

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

In re:

PREMIER KINGS, INC., *et al.*,¹

Debtors.

(Chapter 11)

Case No. 23-02871-TOM

Jointly Administered

**FIFTH MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C.
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT
OF EXPENSES AS COUNSEL TO DEBTORS FOR THE PERIOD
MARCH 1, 2024 THROUGH MARCH 31, 2024**

Name of Applicant:	Cole Schotz P.C.
Applicant’s Role in Case:	Counsel to Debtors and Debtors-in-Possession
Date Order of Employment Signed:	November 29, 2023 (Docket No. 267)
Time Period:	March 1, 2024 through March 31, 2024
Total Fees Requested to be Paid in this Statement:	\$61,651.60 (80% of \$77,064.50)
Total Expenses Requested to be Paid in this Statement:	\$776.57
Total Fees and Expenses:	\$77,841.07
This is a(n): <input checked="" type="checkbox"/> Monthly Application <input type="checkbox"/> Interim Application <input type="checkbox"/> Final Application	

Pursuant to sections 327, 330, and 331 of chapter 11 of Title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.* the “Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the *Order Authorizing the Retention and Employment of Cole Schotz P.C. as Counsel for the Debtors and Debtors in Possession Effective*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification numbers, are: Premier Kings, Inc. (3932); Premier Kings of Georgia, Inc. (9797); and Premier Kings of North Alabama, LLC (9282). The Debtors’ address is 7078 Peachtree Industrial Blvd., Suite #800, Peachtree Corners, GA 30071.



as of the Petition Date dated November 29, 2023 [Docket No. 267] (the “Retention Order”), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals dated November 29, 2023 [Docket No. 266] (the “Interim Compensation Order”),² Cole Schotz P.C. (“Cole Schotz”), counsel for Premier Kings, Inc. and its affiliated debtors and debtors in possession in this jointly administered case (collectively, the “Debtors”), hereby submits this *Fifth Monthly Fee Statement of Cole Schotz P.C. for Compensation for Services and Reimbursement of Expenses as Counsel to Debtors for the Period March 1, 2024 through March 31, 2024* (this “Fee Statement”).³ Specifically, Cole Schotz seeks: (i) interim allowance of \$77,064.50 for the reasonable and necessary legal services that Cole Schotz rendered to the Debtors during this Fee Period; (ii) compensation in the amount of \$61,651.60, which is equal to 80% of the total amount of compensation sought for actual and necessary legal services rendered during the Fee Period (*i.e.* \$77,064.50); and (iii) allowance and payment of \$776.57 for the actual and necessary expenses that Cole Schotz incurred in connection with such services during the Fee Period.

ITEMIZATION OF SERVICES RENDERED AND DISBURSEMENTS INCURRED

1. Attached hereto as **Exhibit A** is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Cole Schotz partners, associates, and paralegals during the Fee Period with respect to each of the project categories Cole Schotz established in accordance with its internal billing procedures. As reflected in **Exhibit A**, Cole Schotz incurred \$77,064.50 in

² Capitalized terms not otherwise defined herein shall be defined as set forth in the Interim Compensation Order.

³ The period from March 1, 2024 through and including March 31, 2024, is referred to herein as the “Fee Period.”

fees during the Fee Period. Pursuant to this Fee Statement, Cole Schotz seeks reimbursement for 80% of such fees (\$61,651.60 in the aggregate).

2. Attached hereto as **Exhibit B** is a schedule of Cole Schotz professionals and paralegals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Fee Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional.

3. Attached hereto as **Exhibit C** is a schedule for the Fee Period setting forth the total amount of payment sought with respect to each category of expenses for which Cole Schotz is seeking payment in this Fee Application. All of these disbursements comprise the requested sum for Cole Schotz's out-of-pocket expenses, which total \$776.57.

4. Attached hereto as **Exhibit D** are the time records of Cole Schotz, which provide a daily summary of the time spent by each Cole Schotz professionals during the Fee Period as well as an itemization of expenses by project category.

NOTICE

5. Pursuant to the Interim Compensation Order, Application Recipients shall have until 4:00 p.m. (prevailing Central Time) on the 21st day following service of this Fee Statement to serve on Cole Schotz and the Application Recipients a Notice of Objection to Monthly Fee Statement.

6. On the date hereof, the Debtors will provide notice of this Fee Statement to the Application Recipients in accordance with paragraph 2(a) of the Interim Compensation Order. The Debtors submit that no other further notice is necessary.

WHEREFORE, Cole Schotz, in connection with services rendered on behalf of the Debtors, respectfully requests (i) interim allowance of compensation for professional services

rendered during the Fee Period, in the amount of \$77,064.50, (ii) payment in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of 80% of the compensation sought, in the amount of \$61,651.60), and (iii) payment of 100% of expenses incurred, in the amount of \$776.57.

Dated: May 6, 2024
Birmingham, Alabama

/s/ Jesse S. Vogtle, Jr.
Jesse S. Vogtle, Jr.
Eric T. Ray
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-and-

Gary H. Leibowitz (admitted *pro hac vice*)
Irving E. Walker (admitted *pro hac vice*)
H.C. Jones III (admitted *pro hac vice*)
J. Michael Pardoe (admitted *pro hac vice*)
COLE SCHOTZ P.C.
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Attorneys for the Debtors and Debtors-in-Possession

EXHIBIT A

**SUMMARY OF EXPENSES EARNED FOR SERVICES RENDERED BY PROJECT
CATEGORY BY COLE SCHOTZ P.C. AS COUNSEL FOR DEBTORS AND DEBTORS-
IN-POSSESSION FOR FIFTH APPLICATION PERIOD**

PROJECT CODES	HOURS	AMOUNT
Asset Acquisitions/Business Combinations	10.5	\$9,240.00
Asset Dispositions, Sales, Uses, and Leases (Section 363)	6.6	\$5,027.00
Automatic Stay Matters/Litigation	2.2	\$1,637.00
Bank Claims and Litigation Matters	1.6	\$1,272.00
Case Administration	0.6	\$349.50
Cash Collateral and DIP Financing	7.0	\$5,565.00
Claims Analysis, Administration and Objections	8.2	\$6,519.00
Disclosure Statement/Voting Issues	2.6	\$1,475.00
Executory Contracts	4.0	\$2,160.00
Fee Application Matters/Objections	1.7	\$1,105.50
Leases (Real Property)	3.0	\$2,385.00
Litigation/ Gen. (Except Automatic Stay Relief)	0.3	\$238.50
Non-Working Travel Time	9.6	\$3,816.00
Preparation for and Attendance at Hearings	16.3	\$12,753.50
Reorganization Plan	30.0	\$22,711.50
Retention Matters	1.5	\$810.00
TOTAL	105.7	\$77,064.50

EXHIBIT B

**SUMMARY OF FEES EARNED FOR SERVICES RENDERED BY COLE SCHOTZ
P.C.'S PROFESSIONALS AS COUNSEL TO DEBTORS AND DEBTORS-IN-
POSSESSION FOR FIFTH APPLICATION PERIOD**

PROFESSIONAL	TITLE	HOURLY RATE	HOURS	TOTAL
Gary H. Leibowitz	Member	\$795.00	59.6	\$47,382.00
Gary H. Leibowitz	Member	\$397.50	9.6	\$3,816.00
Irving E. Walker	Member	\$795.00	10.8	\$8,586.00
Roger M. Iorio	Member	\$880.00	10.5	\$9,240.00
Stacy L. Newman	Member	\$725.00	1.0	\$725.00
H.C. Jones III	Member	\$540.00	11.5	\$6,210.00
J. Michael Pardoe	Associate	\$495.00	0.6	\$297.00
Pauline Z. Ratkowiak	Paralegal	\$385.00	2.1	\$808.50
TOTALS			105.7	\$77,064.50

EXHIBIT C

**SUMMARY OF EXPENSES EARNED FOR SERVICES RENDERED BY PROJECT
CATEGORY BY COLE SCHOTZ P.C. AS COUNSEL FOR DEBTORS AND DEBTORS-
IN-POSSESSION FOR FIFTH APPLICATION PERIOD**

EXPENSES	TOTAL
Photocopying/Printing/Scanning	\$1.20
Court Fees	\$0.50
Travel – Car Service	\$103.14
Travel – Lodging	\$665.73
Data Host	\$6.00
TOTAL	\$776.57

EXHIBIT D

DETAILED DESCRIPTION OF TIME AND EXPENSES

PREMIER KINGS, INC.
 112 SOUTH TRYON STREET, SUITE 1770
 CHARLOTTE, NC 28284

Invoice Date: April 4, 2024
 Invoice Number: 973188
 Matter Number: 65533-0002

Re: CHAPTER 11

FOR PROFESSIONAL SERVICES THROUGH MARCH 31, 2024

ASSET ACQUISITIONS/BUSINESS COMBINATIONS 10.50 9,240.00

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/05/24	RMI	DRAFTING ASSIGNMENT DOCUMENT; CORRESPONDENCE WITH COUNSEL FOR BUYER	0.40	352.00
03/12/24	RMI	DRAFTING ASSIGNMENT AND ASSUMPTION AGREEMENT	0.40	352.00
03/18/24	RMI	CORRESPONDENCES RE: BURGER KING LEASE	0.30	264.00
03/19/24	RMI	REVIEW BK DRAFT OF LEASE	1.50	1,320.00
03/25/24	RMI	WORK ON REAL ESTATE SALE DOCUMENTS AND CONFERENCE CALL WITH BUYERS COUNSEL	2.20	1,936.00
03/26/24	RMI	DRAFTING NEWELL TRANSFER DOCUMENTS	1.80	1,584.00
03/27/24	RMI	WORK ON CLOSING DOCUMENTS AND OPEN ISSUES RE: SALE TO NEWELL	2.50	2,200.00
03/28/24	RMI	CALLS AND EMAILS RE: OPEN ISSUES ON NEWELL-BERG ACQUISITION	0.50	440.00
03/29/24	RMI	REVISIONS TO CLOSING DOCUMENTS AND CORRESPONDENCES WITH TITLE	0.90	792.00

ASSET DISPOSITIONS, SALES, USES, AND LEASES (SECTION 363) 6.60 5,027.00

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/24	IEW	LETTER AND CALL WITH BULLDOG COUNSEL REGARDING DETERMINATION OF DEFERRED STORES TO ASSUME AND REJECT (.3); CONFER WITH HC JONES REGARDING MOTION TO REJECT LEASES (.2); EMAILS WITH CLIENT AND CS TEAM REGARDING BULLDOG FINAL DETERMINATION AND IMPACT ON CURE COSTS TO BE PAID AND NOT PAID (.2)	0.70	556.50
03/04/24	JMP	CALL WITH H. JONES, G. LEIBOWITZ AND I. WALKER TO DISCUSS ACTION ITEMS.	0.20	99.00
03/04/24	IEW	CONFER WITH HC JONES REGARDING MOTION TO REJECT LEASES BULLDOG DESIGNATED FOR REJECTION (.3); EMAIL TO BULLDOG COUNSEL RESPONDING TO NOTICE DESIGNATING LEASES FOR ASSUMPTION AND REJECTION (.1); EMAIL TO CLIENT REGARDING MOTION TO REJECT LEASES (.1)	0.50	397.50

COLE SCHOTZ P.C.

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April 4, 2024
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/07/24	SLN	EMAIL FROM PREPETITION AGENT REGARDING PROPOSED SALE ORDER;	0.10	72.50
03/08/24	SLN	CORRESPONDENCE WITH CS TEAM AND PREPETITION AGENT REGARDING PROPOSED SALE ORDER;	0.20	145.00
03/08/24	IEW	EMAILS WITH LENDERS' COUNSEL REGARDING SALE OF LAWRENCEBURG PROPERTY (.1); EMAILS WITH CLIENT REGARDING SALE OF LIMITED VALUE ASSETS (.1)	0.20	159.00
03/09/24	SLN	CORRESPONDENCE WITH LENDER REGARDING SALE ORDER;	0.20	145.00
03/10/24	SLN	CORRESPONDENCE WITH LENDER REGARDING SALE ORDER (.2);	0.20	145.00
03/11/24	SLN	CORRESPONDENCE WITH LENDER REGARDING SALE ORDER (.1);	0.10	72.50
03/11/24	JMP	CONFER WITH H. JONES, G. LEIBOWITZ, AND I. WALKER REGARDING ACTION ITEMS.	0.20	99.00
03/11/24	IEW	HEARING ON SALE OF LAWRENCEBURG PROPERTY AND OTHER MATTERS (BY TELEPHONE) (.6); DRAFT REVISED ORDER APPROVING SALE AND CONFER WITH GARY L. REGARDING SAME (.4); FURTHER REVISE ORDER AND EMAIL TO LENDERS' COUNSEL FOR COMMENT (.2)	1.20	954.00
03/11/24	IEW	CONFER WITH GARY L. REGARDING SALE OF LAWRENCEBURG PROPERTY ISSUES (.1); CONFER WITH ERIC RAY TO REVIEW ISSUES FOR HEARING TODAY (.4); REVIEW MATTERS FOR HEARING TODAY TO PREPARE FOR SAME (.1)	0.60	477.00
03/12/24	SLN	CORRESPONDENCE WITH CO-COUNSEL REGARDING M&M ORDER AND SALE ORDER (.1); FOLLOW UP CORRESPONDENCE WITH M&M (.1);	0.20	145.00
03/12/24	IEW	REVIEW EMAILS FROM LENDERS' COUNSEL REGARDING PROPOSED FORM OF ORDERS AND OTHER MATTERS (.1); EMAIL TO CO-COUNSEL TO UPLOAD ORDER APPROVING SALE OF LAWRENCEBURG PROPERTY (.1)	0.20	159.00
03/22/24	IEW	EMAILS WITH CLIENT AND R. IORIO REGARDING CLOSING FOR SALE OF LAWRENCEBURG PROPERTY	0.20	159.00
03/25/24	JMP	CONFER H. JONES G. LEIBOWITZ AND I. WALKER REGARDING UPDATES AND ACTION ITEMS IN MATTER.	0.10	49.50
03/26/24	IEW	EMAILS WITH CLIENT REGARDING POST-CLOSING SALE MATTERS	0.20	159.00
03/27/24	IEW	EMAILS WITH R. IORIO AND BUYER'S TITLE COMPANY TO ATTEMPT TO GET TITLE COMPANY TO ACCEPT THE ORDER APPROVING THE SALE TO PERMIT CLOSING	0.30	238.50
03/27/24	IEW	REVIEW DRAFT CLOSING DOCUMENTS AND EMAILS FOR SALE OF LAWRENCEBURG PROPERTY (.3); EMAILS AND TEAMS CALL WITH R. IORIO REGARDING SAME (.3); EMAIL TO WELLS FARGO COUNSEL REGARDING WELLS FARGO LIEN RELEASE (.1)	0.70	556.50
03/29/24	IEW	REVIEW AND RESPOND TO EMAILS REGARDING CLOSING OF SALE OF LAWRENCEBURG	0.20	159.00

COLE SCHOTZ P.C.

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/31/24	IEW	EMAILS WITH R. IORIO REGARDING LAWRENCEBURG SALE CLOSING AND TITLE INSURANCE MATTERS	0.10	79.50

AUTOMATIC STAY MATTERS/LITIGATION	2.20	1,637.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/04/24	JMP	REVIEW MOTION FOR RELIEF FROM STAY.	0.10	49.50
03/04/24	GHL	WORK ON FMC AND NEW LIFT STAY RE; INSURANCE PROCEEDS FOR INJURED PATRON	1.50	1,192.50
03/05/24	PVR	RETRIEVE AND REVIEW NOTICE OF FILING HEARING AND C. EDWIN MOTION FOR RELIEF FROM STAY AND UPDATE CASE CALENDAR RE: APRIL 3, 2024 HEARING	0.20	77.00
03/06/24	IEW	REVIEW MOTION FOR RELIEF FROM STAY FILED BY CHRISTY SLACK AND EMAIL CO-COUNSEL AND CLIENT TO OPPOSE THE REQUESTED RELIEF (.3); FOLLOW-UP EMAILS REGARDING SAME AND REVIEW CREDITOR'S WITHDRAWAL OF LIFT STAY MOTION (.1)	0.40	318.00

BANK CLAIMS AND LITIGATION MATTERS	1.60	1,272.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/27/24	GHL	REVIEW LENDER GROUP BALLOTS FROM KCC AND SOLICITATION PACKAGE	1.60	1,272.00

CASE ADMINISTRATION	0.60	349.50
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/14/24	HCJ	REVIEW OF DOCKET AND RECENT FILINGS	0.50	270.00
03/14/24	IEW	EMAILS WITH CLIENT REGARDING CASE ADMINISTRATION MATTER	0.10	79.50

CASH COLLATERAL AND DIP FINANCING	7.00	5,565.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/24	GHL	REVIEW AND ANALYZE R/E SALES AND PROJECTED PROCEEDS, AND RE-WORK WIND DOWN BUDGET RE: SAME	3.70	2,941.50
03/01/24	GHL	EMAILS FROM J.DUTSON RE; WINDDOWN	0.20	159.00
03/01/24	IEW	REVIEW CASH COLLATERAL ORDERS AND CONFER WITH GARY L. REGARDING CASH COLLATERAL MATTERS	0.50	397.50
03/05/24	GHL	CALL WITH G.BAKER RE: REVISED WIND DOWN BUDGET	0.40	318.00
03/07/24	GHL	REVISE BUDGET THROUGH CONFIRMATION	1.70	1,351.50
03/12/24	GHL	CALL WITH AMP RE: WIND DOWN BUDGET AND CASH ISSUES	0.50	397.50

CLAIMS ANALYSIS, ADMINISTRATION AND OBJECTIONS	8.20	6,519.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/05/24	GHL	ANALYZE SCHUSTER ENTERPRISES CLAIM TO INSURANCE PROCEEDS FROM FIRE AGAINST LENDER CLAIMS	2.00	1,590.00

COLE SCHOTZ P.C.

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/06/24	GHL	EMAILS AND CALLS WITH GUNBY AND DUTSON RE: INSURANCE ISSUES FOR FIRE DAMAGED LOCATION	0.50	397.50
03/08/24	IEW	EMAILS WITH CLIENT AND ERIC RAY REGARDING NEW ACCIDENT CLAIM AND RESPONSE TO DEMAND FROM CLAIMANT'S COUNSEL	0.10	79.50
03/22/24	GHL	REVIEW CLAIMS AND SCHEDULES RE: SOLICITATION AND COMPARE WITH KCC SCHEDULES	3.50	2,782.50
03/28/24	GHL	REVIEW SCHEDULES AND POCS RE: PRIORITY CLAIM ISSUES	2.10	1,669.50

DISCLOSURE STATEMENT/VOTING ISSUES **2.60** **1,475.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/13/24	PVR	EMAIL TO G. LEIBOWITZ, I. WALKER, H. JONES AND M. PARDOE AND RETRIEVE BANKRUPTCY ADMINISTRATOR'S LIMITED OBJECTION TO DEBTOR'S DISCLOSURE STATEMENT	0.20	77.00
03/19/24	IEW	REVIEW EMAILS WITH COUNSEL FOR LENDERS AND PREMIER HOLDINGS REGARDING PLAN AND DISCLOSURE STATEMENT, AND EMAILS WITH GARY L. AND ERIC RAY REGARDING SAME TO FINALIZE PRIOR TO HEARING	0.40	318.00
03/21/24	HCJ	REVIEW OF AMENDED DISCLOSURE STATEMENT AND SOLICITATION PACKAGES	2.00	1,080.00

EXECUTORY CONTRACTS **4.00** **2,160.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/24	HCJ	REVIEW SALE DOCUMENTS AND PLEADINGS IN CONNECTION WITH PREPARING MOTION TO REJECT LEASES	1.50	810.00
03/04/24	HCJ	DRAFT THIRD OMNIBUS MOTION TO REJECT LEASES	2.50	1,350.00

FEE APPLICATION MATTERS/OBJECTIONS **1.70** **1,105.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/11/24	GHL	REVIEW AND REVISE FEE STATEMENT	0.40	318.00
03/11/24	PVR	EMAIL FROM AND TO G. LEIBOWITZ AND DRAFT COLE SCHOTZ 4TH (FEBRUARY) MONTHLY FEE STATEMENT	0.60	231.00
03/19/24	GHL	REVIEW AND REVISE FIRST FEE APPS	0.70	556.50

LEASES (REAL PROPERTY) **3.00** **2,385.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/04/24	IEW	REVIEW AND REVISE DRAFT MOTION TO REJECT LEASES DESIGNATED FOR REJECTION BY BULLDOG (.4) AND EMAILS AND CALLS WITH CLIENT AND ERIC RAY REGARDING SAME (.3); FINALIZE MOTION AND SEND TO E. RAY FOR FILING (.1)	0.80	636.00
03/05/24	IEW	CALL WITH CLIENT AND EMAIL WITH R. IORIO REGARDING ASSUMPTION AND ASSIGNMENT AGREEMENT FOR 2 ADDITIONAL STORES BULLDOG DESIGNATED FOR ASSUMPTION	0.10	79.50

COLE SCHOTZ P.C.

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/06/24	IEW	EMAILS WITH R. IORIO AND BULLDOG COUNSEL REGARDING ASSIGNMENT AND ASSUMPTION AGREEMENT FOR TWO DEFERRED STORE LEASES	0.10	79.50
03/12/24	IEW	EMAILS WITH CLIENT AND COUNSEL FOR BULLDOG REGARDING EXECUTION OF ASSIGNMENT AND ASSUMPTION AGREEMENT FOR TWO DEFERRED STORE LEASES ASSUMED BY BULLDOG AND PAYMENT OF CURE COSTS	0.20	159.00
03/13/24	IEW	QUICK REVIEW OF BKC EMAIL WITH PROPOSED LEASE FOR NEW HOPE PROPERTY AND EMAILS WITH CLIENT REGARDING SAME	0.30	238.50
03/20/24	IEW	REVIEW CLIENT EMAILS REGARDING NEGOTIATIONS WITH BKC OVER TERMS OF NEW HOPE LEASE	0.10	79.50
03/25/24	IEW	CALL WITH BULLDOG COUNSEL REGARDING HEARING ON MOTION TO REJECT LEASES (.2); REVIEW BULLDOG AGREEMENT REGARDING SAME AND OBJECTION FILED BY PREMIER HOLDINGS (.3); EMAIL TO CLIENT REGARDING HEARING ON MOTION TO REJECT (.1)	0.60	477.00
03/26/24	GHL	WORK ON NEW HOPE LEASE	0.50	397.50
03/27/24	IEW	REVIEW AND RESPOND TO MULTIPLE EMAILS ABOUT ATTEMPTS TO NEGOTIATE LEASE WITH BKC FOR NEW HOPE STORE (.2); CALL WITH R. IORIO REGARDING SAME (.1)	0.30	238.50

LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF) 0.30 238.50

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/12/24	IEW	REVIEW ORDER APPROVING SETTLEMENT OF COMPLAINT V. HOLDINGS AND DISBURSEMENT OF DISPUTED CLAIMS RESERVE (.1); EMAIL TO CLIENT WITH INSTRUCTIONS FOR DISBURSEMENT OF FUNDS PURSUANT TO COURT ORDER (.2)	0.30	238.50

NON-WORKING TRAVEL TIME 9.60 3,816.00

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/19/24	GHL	TRAVEL TO AL FOR HEARING	4.70	1,868.25
03/20/24	GHL	RETURN TRAVEL AFTER HEARING	4.90	1,947.75

PREPARATION FOR AND ATTENDANCE AT HEARINGS 16.30 12,753.50

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/05/24	IEW	EMAILS WITH CO-COUNSEL AND CS TEAM REGARDING PREPARATION FOR HEARINGS ON SALE OF LAWRENCEBURG PROPERTY AND STATUS CONFERENCE ON ADVERSARY PROCEEDING	0.20	159.00
03/06/24	PVR	RETRIEVE AND REVIEW NOTICE OF FILING HEARING AND J. STRAPPY-DANIELS MOTION FOR RELIEF FROM STAY AND THIRD MOTION RE: REJECTION OF UNEXPIRED LEASES AND UPDATE CASE CALENDAR RE: APRIL 3, 2024 HEARING	0.30	115.50
03/07/24	GHL	PREPARE FOR DS HEARING	2.20	1,749.00

COLE SCHOTZ P.C.

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/11/24	GHL	PREPARE I.WALKER FOR LAWRENCEBURG SALE HEARING	0.50	397.50
03/14/24	PVR	REVIEW DOCKET AND UPDATE CASE CALENDAR RE: MATTERS SCHEDULED FOR MARCH 20, 2024 AND APRIL 3, 2024 HEARINGS	0.20	77.00
03/18/24	GHL	PREPARE FOR HEARING ON DS	4.40	3,498.00
03/19/24	GHL	PREPARE FOR HEARING ON DS AND EXCLUSIVITY	4.20	3,339.00
03/20/24	GHL	PREPARE FOR AN ATTEND HEARING AND REVISE ORDERS AFTER HEARING PER COURT	4.30	3,418.50

REORGANIZATION PLAN **30.00** **22,711.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/06/24	GHL	REVIEW AND ANALYZE PROPOSED PLAN CHANGES FROM LENDERS AND COMMITTEE	0.80	636.00
03/06/24	HCJ	REVIEW OF LENDER EDITS TO PLAN OF LIQUIDATION	0.30	162.00
03/06/24	GHL	REVIEW AND REVISE FILED PLAN	2.20	1,749.00
03/07/24	IEW	REVIEW LENDERS' REQUESTED REVISIONS TO CHAPTER 11 PLAN AND PROVIDE COMMENTS TO GARY L ON OPEN ISSUES (.4)	0.40	318.00
03/12/24	GHL	REVISIONS TO PLAN AND DISCLOSURE STATEMENT	2.60	2,067.00
03/12/24	IEW	TEAMS MEETING WITH LENDERS' COUNSEL AND GARY L. TO RESOLVE OPEN ISSUES ON PLAN	0.20	159.00
03/14/24	GHL	REVIEW PLAN AND BUDGET EDITS FROM J.DUTSON AND ANALYZE SAME	1.40	1,113.00
03/15/24	GHL	PREPARE DS ORDER, NOTICE OF HEARING; NOTICE OF NON-VOTONG STATUS, AND CONFORM WITH PLAN AND DS	5.10	4,054.50
03/18/24	GHL	REVIEW AND REVISE DS AND PLAN	4.70	3,736.50
03/20/24	HCJ	EMAILS WITH CLAIMS AGENT RE: PLAN SOLICITATION PACKAGES	0.20	108.00
03/20/24	IEW	REVIEW REVISED CHAPTER 11 PLAN AND EMAIL RECOMMENDED CHANGES TO GARY L. AND ERIC R. (.4); CALLS WITH GARY L. REGARDING SAME (.2)	0.60	477.00
03/21/24	GHL	PREPARE SOLICITATION WITH KCC	2.20	1,749.00
03/21/24	GHL	PREPARE WINDDOWN BUDGET FOR FILING	0.40	318.00
03/21/24	PVR	RETRIEVE AND REVIEW ORDER EXTENDING EXCLUSIVE PERIODS AND UPDATE CASE CALENDAR RE: EXPIRATION OF DEBTORS' EXCLUSIVE PERIOD TO FILE A PLAN AND TO SOLICIT ACCEPTANCE OF PLAN	0.30	115.50
03/21/24	PVR	RETRIEVE AND REVIEW SECOND AMENDED PLAN, NOTICE OF SECOND AMENDED PLAN COMPARISON AND SOLICITATION PROCEDURES ORDER AND UPDATE CASE CALENDAR RE: CONFIRMATION HEARING AND PLAN CONFIRMATION OBJECTION DEADLINE	0.30	115.50
03/26/24	GHL	REVIEW INFORMAL PLAN OBJECTION FROM MCLANE AND ANALYZE SAME IN PLAN	1.90	1,510.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/28/24	GHL	LEGAL RESEARCH AND PREPARE CONFIRMATION MEMO	3.40	2,703.00
03/28/24	HCJ	REVIEW OF PLAN AND DISCLOSURE STATEMENT AND OTHER BACKGROUND MATERIALS IN PREPARATION FOR DRAFTING MOTION IN SUPPORT OF PLAN CONFIRMATION	3.00	1,620.00

RETENTION MATTERS	1.50	810.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/21/24	HCJ	REVIEW OF ISSUES PERTAINING TO RETENTION APPLICATIONS AND ORDINARY COURSE PROFESSIONALS; COMMUNICATIONS WITH LOCAL COUNSEL RE: SAME	1.50	810.00

TOTAL HOURS 105.70

PROFESSIONAL SERVICES:	\$77,064.50
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TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Gary H. Leibowitz	Member	59.60	795.00	47,382.00
Gary H. Leibowitz	Member	9.60	397.50	3,816.00
H.C. Jones, III	Member	11.50	540.00	6,210.00
Irving E. Walker	Member	10.80	795.00	8,586.00
J. Michael Pardoe	Associate	0.60	495.00	297.00
Pauline Z. Ratkowiak	Paralegal	2.10	385.00	808.50
Roger M. Iorio	Member	10.50	880.00	9,240.00
Stacy L. Newman	Member	1.00	725.00	725.00
Total		105.70		\$77,064.50

COST SUMMARY

<u>Description</u>	<u>AMOUNT</u>
TRAVEL - CAR SERVICE	103.14
TRAVEL - LODGING	665.73
COURT FEES	0.50
DATA HOST	6.00
PHOTOCOPYING / PRINTING / SCANNING	1.20
TOTAL COSTS	\$776.57

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TOTAL SERVICES AND COSTS:	\$	77,841.07
PREVIOUS BALANCE DUE:	\$	<u>257,787.08</u>
TOTAL DUE INCLUDING PREVIOUS BALANCE:	\$	<u>335,628.15</u>