed orders and confer with counterparties regarding the same (0.4)	1.4
09/04/25	J Dutson	B320	Prepare for confirmation hearing	3.4
09/04/25	T Kim	B320	Review comments to script for confirmation and K&S interim fee application (0.3); revise scripts regarding the same (1.1); correspondence with B. Bean regarding the same (0.1); review revisions to script for J. Dutson (0.2)	1.7
09/04/25	R Neilson	B240	Coordinate with team regarding tax payment transfers	0.2
09/04/25	A Song	B160	Attention to August fee applications	1.5
09/04/25	A Song	B320	Review and revise Combined Hearing Agenda and prepare same for filing (0.5); prepare for Combined Hearing (0.7); confer with K&S team re: Combined Hearing (0.2)	1.4
09/04/25	A Song	B310	Research stub rent issue in Georgia (0.3); analyze response to claims objection (0.6); review related documents re: same (0.2); draft summary and analysis re: same for internal review (0.4); draft Notice of Filing of Modified Proposed Orders (0.5)	2.0
09/04/25	A Song	B110	Draft Hearing Agenda	0.7
09/05/25	B Bean	B310	Prepare script for and prepare for hearing on claim objections, including revising proposed orders and conferring with interested parties	2.4

38110 OTB Holding LLC
230001 OTB Restructuring
09/24/25

Invoice No. 10833517
Page 5

Date	Timekeeper	Task	Description	Hours
09/05/25	B Bean	B320	Prepare for, travel to and attend confirmation hearing	3.4
09/05/25	J Dutson	B320	Prepare for and attend confirmation hearing (3.3); attention to transition issues (0.4)	3.7
09/05/25	A Song	B310	Revise notice of filing of modified proposed orders (0.2); research voluntary notice procedures in NDGA (0.2); internal correspondence re: foregoing (0.1)	0.5
09/05/25	A Song	B110	Revise numerous orders and prepare same for filing (0.6); revise Agenda (0.1)	0.7
09/05/25	A Song	B320	Prepare for Combined Hearing (0.8); attend Combined Hearing (1.1)	1.9
09/06/25	B Bean	B110	Confer with Committee and claims agent regarding claims register and claims	0.3
09/07/25	B Bean	B310	Confer with Committee and certain claimants regarding claim objections	0.8
09/08/25	C Adams	B160	Review correspondence from B. Bean regarding A&M final fee application (0.1); confer with B. Bean regarding same (0.1)	0.2
09/08/25	B Bean	B240	Confer with H. Neilson and client regarding sales tax claim	0.2
09/08/25	B Bean	B160	Confer with C. Adams regarding fee application	0.3
09/08/25	B Bean	B130	Review and revise purchase agreements for liquor licenses	0.5
09/08/25	B Bean	B320	Prepare for and attend call with client and Committee's professionals regarding transition	0.7
09/08/25	B Bean	B310	Review and revise agreed orders, agenda and notice of filing ahead of September 9 hearing and prepare the same for filing (1.7); revise script for September 9 hearing and prepare for presentation (1.1)	2.8
09/08/25	B Bean	B110	Prepare for and attend bi-weekly call with client (0.7); confer with claims agent regarding service issues (0.2)	0.9
09/08/25	J Dutson	B320	Call regarding transition issues with committee counsel and prepare for same	1.0
09/08/25	R Neilson	B310	Coordinate with various parties regarding payment and transfer of tax amounts in connection with current and former Maryland locations	0.6
09/08/25	A Song	B160	Attention to August fee applications (0.4); confer with B. Bean re: same (0.1); draft Second Interim and Final Fee Application (0.9)	1.4
09/08/25	A Song	B310	Review and prepare Notice of Filing of Modified Proposed Orders and Agenda for filing (0.5);	1.3

38110 OTB Holding LLC
230001 OTB Restructuring
09/24/25

Invoice No. 10833517
Page 6

Date	Timekeeper	Task	Description	Hours
			prepare for omnibus hearing (0.8)	
09/08/25	A Song	B310	Prepare response to Committee's information requests (0.8); confer with B. Bean re: same (0.1)	0.9
09/09/25	B Bean	B510	Prepare for and attend hearing on claim objections (2.5); revise proposed orders and confer with A. Song and J. Dutson regarding the same (0.4)	2.9
09/09/25	B Bean	B110	Confer with client regarding various workstreams	0.3
09/09/25	T Kim	B160	Call with Brooke on post confirmation fee application (0.2); review second interim fee application (0.5)	0.7
09/09/25	A Song	B510	Prepare for September 9 Hearing	0.4
09/09/25	A Song	B110	Update workstreams tracker	0.2
09/09/25	A Song	B160	Attention to July fee applications	0.9
09/09/25	A Song	B320	Review insurance policies and various documents (1.4) comment on transition checklist re: same (0.4); prepare responses to information requests (0.6); confer internally re: same (0.1)	2.5
09/09/25	A Song	B310	Revise and prepare order to omnibus claims objection for filing (0.6); research and review orders (0.5)	1.1
09/10/25	C Adams	B160	Draft Alvarez & Marsal final fee application and circulate same to B. Bean (3.5); research caselaw regarding reasonable professional fees and insert same into final fee application (0.7)	4.2
09/10/25	C Adams	B185	Review correspondence regarding access to UHC portal and related documentation and agreements related to same	0.2
09/10/25	B Bean	B110	Prepare for and attend call with insurer (0.5); confer with A. Song regarding transition package for liquidating trustee and gather transition documents (0.6); follow up with administrator regarding 401(k) (0.1); confer with client and J. Dutson regarding account information (0.3); confer with benefit provider regarding health plan (0.1)	1.6
09/10/25	B Bean	B310	Revise agreed claim objection orders and confer with J. Dutson and A. Song regarding the same	0.6
09/10/25	S Choy	B220	Review 401k liquidation status	0.2
09/10/25	J Dutson	B320	Communications regarding plan effective date and transition	0.9
09/10/25	A Song	B310	Review and prepare orders to omnibus claims objections for filing	0.3
09/10/25	A Song	B160	Draft Second Interim and Final Fee Application	4.3
09/10/25	A Song	B320	Correspondence with A&M re: Committee	1.3

38110 OTB Holding LLC
230001 OTB Restructuring
09/24/25

Invoice No. 10833517
Page 7

Date	Timekeeper	Task	Description	Hours
			information requests in preparation of Plan effective date (0.2); update information request list and review various documents in preparation of same (0.8); confer with B. Bean re: same (0.1); attention to execution of Liquidating Trust Agreement (0.2)	
09/11/25	B Bean	B110	Prepare for and attend bi-weekly call with client (0.7); confer with claims agent regarding service related questions (0.2); confer with client regarding benefit related information (0.2)	1.1
09/11/25	B Bean	B320	Confer with various parties and attend to several transition related workstreams	2.4
09/11/25	B Bean	B310	Confer with claimants and client regarding claim objections	1.1
09/11/25	J Dutson	B320	Review and revise funds flow (0.5); communications with client regarding same (0.3); communications with committee regarding same (0.2)	1.0
09/11/25	T Kim	B160	Review revisions to second and final fee application (0.3); review precedent fee application in preparation regarding the same (0.3)	0.6
09/11/25	A Song	B110	Respond to inquiries regarding service	0.2
09/11/25	A Song	B160	Draft Second Interim and Final Fee Application	1.7
09/11/25	A Song	B320	Attention to Liquidating Trustee's information requests (0.6); attention to execution of Liquidating Trust Agreement (0.3)	0.9
09/12/25	C Adams	B185	Review correspondence related to UnitedHealth contract cure	0.2
09/12/25	C Adams	B160	Review and revise A&M final fee application in accordance with B. Bean's comments (0.3); correspond with B. Bean regarding same (0.1)	0.4
09/12/25	B Bean	B160	Review and comment on A&M final fee app	1.5
09/12/25	B Bean	B310	Confer with claimants regarding claim objections	0.2
09/12/25	B Bean	B110	Confer with client regarding benefits payments	0.1
09/12/25	B Bean	B320	Confer with various parties and attend to several transitions related matters	0.8
09/12/25	A Song	B320	Revise confirmation notice (0.1); attention to Liquidating Trustee's information requests (0.4); update tracker and internal correspondence re: same (0.2)	0.7
09/14/25	B Bean	B160	Review and revise final fee application	2.2
09/15/25	C Adams	B160	Review final draft of A&M final fee application and correspond with J. Dutson regarding same	0.2
09/15/25	B Bean	B160	Revise fee application and confer with A. Song and	2.3

38110 OTB Holding LLC
230001 OTB Restructuring
09/24/25

Invoice No. 10833517
Page 8

Date	Timekeeper	Task	Description	Hours
			J. Dutson regarding the same	
09/15/25	B Bean	B320	Confer with client and committee regarding plan related issues (1.0); update effective date punch list and attend to numerous plan related tasks ahead of effective date (1.1)	2.1
09/15/25	B Bean	B310	Prepare for and attend call with claimant regarding claim objection (0.8); review and comment on notice of cancelled evidentiary hearing (0.2)	1.0
09/15/25	B Bean	B110	Prepare for and attend bi-weekly meeting with client	0.7
09/15/25	J Dutson	B320	Call with Committee regarding Effective Date (0.2); prepare for same (0.3)	0.5
09/15/25	A Song	B320	Review Liquidating Trust Agreement (0.2); revise Notice of Plan Confirmation (0.1); internal correspondence re: the foregoing (0.1)	0.4
09/15/25	A Song	B110	Review docket in preparation for, draft and revise Notice of Cancelled Hearing (0.8); correspondence re: same (0.2); update post-confirmation workstreams tracker (0.4); take related actions thereto (0.2)	1.6
09/15/25	A Song	B310	Update claims administration tracker	0.3
09/16/25	B Bean	B110	Confer with U.S. Trustee regarding monthly operating reports (0.1); confer with client regarding benefits payments (0.1)	0.2
09/16/25	B Bean	B320	Confer with various parties and attend to plan transition related matters (1.3); review notice of effective date (0.2)	1.5
09/16/25	B Bean	B130	Confer with client and local counsel regarding liquor license sales	0.5
09/16/25	J Dutson	B320	Attention to Effective Date issues (0.9); communications with team regarding Effective Date (0.4)	1.3
09/16/25	A Song	B110	Prepare and file Notice of Cancelled Hearing	0.3
09/16/25	A Song	B320	Revise and file Notice of Plan Effective Date (0.5); correspondence with Committee counsel and K&S team re: same (0.2)	0.7
				<hr/> 120.3

38110 OTB Holding LLC
230001 OTB Restructuring
09/24/25

Invoice No. 10833517
Page 9

TIMEKEEPER SUMMARY

Timekeeper	Status	Hours
Sam Choy	Partner	0.2
Jeff Dutson	Partner	14.0
Christian Adams	Associate	6.5
Brooke Bean	Associate	53.6
Taeyeong Kim	Associate	8.4
R. Neilson	Associate	1.5
Alice Kyung Won Song	Associate	36.1
Total		<hr/> 120.3

Expenses Incurred

09/09/25	Cabfare - VENDOR: Bean, Brooke INVOICE#: 7679993609171235 DATE: 9/17/2025 Uber to court for OTB hearing on 9/5	44.79
09/09/25	Cabfare - VENDOR: Bean, Brooke INVOICE#: 7680000209171235 DATE: 9/17/2025 Uber going to court for OTB hearing on 9/9	45.26
09/09/25	Cabfare - VENDOR: Bean, Brooke INVOICE#: 7680000209171235 DATE: 9/17/2025 Uber returning from OTB hearing on 9/9	44.00
09/13/25	Document Delivery - VENDOR: Georgia Messenger Service, Inc. INVOICE#: 2820-1165 DATE: 9/13/2025 ATL - Georgia Messenger Courier Service.	28.98
	Total Expenses	<hr/> 163.03

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

OTB Holding LLC

Invoice No.	10833517
Invoice Date	09/24/25
Client No.	38110
Matter No.	230001

RE: OTB Restructuring

For questions, contact:
Jeff Dutson +1 404 572 2803

REMITTANCE

Please return this page with your remittance.

Amount Due This Invoice

\$132,439.03

Payment is Due Upon Receipt

Exhibit E

Proposed Order

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:)	Chapter 11
)	
OTB HOLDING LLC, <i>et al.</i> , ¹)	Case No. 25-52415 (SMS)
)	
)	
Debtors.)	(Jointly Administered)
_____)	

**ORDER ON SECOND INTERIM AND FINAL APPLICATION FOR
ALLOWANCE OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES
INCURRED BY KING & SPALDING LLP, COUNSEL TO THE DEBTORS**

Upon consideration of the *Second Interim and Final Application for Allowance of Attorneys' Fees and Reimbursement of Expenses Incurred by King & Spalding LLP, Counsel to the Debtors* (the "Application"),² for final allowance of (a) the interim compensation and expense

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, include: OTB Holding LLC (3213), OTB Acquisition LLC (8500), OTB Acquisition of New Jersey LLC (1506), OTB Acquisition of Howard County LLC (9865), Mt. Laurel Restaurant Operations LLC (5100), OTB Acquisition of Kansas LLC (9014), OTB Acquisition of Baltimore County, LLC (6963). OTB Holding LLC's service address is One Buckhead Plaza, 3060 Peachtree Road, NW, Atlanta, GA 30305.

² Capitalized terms used in this Order being given the same meanings as are ascribed to those terms in the Application.

reimbursements previously approved by this Court by the First Interim Fee Order, (b) additional \$884,864.50 in fees and reimbursement of \$497.38 charges and disbursements of actually and necessarily expenses incurred by K&S while providing services to the Debtors during the period from July 1, 2025 through September 16, 2025 (the “Second Interim Application Period”), and (c) \$18,000.00 in estimated fees and expenses to be incurred by K&S in connection with preparation and prosecution of this Application and the fee applications of other professionals of the Debtors; and pursuant to the procedures established under the Court’s *Fifth Amended and Restated General Order No. 24-2018*, the relevant parties were provided with due and proper notice of the Application, the deadline of October 21, 2025 (the “Response Deadline”) to file a response in opposition thereto, and the hearing scheduled for October [●], 2025, to consider the Application and any timely response filed thereto. [No response to the Application was filed to the Response Deadline. Therefore, after considering the Application and all other matters of record, including the lack of any response in opposition to the Application, the Court finds that good cause exists to grant the relief sought in the Application.]

[After a hearing regarding the Application having been held on [●], 2025; and good and sufficient cause appearing therefore,] it is hereby ORDERED as followed:

1. The Application [Docket No. [●]] is approved on a **final** basis and is hereby granted in its entirety.
2. King & Spalding LLP (“K&S”) is hereby awarded and allowed, on a **final** basis, (a) total compensation in the amount of \$3,922,887.50 for services performed on behalf of the Debtors for the Final Application Period and (b) total reimbursement of incurred expenses in the

amount of \$23,009.66 for the First Interim Application Period and Second Interim Application Period.³

3. The foregoing award of final compensation and reimbursement of expenses shall be entitled to administrative expense priority under 11 U.S.C. §§ 330(a) and 503(b)(2).

4. K&S is authorized to apply against such amounts the amounts that have been and subsequent to the Application, were paid to it by the Debtors in respect of the Application Period pursuant to the Complex Case Procedures.

5. K&S is hereby authorized to apply its Remaining Retainer Amount (a) first, to satisfy the Lien Search Costs in full and (b) second, to any amounts approved by this Order that remain unpaid by the Debtors. The Debtors are authorized to pay to K&S any amounts approved by this Order that remain unpaid by the Debtors following application of the Remaining Retainer Amount in accordance with this Order.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

8. Notice of the Application as provided therein shall be deemed good and sufficient notice of such Application and the requirements of Bankruptcy Rule 6004(a), the Local Rules, and the Complex Case Procedures are satisfied by such notice.

³ This amount includes estimated fees in the amount of \$18,000.00 in connection with the preparation of this Application and the fee applications for other professionals of the Debtors.

9. The court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

10. Counsel for the Debtors, through Kurtzman Carson Consultants, LLC d/b/a Verita Global (“Verita”) shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Application, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF ORDER]

Prepared and presented by:

/s/Jeffrey R. Dutson

Jeffrey R. Dutson

Georgia Bar No. 637106

Brooke L. Bean

Georgia Bar No. 764552

Alice Kyung Won Song

Georgia Bar No. 692753

KING & SPALDING LLP

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Email: asong@kslaw.com

Counsel for the Debtors in Possession