

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
	)	
PGX HOLDINGS, INC, <i>et al.</i> , <sup>1</sup>	)	Case No. 23-10718 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	

**FINAL FEE APPLICATION OF HOLLAND & HART LLP FOR  
PAYMENT OF COMPENSATION AND REIMBURSEMENT OF  
EXPENSES AS SPECIAL EMPLOYMENT COUNSEL FOR THE DEBTORS  
FOR THE PERIOD FROM JUNE 4, 2023 THROUGH DECEMBER 29, 2023**

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Name of Applicant:	<u>Holland &amp; Hart LLP</u>
Authorized to Provide Professional Services to:	<u>Debtors and Debtors-In-Possession</u>
Date of Retention:	<u>Effective as of the Petition Date, June 4, 2023</u>
Date of Order Approving Retention [Docket No. 386]	<u>August 22, 2023</u>
Period for which compensation and reimbursement is sought:	<u>June 4, 2023 through December 29, 2023</u>
Amount of Final Compensation sought as actual, reasonable and necessary:	<u>\$384,546.50</u>
Amount of Final Expense Reimbursement sought as actual, reasonable and necessary:	<u>\$12,515.10</u>
Total Final Fees and Expenses Sought:	<u>\$397,061.60</u>
Total Compensation Approved by Interim Order to Date:	<u>N/A</u>
Total Expenses Approved by Interims Order to Date:	<u>N/A</u>

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.



Total Compensation Paid to Date for this Period:

N/A

Total Expenses Paid to date for this Period:

N/A

Blended Rate in this Application for all Attorneys:

\$482.97

Blended Rate in this Application for all Timekeepers:

\$470.85

Compensation sought in this Application already paid pursuant to monthly compensation order but not yet allowed:

N/A

Number of Professionals Billing Fewer than 15 Hours to the case During this Period:

7

Are any rates higher than those approved or disclosed at retention?

No

This is a(n):

Monthly  Interim  Final application

Prior Applications:

		Requested		Approved		
Date Filed	Period Covered	Fees	Expenses	Fees [80%]	Expenses [100%]	Fee Holdback
N/A						

**TIME AND COMPENSATION BREAKDOWN**  
**JUNE 4, 2023 THROUGH DECEMBER 29, 2023**

NAME OF PROFESSIONAL PERSON	POSITION/ NUMBER OF YEARS	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Steve W. Suflas	Labor and Employment Admitted to Bar 1978	\$815.00	1.90	\$1,548.50
John E. Ludlum	Employee Benefits Partner Admitted to Bar 2000	\$760.00	0.40	\$304.00
Brent E. Johnson	Litigation – Class Actions Partner Admitted to Bar 1988	\$710.00	0.50	\$355.00
Steven P. Young	Tax Partner Admitted to Bar 1996	\$710.00	4.60	\$3,266.00
Engels J. Tejeda	Bankruptcy & Litigation Partner Admitted to Bar 2007	\$550.00	457.90	\$251,845.00
Engels J. Tejeda	Travel Time Under Local Rule 2016-2(d)(ix)	\$275.00	13.00	\$3,575.00
Bryan K. Benard	Labor and Employment Partner Admitted to Bar 1997	\$535.00	38.40	\$20,544.00
Mickell Jimenez	Labor and Employment Partner Admitted to Bar 1999	\$535.00	0.30	\$160.50
Leslie M. Perkins	Employment Litigation Associate Admitted to Bar 2021	\$360.00	222.50	\$80,100.00
Leslie M. Perkins	Travel Time Under Local Rule 2016-2(d)(ix)	\$180.00	15.00	\$2,700.00
Brita B. Larsen	Litigation Paralegal	\$345.00	51.30	\$17,698.50
Stephanie M. Omsberg	eDiscovery Project Manager	\$225.00	10.40	\$2,340.00
Jason M. Bullinger	Graphics Professional	\$220.00	0.50	\$110.00
<b>TOTALS</b>			<b>816.7</b>	<b><u>\$384,546.50</u></b>
<b>BLENDED RATE</b>				<b><u>\$470.85</u></b>

**COMPENSATION BY PROJECT CATEGORY**  
**JUNE 4, 2023 THROUGH DECEMBER 29, 2023**

<b>PROJECT CATEGORY</b>	<b>TASK CODES</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Business Operations	BU	6.30	\$4,190.00
Employment and Fee Applications	EF	20.60	\$11,139.00
Litigation: Contested Matters and Adversary Proceedings	LC	761.80	\$362,942.50
Travel Time	TR	28.00	\$6,275.00
<b>TOTAL</b>		<b>816.7</b>	<b><u>\$384,546.50</u></b>



**EXPENSE SUMMARY**  
**JUNE 4, 2023 THROUGH DECEMBER 29, 2023**

<b>EXPENSE CATEGORY</b>	<b>TOTAL COMPENSATION</b>
Air Travel	\$1,615.60
Auto Rental	\$523.25
Deposition Transcripts	\$4,194.98
Ground Travel	\$70.00
Lodging	\$2,072.50
Meals	\$218.66
Document Review Platform	\$3,563.00
United Parcel Service	\$257.11
<b>TOTAL</b>	<b>\$12,515.10</b>

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PGX HOLDINGS, INC, <i>et al.</i> , <sup>1</sup>	)	Case No. 23-10718 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	

**FINAL FEE APPLICATION OF HOLLAND & HART LLP  
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF  
EXPENSES AS SPECIAL EMPLOYMENT COUNSEL FOR THE DEBTORS  
FOR THE PERIOD FROM JUNE 4, 2023 THROUGH DECEMBER 29, 2023**

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Holland & Hart LLP (“H&H”), special employment counsel to PGX Holdings, Inc. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), hereby submits its final fee application (the “Application”) for entry of an order pursuant to section 331 of title 11 of the United States Code, 11 U.S.C. §§101 et seq, as amended (the “Bankruptcy Code”) granting it final compensation and reimbursement of expenses for the period from June 4, 2023 through December 29, 2023 (the “Final Compensation Period”). In support hereof, H&H respectfully represents as follows:

**I. JURISDICTION, VENUE AND STATUTORY  
PREDICATES FOR RELIEF SOUGHT**

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (B). Venue of this proceeding and

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

this Application is proper in this District pursuant to 28 U.S.C. §§1408 and 1409. The statutory predicate for the relief sought herein is section 331 of the Bankruptcy Code.

## II. BACKGROUND

2. On June 4, 2023, (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors have continued in the management of its businesses and operation of its properties pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. Prior to the Petition Date, H&H had served as general employment counsel to the Debtors.

4. On June 5, 2023, Kirsten Hansen filed a complaint alleging that the Debtors violated the Worker Adjustment and Retraining Notification Act, 29 U.S.C. §§ 2101 et seq. (the “WARN Act”) when they terminated nearly 900 employees within 60 days of the Petition Date. *See* Adversary Proceeding No. 23-50396(CTG) (the “WARN Litigation”), Docket 1.

5. On June 14, 2023, the United States Trustee appointed an Official Committee of Unsecured Creditors (the “Committee”) in these cases.

6. On August 22, 2023, this Court entered an *Order Authorizing the Retention and Employment of Holland & Hart LLP as Special Counsel for the Debtors and Debtors in Possession Pursuant to Section 327(e) of the Bankruptcy Code Effective as of the Petition Date* [Docket No. 386].

7. H&H has continuously rendered services on behalf of the Debtors during the Final Compensation Period, totaling 816.7 hours of professional time or \$384,546.50 at the blended hourly rate of \$470.85.

8. The professional services H&H rendered on behalf of the Debtors during the Final Compensation Period were reasonable and necessary.

9. Attached as Exhibit “A” is a full and detailed statement describing the professional services rendered by each H&H attorney and paraprofessional during the Final Compensation Period.

10. H&H also incurred costs on behalf of the Debtors in the sum of \$12,515.10 during the Final Compensation Period. In accordance with Local Bankruptcy Rule 2016-2(e)(iii), H&H did not charge the Debtors for copying charges. Attached hereto as Exhibit “B” is an itemized list of expenses incurred during the Final Compensation Period.

11. H&H accordingly seeks allowance of the sum of \$384,546.50 in fees and \$12,515.10 in expenses, for a total of \$397,061.60.

12. During the Final Compensation Period, H&H represented the Debtor in the WARN Litigation, which included extensive discovery and expedited briefing. That matter settled on the date of trial on terms favorable to the estate in light of the applicable law and evidence produced during discovery. The resolution of that matter removed the final obstacle to confirmation of the Debtors’ plan of reorganization. H&H also advised the Debtors on the implications of certain actions or omissions under employment and tax laws.

13. To help the Court and parties in interest evaluate this Application, H&H has categorized its fees as follows:

a. **Business Operations [BU]:** This category includes time spent by H&H professionals advising the Debtors on business operational issues throughout the Final Application Period.

b. **Employment and Fee Applications [EF]:** This category covers time spent on the retention of H&H as special employment counsel to the Debtors.

c. **Litigation: Contested Matters and Adversary Proceedings [LC]:** This category includes most of H&H fees and expenses because it covers the time incurred in advising and representing the Debtors in the contentious WARN Litigation. This included prosecuting and defending the Debtors with respect to several motions, including class certification and summary judgment motions, representing the Debtors through extensive discovery, including multiple depositions, and preparing the Debtors' defense for trial.

d. **Travel Time [TR]:** This category covers time that H&H professionals spent traveling during which the professionals were not working on the matter. Pursuant to Local Rule 2016-2(d)(ix), this category was billed at half the professional's billable rate.

14. The undersigned attests that he has reviewed the requirements of Local Rule 2016-1 and this Application conforms to such requirements. In further support of this Application, H&H submits the Certification of Engels J. Tejada.

WHEREFORE, H&H hereby requests: (a) allowance of compensation for necessary and valuable professional services rendered to the Debtors in the sum of \$384,546.50 and reimbursement of actual and necessary expenses incurred in the sum of \$12,515.10 for the period from June 4, 2023 through December 29, 2023; (b) payment in the total amount of \$397,061.60, which represents (i) 100% of the total fees billed and 100% of the expenses incurred during the Final Application Period; and (c) such other relief as this Court deems just and proper.

*/s/ Engels J. Tejada*

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Engels J. Tejada (admitted *pro hac vice*)  
HOLLAND & HART LLP  
222 South Main Street, Suite 2200  
Salt Lake City, Utah 84105  
Telephone: (801)799-5800  
Facsimile: (877)665-1699  
Email: [ejtejeda@hollandhart.com](mailto:ejtejeda@hollandhart.com)

*Special Employment Counsel to the Debtors  
and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
PGX HOLDINGS, INC, <i>et al.</i> , <sup>1</sup>	)	Case No. 23-10718 (CTG)
Debtors.	)	(Jointly Administered)
	)	

**CERTIFICATION OF ENGELS J. TEJEDA**

I, Engels J. Tejeda, under penalty of perjury, declare as follows:

1. I am a partner in the firm of Holland and Hart LLP (“H&H”), Special Counsel to the Debtors and Debtors in Possession in these cases (the “Debtors”).

2. I have read the foregoing *Final Fee Application of Holland and Hart LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel for the Debtors for the Period from June 4 through December 29, 2023* and know the contents thereof. The same contents are true to the best of my knowledge, except as to matters therein alleged to be upon information and belief, and as to those matters, I believe them to be true. I have personally performed many of the legal services rendered by H&H and am thoroughly familiar with all other work performed on behalf of the Debtors by the attorneys and paraprofessionals at H&H.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and Section 504 of Title 11, United States Code, no agreement or understanding exists between H&H

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and any other person for the sharing of compensation to be received in connection with the above-captioned cases.

4. I have reviewed the requirements of Local Rule 2016-2 of the United States Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and belief, this Application complies with Local Rule 2016-2.

5. H&H did not agree to any variations from, or alternatives to, its standard and customary billing arrangements for the proposed engagement by the Debtors pursuant to the Application.

6. None of the professionals at H&H included in the proposed engagement by the Debtors pursuant to the Application vary their rates based on geographic location of the bankruptcy case.

7. Other than an annual rate increase effective January 1 of each calendar year, during the twelve months prior to the filing of the Debtors' chapter 11 petitions, the billing rates of H&H with respect to the Debtors was not different than those sought under the Application. The rates effective as of January 1, 2023 are the rates charged to the Debtors in the Application.

8. The Application does not include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2024

/s/ Engels J. Tejada  
Engels J. Tejada (Utah Bar No. 11427)  
(Admitted *Pro Hac Vice*)

Exhibit A

Detailed Time Entries

Date	TKPR Name	Bs Hrs	Base Amt	Task	Narrative
7/28/2023	Young, Steven P	1.2	\$852.00	BU	Prepare for and attend telephone conference with Russell Hall regarding tax issues;
7/31/2023	Young, Steven P	0.7	\$497.00	BU	Prepare email for client team (Progrexion);
8/10/2023	Benard, Bryan K.	1	\$535.00	BU	Research on WARN issues for client;
8/17/2023	Young, Steven P	0.2	\$142.00	BU	Prepare for telephone conference with client team regarding sales tax issues;
8/18/2023	Young, Steven P	1.7	\$1,207.00	BU	Prepare for and hold telephone conference with client team regarding sales tax issues;
8/21/2023	Young, Steven P	0.3	\$213.00	BU	Address sales tax issues;
8/22/2023	Tejeda, Engels J	0.8	\$440.00	BU	Calls with SVeghte, MYurkewicz and SPYoung regarding tax advice;
12/6/2023	Ludlum, John E	0.4	\$304.00	BU	Attention to ERISA status of benefit programs; draft and revise message on same;
	<b>Subtotal (BU)</b>	<b>6.3</b>	<b>\$4,190.00</b>		
6/13/2023	Tejeda, Engels J	0.8	\$440.00	EF	Research regarding employment as special counsel regarding Warn act class actions;
6/19/2023	Tejeda, Engels J	0.8	\$440.00	EF	Prepare for and attend call with DPacitti, MBranzburg and BKBenard regarding local practices and strategy to resolve AP efficiently in light of limited resources;
6/20/2023	Perkins, Leslie M.	1	\$360.00	EF	Research regarding the notice of appearance and notice of filing bankruptcy;
6/20/2023	Tejeda, Engels J	0.2	\$110.00	EF	Draft email to internal team regarding scope of initial motion;
6/28/2023	Benard, Bryan K.	2.5	\$1,337.50	EF	Numerous conferences with EJTejeda regarding application for approval as special counsel, prior engagements with Progrexion, prior work and fees, conflict of interest issues, and related matters (.90); review and revise retention application and declaration and conferences regarding same (1.40); provide prior engagement letters to LTanner at her request (.20);
6/28/2023	Tejeda, Engels J	2.8	\$1,540.00	EF	Finish draft pf employment application and submit same to local counsel;
6/29/2023	Benard, Bryan K.	0.9	\$481.50	EF	Follow up conferences and discussions finalizing the application and supporting documents for appointment of counsel; work on same;
6/29/2023	Tejeda, Engels J	0.8	\$440.00	EF	Conference with BKBenard regarding scope of employment and rules governing application in bankruptcy and research regarding same;
6/30/2023	Benard, Bryan K.	1	\$535.00	EF	Numerous conferences with EJTejeda and co-counsel regarding finalizing and filing of documents;
6/30/2023	Tejeda, Engels J	1	\$550.00	EF	Conference with BKBenard and co-counsel regarding employment application as special counsel and review correspondence regarding same;
7/12/2023	Benard, Bryan K.	0.3	\$160.50	EF	Review issues raised by Trustee regarding appointment of counsel and review information from client regarding potential employee objections at hearing;
7/13/2023	Tejeda, Engels J	0.8	\$440.00	EF	Review US Trustee's comments regarding employment application and call with DEPacitti regarding same; exchange emails with local counsel regarding answer to Hansen complaint and make additional revisions to same based on his comments;
7/20/2023	Tejeda, Engels J	0.8	\$440.00	EF	Follow-up with client intake regarding supplemental conflicts check per US Trustee's request;
7/21/2023	Benard, Bryan K.	0.7	\$374.50	EF	Conference with EJTejeda regarding bankruptcy implications for regular ongoing employment decisions and extended strategy conference with LTanner regarding same, WARN, and related employment issues;
8/10/2023	Tejeda, Engels J	3.6	\$1,980.00	EF	Revise attachment to employment application;
8/17/2023	Tejeda, Engels J	0.4	\$220.00	EF	Review DPacitti's draft of supplemental declaration;
8/22/2023	Young, Steven P	0.5	\$355.00	EF	Complete bankruptcy pleadings and correspond with bankruptcy counsel regarding same;
12/20/2023	Tejeda, Engels J	1.7	\$935.00	EF	Begin working on fee application and research local rules and compensation order regarding same;
	<b>Subtotal (EF)</b>	<b>20.6</b>	<b>\$11,139.00</b>		
6/5/2023	Benard, Bryan K.	0.3	\$160.50	LC	Conferences with LTanner regarding both WARN class actions filed as well as bankruptcy filing and coordination;
6/9/2023	Benard, Bryan K.	0.4	\$214.00	LC	Conferences regarding filings in both WARN civil cases for the notice of bankruptcy and coordinating same; review notice template;
6/14/2023	Benard, Bryan K.	1.2	\$642.00	LC	Conference call with client team and lead bankruptcy counsel team regarding responding to WARN adversary proceeding, options, and coordinating the elimination of duplication (0.80); extended conference with EJTejeda regarding background of WARN Act issues, exemptions and exceptions that client relied upon in taking actions, penalties as wages, and potential procedural ways to get to fasted resolution of WARN adversary litigation (0.40);
6/15/2023	Benard, Bryan K.	1.2	\$642.00	LC	Various conferences regarding underlying facts of WARN matter, additional information needed, and related matters (.3); conferences with Mr. Pacitti regarding procedural issues and conferences with EJTejeda and LMPerkins regarding WARN act issues, strategy, and research (.9);
6/15/2023	Perkins, Leslie M.	0.7	\$252.00	LC	Communication with team regarding previous terminations and processes moving forward with bankruptcy;
6/15/2023	Tejeda, Engels J	1.4	\$770.00	LC	Review and file suggestion of bankruptcy and continue reviewing case filings and local rules regarding stay of proceedings;
6/16/2023	Tejeda, Engels J	2.1	\$1,155.00	LC	Begin research unforeseeable business circumstance exception to warn act;
6/17/2023	Tejeda, Engels J	2.7	\$1,485.00	LC	Begin research fltering company exemption in the 3rd circuit;
6/19/2023	Benard, Bryan K.	1.6	\$856.00	LC	Extended strategy conference with Delaware counsel regarding alternatives for most expeditious mechanism for getting WARN exemptions heard, motion practice, priority claims motions, judge's preferences, and related background strategies and conferences regarding filing bankruptcy notices in both civil WARN class cases; further discussions regarding strategy for moving forward and research issues;
6/20/2023	Perkins, Leslie M.	0.7	\$252.00	LC	Communication with EJTejeda regarding upcoming research assignments and briefs;
6/21/2023	Perkins, Leslie M.	2.8	\$1,008.00	LC	Begin research regarding WARN act notice and 507(a)(4);
6/21/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Continue researching WARN Act affirmative defenses and case background regarding same;
6/22/2023	Benard, Bryan K.	0.3	\$160.50	LC	Follow up discussions on service in adversary WARN proceeding and related matters, answering complaint, and timing of same;
6/22/2023	Benard, Bryan K.	0.3	\$160.50	LC	Draft update to defense team discussing procedural options for addressing WARN issues in most expeditious manner and alternatives;
6/22/2023	Benard, Bryan K.	0.4	\$214.00	LC	Review and finalize notices of bankruptcy to be filed in the WARN civil matters;
6/22/2023	Perkins, Leslie M.	4.1	\$1,476.00	LC	Conditue research regarding management issue, WARN Act and section 507;
6/22/2023	Tejeda, Engels J	5.6	\$3,080.00	LC	Exchange multiple emails with internal team regarding AP response deadline, procedural hurdles to overcome in seeking prompt and efficient resolution of class action, and conduct legal research regarding same;
6/23/2023	Benard, Bryan K.	1.1	\$588.50	LC	Review and revise client memorandum on WARN act defenses, requirements, process for moving matter to expeditious rulings or decisions, and related strategy matters (.9); follow up conferences with defense team regarding filing of answer and related matters (.2);
6/23/2023	Jimenez, Mickell	0.3	\$160.50	LC	Attend to questions regarding WARN notices and bankruptcy issues;
6/23/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Continue analyzing first day motions for case background;
6/23/2023	Tejeda, Engels J	0.6	\$330.00	LC	Exchange emails with BKBenard regarding draft email memo summarizing strategy to speed up resolution of AP and incorporate changes to same;
6/23/2023	Tejeda, Engels J	0.3	\$165.00	LC	Exchange emails with internal team regarding service of process, response deadlines and review rules regarding same;
6/27/2023	Benard, Bryan K.	0.4	\$214.00	LC	Conferences with client and bankruptcy counsel regarding service of adversary WARN complaint and responding to same;
6/27/2023	Tejeda, Engels J	0.8	\$440.00	LC	Brief review of background documents regarding loan agreement with Prospect, Blue Torch;
6/27/2023	Tejeda, Engels J	2.1	\$1,155.00	LC	Continue revising employment motion and research case files regarding client history;
6/30/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Continue reviewing case files regarding affirmative defenses to WARN ACT liability;
7/1/2023	Tejeda, Engels J	4.8	\$2,640.00	LC	Continue drafting answer to WARN Act complaint;
7/2/2023	Tejeda, Engels J	4.8	\$2,640.00	LC	Continue researching defenses to class certification in under 3rd Circuit law and other procedural defenses in bankruptcy;
7/3/2023	Benard, Bryan K.	1.1	\$588.50	LC	Conferences with EJTejeda regarding answer and coordinating description of ongoing client business as it relates to WARN, conferences and strategy discussions regarding answer to adversary WARN act complaint, and strategy conference with client representatives, EJTejeda, and bankruptcy counsel regarding hearing preparations, WARN act defenses, and related issues;



Detailed Time Entries

7/3/2023	Tejeda, Engels J	5.8	\$3,190.00	LC	Continue drafting answer to WARN Act class action and call with LTanner,WFogelberg, EKamerath, and BKBenard regarding answer;
7/4/2023	Benard, Bryan K.	1.2	\$642.00	LC	Review and revise answer to complaint and complaint; provide additional affirmative defenses;
7/4/2023	Tejeda, Engels J	7.8	\$4,290.00	LC	Continue drafting answer to adversary proceeding complaint and research case files and recent WARN Act decisions from Delaware Court (including Hoover) and the Third District; email drafts to BKBenard and client representative;
7/5/2023	Benard, Bryan K.	0.5	\$267.50	LC	Further conferences regarding answer to complaint, defenses, and revisions to same;
7/5/2023	Tejeda, Engels J	1.1	\$605.00	LC	Review and incorporate Laura Turner's changes to draft answer to Hansen complaint and circulate same to lead and local bankruptcy counsel;
7/6/2023	Tejeda, Engels J	4.6	\$2,530.00	LC	Continue research regarding motion for summary judgment on WARN Act and viability of Rule 56 discovery;
8/5/2023	Tejeda, Engels J	5.8	\$3,190.00	LC	Review and analyze plaintiff's motion for class certification and begin research regarding same;
8/8/2023	Benard, Bryan K.	0.6	\$321.00	LC	Extended conference with client team regarding WARN act issues, various factual background matters, and strategy;
8/8/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Continue researching case files and rule 23 regarding class certification motion;
8/9/2023	Benard, Bryan K.	1.8	\$963.00	LC	Review and analyze motion for class certification of WARN matter (.5); conference with EJTejeda regarding same and strategy and with client and bankruptcy counsel regarding same, strategy, and next steps (.6); conference regarding calculation of potential damages and related issues (.7);
8/9/2023	Perkins, Leslie M.	0.8	\$288.00	LC	Begin research for the opposition to the motion for class certification;
8/9/2023	Tejeda, Engels J	2.4	\$1,320.00	LC	Call with LMPerkins regarding objection to class cert motion and review top-line case law regarding same;
8/9/2023	Tejeda, Engels J	1.4	\$770.00	LC	Prepare for and attend conference with LTanner, AWirtz, DPacitti, BKBenard regarding plan of reorganization and response to class motion;
8/9/2023	Tejeda, Engels J	0.4	\$220.00	LC	Call with BKBenard in anticipation of class certification discussion;
8/10/2023	Perkins, Leslie M.	1	\$360.00	LC	Begin drafting the opposition to the motion for class certification;
8/10/2023	Perkins, Leslie M.	1.1	\$396.00	LC	Conduct research in preparation for drafting the opposition to the motion for class certification;
8/10/2023	Tejeda, Engels J	0.6	\$330.00	LC	Call with LMPerkins regarding objection to class cert motion and review email regarding same;
8/11/2023	Perkins, Leslie M.	5.3	\$1,908.00	LC	Continue drafting the opposition to the motion for class certification;
8/11/2023	Perkins, Leslie M.	2.5	\$900.00	LC	Continue conducting research for the opposition to the motion for class certification;
8/13/2023	Tejeda, Engels J	5.6	\$3,080.00	LC	Continue researching, revising objection to class cert motion;
8/14/2023	Benard, Bryan K.	0.5	\$267.50	LC	Further review and research on WARN issues; conferences regarding same;
8/14/2023	Perkins, Leslie M.	5.1	\$1,836.00	LC	Draft the motion for summary judgment;
8/14/2023	Perkins, Leslie M.	3	\$1,080.00	LC	Conduct research for the motion for summary judgment related to the faltering business and unforeseen circumstances exceptions;
8/14/2023	Tejeda, Engels J	0.3	\$165.00	LC	Calls with LMPerkins regarding additional research regarding motion for summary judgment;
8/15/2023	Benard, Bryan K.	0.9	\$481.50	LC	Conferences with EJTejeda regarding opposition to motion to certify a WARN class and with client regarding WARN issues and related employment termination issues;
8/15/2023	Perkins, Leslie M.	2.2	\$792.00	LC	Continue drafting the opposition to the Motion for Class Certification;
8/15/2023	Perkins, Leslie M.	2.1	\$756.00	LC	Conduct research for the opposition to the Motion for Class Certification regarding the subjective intent and class certification standards;
8/15/2023	Tejeda, Engels J	11.6	\$6,380.00	LC	Finish first draft of objection to class certification motion and submit same to BKBenard, client for comments;
8/16/2023	Benard, Bryan K.	2.8	\$1,498.00	LC	Review and revise brief in opposition to class certification (1.4); various conferences regarding same (.5); review information on which defendants participated in each RIF (.4); follow up conference with EJTejeda regarding strategy issues and final revisions to brief (.5);
8/16/2023	Perkins, Leslie M.	1.2	\$432.00	LC	Analyze number of employees terminated by location, by employer, and by date for incorporation into opposition to motion for class certification;
8/16/2023	Perkins, Leslie M.	2	\$720.00	LC	Check citations and make edits to the opposition to the motion for class certification;
8/16/2023	Tejeda, Engels J	1.2	\$660.00	LC	Revise draft of objection to class certification motion per comments from BKBenard, LTanner, and review case files regarding same;
8/16/2023	Tejeda, Engels J	1.4	\$770.00	LC	Continue drafting motion for summary judgment;
8/16/2023	Tejeda, Engels J	0.3	\$165.00	LC	Follow-up with local counsel regarding status of supplemental attachments to employment application;
8/17/2023	Tejeda, Engels J	0.3	\$165.00	LC	Review and adopt proposed changes to objection to Class Certification Motion for DPacitti;
8/18/2023	Benard, Bryan K.	0.5	\$267.50	LC	Conferences finalizing objection to class certification and related strategies; conference regarding contact from plaintiffs' counsel and strategy;
8/18/2023	Tejeda, Engels J	1.8	\$990.00	LC	Finish and circulate for filing objection to class certification;
8/19/2023	Tejeda, Engels J	5.6	\$3,080.00	LC	Continue researching cases regarding motion for summary judgment on faltering company exception;
8/20/2023	Tejeda, Engels J	7.4	\$4,070.00	LC	Continue drafting motion for summary judgment and researching factual background, consistency with prior filings;
8/21/2023	Tejeda, Engels J	1.9	\$1,045.00	LC	Continue drafting memorandum in support of summary judgment;
8/22/2023	Benard, Bryan K.	0.4	\$214.00	LC	Review messages from WARN plaintiffs, discuss specific putative class information sought from client and assess risks and advantages to same;
8/22/2023	Tejeda, Engels J	0.4	\$220.00	LC	Prepare for and attend conference call with Committee's counsel, lead bankruptcy counsel, regarding substantive defenses to War Act Claim;
8/23/2023	Tejeda, Engels J	6.6	\$3,630.00	LC	Continue drafting fact section of memorandum in support of motion for summary judgment and research regarding same;
8/24/2023	Perkins, Leslie M.	1.5	\$540.00	LC	Check citations and perform edits and updates to the Motion for summary judgment;
8/24/2023	Tejeda, Engels J	5.3	\$2,915.00	LC	Continue researching and drafting arguments regarding faltering company exception;
8/25/2023	Perkins, Leslie M.	1	\$360.00	LC	Final review of motion for summary judgment before submission to client for review;
8/25/2023	Tejeda, Engels J	6.1	\$3,355.00	LC	Continue researching and drafting brief in support of summary judgment regarding unforeseen circumstances and liquidating trustee exceptions to WARN Act;
8/30/2023	Tejeda, Engels J	0.3	\$165.00	LC	Follow up with LTanner, co-counsels regarding draft of brief in support of motion for summary judgment;
9/1/2023	Benard, Bryan K.	2.3	\$1,230.50	LC	Review and revise brief in support of motion for summary judgment and extended strategy conference with client team, K&E and local counsel on revisions to brief, strategy, and related matters;
9/1/2023	Tejeda, Engels J	0.6	\$330.00	LC	Prepare for and attend call with LTanner, Awirtz, DPacitti and BKBenard regarding changes to draft brief in support of motion for summary judgment and case background;
9/4/2023	Benard, Bryan K.	0.8	\$428.00	LC	Review and analyze redline revisions and suggestions from Ms. Wirtz; conference with LTanner and EJTejeda regarding same and next steps on updated draft;
9/7/2023	Tejeda, Engels J	2.4	\$1,320.00	LC	Incorporate changes from co-counsel into draft brief in support of motion for summary judgement and draft supplemental Wallace declaration regarding same;
9/8/2023	Perkins, Leslie M.	1.6	\$576.00	LC	Conduct final review of memorandum in support of motion for summary judgment and the declaration in support thereof;
9/11/2023	Tejeda, Engels J	0.4	\$220.00	LC	Review employment files and emails with CCeresa, BKBenard, regarding disclosures of same within context of settlement negotiations with class counsel;
9/12/2023	Benard, Bryan K.	1	\$535.00	LC	Strategy conference with Ms. Tanner regarding employee related issues and information requested by WARN plaintiffs' counsel; review and consider plaintiffs' request for information; conferences regarding same, protective order and privacy issues;
9/13/2023	Tejeda, Engels J	0.7	\$385.00	LC	Review and email LTanner regarding reply in support of class certification motion filed by KHansen in adversary proceeding;
9/14/2023	Tejeda, Engels J	2.3	\$1,265.00	LC	Exchange emails with AWirtz regarding final edits to brief in support of motion for summary judgment, and incorporate edits and circulate same to client group for sharing with Committee and counsel for lenders;
9/15/2023	Benard, Bryan K.	0.4	\$214.00	LC	Follow up discussions on information exchange with WARN plaintiffs and summary judgment issues;
9/15/2023	Tejeda, Engels J	0.6	\$330.00	LC	Finalize and submit to local counsel draft motion for summary judgment and review declaration in support of same;
9/22/2023	Tejeda, Engels J	3.3	\$1,815.00	LC	Finalize and file motion for summary judgment, brief in support of same, and Supplemental Declaration and corresponding exhibits, and call and emails with co-counsels, internal team, regarding same;
9/28/2023	Tejeda, Engels J	0.1	\$55.00	LC	Exchange emails with counsel for plaintiff KHansen regarding extension to respond to motion for summary judgement;

## Detailed Time Entries

9/29/2023	Tejeda, Engels J	0.7	\$385.00	LC	Minor revisions to plaintiff's proposed motion to extend response deadline to MJS and exchange emails with local counsel regarding same;
10/3/2023	Benard, Bryan K.	0.6	\$321.00	LC	Initial review of discovery from WARN plaintiffs and subpoenas to third parties; conference with EJTejeda regarding same;
10/10/2023	Tejeda, Engels J	0.7	\$385.00	LC	Call with AWirtz regarding pending deadlines, next steps, and review case docket and communications regarding related deadlines;
10/11/2023	Tejeda, Engels J	1.4	\$770.00	LC	Research case files regarding pending issues and effect of sale on pending lawsuit;
10/17/2023	Tejeda, Engels J	0.7	\$385.00	LC	Call with counsel for subpoenaed third party regarding confidentiality and attorney-client privilege issues and review subpoena;
10/18/2023	Tejeda, Engels J	0.4	\$220.00	LC	Follow-up plaintiff's counsel and co-counsel regarding settlement;
10/19/2023	Tejeda, Engels J	0.9	\$495.00	LC	Prepare for and attend call with DPacitti and AWirtz regarding settlement discussions with plaintiff's counsel and review case files regarding same;
10/20/2023	Benard, Bryan K.	0.5	\$267.50	LC	Initial review and analysis of Objection filed by WARN plaintiffs;
10/20/2023	Tejeda, Engels J	3.8	\$2,090.00	LC	Review plaintiff's objection to confirmation of the plan and exchange emails regarding same with debtor's lead and local counsel, LTanner; Prepare for and attend call with lead debtor's counsel and local counsel regarding coordinated response to Hansen's plan objection and opposition to motion for summary judgment;
10/21/2023	Tejeda, Engels J	1.4	\$770.00	LC	
10/21/2023	Tejeda, Engels J	2.9	\$1,595.00	LC	Review memorandum in opposition to the motion for summary judgment and supporting document and review cases cited in same;
10/22/2023	Tejeda, Engels J	2.7	\$1,485.00	LC	Continue analyzing objection to plan based on Warn act claims, effect of sale on same;
10/22/2023	Tejeda, Engels J	0.8	\$440.00	LC	Prepare for and attend settlement conference with KHansen's attorneys;
10/23/2023	Tejeda, Engels J	3.2	\$1,760.00	LC	Review and analyze drafts of Wallace Declaration in support of plan confirmation;
10/24/2023	Tejeda, Engels J	0.9	\$495.00	LC	Research and prepare exhibits regarding WARN Act claim issue, email same to co-counsel and request additional documents from LTanner and CWallace;
10/24/2023	Tejeda, Engels J	0.4	\$220.00	LC	Call with DPacitti, AWirtz, CCeresa, MYurkewicz, regarding preparation;
10/24/2023	Tejeda, Engels J	0.9	\$495.00	LC	Review and analyze order on class certification and email LTanner regarding same; review impact of same on pending issues;
10/24/2023	Tejeda, Engels J	3.8	\$2,090.00	LC	Review and edit WARN Act sections of confirmation brief and exchange emails with local counsel regarding same;
10/25/2023	Tejeda, Engels J	0.8	\$440.00	LC	Prepare for and attend Rule 408 discussions with SWinters, CLoizides, AWirtz, RRoupinian, JRaisner regarding settlement discussions and review proposed plan provisions regarding information discussed during settlement;
10/25/2023	Tejeda, Engels J	0.7	\$385.00	LC	Continue researching, drafting, reply in support of motion for summary judgment;
10/26/2023	Tejeda, Engels J	11.8	\$6,490.00	LC	Research and draft reply in support of motion for summary judgment;
10/27/2023	Tejeda, Engels J	0.6	\$330.00	LC	Emails and calls with client team regarding status conference, preparing for trial, and exchange emails with co-counsels regarding same;
10/27/2023	Tejeda, Engels J	1.9	\$1,045.00	LC	Finish revisions to reply in support of summary judgment;
10/27/2023	Tejeda, Engels J	3.5	\$1,925.00	LC	Continue drafting reply in support of motion for summary judgment;
10/27/2023	Tejeda, Engels J	0.6	\$330.00	LC	Attend status conference regarding confirmation and WARN Claim and calls with SWinters regarding same;
10/30/2023	Benard, Bryan K.	1.8	\$963.00	LC	Multiple conferences regarding reply brief, opposition to summary judgment, court ruling on conditional certification, and upcoming trial deadlines and analyze and assess strategies for affirmative defenses, proposed class definition, and related matters, and review litigation budget regarding same;
10/30/2023	Larsen, Brita B	0.3	\$103.50	LC	Conference with EJTejeda regarding trial preparations;
10/30/2023	Tejeda, Engels J	0.8	\$440.00	LC	Draft proposed scheduling order in Hansen matter based on Court's status conference, applicable rules, and email co-counsels regarding same;
11/1/2023	Larsen, Brita B	0.1	\$34.50	LC	Conference with EJTejeda regarding trial preparations;
11/1/2023	Tejeda, Engels J	0.9	\$495.00	LC	Revise WARN Act class description, and research regarding same;
11/1/2023	Tejeda, Engels J	1.9	\$1,045.00	LC	Follow-up with plaintiff's counsel and co-counsel regarding scheduling order and outline issues for trial to anticipate necessary discovery;
11/2/2023	Larsen, Brita B	0.8	\$276.00	LC	Conferences with EJTejeda regarding documents review; conference call with EJTejeda, CWallace, EKamerath and JHartley regarding discovery and trial preparations; conference with eDiscovery team regarding database creation;
11/2/2023	Larsen, Brita B	0.6	\$207.00	LC	Conference call with EJTejeda, CWallace, EKamerath and JHartley regarding trial preparations;
11/2/2023	Perkins, Leslie M.	2.4	\$864.00	LC	Review new discovery requests and draft search terms for response to new discovery requests;
11/2/2023	Perkins, Leslie M.	1	\$360.00	LC	Analyze proposed protective order;
11/2/2023	Perkins, Leslie M.	1.7	\$612.00	LC	Draft search terms for response to request for information;
11/2/2023	Perkins, Leslie M.	1.1	\$396.00	LC	Analyze pleadings for response to request for information;
11/2/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Call with debtors' team regarding document requests, and with BBLarsen and LMPerkins, regarding search terms and draft production protocol to minimize duplicative efforts, and exchange multiple emails regarding same;
11/2/2023	Tejeda, Engels J	2.7	\$1,485.00	LC	Calls with plaintiff's counsel, local counsel, and co-counsel, regarding discovery, trial preparation, class definition, depositions, scheduling order and protective order, and review and response to emails regarding same;
11/3/2023	Larsen, Brita B	0.2	\$69.00	LC	Conference with EJTejeda; address additional documents for attorney review and production;
11/3/2023	Tejeda, Engels J	0.9	\$495.00	LC	Propose changes to scheduling order, protective order, in hopes of addressing issues at minimal expense to the estate;
11/3/2023	Tejeda, Engels J	1.8	\$990.00	LC	Continue refining document production protocol based on plaintiff's over-broad interrogatories and requests for "all documents" regarding the debtors' financial conditions from 2018 to 2023 and email JHartley regarding same;
11/3/2023	Tejeda, Engels J	1.4	\$770.00	LC	Exchange multiple emails and hold call with AWirtz, DPacitti, and MYurkewicz regarding plaintiff's aggressive litigation posture and ways to attempt to resolve discovery disputes without having to seek court intervention given risk of administrative insolvency;
11/4/2023	Larsen, Brita B	0.9	\$310.50	LC	Conferences with EJTejeda regarding document review and email collection; database work to assist with attorney document review;
11/4/2023	Tejeda, Engels J	5.6	\$3,080.00	LC	Begin drafting trial plan and analyze the AE Liquidation opinion;
11/5/2023	Larsen, Brita B	0.2	\$69.00	LC	Conference with EJTejeda; add RRobins and LTanner to Box folder; provide instructions to same for uploading files;
11/5/2023	Tejeda, Engels J	4.3	\$2,365.00	LC	Research regarding cause of termination after Art Van, Jevic, Roquet, and Elsinore opinions;
11/6/2023	Larsen, Brita B	0.7	\$241.50	LC	Address Box link to include RRobins and LTanner; address email collection from RRobins; conferences with SOMsberg regarding ECA database to search email collection; conferences with EJTejeda and LMPerkins regarding search terms to cull emails for review, document review and pending production;
11/6/2023	Perkins, Leslie M.	1.1	\$396.00	LC	Begin responses to first set of interrogatories and first and second set of requests for production;
11/7/2023	Larsen, Brita B	0.5	\$172.50	LC	Conferences with EJTejeda and LMPerkins regarding document review and production of documents; conference with SOMsberg regarding Relativity production;
11/7/2023	Omsberg, Stephanie M.	2.1	\$472.50	LC	PST repair and retry publishing into Relativity ECA; apply search terms to ECA; migrate hit docs and families to review; build analytics index and cluster;
11/7/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Meeting to discuss document review and responses to discovery requests;
11/7/2023	Perkins, Leslie M.	0.7	\$252.00	LC	Continue drafting responses to plaintiff's first set of requests for production;
11/7/2023	Perkins, Leslie M.	7.4	\$2,664.00	LC	Conduct document review of large quantity of documents in preparation for producing documents responsive the plaintiff's first set of requests for production;
11/7/2023	Tejeda, Engels J	0.4	\$220.00	LC	Review plaintiff's rejection of debtor's continuous attempts to resolve matter via settlement and advised debtors regarding same, alternative options;
11/7/2023	Tejeda, Engels J	0.8	\$440.00	LC	Begin drafting initial disclosures and reviewing documents regarding initial disclosures and responses to plaintiff's first set of document requests;
11/7/2023	Tejeda, Engels J	0.2	\$110.00	LC	Review and approve proposed order regarding class certification and email plaintiff's counsel regarding same;
11/7/2023	Tejeda, Engels J	0.2	\$110.00	LC	Review proposed changes to protective order and scheduling orders and email with GLin (counsel for the plaintiff) regarding same;
11/7/2023	Tejeda, Engels J	0.4	\$220.00	LC	Meet with LMPerkins regarding discovery requests and locate and share key documents;

Exhibit A

Detailed Time Entries

11/8/2023	Larsen, Brita B	1.2	\$414.00	LC	Conferences with EJTejeda and LMPerkins regarding production of documents and address confidentiality related to production set (0.60); finalize production set for service on opposing counsel and address additional board meeting minutes (0.40); conference with LMPerkins regarding same (0.20);
11/8/2023	Omsberg, Stephanie M.	0.9	\$202.50	LC	Process documents for production;
11/8/2023	Perkins, Leslie M.	0.1	\$36.00	LC	Communicate with LTanner and EKamerath regarding unredacted copies of board meeting minutes for the production;
11/8/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Communicate with EJTejeda and BBLarsen regarding the document review for today's production;
11/8/2023	Perkins, Leslie M.	1.1	\$396.00	LC	Prepare documents for production in response to first set of document requests;
11/8/2023	Perkins, Leslie M.	2.5	\$900.00	LC	Complete draft discovery request responses;
11/8/2023	Tejeda, Engels J	0.4	\$220.00	LC	Email with DPacitti and MYurkewicz regarding status of discovery responses, initial disclosures, and best approach to meet and confer with plaintiff's counsel about overbroad discovery requests;
11/8/2023	Tejeda, Engels J	1.8	\$990.00	LC	Review first batch of responsive documents and initial disclosures and discuss same with LMPerkins;
11/9/2023	Larsen, Brita B	0.6	\$207.00	LC	Conferences with EJTejeda and LMPerkins regarding production of initial disclosure documents; address unredacted board meeting minutes; conference with LMPerkins regarding review of same; serve document production to opposing counsel via Box;
11/9/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Communicate with EJTejeda and BBLarsen regarding privilege check and document production for responses to first document requests;
11/9/2023	Perkins, Leslie M.	0.4	\$144.00	LC	Conduct final review of initial disclosures for filing;
11/9/2023	Perkins, Leslie M.	0.4	\$144.00	LC	Review of plaintiff's initial disclosures;
11/9/2023	Perkins, Leslie M.	0.4	\$144.00	LC	Review of plaintiff's subpoena to KPMG;
11/9/2023	Perkins, Leslie M.	2.5	\$900.00	LC	Review unredacted board meeting minutes specifically for privilege and responsiveness to our responses to the first set of document requests;
11/9/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Draft certificate of service for discovery responses and prepare for submission;
11/9/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Draft certificate of service for initial disclosures and prepare for submission;
11/9/2023	Tejeda, Engels J	3.4	\$1,870.00	LC	Finalize and serve responses to first set of discovery requests, initial disclosures, and discuss same with LMPerkins, LTanner, and BBLarsen;
11/9/2023	Tejeda, Engels J	0.3	\$165.00	LC	Call with Alensen and FHarperBrown regarding KPMG's attempt to accommodate plaintiff's subpoena without causing parties to incur unnecessary fees and protecting confidential information;
11/10/2023	Larsen, Brita B	1.6	\$552.00	LC	Conferences with EJTejeda regarding non-redacted board meeting minutes (0.30); database work to determine certain perimeters for review; conferences with LMPerkins regarding unredacted board meeting minutes and report findings to EJTejeda (0.90); conferences with GLin regarding Box issues and prepare PDF'd set of production and forward to IRaisner (0.40);
11/10/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Meet and confer call with opposing counsel to discuss second discovery set;
11/10/2023	Tejeda, Engels J	0.5	\$275.00	LC	Prepare for and attend meet and confer with plaintiff's counsel regarding discovery requests;
11/10/2023	Tejeda, Engels J	0.2	\$110.00	LC	Email plaintiff's counsel regarding proposed search terms to limit discovery requests;
11/12/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Continue reviewing deposition transcript of NAugustine, which has been requested by plaintiff;
11/13/2023	Larsen, Brita B	2.8	\$966.00	LC	Conferences with EJTejeda regarding productions and proposed time periods of data and database work to prepare proposed time periods of data for review and report findings to EJTejeda (1.30); prepare sets of potentially privileged documents within proposed time frames and database work to update potentially privileged search terms (1.2); conferences with Somsberg regarding batched review, new search terms and pending production (0.30);
11/13/2023	Omsberg, Stephanie M.	0.5	\$112.50	LC	Migrate docs from ECA to review in Relativity;
11/13/2023	Perkins, Leslie M.	2.5	\$900.00	LC	Draft first set of discovery requests to plaintiff;
11/13/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Meet with EJTejeda to discuss search terms, document review, and discovery requests;
11/13/2023	Tejeda, Engels J	0.6	\$330.00	LC	Exchange emails with plaintiff's counsel regarding meet and confer to narrow scope of plaintiff's overbroad discovery requests for documents from 2018 to July 2023 and discuss new search terms with BBLarsen;
11/14/2023	Larsen, Brita B	2.4	\$828.00	LC	Conferences with EJTejeda and LMPerkins regarding batched document review and pending production; database work to finalize batched review; prepare potentially privileged privilege log for EJTejeda review and revision;
11/14/2023	Omsberg, Stephanie M.	0.1	\$22.50	LC	Create batches for review in Relativity;
11/14/2023	Perkins, Leslie M.	8.7	\$3,132.00	LC	Review documents for production;
11/14/2023	Tejeda, Engels J	3.7	\$2,035.00	LC	Review documents for production in response to plaintiff's overbroad requests;
11/15/2023	Larsen, Brita B	4.2	\$1,449.00	LC	Conferences with EJTejeda and LMPerkins regarding document review and pending production and conferences with Somsberg regarding production QC (1.7); database work to prepare and finalize production (2.1); prepare production set for service on opposing counsel and serve opposing counsel via Box (0.40);
11/15/2023	Omsberg, Stephanie M.	1.2	\$270.00	LC	Process documents for production;
11/15/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Communicate with EJTejeda regarding next round of document review and responses to the second round of discovery requests;
11/15/2023	Perkins, Leslie M.	2.3	\$828.00	LC	Begin analysis of interrogatories and gathering documents and answers for our responses;
11/15/2023	Tejeda, Engels J	2.6	\$1,430.00	LC	Continue reviewing documents for production in response to plaintiff's broad discovery requests (batch 1) and exchange emails with plaintiff's counsel, and internal team, regarding same;
11/15/2023	Tejeda, Engels J	1.4	\$770.00	LC	Review QC check on privilege and dedesignate minutes per plaintiff's document requests and exchange emails regarding same with BBLarsen and LMPerkins;
11/15/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Review 741 documents dated February 1-28, 2023 requested by plaintiff and email BBLarsen regarding same;
11/16/2023	Larsen, Brita B	1.1	\$379.50	LC	Conferences with EJTejeda and LMPerkins regarding document review and second production and database work to prepare second production set (0.60); finalize production set and conference with EJTejeda regarding privilege log (0.50);
11/16/2023	Omsberg, Stephanie M.	0.8	\$180.00	LC	Process documents for production;
11/16/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Begin responses to second set of RFPs;
11/16/2023	Perkins, Leslie M.	2.1	\$756.00	LC	Continue document review on documents for production;
11/16/2023	Perkins, Leslie M.	2.5	\$900.00	LC	Complete first draft of responses to interrogatories;
11/16/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Analyze second RFPs for responsive documents;
11/16/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Analyze first interrogatories for responses;
11/16/2023	Tejeda, Engels J	1.4	\$770.00	LC	Continue working on document production;
11/17/2023	Larsen, Brita B	0.4	\$138.00	LC	Conferences with EJTejeda and prepare production for service of supplemental production of documents on counsel;
11/17/2023	Perkins, Leslie M.	3.5	\$1,260.00	LC	Draft responses to interrogatories;
11/17/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Call with client to discuss interrogatory responses;
11/17/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Communicate with EJTejeda regarding interrogatory responses;
11/17/2023	Perkins, Leslie M.	0.4	\$144.00	LC	Call with BSmith to discuss data needed for production and interrogatory responses;
11/17/2023	Perkins, Leslie M.	0.2	\$72.00	LC	Call to JMorris regarding data needed for upcoming production;
11/17/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Communicate with client regarding spreadsheet with class information;
11/17/2023	Tejeda, Engels J	0.6	\$330.00	LC	Propose changes to draft interrogatories and responses to document requests and exchange multiple emails with LMPerkins regarding same, discovery responses;
11/17/2023	Tejeda, Engels J	1.5	\$825.00	LC	Calls with LTanner and LMPerkins regarding responses to interrogatories and review case file for backup related to the responses;
11/18/2023	Perkins, Leslie M.	1.5	\$540.00	LC	Conduct research for the upcoming trial on how the WARN Act addresses multiple rounds of layoffs;
11/18/2023	Perkins, Leslie M.	0.2	\$72.00	LC	Call with EJTejeda regarding research needed and additional documents that need to be marked for production;
11/18/2023	Perkins, Leslie M.	0.2	\$72.00	LC	Communicate with BBLarsen regarding additional documents for upload and production;

Detailed Time Entries

11/18/2023	Tejeda, Engels J	5.4	\$2,970.00	LC	Continue reviewing over 600 documents for third production in response to plaintiff's broad second set of document requests;
11/18/2023	Tejeda, Engels J	2.6	\$1,430.00	LC	Analyze database of potential class members and exchange emails with plaintiff's counsel, debtors' representatives, regarding same;
11/19/2023	Perkins, Leslie M.	2.5	\$900.00	LC	Continue conducting research for upcoming trial on how the WARN Act addresses multiple rounds of layoffs;
11/19/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Draft verification for interrogatory responses;
11/19/2023	Perkins, Leslie M.	3.4	\$1,224.00	LC	Complete document review for 11/20 production;
11/19/2023	Tejeda, Engels J	7	\$3,850.00	LC	Continue reviewing documents for production in response to plaintiff's broad requests;
11/20/2023	Larsen, Brita B	3.3	\$1,138.50	LC	Conferences with EJTejeda regarding completion of document review; database work to prepare document set for production and create privilege log; prepare production set for service on opposing counsel; service production on opposing counsel via Box;
11/20/2023	Omsberg, Stephanie M.	1.5	\$337.50	LC	Assist case team with production; process documents for production;
11/20/2023	Suffas, Steven W.	0.2	\$163.00	LC	Conference with EJTejeda regarding WARN act;
11/20/2023	Tejeda, Engels J	0.1	\$55.00	LC	Follow-up with LTurner regarding draft discovery responses;
11/20/2023	Tejeda, Engels J	1.8	\$990.00	LC	Follow-up with BSmith regarding calculation of wages for employees impacted by layoffs and analyze data regarding same;
11/20/2023	Tejeda, Engels J	1.4	\$770.00	LC	Call with JKesselman (Committee's counsel), MYurkewicz (local counsel) and AWirtz regarding potential settlement discussions and efficient ways to address plaintiff's claim despite estate's limited resources and evidence supporting WARN act exemptions and research regarding possible maximum liability, if any;
11/20/2023	Tejeda, Engels J	1.7	\$935.00	LC	Finish production of 2,500+ documents in response to plaintiff's broad document requests and exchange multiple emails with BBLarsen regarding same;
11/21/2023	Larsen, Brita B	1.8	\$621.00	LC	Conferences with EJTejeda regarding supplemental production; prepare Reduction in Force spreadsheet for production; prepare privilege log for EJTejeda review; address supplemental production and prepare for service;
11/21/2023	Omsberg, Stephanie M.	0.5	\$112.50	LC	Process documents for production;
11/21/2023	Tejeda, Engels J	4.7	\$2,585.00	LC	Continue revising responses to plaintiff's broad interrogatories and second set of requests for documents and exchange emails with LTanner, JRaisner and BBLarsen regarding same;
11/21/2023	Tejeda, Engels J	6.5	\$3,575.00	LC	Continue reviewing and coding 3600+ documents identified as potentially privileged and devise deploy methodology to mitigate false positives and designate for supplemental production over 1,100 documents in response to plaintiff's overbroad document requests; email BBLarsen regarding same;
11/22/2023	Larsen, Brita B	3.4	\$1,173.00	LC	Conferences with EJTejeda regarding final production and privilege log; revise privilege log for service on opposing counsel; database work to finalize production set; prepare production set for service on opposing counsel; serve production documents on counsel via Box; serve deposition transcripts on opposing counsel;
11/22/2023	Omsberg, Stephanie M.	0.9	\$202.50	LC	Process documents for production;
11/22/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Exchange multiple emails with BBLarsen and QC regarding final production of documents in response to plaintiff's broad requests and privilege log;
11/22/2023	Tejeda, Engels J	2.2	\$1,210.00	LC	Research effect of unemployment benefits on damages under WARN Act and email committee's counsel regarding potential resolution;
11/24/2023	Tejeda, Engels J	6.3	\$3,465.00	LC	Continue reviewing and analyzing transcripts and exhibits from committee's depositions of the defendants' consultant and officers/directors to avoid duplicative discovery;
11/25/2023	Tejeda, Engels J	6.8	\$3,740.00	LC	Continue reviewing and analyzing transcripts of the committee's depositions of debtors' representatives about events leading to bankruptcy and impact of CFPB Ruling;
11/25/2023	Tejeda, Engels J	0.8	\$440.00	LC	Review initial disclosures and case files regarding plaintiff's proposed depositions, and exchange emails with plaintiff's counsel regarding meet and confer to narrow number and duration of proposed depositions;
11/26/2023	Tejeda, Engels J	0.4	\$220.00	LC	Research local rules and JGoldblatt's rules regarding discovery disputes;
11/26/2023	Tejeda, Engels J	5.5	\$3,025.00	LC	Continue reviewing and analyzing transcripts of the committee's depositions of Metzger and Cervinka regarding testimony about RIFs or events leading to RIFs and bankruptcy planning;
11/26/2023	Tejeda, Engels J	0.6	\$330.00	LC	Prepare for and attend meet and confer with plaintiff's counsel JRaisner, GLin, and JRaisner regarding attempts save estate resources by reducing number or duration of depositions proposed by plaintiff in light of deposition transcripts shared with plaintiff's counsel;
11/27/2023	Larsen, Brita B	0.3	\$103.50	LC	Conferences with EJTejeda and LMPerkins regarding deposition preparations;
11/27/2023	Perkins, Leslie M.	3	\$1,080.00	LC	Conduct research regarding the sufficiency of the employee termination notices;
11/27/2023	Perkins, Leslie M.	0.2	\$72.00	LC	Communicate with the client regarding the sufficiency of the employee termination notices;
11/27/2023	Perkins, Leslie M.	0.9	\$324.00	LC	Draft the notice of deposition for the plaintiff's deposition;
11/27/2023	Perkins, Leslie M.	1.2	\$432.00	LC	Draft supplemental initial disclosures;
11/27/2023	Perkins, Leslie M.	0.4	\$144.00	LC	Call with committee counsel regarding notices of termination and budget;
11/27/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Communication with EJTejeda regarding supplemental initial disclosures, research needed for the upcoming depositions, and notices for the upcoming depositions;
11/27/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Call with co-counsel regarding deposition preparation meetings and potential settlement;
11/27/2023	Perkins, Leslie M.	0.1	\$36.00	LC	Communicate with client and co-counsel regarding supplemental initial disclosures;
11/27/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Conduct review of documents for upcoming depositions;
11/27/2023	Perkins, Leslie M.	2.6	\$936.00	LC	Prepare for and attend deposition preparation and ground rules meeting with clients;
11/27/2023	Perkins, Leslie M.	1	\$360.00	LC	Begin deposition preparation for plaintiff's deposition;
11/27/2023	Tejeda, Engels J	3.4	\$1,870.00	LC	Research case files regarding plaintiff's challenge to notice and review cases regarding same;
11/27/2023	Tejeda, Engels J	2.8	\$1,540.00	LC	Multiple calls with committee's counsel, debtor's lead counsel, plaintiff's counsel, regarding potential resolution of plaintiff's claim and review documents regarding issues discussed during calls;
11/27/2023	Tejeda, Engels J	0.1	\$55.00	LC	Review and revise supplemental initial disclosures and notice of deposition;
11/27/2023	Tejeda, Engels J	0.5	\$275.00	LC	Call with AWirtz regarding potential resolution to mitigate litigation expenses;
11/27/2023	Tejeda, Engels J	2.6	\$1,430.00	LC	Prepare for and attend ground rules call with deposition witnesses designated by plaintiff;
11/28/2023	Benard, Bryan K.	0.9	\$481.50	LC	Conference with EJTejeda regarding deposition and summary judgment strategy, settlement strategy, and related matters;
11/28/2023	Perkins, Leslie M.	0.9	\$324.00	LC	Prepare for and attend additional call with CJohnson to prepare for his deposition;
11/28/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Complete final draft of supplemental initial disclosures and notice of deposition;
11/28/2023	Perkins, Leslie M.	1.1	\$396.00	LC	Prepare for and attend call with JHartley to prepare for his deposition;
11/28/2023	Perkins, Leslie M.	1.1	\$396.00	LC	Prepare for and attend call with CJohnson to prepare for his deposition;
11/28/2023	Perkins, Leslie M.	1	\$360.00	LC	Prepare for and attend call with JMorris to prepare for her deposition;
11/28/2023	Perkins, Leslie M.	0.9	\$324.00	LC	Prepare for and attend call with CWallace to prepare for his deposition;
11/28/2023	Perkins, Leslie M.	0.1	\$36.00	LC	Communicate with court reporter to schedule reporting for plaintiff's deposition;
11/28/2023	Perkins, Leslie M.	1	\$360.00	LC	Prepare for and attend additional call with JHartley to prepare for his deposition;
11/28/2023	Perkins, Leslie M.	1.2	\$432.00	LC	Prepare for and attend call with BSmith to prepare for his deposition;
11/28/2023	Perkins, Leslie M.	2.7	\$972.00	LC	Continue preparing for the plaintiff's deposition;
11/28/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Prepare for and attend call with MDeVico to prepare for his deposition;
11/28/2023	Tejeda, Engels J	10.7	\$5,885.00	LC	Continue preparation for 6 depositions scheduled by plaintiffs and hold multiple calls with co-counsel, committee's counsel, regarding same;
11/28/2023	Tejeda, Engels J	0.7	\$385.00	LC	Research regarding effect of plaintiff's lost claim on class case;
11/29/2023	Johnson, Brent E.	0.5	\$355.00	LC	Analyze class action question; communications with EJTejeda regarding class representative after class certification;
11/29/2023	Larsen, Brita B	0.2	\$69.00	LC	Conference with LMPerkins regarding deposition exhibit preparations; review exhibits;
11/29/2023	Perkins, Leslie M.	0.4	\$144.00	LC	Prepare for and attend preparation call for JHartley in preparation for his deposition;
11/29/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Prepare for and attend preparation call for CJohnson in preparation for his deposition;

## Detailed Time Entries

11/29/2023	Perkins, Leslie M.	0.6	\$216.00	LC	Meeting with EJTejeda to discuss today's depositions and tomorrow's depositions;
11/29/2023	Perkins, Leslie M.	2.7	\$972.00	LC	Continue drafting deposition outline for KHansen's deposition;
11/29/2023	Perkins, Leslie M.	6.6	\$2,376.00	LC	Attend CWallace's deposition;
11/29/2023	Perkins, Leslie M.	0.3	\$108.00	LC	Prepare for and attend preparation call for BSmith in preparation for his deposition;
11/29/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Prepare for and attend preparation call for JMorris in preparation for her deposition;
11/29/2023	Tejeda, Engels J	2.4	\$1,320.00	LC	Continue preparing for second round of plaintiff's depositions of 6 witnesses;
11/29/2023	Tejeda, Engels J	6.6	\$3,630.00	LC	Defend plaintiff's deposition of CWallace;
11/30/2023	Larsen, Brita B	0.2	\$69.00	LC	Conferences with EJTejeda and LMPerkins; search production documents for specific emails regarding Lexington Law; forward findings to same;
11/30/2023	Perkins, Leslie M.	1.8	\$648.00	LC	Prepare for and attend deposition for CJohnson;
11/30/2023	Perkins, Leslie M.	2.3	\$828.00	LC	Attend KHansen's deposition;
11/30/2023	Perkins, Leslie M.	6.2	\$2,232.00	LC	Complete final preparations for plaintiff's deposition;
11/30/2023	Tejeda, Engels J	1.8	\$990.00	LC	Attend KHansen's deposition;
11/30/2023	Tejeda, Engels J	3.1	\$1,705.00	LC	Prepare for and defend plaintiff's deposition of JHartley;
11/30/2023	Tejeda, Engels J	1.6	\$880.00	LC	Meet with LMPerkins regarding revisions to outline of deposition of KHansen and suggest revisions to same;
11/30/2023	Tejeda, Engels J	1	\$550.00	LC	Prepare for and defend plaintiff's deposition of CJohnson;
11/30/2023	Tejeda, Engels J	0.1	\$55.00	LC	Email CWallace regarding review of deposition transcripts and errata deadline;
12/1/2023	Larsen, Brita B	0.3	\$103.50	LC	Conferences with EJTejeda and LMPerkins; address deposition transcripts;
12/1/2023	Perkins, Leslie M.	2	\$720.00	LC	Prepare exhibits for JMorris' deposition;
12/1/2023	Perkins, Leslie M.	5.2	\$1,872.00	LC	Conduct research for the motion to decertify;
12/1/2023	Tejeda, Engels J	2.8	\$1,540.00	LC	Call with LTanner and BSmith regarding supplemental document production and research key warn-act cases;
12/1/2023	Tejeda, Engels J	0.6	\$330.00	LC	Defend plaintiff's deposition of BSmith;
12/1/2023	Tejeda, Engels J	5.3	\$2,915.00	LC	Defend plaintiff's deposition of JMorris;
12/1/2023	Tejeda, Engels J	1.4	\$770.00	LC	Defend plaintiff's deposition of Devico (5th deposition in 3 days);
12/2/2023	Benard, Bryan K.	0.8	\$428.00	LC	Strategy conferences with EJTejeda regarding depositions, preparation, settlement discussions, and related matters; consider and analyze same;
12/2/2023	Perkins, Leslie M.	5	\$1,800.00	LC	Conduct research for and draft the motion for decertification;
12/2/2023	Perkins, Leslie M.	3.1	\$1,116.00	LC	Conduct additional research in preparation for the trial regarding the WARN Act exceptions;
12/2/2023	Tejeda, Engels J	8.1	\$4,455.00	LC	Continue preparing exhibits for trial;
12/3/2023	Larsen, Brita B	0.4	\$138.00	LC	Conferences with EJTejeda; address deposition transcripts and exhibits;
12/3/2023	Perkins, Leslie M.	1.5	\$540.00	LC	Complete edits to the motion for decertification;
12/3/2023	Tejeda, Engels J	0.6	\$330.00	LC	Email EKamerath and LTanner regarding plaintiff's supplemental document demand and threatened motion regarding notice;
12/3/2023	Tejeda, Engels J	9.9	\$5,445.00	LC	Continue trial preparation, trial outline and exhibits and email BBLarsen and LMPerkins regarding same;
12/3/2023	Tejeda, Engels J	1.4	\$770.00	LC	Revise and suggest changes to decertification motion;
12/4/2023	Benard, Bryan K.	1.2	\$642.00	LC	Strategy conferences with LMPerkins and EJTejeda regarding summary judgment arguments, cases, strategies, evidence and related WARN act issues; follow up conferences and review of documents and motions;
12/4/2023	Larsen, Brita B	4.8	\$1,656.00	LC	Conferences with EJTejeda and LMPerkins regarding trial preparations (0.80); database work to prepare exhibits and gather court form for exhibit list (2.7); address deposition exhibit replacements received from court reporters (0.20); conferences with EJTejeda regarding additional documents for production (0.40); address additional documents received from client (0.20); review emails from BSmith for relevance (0.10); conferences with Somsberg regarding additional documents to upload to Relativity and pending production (0.10); telephone conference with EJTejeda, JVandersloot and JMorris regarding audio files, WARN notices and additional emails (0.30);
12/4/2023	Perkins, Leslie M.	5.1	\$1,836.00	LC	Complete first draft of the opposition to the motion for partial summary judgment and cross-motion for summary judgment and the two accompanying declarations;
12/4/2023	Perkins, Leslie M.	0.8	\$288.00	LC	Communicate with EJTejeda and BBLarsen regarding witness list, exhibits for trial and opposition to plaintiff's motion for partial summary judgment;
12/4/2023	Perkins, Leslie M.	2	\$720.00	LC	Begin drafting the statement of undisputed facts in preparation for trial;
12/4/2023	Tejeda, Engels J	3.6	\$1,980.00	LC	Review and mark for production additional 2,000 documents requested by counsel regarding adequacy of warn notices and work with multiple client representatives, including HR and IT, to track down responsive documents that were non-responsive to plaintiff's prior requests and unnecessary but for plaintiff's threats to file motion (3.2); work with BBLarsen regarding gathering same (.40);
12/4/2023	Tejeda, Engels J	1.6	\$880.00	LC	Revise and finalize motion for partial decertification and exchange same with co-counsel team;
12/4/2023	Tejeda, Engels J	1.3	\$715.00	LC	Watch and analyze videorecording of March 23 town hall requested by plaintiff's counsel, and admissibility of same;
12/4/2023	Tejeda, Engels J	5.5	\$3,025.00	LC	Continue preparing trial exhibits, including damages calculation and potential exposure for the estate;
12/4/2023	Tejeda, Engels J	1.2	\$660.00	LC	Exchange multiple emails with BBLarsen, LMPerkins regarding efficient identification of trial exhibits and tailoring same to specific issues on affirmative defenses;
12/4/2023	Tejeda, Engels J	1.5	\$825.00	LC	Review and analyze plaintiff's motion for partial summary judgment as to May and June layoffs, research and discuss response to same and exchange it with client team;
12/4/2023	Tejeda, Engels J	0.4	\$220.00	LC	Exchange emails with MJimenez and LMPerkins regarding plaintiff's argument regarding adequacy of notices;
12/5/2023	Larsen, Brita B	4.1	\$1,414.50	LC	Conferences with EJTejeda and LMPerkins and trial preparations and address trial exhibits (2.1); address supplemental production of documents and finalize and serve on opposing counsel (1.2); finalize preparation of exhibit list in court format requested by EJTejeda (0.80);
12/5/2023	Omsberg, Stephanie M.	1.9	\$427.50	LC	Process documents for productions x2;
12/5/2023	Perkins, Leslie M.	3.6	\$1,296.00	LC	Collect and process exhibits to the cross motion for summary judgment and the opposition to the motion for summary judgment;
12/5/2023	Perkins, Leslie M.	2	\$720.00	LC	Complete final edits to the cross motion for summary judgment and the opposition to the motion for summary judgment;
12/5/2023	Perkins, Leslie M.	5.6	\$2,016.00	LC	Prepare for and attend trial preparation meeting with clients;
12/5/2023	Tejeda, Engels J	4.6	\$2,530.00	LC	Prepare for and conduct trial preparation with CWallace, JHartley, LTanner, EKamerath;
12/5/2023	Tejeda, Engels J	2.6	\$1,430.00	LC	Continue outlining elements of warn act exceptions;
12/5/2023	Tejeda, Engels J	3.4	\$1,870.00	LC	Finalize and file cross motion for summary judgment on notices and opposition to plaintiff's motion for summary judgment on May and June notices;
12/6/2023	Larsen, Brita B	4.6	\$1,587.00	LC	Conference call with EJTejeda, LMPerkins and MYurkewicz regarding trial preparations; gather proposed trial exhibits and prepare list of exhibits per EJTejeda request;
12/6/2023	Perkins, Leslie M.	1.2	\$432.00	LC	Complete statement of undisputed facts;
12/6/2023	Perkins, Leslie M.	3	\$1,080.00	LC	Prepare trial exhibits;
12/6/2023	Perkins, Leslie M.	1.4	\$504.00	LC	Prepare for and attend call with opposing counsel to discuss trial;
12/6/2023	Perkins, Leslie M.	1	\$360.00	LC	Complete and process errata sheet for JHartley's deposition;
12/6/2023	Perkins, Leslie M.	1.1	\$396.00	LC	Attend call with local counsel to prepare for trial;
12/6/2023	Perkins, Leslie M.	1	\$360.00	LC	Draft witness and exhibit list pleading;
12/6/2023	Suflas, Steven W.	1.4	\$1,141.00	LC	Emails and conference with EJTejeda regarding WARN issues and prepare for oral argument; review emails from plaintiffs' counsel; conduct research regarding benefit plans;
12/6/2023	Tejeda, Engels J	9.6	\$5,280.00	LC	Continue preparing witnesses and outlines for trial and research regarding WARN defenses in light of concluding evidence;
12/6/2023	Tejeda, Engels J	0.8	\$440.00	LC	Meet with local counsel regarding trial preparation and follow-up on witness and exhibits lists;
12/6/2023	Tejeda, Engels J	1.1	\$605.00	LC	Meet and confer with plaintiff's counsel on pretrial matter and review rules regarding designations;
12/7/2023	Bullinger, Jason M.	0.5	\$110.00	LC	Edit a new video clip from exhibit 125;

Exhibit A

Detailed Time Entries

12/7/2023	Larsen, Brita B	4.2	\$1,449.00	LC	Conferences with ETejeda and LMP Perkins regarding trial exhibits and preparations and conference with litigation team regarding logistics (1.5); conference with ETejeda, LMP Perkins, CWallace and JHartley regarding spreadsheets for use at trial (0.80); prepare and mark trial exhibits for use in trial (1.70); obtain clip of Town Hall video for use in trial (0.20);
12/7/2023	Perkins, Leslie M.	0.8	\$288.00	LC	Prepare for and attend meeting with client to identify relevant spreadsheet tabs for exhibits to be used at trial;
12/7/2023	Perkins, Leslie M.	2.3	\$828.00	LC	Conduct research regarding the standard for adding a new
12/7/2023	Perkins, Leslie M.	1	\$360.00	LC	Prepare for pre-trial conference with Judge;
12/7/2023	Perkins, Leslie M.	3.3	\$1,188.00	LC	Complete research regarding all elements of all claims in the matter;
12/7/2023	Perkins, Leslie M.	3.1	\$1,116.00	LC	Review deposition transcripts for deposition designation;
12/7/2023	Perkins, Leslie M.	0.5	\$180.00	LC	Attend pre-trial conference;
12/7/2023	Suftas, Steven W.	0.3	\$244.50	LC	Conference and emails with ETejeda;
12/7/2023	Tejeda, Engels J	2.4	\$1,320.00	LC	Review plaintiff's deposition transcript designations and being counter-designating deposition testimony (Smith, Deviko, Hartley, Morris);
12/7/2023	Tejeda, Engels J	2.6	\$1,430.00	LC	Continue preparing for trial on WARN Act claims, reviewing plaintiffs exhibits for ways to minimize duplication and searching for new exhibits in light of plaintiff's last minute attempt to substitute third party;
12/7/2023	Tejeda, Engels J	0.1	\$55.00	LC	Work with BBLarsen to fix exhibit lists to make it easier for the witnesses and court to follow given that both parties used numbers to mark their exhibits and there's limited time at trial;
12/7/2023	Tejeda, Engels J	1.9	\$1,045.00	LC	Prepare for and attend pretrial conference;
12/7/2023	Tejeda, Engels J	2.6	\$1,430.00	LC	multiple conversations with PGX representatives, co-counsel, BBLarsen and LMP Perkins regarding trial preparation and pretrial conference;
12/8/2023	Benard, Bryan K.	1	\$535.00	LC	Work on trial strategy, arguments and conferences regarding same;
12/8/2023	Larsen, Brita B	4.9	\$1,690.50	LC	Conferences with ETejeda and LMP Perkins regarding trial exhibits and prepare additional trial exhibits (2.8); coordinate preparation and shipment of trial exhibit binders and other materials (0.90); revise certain exhibits and conference with MYurkewicz and DPacitti regarding logistics for trial and service of trial exhibits on opposing counsel and the court (1.2);
12/8/2023	Perkins, Leslie M.	1.2	\$432.00	LC	Prepare for and attend call with local counsel regarding trial preparation;
12/8/2023	Perkins, Leslie M.	2.5	\$900.00	LC	Conduct additional research regarding the decertification motion and the new class representative;
12/8/2023	Perkins, Leslie M.	4.3	\$1,548.00	LC	Meeting with CWallace to prepare for him trial;
12/8/2023	Perkins, Leslie M.	1.5	\$540.00	LC	Complete final preparation of exhibits for use at trial;
12/8/2023	Perkins, Leslie M.	2	\$720.00	LC	Complete draft of stipulated facts for trial;
12/8/2023	Tejeda, Engels J	4.6	\$2,530.00	LC	Continue reviewing docket filings and preparing for trial on WARN Claim;
12/8/2023	Tejeda, Engels J	5.9	\$3,245.00	LC	Prepare for and meet with CWallace regarding exhibits and testimony at trial and finish preparing revised exhibits;
12/9/2023	Perkins, Leslie M.	1.5	\$540.00	LC	Complete edits to proposed stipulated facts;
12/9/2023	Tejeda, Engels J	1.7	\$935.00	LC	Call with co-counsel regarding settlement discussions and other ways to resolve case without incurring further expenses and research plan regarding proposed alternatives;
12/9/2023	Tejeda, Engels J	6.4	\$3,520.00	LC	Review multiple deposition transcripts in preparation for trial;
12/10/2023	Benard, Bryan K.	2.3	\$1,230.50	LC	Strategy conferences with ETejeda and LTanner regarding trial issues, arguments, and strategy, and review and revise draft trial declaration for CWallace (1.9); further advice and guidance on trial themes, presentation issues, and related matter (0.40);
12/10/2023	Larsen, Brita B	0.2	\$69.00	LC	Conferences with ETejeda and LMP Perkins regarding trial preparations and exhibits;
12/10/2023	Perkins, Leslie M.	4	\$1,440.00	LC	Prepare clients for trial;
12/10/2023	Perkins, Leslie M.	2	\$720.00	LC	Prepare plaintiff's cross examination;
12/10/2023	Tejeda, Engels J	4.8	\$2,640.00	LC	Draft, circulate, edit and file declaration of CWallace in lieu of direct testimony and multiple calls with co-counsel, client representative, regarding same;
12/10/2023	Tejeda, Engels J	2.8	\$1,540.00	LC	Multiple calls with local counsel regarding pre-trial logistics and resolution strategy, review case files regarding same;
12/10/2023	Tejeda, Engels J	4.6	\$2,530.00	LC	Continue preparing witness outlines and meet with CJohnson and CWallace regarding preparation for trial testimony;
12/11/2023	Benard, Bryan K.	0.9	\$481.50	LC	Various strategy conferences regarding trial and settlement issues, as well as next steps;
12/11/2023	Perkins, Leslie M.	5	\$1,800.00	LC	Attend trial and post-trial talks with client;
12/11/2023	Tejeda, Engels J	3.8	\$2,090.00	LC	Defend debtor defendants at trial on WARN Claim and debrief regarding settlement;
12/11/2023	Tejeda, Engels J	4.1	\$2,255.00	LC	Finish outlining trial closing and reviewing exhibits, tentative redirect outline for CWallace and direct outline for CJohnson;
	<b>Subtotal (LC)</b>	<b>761.8</b>	<b>\$362,942.50</b>		
12/9/2023	Tejeda, Engels J	6.4	\$1,760.00	TR	Travel to Delaware for trial;
12/10/2023	Perkins, Leslie M.	8	\$1,440.00	TR	Travel to bankruptcy trial in Delaware;
12/11/2023	Perkins, Leslie M.	7	\$1,260.00	TR	Travel back to SLC from the trial in DE;
12/12/2023	Tejeda, Engels J	6.6	\$1,815.00	TR	Travel from trial in Delaware;
	<b>Subtotal (TR)</b>	<b>28</b>	<b>\$6,275.00</b>		
	<b>Total</b>	<b>816.7</b>	<b>\$384,546.50</b>		
	<b>Blended Rate</b>	<b>\$470.85</b>			
	<b>Tota Costs</b>	<b>\$11,126.38</b>			
	<b>Total Sought</b>	<b>\$395,672.88</b>			

**Exhibit B**  
**Itemized Expenses**

Date	TKPR Name	Base Amt	Narrative
11/3/2023	Benard, Bryan K.	\$107.50	Extract client documents to Relativity for review, Chad Wallace
11/7/2023	Benard, Bryan K.	\$950.00	Extract client email to ECA for culling, Chad Wallace
11/7/2023	Benard, Bryan K.	\$2,009.25	Migrate culled data to Relativity for review, Chad Wallace
11/9/2023	Benard, Bryan K.	\$62.50	Extract client docs to Relativity for review, Chad Wallace
11/13/2023	Benard, Bryan K.	\$41.25	Migrate culled data to review in Relativity, Chad Wallace
11/20/2023	Benard, Bryan K.	\$62.50	Extract client docs to Relativity for review, Chad Wallace
11/21/2023	Benard, Bryan K.	\$62.50	Extract client docs to Relativity for review, Chad Wallace
11/30/2023	Tejeda, Engels J	\$587.80	11/30/2023 - Amex - Airfare - Travel to Delaware for Trial
12/1/2023	Tejeda, Engels J	\$1,388.72	VENDOR: Hanson/Renaissance Reporting & Video; INVOICE#: 735515; DATE: 12/1/2023 - Transcript - Chad Wallace
12/4/2023	Tejeda, Engels J	\$1,274.66	VENDOR: Hanson/Renaissance Reporting & Video; INVOICE#: 735660; DATE: 12/4/2023 - Copy of Transcript of Judith Morris and Michael DeVico
12/4/2023	Tejeda, Engels J	\$690.50	VENDOR: Hanson/Renaissance Reporting & Video; INVOICE#: 735661; DATE: 12/4/2023 - Copy of Transcript of Kirsten Hansen
12/4/2023	Benard, Bryan K.	\$62.50	Extract client email to Relativity for review Chad Wallace
12/4/2023	Benard, Bryan K.	\$62.50	Extract client docs to Relativity for review Chad Wallace
12/4/2023	Benard, Bryan K.	\$142.50	Extract client docs to Relativity for review Chad Wallace VENDOR: Hanson/Renaissance Reporting & Video; INVOICE#: 735831; DATE: 12/6/2023 - Copy of Transcript of Cody
12/6/2023	Tejeda, Engels J	\$841.10	Johnson and Jared Hartley
12/8/2023	Tejeda, Engels J	\$120.31	COM. NEXT DAY AIR, c/o HOTEL DU PONT, Engels J. Tejeda, Wilmington, DE, 1Z59E98W4495737873
12/8/2023	Tejeda, Engels J	\$146.99	COM. NEXT DAY AIR, c/o HOTEL DU PONT, Engels J. Tejeda, Wilmington, DE, 1Z59E98W4499045265
12/8/2023	Tejeda, Engels J	(\$10.19)	SHIPPING CHRG CORRECTION, c/o HOTEL DU PONT, Engels J. Tejeda, Wilmington, DE, 1Z59E98W4495737873
12/8/2023	Perkins, Leslie M.	\$997.80	Airfare - Airfare for PGX trial
12/8/2023	Tejeda, Engels J	\$220.36	12/08/2023 - Amex - Car Rental - Travel to Delaware for Trial - reservation fee
12/10/2023	Tejeda, Engels J	\$33.81	12/10/2023 - Amex - Breakfast - Breakfast (for trial)
12/10/2023	Tejeda, Engels J	\$61.50	12/10/2023 - Amex - Lunch - Breakfast (for trial)
12/11/2023	Perkins, Leslie M.	\$567.50	Hotel - Lodging - Hotel expenses during PGX trial
12/11/2023	Perkins, Leslie M.	\$76.05	Car Rental - Car rental expenses during PGX trial
12/11/2023	Perkins, Leslie M.	\$70.00	Parking - Parking at the airport while at out-of-state trial for PGX.

**Exhibit B**  
**Itemized Expenses**

		12/12/2023 - Amex - Car Rental - Travel to Delaware for Trial -
12/12/2023 Tejada, Engels J	\$179.30	balance for rental
12/12/2023 Tejada, Engels J	\$47.54	12/12/2023 - Amex - Car Rental Fuel - Fuel
12/13/2023 Tejada, Engels J	\$1,370.00	12/13/2023 - Amex - Hotel - Lodging - Hotel during Trial
12/13/2023 Tejada, Engels J	\$135.00	12/13/2023 - Amex - Hotel - Parking - Parking during Trial
		12/13/2023 - Amex - Hotel - Breakfast - Breakfast (2) during
12/13/2023 Tejada, Engels J	\$89.57	Trial
12/13/2023 Tejada, Engels J	\$33.78	12/13/2023 - Amex - Hotel - Dinner - Dinner during Trial
12/13/2023 Tejada, Engels J	\$30.00	12/13/2023 - Amex - Baggage Fee - Travel for trial
<b>Total</b>	<b>\$12,515.10</b>	



*Code: 02*



**Hanson Renaissance Court Reporting and Vic**

2111 Woodward Ave Suite 1105  
 Detroit, MI 48201  
 Phone: 313-567-8100  
 Fax: 313-567-4362



Engels J Tejada  
 Holland & Hart LLP - Utah  
 222 South Main Street  
 Suite 2200  
 Salt Lake City, UT 84101

Invoice date: 12/01/2023  
 Vendor: Hanson  
 Renaissance Amt: \$1,388.72  
 Matter No.: 103795.0005  
 Atty: Engels J. Tejada  
 Invoice No.: 735515  
 Approval:

**Invoice #735515**

Date	Terms
12/01/2023	Net 45

**PAST DUE**

**Re-Sent On 01/31/2024**

Assignment #260765 on 11/29/2023

Case: Hansen, Kirsten v. PGX Holdings, et al  
 Court Docket#: 23-10718 (CTG)

Shipped On: 11/30/2023  
 Shipped Via: Emailed  
 Provider: Durkin, Neal E; Voza Mada, Elaine M

Description	Price	Qty	Amount
<b>Chad Wallace</b>			
Copy of Transcript (Emailed) (185 Pages)	\$ 5.80	1.00	\$ 1,073.00
Emailed Transcript	\$ 10.00	1.00	\$ 10.00
Virtual Videoconference	\$ 100.00	1.00	\$ 100.00
Exhibits Emailed (463 Units)	\$ 0.40	1.00	\$ 185.20
*****EXPEDITED TRANSCRIPT*****		1.00	\$ 0.00

\$ 1,368.20

Finance Charge percentage

\$ 20.52

**Sales & Use Tax Accrual**

\$ 20.52

City 64 **GL-23201**  
 State 64 **GL-23202**  
 City Consumption **GL-23201**  
 State Consumption **GL 23202**  
 Exempt from tax   
 Tax Included

Amount Due: **\$ 1,388.72**  
 Paid: \$ 0.00

*Transcript*

<b>Balance Due:</b>	<b>\$ 1,388.72</b>
<b>Payment Due:</b>	<b>01/15/2024</b>

THANK YOU \*\*We accept all major credit cards\*\*  
 A 3.5% convenience fee will be applied for all credit card payments.  
<https://www.alservicelink.com/hansonreporting/quickpay>

"Payment Is Not Contingent On Client Reimbursement"

EIN: 38-2436945  
 DUNS: 147559587

INVOICE APPROVED FOR PAYMENT

Vendor: 62198  
 Office: 64  
 Client/Case: 103795.0005  
 T/R: 5852  
 Amount \$: 1368.20  
 By: \_\_\_\_\_

**Received**

FEB 15 2024

Financial Services

**Hanson Renaissance Court Reporting and Vic**

2111 Woodward Ave Suite 1105  
 Detroit, MI 48201  
 Phone: 313-567-8100  
 Fax: 313-567-4362



Engels J Tejada  
 Holland & Hart LLP - Utah  
 222 South Main Street  
 Suite 2200  
 Salt Lake City, UT 84101

Invoice date: 12/01/2023  
 Vendor: Hanson  
 Renaissance Amt: \$1,388.72  
 Matter No.: 103795.0005  
 Atty: Engels J. Tejada  
 Invoice No.: 735515  
 Approval:

**Invoice #735515**

Date	Terms
12/01/2023	Net 45

**PAST DUE**  
**Re-Sent On 01/31/2024**

**Assignment #260765 on 11/29/2023**

**Case:** Hansen, Kirsten v. PGX Holdings, et al  
**Court Docket#:** 23-10718 (CTG)

**Shipped On:** 11/30/2023  
**Shipped Via:** Emailed  
**Provider:** Durkin, Neal E; Vozza Mada, Elaine  
 M

Description	Price	Qty	Amount
<b>Chad Wallace</b>			
Copy of Transcript (Emailed) (185 Pages)	\$ 5.80	1.00	\$ 1,073.00
Emailed Transcript	\$ 10.00	1.00	\$ 10.00
Virtual Videoconference	\$ 100.00	1.00	\$ 100.00
Exhibits Emailed (463 Units)	\$ 0.40	1.00	\$ 185.20
*****EXPEDITED TRANSCRIPT*****		1.00	\$ 0.00
			\$ 1,368.20
Finance Charge percentage			\$ 20.52
			\$ 20.52

Amount Due: \$ 1,388.72  
 Paid: \$ 0.00

<b>Balance Due:</b>	<b>\$ 1,388.72</b>
<b>Payment Due:</b>	<b>01/15/2024</b>

**THANK YOU \*\*We accept all major credit cards\*\***  
**A 3.5% convenience fee will be applied for all credit card payments.**  
<https://www.alservicelink.com/hansonreporting/quickpay>

"Payment Is Not Contingent On Client Reimbursement"

EIN: 38-2436945  
 DUNS: 147559587

**Hanson Renaissance Court Reporting and Vic**

2111 Woodward Ave Suite 1105  
 Detroit, MI 48201  
 Phone: 313-567-8100  
 Fax: 313-567-4362



Invoice date: 12/04/2023  
 Vendor: Hanson Renaissance  
 Amt: \$690.50  
 Matter No.: 103795.0005  
 Atty: Engels J. Tejada  
 Invoice No.: 735661  
 Approval: /s/Engels J. Tejada

**Invoice #735661**

Leslie M Perkins  
 Holland & Hart LLP - Utah  
 222 South Main Street  
 Suite 2200  
 Salt Lake City, UT 84101

Date	Terms
12/04/2023	Net 45

**Assignment #260836 on 11/30/2023**

**Case:** Hansen, Kirsten v. PGX Holdings, et al  
**Court Docket#:** 23-10718 (CTG)

**Shipped On:** 12/01/2023  
**Shipped Via:** Emailed  
**Provider:** Durkin, Neal E; Vozza Mada, Elaine  
 M

Description	Price	Qty	Amount
<b>Kirsten Hansen</b>			
(Hold) Original & Emailed (53 Pages)	\$ 8.50	1.00	\$ 450.50
Attendance premium hours (2 Hours)	\$ 50.00	1.00	\$ 100.00
Exhibits Emailed (100 Units)	\$ 0.40	1.00	\$ 40.00
Virtual Videoconference	\$ 100.00	1.00	\$ 100.00
			\$ 690.50
<b>Other</b>			
*****EXPEDITED TRANSCRIPT*****		1.00	\$ 0.00
			\$ 0.00

Amount Due: \$ 690.50  
 Paid: \$ 0.00

**NO ORIGINAL EXHIBITS TO RETURN**

<b>Balance Due:</b>	<b>\$ 690.50</b>
<b>Payment Due:</b>	<b>01/18/2024</b>

Interest after 45 days at 1.50%: \$ 700.86

THANK YOU \*\*We accept all major credit cards\*\*  
<https://www.alservicelink.com/hansonreporting/quickpay/index/division/28> -- Quick Pay.

"Payment Is Not Contingent On Client Reimbursement"

EIN: 38-2436945

**Hanson Renaissance Court Reporting and Vic**

2111 Woodward Ave Suite 1105  
 Detroit, MI 48201  
 Phone: 313-567-8100  
 Fax: 313-567-4362



Invoice date: 12/04/2023  
 Vendor: Hanson  
 Renaissance Amt: \$1,202.20  
 Matter No.: 103795.0005  
 Atty: Engels J. Tejada  
 Invoice No.: 735660  
 Approval: /s/Engels J. Tejada

**Invoice #735660**

Engels J Tejada  
 Holland & Hart LLP - Utah  
 222 South Main Street  
 Suite 2200  
 Salt Lake City, UT 84101

Date	Terms
12/04/2023	Net 45

**Assignment #260766 on 12/01/2023**

**Case:** Hansen, Kirsten v. PGX Holdings, et al  
**Court Docket#:** 23-10718 (CTG)

**Shipped On:** 12/02/2023  
**Shipped Via:** Emailed  
**Provider:** Harris, Becky L; Myers, Marc M

Description	Price	Qty	Amount
<b>Michael DeVico</b>			
Copy of Transcript (Emailed) (45 Pages)	\$ 5.50	1.00	\$ 247.50
			<hr/>
			\$ 247.50
<b>Judith Morris</b>			
Copy of Transcript (Emailed) (104 Pages)	\$ 5.50	1.00	\$ 572.00
			<hr/>
			\$ 572.00
<b>Other</b>			
Exhibits Emailed (343 Units)	\$ 0.40	1.00	\$ 137.20
Emailed Transcript (3 Units)	\$ 10.00	1.00	\$ 30.00
Virtual Videoconference	\$ 100.00	1.00	\$ 100.00
*****EXPEDITED TRANSCRIPT*****		1.00	\$ 0.00
			<hr/>
			\$ 267.20
<b>Robert Smith</b>			
Copy of Transcript (Emailed) (21 Pages)	\$ 5.50	1.00	\$ 115.50
			<hr/>
			\$ 115.50

Amount Due: \$ 1,202.20  
 Paid: \$ 0.00

<b>Balance Due:</b>	<b>\$ 1,202.20</b>
<b>Payment Due:</b>	<b>01/18/2024</b>

Interest after 45 days at 1.50%: \$ 1,220.23

THANK YOU \*\*We accept all major credit cards\*\*  
<https://www.alservicelink.com/hansonreporting/quickpay/index/division/28> -- Quick Pay.

"Payment Is Not Contingent On Client Reimbursement"

EIN: 38-2436945

**Hanson Renaissance Court Reporting and Vic**

2111 Woodward Ave Suite 1105  
 Detroit, MI 48201  
 Phone: 313-567-8100  
 Fax: 313-567-4362



Invoice date: 12/06/2023  
 Vendor: Hanson Renaissance  
 Amt: \$793.00  
 Matter No.: 103795.0005  
 Atty: Engels J. Tejada  
 Invoice No.: 735831  
 Approval: /s/Engels J. Tejada

**Invoice #735831**

Engels J Tejada  
 Holland & Hart LLP - Utah  
 222 South Main Street  
 Suite 2200  
 Salt Lake City, UT 84101

Date	Terms
12/06/2023	Net 45

**Assignment #260816 on 11/30/2023**

**Case:** Hansen, Kirsten v. PGX Holdings, et al  
**Court Docket#:** 23-10718 (CTG)

**Shipped On:** 12/01/2023  
**Shipped Via:** Emailed  
**Provider:** Durkin, Neal E; Vozza Mada, Elaine  
 M

Description	Price	Qty	Amount
<b>Jared Hartley</b>			
Copy of Transcript (Emailed) (76 Pages)	\$ 5.80	1.00	\$ 440.80
			\$ 440.80
<b>Cody Johnson</b>			
Copy of Transcript (Emailed) (31 Pages)	\$ 5.80	1.00	\$ 179.80
			\$ 179.80
<b>Other</b>			
Emailed Transcript (2 Units)	\$ 10.00	1.00	\$ 20.00
Exhibits Emailed (131 Units)	\$ 0.40	1.00	\$ 52.40
Virtual Videoconference	\$ 100.00	1.00	\$ 100.00
*****EXPEDITED TRANSCRIPT*****		1.00	\$ 0.00
			\$ 172.40

Amount Due: \$ 793.00  
 Paid: \$ 0.00

<b>Balance Due:</b>	<b>\$ 793.00</b>
<b>Payment Due:</b>	<b>01/20/2024</b>

Interest after 45 days at 1.50%: \$ 804.90

THANK YOU \*\*We accept all major credit cards\*\*  
<https://www.alservicelink.com/hansonreporting/quickpay/index/division/28> -- Quick Pay.

"Payment Is Not Contingent On Client Reimbursement"

EIN: 38-2436945



**HOTEL DU PONT**

Mrs. Leslie Perkins  
 10052 Buttercup Ln  
 Cedar Hills UT 84062  
 United States

**INFORMATION INVOICE**

Room No. : [REDACTED]  
 Arrival : 12/10/23  
 Departure : 12/11/23  
 Page No. : 1 of 2  
 Folio No. : 9318  
 Conf. No. : 157263169  
 Cashier No. : 131  
 Custom Ref. :

Company Name :  
 Group Name :  
 Guest Name :

Date	Description	Charges	Credits
12/10/23	Valet Parking Overnight Room# 0934 : CHECK# 113665 Gray Nissan	45.00	
12/10/23	Room Charge	475.00	
12/10/23	City Tax [TAX2]%	9.50	
12/10/23	State Tax [TAX8]%	38.00	
12/11/23	[REDACTED]		567.50
<b>Total Charges</b>		<b>567.50</b>	
<b>Total Credits</b>			<b>567.50</b>
<b>Balance</b>			<b>0.00</b>

Merchant ID

Credit Card #



I agree that I am personally liable for payment of this account, and if this person, company or association indicated does not settle by departure date, my liability for payment should be joint and several with such person, company or association.



**HOTEL DU PONT**

Mrs. Leslie Perkins  
10052 Buttercup Ln  
Cedar Hills UT 84062  
United States

**INFORMATION INVOICE**

Room No. : XXXXXXXXXX  
Arrival : 12/10/23  
Departure : 12/11/23  
Page No. : 2 of 2  
Folio No. : 9318  
Conf. No. : 157263169  
Cashier No. : 131  
Custom Ref. :

Company Name :  
Group Name :  
Guest Name :

Transaction ID	19892815	Credit Card Expiry	XX/XX
Approval Code	104043	Capture Method	Manual
Approval Amount	567.50	Transaction Amount	567.50

---

I agree that I am personally liable for payment of this account, and if this person, company or association indicated does not settle by departure date, my liability for payment should be joint and several with such person, company or association.



Rental Agreement # 777606428

Invoice # 90155473504

**Renter Information**

**Renter Name**  
LESLIE PERKINS

**Renter Address**  
CEDARHILL, UT 84062  
USA

**Contract**  
ENTERPRISE PLUS

**Trip Information**

**Pickup**

Sunday, December 10, 2023 5:56 PM

**PHILADELPHIA INTL ARPT (PHL)** ✈️  
1 ARRIVALS RD  
PHILADELPHIA, PA 19153-3708  
USA

**Return**

Monday, December 11, 2023 3:23 PM

**PHILADELPHIA INTL ARPT (PHL)** ✈️  
1 ARRIVALS RD  
PHILADELPHIA, PA 19153-3708  
USA

**Vehicle Information**

**SV AWD**  
**License #:** LCV9083  
**State/Province:** NY  
**Unit #:** 8F0V60  
**Vehicle #:** PC833710

**Vehicle Class Driven**  
Midsize SUV AWD 4-Door/Automatic/  
Air

**Vehicle Class Charged**  
Midsize SUV 4 door/Automatic/Air

**Odometer Mileage/Kilometers**  
**Starting:** 13,984 **Ending:** 14,029

**Total:** 45

**Fuel**  
**Starting:** Full **Ending:** Full

**Renter Charges**

<b>Rental Rate</b>	Time & Distance 1 Day at \$55.86 / Day	\$55.86
<b>Add-Ons</b>	Discount (5.00%)	(\$2.79)
<b>Taxes and Fees</b>	Concession Fee Recovery 11.11 Pct (11.11%)	\$5.90
	Phil Vehicle Rental Tax 2 Pct (2.00%)	\$1.18
	Pa Tax (6.00%)	\$3.54
	Vehicle Rental Tax (2.00%)	\$1.18
	Pta Fee 2.00/day (\$2.00 / Day)	\$2.00
	Phl Tax (2.00%)	\$1.18
	Customer Facility Charge 8.00/day (\$8.00 / Day)	\$8.00
<b>Total</b>		<b>\$76.05</b>
	(Subject to audit)	
	Amount charged on December 11, 2023 to AMERICAN EXPRESS (3008)	(\$76.05)
<b>Amount Due</b>		<b>\$0.00</b>

**Thank you for renting with Enterprise Rent-A-Car**

**We appreciate your business!**

This email was automatically generated from an unattended mailbox, so please do not reply to this e-mail.

If you have any questions about your rental, please view our Frequently



**Thank you for renting  
with Enterprise Rent-A-  
Car**

Asked Questions or send us a secured  
message by visiting our [Support Center](#)



You're all set. If your plans change, be sure to make changes or cancel via [MyTrips](#) on [delta.com](#) before your flight departs.

Have a great trip, and thank you for choosing Delta.

### Passenger Info

Name: LESLIE PERKINS  
SkyMiles [REDACTED]  
Gold

FLIGHT	SEAT
DELTA 1276	29E
DELTA 2717	28E

Visit [delta.com](#) or download the [Fly Delta app](#) to view, select or change your seat. If

you purchased a Delta Comfort+™ seat or a Trip Extra, please visit [My Trips](#) to access a receipt of your purchase.

Sun, 10DEC	DEPART	ARRIVE
DELTA 1276 Main Cabin (T)	SALT LAKE CITY 11:10am	PHILADELPHIA, PA 5:29pm

Tue, 12DEC	DEPART	ARRIVE
DELTA 2717 Main Cabin (T)	PHILADELPHIA, PA 7:00am	SALT LAKE CITY 10:24am

**MANAGE MY TRIP**


### Flight Receipt

Ticket #: [0062194222068](#)

Place of Issue:

Issue Date: 08DEC23

Expiration Date: 08DEC24

METHOD OF PAYMENT	
	\$997.80 USD

CHARGES
Air Transportation Charges

Base Fare	\$900.46 USD
<b>Taxes, Fees and Charges</b>	
United States - September 11th Security Fee(Passenger Civil Aviation Security Service Fee) (AY)	\$11.20 USD
United States - Transportation Tax (US)	\$67.54 USD
United States - Passenger Facility Charge (XF)	\$9.00 USD
United States - Flight Segment Tax (ZP)	\$9.60 USD
<b>TICKET AMOUNT</b>	<b>\$997.80 USD</b>

### Checked Bag Allowance

The fees below are based on your original ticket purchase. Fees may be converted to local currency based on your departure airport. **If you qualify for free or discounted checked baggage**, this will be taken into account when you check in. Visit [delta.com](https://delta.com) for details on baggage embargoes that may apply to your itinerary.

Sun 10 Dec 2023		SLC-PHL
CARRY ON	FIRST	SECOND
FREE	FREE (70LBS/32KG) WAS: <del>\$30.00<sup>USD</sup></del> OR 3,000 miles	FREE (70LBS/32KG) WAS: <del>\$40.00<sup>USD</sup></del> OR 4,000 miles

This trip is operated by Delta and the following carrier(s): . Visit [delta.com](https://delta.com) for details on [baggage embargoes](#) that may apply to your itinerary. Also see other carrier's complete [baggage information](#).

Tue 12 Dec 2023		PHL-SLC
-----------------	--	---------



[REDACTED]  
SkyMiles® Member

CONFIRMATION #: H5ZPQK



You're all set. If your plans change, be sure to make changes or cancel via [MyTrips](#) on [delta.com](#) before your flight departs.

Have a great trip, and thank you for choosing Delta.

### Passenger Info

Name: ENGELS JOSE TEJEDA [REDACTED]  
[REDACTED]

FLIGHT	SEAT
DELTA 1272	21E
DELTA 1272	27E

Visit [delta.com](https://delta.com) or download the [Fly Delta app](#) to view, select or change your seat. If you purchased a Delta Comfort+™ seat or a Trip Extra, please visit [My Trips](#) to access a receipt of your purchase.

Sat, 09DEC	DEPART	ARRIVE
DELTA 1272 Main Cabin (U)	SALT LAKE CITY 11:16am	NEWARK, NJ 5:49pm

Tue, 12DEC	DEPART	ARRIVE
DELTA 1272 Main Cabin (U)	NEWARK, NJ 6:45pm	SALT LAKE CITY 10:15pm

MANAGE MY TRIP


### Flight Receipt

Ticket #: [REDACTED]

Place of Issue:

Issue Date: 29NOV23

Expiration Date: 29NOV24

METHOD OF PAYMENT	
	\$587.80 USD

CHARGES	
<b>Air Transportation Charges</b>	
Base Fare	\$519.08 USD
<b>Taxes, Fees and Charges</b>	
United States - September 11th Security Fee(Passenger Civil Aviation Security Service Fee) (AY)	\$11.20 USD
United States - Transportation Tax (US)	\$38.92 USD
United States - Passenger Facility Charge (XF)	\$9.00 USD
United States - Flight Segment Tax (ZP)	\$9.60 USD
<b>TICKET AMOUNT</b>	<b>\$587.80 USD</b>

---

## Checked Bag Allowance

The fees below are based on your original ticket purchase. Fees may be converted to local currency based on your departure airport. **If you qualify for free or discounted checked baggage**, this will be taken into account when you check in. Visit [delta.com](https://www.delta.com) for details on baggage embargoes that may apply to your itinerary.

Sat 09 Dec 2023

SLC-EWR

CARRY ON	FIRST	SECOND
FREE	\$30.00 <sup>USD</sup> (50LBS/23KG) OR 3,000 miles	\$40.00 <sup>USD</sup> (50LBS/23KG) OR 4,000 miles

This trip is operated by Delta and the following carrier(s): . Visit [delta.com](https://www.delta.com) for details on **baggage embargoes** that may apply to your itinerary. Also see other carrier's complete **baggage information**.

Tue 12 Dec 2023

EWR-SLC

CARRY ON	FIRST	SECOND
FREE	\$30.00 <sup>USD</sup> (50LBS/23KG) OR 3,000 miles	\$40.00 <sup>USD</sup> (50LBS/23KG) OR 4,000 miles

This trip is operated by Delta and the following carrier(s): . Visit [delta.com](https://www.delta.com) for details on **baggage embargoes** that may apply to your itinerary. Also see other carrier's complete **baggage information**.

## Your Pre-Trip Checklist for Easier Travel



**Book Hotel And  
Transportation**

Earn miles by  
booking your



**Visit Our  
Help Center**

Get all your travel  
questions



**Update Your  
Contact  
Information**



travel accommodations with our hotel and car rental partners ›

answered with information on self-service tools, baggage, SkyMiles and more ›

Make sure your information is updated on your SkyMiles profile for a more personalized experience and service. [View my profile ›](#)

### Request Special Services

We are here to help. Complete our [Service Request Form](#) if you need extra assistance during your trip.

### Transportation of Hazardous Materials

Federal law forbids the carriage of hazardous materials aboard aircraft in your luggage or on your person. A violation can result in civil penalties. Examples include: Paints, aerosols, lighter fluid, fireworks, torch lighters, tear gases and compressed gas cartridges.

There are special exceptions for small quantities (up to 70 ounces total). For further information visit [delta.com Restricted Items Section](#).



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We believe travel can change the world. For good. Learn more about our Flight to Net Zero<sup>SM</sup> at [delta.com/sustainability](https://delta.com/sustainability).

### Terms & Conditions

This ticket is non-refundable unless the original ticket was issued at a fully refundable fare. Some fares may not allow changes. If allowed, any change to your itinerary may require payment of a change fee and increased fare. Failure to appear for any flight without notice to Delta will result in cancellation of your remaining reservation.

Note: When using certain vouchers to purchase tickets, remaining credits may not be refunded. Additional charges and/or credits may apply.

Fare Details: SLC DL EWR259.54UA72A0M2 DL SLC259.54UA72A0M2 USD519.08END ZP  
SLCEWR XF SLC4.5EWR4.5

†All SkyMiles® program rules apply. To review the rules, see Membership Guide & Program Rules. Taxes and fees for Award Travel are the responsibility of the passenger and must be paid at the time the ticket is booked. Award Travel seats are limited and may not be available on all flights or in all markets. Offers void where prohibited by law. Other restrictions may apply.

### Checked Bag Allowance

\*On Delta® operated flights, you may carry on one bag and a small personal item at no charge.

Delta One®/First/Business Class weight allowance reverts to 50 lbs for all checked bags beyond regular free allowance.

At the time of check in with Delta, SkyMiles Medallion members, SkyTeam Elite & Elite Plus and active US Military personnel are eligible for fee waivers and other benefits. For more details, visit [delta.com/baggage](https://delta.com/baggage). Basic Cardmembers with a Gold, Platinum, or Reserve Delta SkyMiles Credit Card from American Express are eligible for the first bag fee waiver. More details on the program can be found at [delta.com/firstbagfree](https://delta.com/firstbagfree)

A standard checked bag with Delta may be up to 50 lbs and 62 linear inches (per piece). Additional fees apply for oversize, overweight, and/or additional pieces of checked baggage. Please review Delta's baggage guidelines for details. Weight and size restrictions may vary when checking baggage on carriers other than Delta. Contact with the operating carrier for detailed checked baggage allowances. You must be checked in at the gate by the applicable check-in deadlines or your reservation may be cancelled. Please review Delta's check-in requirement guidelines for details. Check-in requirements vary by airline, so if your ticket includes travel on other airlines, please check with the operating carrier on your ticket.

Do you have comments about our service? Please [email](#) us to share them.

### ADVICE TO INTERNATIONAL PASSENGERS ON LIMITATIONS OF LIABILITY

Passengers embarking upon a journey involving an ultimate destination or a stop in a country other than the country of departure are advised that the provisions of an international treaty (the Warsaw Convention, the 1999 Montreal Convention, or other treaty), as well as a carrier's own contract of

carriage or tariff provisions, may be applicable to their entire journey, including any portion entirely within the countries of departure and destination. The applicable treaty governs and may limit the liability of carriers to passengers for death or personal injury, destruction or loss of, or damage to, baggage, and for delay of passengers and baggage.

Additional protection can usually be obtained by purchasing insurance from a private company. Such insurance is not affected by any limitation of the carrier's liability under an international treaty. For further information please consult your airline or insurance company representative.

### **Conditions of Carriage**

Air transportation on Delta and the Delta Connection<sup>®</sup> carriers is subject to Delta's [conditions of carriage](#). They include terms governing for example:

- [Limits on our liability](#) for personal injury or death of passengers, and for loss, damage or delay of goods and baggage.
- [Claim restrictions](#) including time periods within which you must file a claim or bring action against us.
- Our right to [change terms](#) of the contract.
- [Check-in requirements](#) and other rules established when we may [refuse carriage](#).
- Our rights and limits of our liability for [delay or failure to perform service](#) including schedule change, substitution of alternative air carriers or aircraft, and rerouting.
- Our policy on [overbooking flights](#), and your rights if we deny you boarding due to an oversold flight.

These terms are incorporated by reference into our contract with you. You may view these conditions of carriage on [delta.com](#), or by requesting a copy from Delta.

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This document establishes the creation of your electronic EMD(S) in our computer systems. It does not constitute a document of carriage. Where this document is issued for transportation or services other than passenger air transportation, specific terms and conditions may apply. These terms and conditions may be provided separately or may be obtained from the issuing agent.

Effective December 15, 2019, the Canada Air Passenger Protection Regulations may provide additional protections to passengers traveling to or from Canada:

*If you are denied boarding, your flight is cancelled or delayed for at least two hours, or your baggage is lost or damaged, you may be entitled to certain standards of treatment and compensation under the Air Passenger Protection Regulations. For more information about your passenger rights please contact your air carrier ([www.delta.com/appr](#)) or visit the Canadian Transportation Agency's website.*

*Si l'embarquement vous est refusé, ou si votre vol est annulé ou retardé d'au moins deux heures ou si vos bagages sont perdus ou endommagés, vous pourriez avoir droit au titre du Règlement sur la protection des passagers aériens, à certains avantages au titre des normes de traitement applicables*

*et à une indemnité. Pour de plus amples renseignements sur vos droits, veuillez communiquer avec votre transporteur aérien ( [www.delta.com/appr](http://www.delta.com/appr)) ou visiter le site Web de l'Office des transports du Canada.*

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Delta Blvd. P.O. Box 20706 • Atlanta, GA 30320-6001

247382E-Receiptprod



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RENTAL AGREEMENT NUMBER: [REDACTED]

RECEIPT

**Your Information**

Customer Name: ENGELS TEJEDA [REDACTED]  
 Wizard Number: R\*190  
 Avis Worldwide Discount: [REDACTED]  
 Method of Payment: [REDACTED]  
 AID: [REDACTED]  
 MID: A0000002501C801  
 AMERICAN EXPRESS 00005034501998  
 Signature Captured  
 TID: GUIEWR00  
 AUTH: 860346  
 Authorization Mode: Issuer

**Your Vehicle Information**

Vehicle Number: 52787151  
 Vehicle Group Rented: Standard SUV-5 Pass  
 Vehicle Group Charged: Intermediate SUV  
 Vehicle Description: BLK MAZDA CX-9 AWD  
 License Plate Number: NYLCH2644  
 Odometer Out: 1  
 Odometer In: 14379  
 Total Driven: 14378  
 Fuel Reading: Out 8/8 In 8/8

**Your Rental**

Pickup Date/Time: DEC 09, 2023 @ 5:57PM  
 Pickup Location: 132 CARSON ROAD 3RD FLOOR  
 NEWARK LIBERTY INTL APO  
 NEWARK, NJ 07114, US  
 973-961-4300

Return Date/Time: DEC 12, 2023 @ 6:33PM  
 Return Location: 132 CARSON ROAD 3RD FLOOR  
 NEWARK LIBERTY INTL APO  
 NEWARK, NJ 07114, US  
 973-961-4300

**Additional fees may apply if changes are made to your return date, time and/or location.**

**Your Vehicle Charges (MIN 51 HRS IF NOT MET DLY RT = \$4.99 / MAX 74 HRS)**

Rate Chart:	Free Miles:	Time and Mileage:
Miles: UNLIMITED		Your Discount:
Hourly: 41.25		1 Adj Hour @ 41.25 = 41.25
Adj day: 54.99		Period @ 164.97 = 164.97
Period: 164.97		
		<b>Time and Mileage:</b> 159.62

**Your Optional Products/Services**

1 TOL 23.99/DY 119.95/WK MX 479.80

**Optional Services Total:** 95.96

**Your Taxable Fees**

11.11% Concession Recovery Fee	28.98
C.R.F. SURCHARGE 0.50/DY	2.00
FACILITY CHARGE 7.58/DY	30.32
TRANSPORTATION FEE 4.50/DY	18.00
VEH LICENSE RECOJP 0.71/DY	2.84
ENERGY RECOVERY FEE 0.60/DY	2.40
Optional Services Total Taxable:	95.96

**Sub-total-Charges:** 340.12  
 TAX 11.625% 39.54

**Your Non-Taxable Products/Services**

SECURITY FEE 5.00/DY 20.00

**Your Total Charges:** 399.66

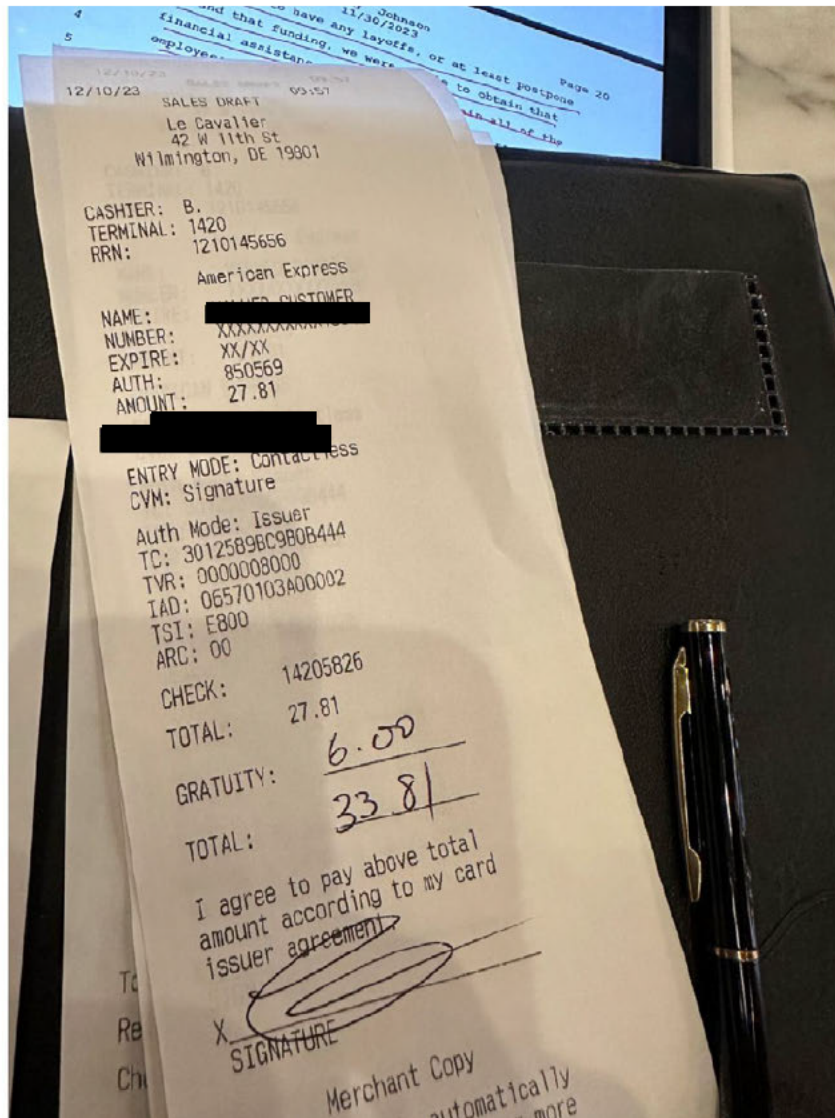
**Prepay Voucher:** (-)220.36

**Net Charges:** USD 179.30  
**Your Total Due:** 0.00

Thank you for renting with Avis.  
 For all other inquiries, please contact us at 1-800-352-7900 or www.Avis.com.  
 At Avis, we are committed to providing you with the best rental experience in the industry. We are in the business of treating people like people.  
 Thank you for renting with AVIS. To enroll in AVIS preferred and to enroll in the AVIS loyalty program, please visit [avis.com](http://avis.com) for more information.

Your vehicle was rented to you by SHARLENE. Your vehicle was checked in by ANTHONY.





Le Cavalier  
www.LeCavalierDE.com  
(302)594-3154  
12/10/2023 9:23  
=====

Le Cavalier  
Check: 14205826 Table: 13  
Server: B. Guests: 1  
Terminal: 1420  
=====

Regular Check  
1 Grapefruit Juice 6.00  
1 Le Cav Breakfast 21.00  
=====

Subtotal 27.00  
Environmental Chg 3% 0.81  
Total 27.81

20% Gratuity is automatically  
added to parties of 6 or more  
Thank you for dining.  
See you next time  
-The Le Cav Team



12/10/23 12:59

SALES DRAFT  
Le Cavalier  
42 W 11th St  
Wilmington, DE 19801

CASHIER: Vanessa  
TERMINAL: 1424  
RRN: 1210175947

NAME: [REDACTED]  
NUMBER: VALUED CUSTOMER  
XXXXXXXXXXXX1591  
EXPIRE: XX/XX  
AUTH: 841251  
AMOUNT: 51.50

ENTRY MODE: Contactless  
CVM: Signature

Auth Mode: Issuer  
TC: 255CE46AE944A471  
TVR: 000008000  
IAD: 06570103A02002  
TST: E800  
ARC: 00

CHECK: 14243463  
TOTAL: 51.50

GRATUITY: 10.00  
TOTAL: 61.50

I agree to pay above total amount according to my card issuer agreement.

X [Signature]  
SIGNATURE

Merchant Copy

20% Gratuity is automatically added to parties of 6 or more



Le Cavalier  
www.LeCavalierDE.com  
(302)594-3154  
12/10/2023 12:26

Le Cavalier  
Check: 14243463 Table: 54  
Server: Vanessa Guests: 2  
Terminal: 1424

Regular Check  
1 Avocado Tart/Egg 18.00  
1 Crab Benedict 20.00  
2 Orange Juice 12.00  
@ 6.00

Subtotal 50.00  
Environmental Chg 3% 1.50  
Total 51.50

Payments  
[REDACTED] 51.50

VALUED CUSTOMER  
[REDACTED]

CVM: Signature  
Entry Mode: Contactless  
Auth Mode: Issuer  
TC: 2550E46AE944A471  
TVR: 000008000  
IAD: 06570103AC2002  
TSI: E800  
ARC: 00

Total Payments 51.50  
Remaining Balance 0.00  
Check Fully Authorized

20% Gratuity is automatically  
added to parties of 6 or more  
Thank you for dining.  
See you next time  
-The Le Cav Team

100 LINDBERG RD  
NEWARK NJ 07114

NEWARK AIRPORT  
XXXXXXXXXX0001  
100 LINBERGH ROAD  
NEWARK , NJ  
07114

12/12/2023 238882373  
05:50:03 PM

INVOICE 057456  
AUTH 820222

PUMP# 3

Regular 10.2716  
PRICE/GAL \$4.629

FUEL TOTAL \$ 47.54

Total = \$ 47.54

CREDIT \$ 47.54

=====  
Customer-activated  
Purchase/Capture  
Site #:  
000000004814133  
Shift Number 1  
Sequence Number  
08607

Mode: Issued  
AID: 000025010801  
A000000008000  
TVR: 000008000  
IAD: 06570103602002  
TSI: F800  
ARC: 00  
TC: F27886E5A920A999  
APPROVED 820222  
=====

100 LINDBERG RD  
NEWARK NJ 07114

NEWARK AIRPORT  
XXXXXXXXXX0001  
100 LINBERGH ROAD  
NEWARK, NJ  
07114

12/12/2023 238882373  
05:50:01 PM

INVOICE 057456  
AUTH 820222

PUMP# 3

Regular	10.2716
PRICE/GAL	\$4.629
FUEL TOTAL	\$ 47.54

Total = \$ 47.54

CREDIT \$ 47.54

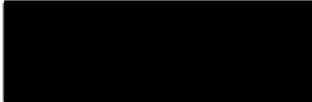
=====  
 Customer-activated  
 Purchase/Capture  
 Site #:  
 00000000482133  
 Shift Number 1  
 Silence Number  
 8807  
 PLO Read  
 [REDACTED]

=====  
 AID:  
 A000000025010801  
 TVR: 000008000  
 LAD: 06570103602002  
 TSI: F800  
 ARC: CO  
 TC: F27886E5A920A999  
 APPROVED 820222  
 =====



**HOTEL DU PONT**

Mr. Engels Tejeda



**INFORMATION INVOICE**

Room No. : 1026  
 Arrival : 12/09/23  
 Departure : 12/12/23  
 Page No. : 1 of 2  
 Folio No. : 9370  
 Conf. No. : 157348571  
 Cashier No. : 141  
 Custom Ref. :

Company Name :  
 Group Name :  
 Guest Name :

Date	Description	Charges	Credits
12/09/23	Room and Breakfast Room# 1026 : CHECK# 14232074	46.58	
12/09/23	Valet Parking Overnight Room# 1026 : CHECK# 113655 Black Mazda	45.00	
12/09/23	Room Charge	429.00	
12/10/23	Valet Parking Overnight Room# 1026 : CHECK# 113655 Black Mazda	45.00	
12/10/23	Room Charge	475.00	
12/11/23	Le Cav Dinner Food Room# 1026 : CHECK# 14189610	33.78	
12/11/23	Valet Parking Overnight Room# 1026 : CHECK# 113655 Black Mazda	45.00	
12/11/23	Room Charge	466.00	
12/12/23	Room and Breakfast Room# 1026 : CHECK# 14205904	42.99	
12/12/23			1,628.35

**Total Charges 1,628.35**

I agree that I am personally liable for payment of this account, and if this person, company or association indicated does not settle by departure date, my liability for payment should be joint and several with such person, company or association.

Hotel DuPont | 42 W. 11<sup>TH</sup> Street | Wilmington, DE 19801  
 Telephone: (302) 594-3100 | Email: [frontdesk@hoteldupont.com](mailto:frontdesk@hoteldupont.com)  
[www.hoteldupont.com](http://www.hoteldupont.com)



**HOTEL DU PONT**

Mr. Engels Tejada  
1170 South 1300 East  
Salt Lake City UT 84105  
United States

**INFORMATION INVOICE**

Room No. : 1026  
Arrival : 12/09/23  
Departure : 12/12/23  
Page No. : 2 of 2  
Folio No. : 9370  
Conf. No. : 157348571  
Cashier No. : 141  
Custom Ref. :

Company Name :  
Group Name :  
Guest Name :

Total Credits 1,628.35

Balance 0.00

Merchant ID

Transaction ID 19894722

Approval Code 175630

Approval Amount 1,628.35


Credit Card Expiry XX/XX

Capture Method Manual


Transaction Amount 1,628.35

I agree that I am personally liable for payment of this account, and if this person, company or association indicated does not settle by departure date, my liability for payment should be joint and several with such person, company or association.

Hotel DuPont | 42 W. 11<sup>TH</sup> Street | Wilmington, DE 19801  
Telephone: (302) 594-3100 | Email: [frontdesk@hoteldupont.com](mailto:frontdesk@hoteldupont.com)  
[www.hoteldupont.com](http://www.hoteldupont.com)

<p>TEJEDA/ENGELS/  <b>**NOT VALID FOR**</b>  <b>**TRANSPORTATION**</b></p>	<p>PASSENGER RECEIPT  12DEC23 0066  DL/RA EWR FTO</p>	<p>00  US</p>	<p>EXCESS BAGGAGE  TICKET</p>
<p>EWR DL SLC  PIECE 30.00  EBC 30.00</p>	<p>PSGR TICKET 0062192594665</p>	<p>H5ZPK /DL</p>	<p>THIS IS YOUR RECEIPT</p>
<p>USD 30.00</p>		<p>NON REFUNDABLE/  NO CHANGES/NON TR  ANSFERABLE/NOT  VALID FOR TRAVEL</p>	<p>NOT VALID FOR TRAVEL</p>
<p>USD30.00</p>	<p>0 006 4204614377 1</p>	<p>0 006 4204614377 1</p>	





**YOUR RENTAL IS UNPROTECTED**

Unexpected events sometimes happen. Add Loss Damage Waiver coverage now to protect yourself from financial responsibility for any loss or damage incurred to our vehicle.

**PROTECT MY RENTAL**

**Shorten Your Time at the Counter with Avis PreCheck™**

Add your driver's license and method of payment online before your upcoming reservation so you can get on the road quicker.

**Get Started Now**

**Thank you ENGELS, your car has been reserved.**

<b>CONFIRMATION NUMBER</b>	<b>PICK UP</b>
<b>33152755US6</b>	Sat Dec 09, 2023 at 05:00 PM
<a href="#">Modify/Cancel/Refund This Reservation</a>	<b>DROP OFF</b>
	Tue Dec 12, 2023 at 04:00 PM

<b>YOUR CAR</b>	<b>ESTIMATED TOTAL</b>														
	<b>\$220.36</b>														
Toyota Rav4 or similar Mileage: Unlimited Automatic Transmission	<table border="0"> <tr> <td><b>Amount Prepaid:</b></td> <td>USD\$220.36</td> </tr> <tr> <td><b>Base Rate:</b></td> <td>\$127.68</td> </tr> <tr> <td><b>Rental Options:</b></td> <td>\$0.00</td> </tr> <tr> <td><b>Protections/Coverages:</b></td> <td>\$0.00</td> </tr> <tr> <td><b>Surcharges/Fees:</b></td> <td>\$71.29</td> </tr> <tr> <td>Concession Recovery Fee (11.11%) :</td> <td>\$14.62</td> </tr> <tr> <td>Concession Recovery Fee Schg .50/day:</td> <td>\$1.50</td> </tr> </table>	<b>Amount Prepaid:</b>	USD\$220.36	<b>Base Rate:</b>	\$127.68	<b>Rental Options:</b>	\$0.00	<b>Protections/Coverages:</b>	\$0.00	<b>Surcharges/Fees:</b>	\$71.29	Concession Recovery Fee (11.11%) :	\$14.62	Concession Recovery Fee Schg .50/day:	\$1.50
<b>Amount Prepaid:</b>	USD\$220.36														
<b>Base Rate:</b>	\$127.68														
<b>Rental Options:</b>	\$0.00														
<b>Protections/Coverages:</b>	\$0.00														
<b>Surcharges/Fees:</b>	\$71.29														
Concession Recovery Fee (11.11%) :	\$14.62														
Concession Recovery Fee Schg .50/day:	\$1.50														

Customer Facility Fee 7.58/day:	\$22.74
Domestic Security Fee 5.00/day:	\$15.00
Energy Recovery Fee .60/day:	\$1.80
Transportation Recovery Fee 4.50/day:	\$13.50
Vehicle Lic Fee .71/day:	\$2.13
<b>Taxes:</b>	<b>\$21.39</b>

[View complete summary of charges](#)

**Additional Fees May Apply If Changes Are Made To Your Return Date, Time And/Or Location.**

**PICK UP LOCATION**

**Newark Liberty Intl Airport,EWR**  
132 Carson Rd, (3rd Floor)  
Newark, NJ 07114 US  
(1) 973-961-4300  
Sun - Sat open 24 hrs

**DROP OFF LOCATION**

**Newark Liberty Intl Airport,EWR**  
132 Carson Rd, (3rd Floor)  
Newark, NJ 07114 US  
(1) 973-961-4300  
Sun - Sat open 24 hrs

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Avis does not accept digital driver's licenses for rental. Please bring a hard copy of your driver's license at the time of rental.

**Please note:** A secondary form of identification may be required when picking up your vehicle. Acceptable forms of identification include passports and state-issued **photo** ID cards.

**HELPFUL TIPS**



- If you need to cancel 24 hours prior to the scheduled pick-up time, we will refund the full prepaid amount, less a \$ 50.00 USD processing fee. If you do not cancel your reservation within 24 hours of the scheduled pick-up time, a refund of the full prepaid amount, less a fee of \$150.00 USD, will be charged. If you fail to pick up the car, entire prepaid amount will be forfeited.
- Please bring your valid driver's license when you pick up the vehicle. If your driver's license is not issued in the US, then you must present your passport in addition to your driver's license.
- This location offers after hours key drop service. Please contact the location for additional details.
- A credit card is required in order to pick up the vehicle. Avis accepts most major credit cards. At the time of the rental, we will request a minimum authorization (hold) or the estimated charges, whichever is greater, on your credit card. Please click here for full details:[View full terms & conditions.](#)
- **Please note: At the time of rental, there will be a hold amount of up to \$300 USD for credit and debit cards**
- If you are planning to use a debit card, please read our [debit card terms and conditions](#) for more information about the use of these types of cards. When using debit cards at airport locations, proof of a return flight that coincides with the rental must be shown. For acceptable credit identification and payment methods for your rental, please click the link above or contact the location directly.
- If during your rental you connect or pair your mobile device with the car (for instance via Bluetooth® or USB port), please unpair your device and delete any personal data stored on the car's infotainment system upon returning the car.
- [Modify/Cancel/Refund This Reservation](#)
- [View full terms & conditions](#)

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[www.aviscarsales.com](http://www.aviscarsales.com)



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Avis | 6 Sylvan Way | Parsippany, NJ 07054

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/\* Google Now Code Starts Here \*/ /\* Google Now Code Ends Here \*/

AIRPORT

RECEIPT A208

IN:12:10:23 09:18

OUT:12:11:23 21:31

PARK-DUR. :D:H:M

1:12:13

AMOUNT:\$ 70.00

AUTH. CODE

A2082300256159

THANK YOU

*Code: 02*



**Hanson Renaissance Court Reporting and Vic**

2111 Woodward Ave Suite 1105  
 Detroit, MI 48201  
 Phone: 313-567-8100  
 Fax: 313-567-4362



Engels J Tejada  
 Holland & Hart LLP - Utah  
 222 South Main Street  
 Suite 2200  
 Salt Lake City, UT 84101

Invoice date: 12/01/2023  
 Vendor: Hanson  
 Renaissance Amt: \$1,388.72  
 Matter No.: 103795.0005  
 Atty: Engels J. Tejada  
 Invoice No.: 735515  
 Approval:

**Invoice #735515**

Date	Terms
12/01/2023	Net 45

**PAST DUE**

**Re-Sent On 01/31/2024**

Assignment #260765 on 11/29/2023

Case: Hansen, Kirsten v. PGX Holdings, et al  
 Court Docket#: 23-10718 (CTG)

Shipped On: 11/30/2023  
 Shipped Via: Emailed  
 Provider: Durkin, Neal E; Voza Mada, Elaine  
 M

Description	Price	Qty	Amount
<b>Chad Wallace</b>			
Copy of Transcript (Emailed) (185 Pages)	\$ 5.80	1.00	\$ 1,073.00
Emailed Transcript	\$ 10.00	1.00	\$ 10.00
Virtual Videoconference	\$ 100.00	1.00	\$ 100.00
Exhibits Emailed (463 Units)	\$ 0.40	1.00	\$ 185.20
*****EXPEDITED TRANSCRIPT*****		1.00	\$ 0.00

\$ 1,368.20

Finance Charge percentage

\$ 20.52

**Sales & Use Tax Accrual**

\$ 20.52

City 64 **GL-23201**  
 State **GL-23202**  
 City Consumption **GL-23201**  
 State Consumption **GL 23202**  
 Exempt from tax   
 Tax Included

Amount Due: **\$ 1,388.72**  
 Paid: \$ 0.00

*Transcript*

<b>Balance Due:</b>	<b>\$ 1,388.72</b>
<b>Payment Due:</b>	<b>01/15/2024</b>

THANK YOU \*\*We accept all major credit cards\*\*  
 A 3.5% convenience fee will be applied for all credit card payments.  
<https://www.alservicelink.com/hansonreporting/quickpay>

"Payment Is Not Contingent On Client Reimbursement"

EIN: 38-2436945  
 DUNS: 147559587

INVOICE APPROVED FOR PAYMENT

Vendor: 62198  
 Office: 64  
 Client/Case: 103795.0005  
 Trk: 5852  
 Amount \$: 1368.20  
 By: \_\_\_\_\_

**Received**

FEB 15 2024

Financial Services



**PLEASE TAKE FURTHER NOTICE** that any objection or response to the Application must be made in writing and be filed with the Bankruptcy Court, on or before **March 19, 2024 at 4:00 p.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon the following: (a) the Debtors, PGX Holdings, Inc., 257 East 200 South, Suite 1200, Salt Lake City, UT 84111, Attn.: Eric Kamerath; (b) counsel to the Debtors (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Joshua A. Sussberg, P.C., (ii) Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois, 60654, Attn.: Spencer Winters and Alison J. Wirtz, (iii) Klehr Harrison Harvey Branzburg LLP, 919 North Market Street, Suite 1000, Wilmington, Delaware 19801, Attn.: Domenic E. Pacitti and Michael W. Yurkewicz, (iv) Klehr Harrison Harvey Branzburg LLP, 1835 Market Street, Suite 1400, Philadelphia, Pennsylvania 19103, Attn.: Morton R. Branzburg, and (v) Holland & Hart LLP, 222 South Main Suite 2200, Salt Lake City, Utah 84101, Attn: Engels J. Tejada and Bryan Benard; (c) counsel for (i) the Prepetition First Lien Agent for the Prepetition First Lien Lenders and (ii) the DIP Agent for the DIP Lenders, King & Spalding LLP, 1185 Avenue of the Americas, 34th Floor, New York, New York 10036 (Attn.: Roger Schwartz, Geoffrey King, and Robert Nussbaum); (d) counsel for the Prepetition Fourth Lien Agent and the Prepetition Fourth Lien Lenders, Proskauer Rose LLP, 11 Times Square, New York, New York, 10036 (Attn: David M. Hillman and Libbie B. Osaben); (e) the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Jane M. Leamy; and (f) counsel to the Committee, (i) ArentFox Schiff LLP, 1301 Avenue of the Americas, 42nd Floor, New York, New York 10019, Attn.: Andrew I. Silfen and Beth M. Brownstein; (ii) ArentFox Schiff LLP, 800 Boylston Street, 32nd Floor, Boston, Massachusetts 02199, Attn.: Justin A. Kesselman; (iii) Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, Delaware 19801, Attn.: Eric J. Monzo, Brya M. Keilson, and Jason S. Levin (collectively, the "Application Recipients").

**PLEASE TAKE FURTHER NOTICE THAT IF AN OBJECTION IS PROPERLY FILED AND SERVED ON THE NOTICE PARTIES IN ACCORDANCE WITH THE ABOVE PROCEDURES, A HEARING WILL BE HELD BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3<sup>RD</sup> FLOOR, COURTROOM #7, WILMINGTON, DELAWARE 19801 ON APRIL 8, 2024 10:00 A.M. (PREVAILING EASTERN TIME).** ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING. IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF DEMANDED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 27, 2024  
Wilmington, Delaware

/s/ Domenic E. Pacitti

KLEHR HARRISON HARVEY  
BRANZBURG LLP

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-and-

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*Special Employment Counsel to the Debtors and  
Debtors in Possession*