

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
RHODIUM ENCORE, LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	Jointly Administered

**BARNES & THORNBURG LLP'S FOURTEENTH MONTHLY
FEE STATEMENT FOR THE PERIOD
OCTOBER 1, 2025, THROUGH OCTOBER 31, 2025**

Barnes & Thornburg LLP (“B&T”) submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the “Interim Compensation Order”) (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period from October 1, 2025, through October 31, 2025, inclusive (the “Fourteenth Monthly Fee Statement”).

B&T seeks payment of interim compensation in the total amount of \$992,355.20 (80% of the services rendered), plus \$79,453.46 (100% of the interim expenses incurred). Summaries of the fees and expenses are attached hereto as Exhibits A and B. An invoice reflecting detailed time entries is attached hereto as Exhibit C.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses will have 14 days after service of the Fourteenth

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



Monthly Fee Statement to serve a written notice, via email, upon B&T and each of the other Fee Notice Parties (as listed below) (the “Notice of Objection to Monthly Statement”). The Notice of Objection to Monthly Statement shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 days of serving the Notice of Objection to Monthly Statement, the objecting party shall file its objection (the “Objection”) with this Court within three business days and serve such Objection on B&T and each of the other Fee Notice Parties. *See* Interim Compensation Order, ¶ 1(b).

The Fee Notice Parties as defined in the Interim Compensation Order are:

Rhodium Enterprises, Inc.

Attn: Charles Topping (chucktopping@rhdm.com)

and Morgan Soule (morgansoule@rhdm.com)

2617 Bissonnet Street, Suite 234

Houston, Texas 77005

Debtors’ Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP

Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com);

Razmig Izakelian (razmigizakelian@quinnemanuel.com),

Alain Jaquet (alainjaquet@quinnemanuel.com),

and Joanna D. Caytas (joannacaytas@quinnemanuel.com),

700 Louisiana, Suite 3900,

Houston, Texas 77002

Debtors’ Financial Advisor, c/o Province

Attn: Mark Robinson (mrobinson@provincefirm.com);

David Dunn (ddunn@provincefirm.com);

Kirsten Lee (klee@province.com);

and Andrew Popescu (apopescu@provincefirm.com),

2360 Corporate Circle, Suite 340,

Henderson, Nevada 89074

Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP,

Ryan C. Wooten (rwooten@orrick.com)

609 Main, 40th Floor

Houston, Texas 77002

and Robert Trust (rtrust@orrick.com)

Mark Franke (mfranke@orrick.com)

and Brandon Batzel (bbatzel@orrick.com)

51 West 52nd Street

New York, New York 10019

Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases

and

United States Trustee,
Ha Minh Nguyen (ha.nguyen@usdoj.gov),
515 Rusk, Suite 3516
Houston, Texas 77002

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay B&T an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 20th day of November 2025.

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
Alan Jaquet (*pro hac vice*)
711 Louisiana, Suite 500
Houston, Texas 77002
Telephone: 713-221-7000
Facsimile: 713-221-7100
Email: pattytomasco@quinnemanuel.com
Email: joannacaytas@quinnemanuel.com
Email: cameronkelly@quinnemanuel.com
Email: alainjaquet@quinnemanuel.com

-and-

Eric Winston (*pro hac vice*)
Razmig Izakelian (*pro hac vice*)
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: 213-443-3000
Facsimile: 213-443-3100
Email: ericwinston@quinnemanuel.com
Email: razmigizakelian@quinnemanuel.com

Counsel to the Debtors and Debtors-in-Possession

BARNES & THORNBURG LLP

/s/ Trace Schmeltz

Vincent P. (Trace) Schmeltz III

Kenneth Kansa

Aaron Gavant

One N. Wacker Drive, Suite 4400

Chicago, Illinois 60606-2833

Telephone: 312-214-4830

Facsimile: 312-759-5646

Email: Trace.Schmeltz@btlaw.com

Email: KKansa@btlaw.com

Email: AGavant@btlaw.com

*Counsel to the Special Committee of Rhodium
Enterprises, Inc.*

CERTIFICATE OF SERVICE

I certify that on November 21, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

Patricia B. Tomasco

/s/ Patricia B. Tomasco

EXHIBIT A**Summary of Hours Billed by Barnes & Thornburg Attorneys and Paraprofessionals**

Professional	Position With the Applicant	Year Admitted	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Trace (Vincent P.) Schmeltz	Partner	1997	Litigation	\$1,000.00	152.40	\$152,400.00
Randal J. Kaltenmark	Partner	1996	Corporate	\$915.00	.80	\$732.00
Kenneth Kansa	Partner	1999	Restructuring and Bankruptcy	\$1,070.00	128.30	\$137,281.00
Carrie M. Raver	Partner	1999	Litigation	\$845.00	5.50	\$4,647.50
Aaron Gavant	Partner	2009	Restructuring and Bankruptcy	\$805.00	9.00	\$7,245.00
Thomas G. Haskins	Partner	2010	Litigation	\$795.00	3.80	\$3,021.00
Kathleen L. Matsoukas	Partner	2005	Litigation	\$780.00	114.50	\$89,310.00
Charlotte Underwood	Counsel	2014	Litigation	\$950.00	93.70	\$89,015.00
Ning He	Of Counsel	2016	Litigation	\$770.00	143.00	\$110,110.00
Paige (Catherine) Lohse	Partner	2015	Litigation	\$640.00	281.50	\$180,160.00
Scott Pelosa	Partner	2008	Litigation	\$640.00	14.30	\$9,152.00
Leah O'Farrell	Associate	2021	Restructuring and Bankruptcy	\$590.00	73.00	\$43,070.00
Addison Smith	Associate	2020	Litigation	\$590.00	28.00	\$16,520.00
Mariah A. Whitner	Associate	2021	Litigation	\$590.00	19.50	\$11,505.00
Haley Casper	Associate	2021	Litigation	\$525.00	208.80	\$109,620.00
Megha Mathur	Associate	2022	Healthcare	\$480.00	38.10	\$18,288.00
Charity Seaborn	Associate	2022	Labor & Employment	\$480.00	31.40	\$15,072.00
Anna Bninski	Associate	2023	Litigation	\$450.00	16.20	\$7,290.00
Kevin Warren	Associate	2024	Litigation	\$430.00	186.60	\$80,238.00
Lydia Parks	Associate	2025	Litigation	\$430.00	23.80	\$10,234.00
Joseph Kipp	Associate Pending Bar Admission	N/A	Litigation	\$430.00	100.00	\$43,000.00
Kathleen Mangan	Associate Pending Bar Admission	N/A	Litigation	\$430.00	13.40	\$5,762.00
Melissa Bonnici	Associate Pending Bar Admission	N/A	Litigation 1	\$430.00	33.70	\$14,491.00

Abigail Wissel	Associate	2025	Restructuring and Bankruptcy	\$375.00	13.20	\$4,950.00
Elizabeth Carpenter	Law Clerk	N/A	Litigation	\$300.00	5.00	\$1,500.00
Anita Peterson	Paralegal	N/A	Litigation	\$370.00	141.30	\$52,281.00
Kathleen A. Murphy	Paralegal	N/A	Litigation	\$315.00	36.80	\$11,592.00
Glenn R. de Roziere	Investigator	N/A	Litigation	\$385.00	8.40	\$3,234.00
Joseph Tate	Director of eDiscovery	N/A	Legal Operations	\$380.00	6.10	\$2,318.00
Eric Beard	Discovery Solutions Manager	N/A	Legal Operations	\$280.00	4.80	\$1,344.00
Janelle Peters	Discovery Solutions Project Coordinator	N/A	Legal Operations	\$265.00	19.10	\$5,061.50
Total					1,954.00	\$1,240,444.00

EXHIBIT B**Summary of Expenses for the Fee Period**

Date	Expense	Amount
9/30/2025	Pacer Court Filing System Charges 09/01/2025 – 09/30/2025	\$3.30
9/30/2025	Pacer Court Filing System Charges 09/01/2025 – 09/30/2025	\$4.70
9/30/2025	Pacer Court Filing System Charges 09/01/2025 – 09/30/2025	\$7.80
10/01/2025	Westlaw – Computerized Legal Research	\$1,619.71
10/01/2025	E-Filing Court Documents	\$50.00
10/01/2025	E-Filing Court Documents	\$50.00
10/03/2025	E-Filing Court Documents	\$100.00
10/03/2025	American Express – T. Schmeltz JW Marriott Houston Downtown, INV137970	\$462.14
10/06/2025	Westlaw – Computerized Legal Research	\$2,327.00
10/07/2025	Westlaw – Computerized Legal Research	\$404.93
10/07/2025	E-Filing Court Documents	\$50.00
10/08/2025	Westlaw – Computerized Legal Research	\$674.88
10/09/2025	Copying charges	\$34.80
10/10/2025	E-Filing Court Documents	\$100.00
10/10/2025	Westlaw – Computerized Legal Research	\$6,883.78
10/11/2025	Westlaw – Computerized Legal Research	\$2,159.62
10/13/2025	E-Filing Court Documents	\$100.00
10/13/2025	E-Filing Court Documents	\$50.00
10/13/2025	E-Filing Court Documents	\$50.00
10/14/2025	American Express – T. Schmeltz Airfare IAH ORD 10/16/20925 INV141145	\$474.34
10/15/2025	Westlaw – Computerized Legal Research	\$3,779.33
10/16/2025	E-Filing Court Documents	\$100.00
10/16/2025	Westlaw – Computerized Legal Research	\$8,464.86
10/16/2025	E-Filing Court Documents	\$50.00
10/17/2025	E-Filing Court Documents	\$50.00
10/19/2025	E-Filing Court Documents	\$100.00
10/28/2025	A. Peterson Uber airport to hotel 10/20/2025	\$145.48
10/20/2025	TransUnion searches	\$24.50
10/20/2025	TransUnion searches	\$6.25
10/20/2025	TransUnion searches	\$6.25
10/20/2025	TransUnion searches	\$6.25
10/20/2025	TransUnion searches	\$5.00
10/20/2025	TransUnion searches	\$5.00
10/20/2025	TransUnion searches	\$24.50
10/20/2025	TransUnion searches	\$5.00
10/20/2025	TransUnion searches	\$6.25

10/20/2025	TransUnion searches	\$6.25
10/20/2025	American Express – K. Warren Airfare ORD DFW 10/20/2025 – 10/22/2025 INV142623	\$705.97
10/21/2025	American Express – A. Peterson Airfare ORD DFW 10/20/2025 – 10/24/2025 INV142741	\$867.55
10/28/2025	Peterson Uber home to airport 10/20/2025	\$80.70
10/28/2025	Peterson Uber hotel to office 10/21/2025	\$17.30
10/28/2025	Peterson Uber office to hotel 10/21/2025	\$18.40
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$5.00
10/21/2025	TransUnion searches	\$5.00
10/21/2025	TransUnion searches	\$6.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$24.50
10/21/2025	TransUnion searches	\$6.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$6.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$12.25
10/21/2025	TransUnion searches	\$12.25
10/24/2025	East Hampton Crescent – Lunch Order for Chase Blackmon Deposition Prep 10/21/2025	\$45.40
10/30/2025	T. Schmeltz Uber to dinner 10/21/2025	\$17.51
10/30/2025	T. Schmeltz airfare Return to DAL 10/21/2025	\$425.48
10/30/2025	T. Schmeltz Uber from airport to 10/21/2025	\$37.64
10/30/2025	T. Schmeltz Dallas Marriott Downtown 10/21/2025 – 10/23/2025	\$1,314.14
10/28/2025	A. Peterson Uber hotel to office 10/22/2025	\$30.38
10/30/2025	T. Schmeltz Uber from dinner to hotel 10/22/2025	\$18.65
10/22/2025	Westlaw – Computerized Legal Research	\$6,305.24
10/22/2025	Color copies	\$24.00
10/22/2025	E-Filing Court Documents	\$50.00
10/22/2025	E-Filing Court Documents	\$50.00
10/28/2025	Mendocino Farms - Lunch for Chase Blackmon Deposition 10/22/2025	\$169.53
10/28/2025	Tiff's Treats – Baked goods for Chase Blackmon Deposition 10/23/2025	\$110.39
10/30/2025	T. Schmeltz Uber for preparation session 10/23/2025	\$29.22

10/30/2025	T. Schmeltz Uber airport to home 10/23/2025	\$84.48
10/28/2025	Peterson Uber hotel to office 10/23/2025	\$38.00
10/28/2025	Peterson Uber airport to home 10/23/2025	\$62.96
10/23/2025	American Express – A. Peterson Airfare DAL MDW 10/23/2025 INV143453	\$605.48
10/30/2025	T. Schmeltz Uber hotel to office 10/23/2025	\$17.68
10/30/2025	T. Schmeltz Uber office to airport 10/23/2025	\$55.45
10/30/2025	T. Schmeltz hotel T. Schmeltz lodging 10/21/2025 – 10/23/2025	\$1,314.14
10/30/2025	T. Schmeltz hotel A. Peterson lodging 10/21/2025 – 10/23/2025	\$1,314.14
10/23/2025	Westlaw – Computerized Legal Research	\$4,049.28
10/23/2025	E-Filing Court Documents	\$50.00
10/31/2025	T. Haskins Hotel Houston for hearing 10/29/2025 – 10/30/2025	\$384.93
10/30/2025	T. Schmeltz Travel MDW from Dallas 10/23/2025	\$493.48
10/31/2025	T. Schmeltz airfare DFW to ORD 10/24/2025	\$2,320.89
10/30/2025	T. Schmeltz - Breakfast preparation session with witness K. Hays at Beatrix Loop 10/24/2025	\$56.18
10/31/2025	Lunch for K. Hays Deposition – Hannah’s Bretzel 10/24/2025	\$240.28
10/25/2025	American Express – A. Peterson Airfare DFW ORD 10/23/2025 INV143360	(\$833.27)
10/25/2025	American Express – A. Peterson Airfare DFW ORD 10/23/2025 INV143360	\$399.50
10/24/2025	TransUnion searches	\$6.25
10/24/2025	TransUnion searches	\$6.25
10/24/2025	TransUnion searches	\$24.50
10/24/2025	TransUnion searches	\$6.25
10/24/2025	TransUnion searches	\$6.25
10/24/2025	TransUnion searches	\$6.25
10/24/2025	TransUnion searches	\$6.25
10/24/2025	E-Filing Court Documents	\$100.00
10/24/2025	E-Filing Court Documents	\$50.00
10/24/2025	E-Filing Court Documents	\$50.00
10/25/2025	TransUnion searches	\$5.00
10/25/2025	TransUnion searches	\$5.00
10/25/2025	TransUnion searches	\$6.25
10/26/2025	American Express – A. Peterson Airfare DAL MDW 10/23/2025 INVC143701	(\$100.00)
10/27/2025	American Express – K. Warren Airfare ORD IAD 10/27/2025 INV144311	\$352.94
10/27/2025	E-Filing Court Documents	\$100.00
10/27/2025	E-Filing Court Documents	\$100.00
10/27/2025	E-Filing Court Documents	\$100.00

10/27/2025	E-Filing Court Documents	\$100.00
10/27/2025	E-Filing Court Documents	\$50.00
10/28/2025	American Express – K. Warren Airfare DCA AUS 10/28/2025 INV144441	\$919.48
10/28/2025	Deposition Solutions LLC dba Lexitas Certified copy of transcript of K. Hays Inv Number 1002801725752 10/27/2025	\$3,516.29
10/28/2025	E-Filing Court Documents	\$100.00
10/28/2025	K. Warren Lodging 10/20/2025 – 10/23/2025	\$1,381.22
10/31/2025	Lunch for J. Cohn deposition – SPO West Wing Café 10/28/2025	\$103.01
10/29/2025	E-Filing Court Documents	\$100.00
10/29/2025	E-Filing Court Documents	\$100.00
10/29/2025	E-Filing Court Documents	\$100.00
10/29/2025	E-Filing Court Documents	\$100.00
10/29/2025	Westlaw – Computerized Legal Research	\$6,710.17
10/29/2025	E-Filing Court Documents	\$50.00
10/31/2025	T. Haskins Uber to hotel 10/29/2025	\$63.37
10/31/2025	T. Haskins Airfare Houston to Dallas 10/30/2025	\$407.48
10/30/2025	Deposition Solutions LLC dba Lexitas certified copy transcript of Chase Blackman Inv Number 1002801725990 10/27/2025	\$4,508.89
10/30/2025	E-Filing Court Documents	\$100.00
10/30/2025	Westlaw – Computerized Legal Research	\$3,972.02
10/30/2025	T. Haskins parking DFW (1/3)	\$51.70
10/30/2025	T. Haskins Uber from hotel to Houston airport	\$164.80
10/31/2025	Court Reporters Clearinghouse Ind – Deposition copy C. Topping Inv 210015 10/31/2025	\$729.81
10/31/2025	E-Filing Court Documents	\$100.00
10/31/2025	Westlaw – Computerized Legal Research	\$1,349.76
10/31/2025	E-Filing Court Documents	\$100.00
10/31/2025	E-Filing Court Documents	\$50.00
10/31/2025	E-Filing Court Documents	\$100.00
10/31/2025	E-Filing Court Documents	\$50.00
10/31/2025	E-Filing Court Documents	\$100.00
10/31/2025	E-Filing Court Documents	\$50.00
10/31/2025	E-Filing Court Documents	\$50.00
10/31/2025	E-Filing Court Documents	\$750.00
10/31/2025	FedEx (boxes to hotel)	\$134.31
10/31/2025	FedEx (boxes to hotel)	\$155.35
10/31/2025	FedEx (boxes to hotel)	\$127.98
10/31/2025	Everlaw Inc – Professional Services; Active Review – eDiscovery Hosting Services Subscription Fees	\$2,520.00
10/31/2025	Everlaw Inc – Professional Services; Early Case Assessment –	\$1,432.00

	eDiscovery Hosting Services Subscription Fees	
Total		\$79,453.46

BARNES & THORNBURG LLP

One North Wacker Drive, Suite 4400
Chicago, Illinois 60606 U.S.A.
E.I.N. 35-0900596
(312) 357-1313

SPECIAL COMMITTEE OF THE BOARD OF
DIRECTORS OF RHODIUM
DAVID EATON
251 LITTLE FALLS DRIVE
WILMINGTON, DE 19808
DAVIDEATON@RHDM.COM

Invoice 3499556

November 19, 2025
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	1,240,444.00
Other Charges	\$	79,453.46
Total This Invoice	\$	1,319,897.46

To remit payments by check, please return this page with remittance to:

Barnes & Thornburg LLP, 11 South Meridian Street, Indianapolis, Indiana 46204-3535 U.S.A.

To remit payments by ACH or Wire, send remittance advice to wireconfirmations@btlaw.com Send payment to:

Fifth Third Bank, Indianapolis, IN, Account Number: 7653510706 SWIFT CODE: FTBCUS3C

ABA #074908594 for ACH

ABA #042000314 for Wires

We do not communicate changes to our bank account details by email. If you receive such a request, please call our office using a verified number before taking any action.

BARNES & THORNBURG LLP

One North Wacker Drive, Suite 4400
Chicago, Illinois 60606 U.S.A.
E.I.N. 35-0900596
(312) 357-1313

SPECIAL COMMITTEE OF THE BOARD OF
DIRECTORS OF RHODIUM
DAVID EATON
251 LITTLE FALLS DRIVE
WILMINGTON, DE 19808
DAVIDEATON@RHDM.COM

Invoice 3499556

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November 19, 2025
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

00101065-00000001

FIDUCIARY DUTY INVESTIGATION

For legal services rendered in connection with the above matter for the period ending October 31, 2025 as described on the attached detail.

Fees for Services	\$	1,240,444.00
Other Charges	\$	<u>79,453.46</u>
Total This Invoice	\$	1,319,897.46

00101065-00000001 SPECIAL COMMITTEE OF THE BOARD OF
DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Summary of Invoice

Date	Name	Description	Hours	Amount
10/01/25	Anita Peterson	Review incoming communications from Company relating to valuations and assist attorneys in executing strategy per request of C. Underwood (.2); communications with L. Parks regarding fourth interim fee application (.2); assist attorneys in executing strategy per request of K. Matsoukas focusing on Special Committee's objection to LKC fee application with declarations (.2).	0.60	222.00
10/01/25	Charlotte Underwood	Communication with T. Schmeltz regarding term sheet (.1); communications with C. Raver regarding term sheet (.2); revisions to D&O term sheet (.3); correspond with R. Mates regarding the same (.1).	0.70	665.00
10/01/25	Kathleen L. Matsoukas	Continue drafting and revising motion (4.6); draft motion to seal and communicate with team regarding necessity of same (1.2); communicate with T. Schmeltz and client regarding objection and declarations and edits to same (2.4); confer with P. Lohse and T. Schmeltz regarding privilege motion (.6).	8.80	6,864.00
10/01/25	Anita Peterson	Review as-filed 2025-10-01 (Dkt 1732) Special Committee's Objection to LKC's Second and Final Application (with Declarations), 2025-10-01 (Dkt 1733) Emergency Motion of Special Committee to Strike Privileged Information from LKC's Second and Final Application and assist attorneys in executing strategy per request of P. Lohse (.2), detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.40	148.00
10/01/25	Joseph Kipp	Update Special Committee's Emergency Motion and Objection to conform to C. Topping Declaration.	0.70	301.00
10/01/25	Joseph Kipp	Review and revise Emergency Motion.	0.30	129.00
10/01/25	Joseph Kipp	Transmit Objection to LKC's Fee Application, C. Topping Declaration, C. Wheeler Declaration, Emergency Motion to Strike, and Proposed Order to Clerk and coordinate filing of same.	0.70	301.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/01/25	Joseph Kipp	Further review and revise the Special Committee's Emergency Motion to Strike and Objection to LKC's Fee Application.	0.60	258.00
10/01/25	Kenneth Kansa	Communication with A. Wissel on DS question (.1); t/cs with C. Raver on D&O settlement (.2); t/cs with P. Lohse on LKC objection and revisions to same (.3); participate in call with carriers, C. Raver, and T. Schmeltz on D&O insurance settlement (.5); email to C. Underwood regarding Plan revisions (.1); review and revise D&O settlement term sheet (.2); email R. Mates regarding PSA and term sheet (.1); review and revise disclosure statement provisions (4.9).	6.40	6,848.00
10/01/25	Joseph Kipp	Research TX and federal case law for cases involving fee disputes initiated by attorneys in which the Court discusses attorney-client privilege and the work-product doctrine.	1.50	645.00
10/01/25	Joseph Kipp	Research bankruptcy case law involving fee disputes.	1.60	688.00
10/01/25	Joseph Kipp	Review and revise C. Topping Declaration.	3.00	1,290.00
10/01/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.4); call with K. Kansa regarding LKC objection (.3); prepare objection to LKC fee objection and supporting documents (9.0); confer with T. Schmeltz and K. Matsoukas on claim objection (.6).	10.30	6,592.00
10/01/25	Lydia Parks	Determine next fee application deadline and request fee statements.	0.10	43.00
10/01/25	Trace (Vincent P.) Schmeltz	Work on objection to LKC fee application (.7); confer with Paige Lohse and Katie Matsoukas on claim objection (.6); D&O Settlement call with carriers, K. Kansa and C. Raver (.5); C. Wheeler declaration call (.7); attend Rhodium Board Meeting (.8).	3.30	3,300.00
10/01/25	Carrie M. Raver	Telephone conference with K. Kansa on D&O settlement (.2); call with carriers, T. Schmeltz and K. Kansa on D&O insurance settlement (.5).	0.70	591.50
10/02/25	Anita Peterson	Communications with investigative team following status conference and assist attorneys	2.00	740.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		in executing strategy per request of P. Lohse (.3); precise tracking and timely updates of deadlines and filings (.4); review communication with C. Potter following status conference (.1); review communications with Company regarding invoice for September fees (.2); review communications with Akin following status conference (.1); review communications with B. Funk following status conference (.1); review as-filed pleadings in Transcend case including 2025-10-02 (Dkt 1740) Special Committee's Brief in Support of Defendant's Motion to Transfer Venue and in Opposition to Plaintiff's Motion to Remand, 2025-10-02 (Dkt 1740-01) Declaration of Trace Schmeltz, 2025-10-02 (Dkt 1740-02) Exhibit A) and assist attorneys in executing strategy per request of P. Lohse (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4).		
10/02/25	Aaron Gavant	Review developments on plan negotiations.	0.20	161.00
10/02/25	Leah O'Farrell	Continue drafting solicitation motion.	1.50	885.00
10/02/25	Leah O'Farrell	Call with K. Kansa regarding solicitation materials (.2); continue drafting solicitation motion and supporting materials (2.4).	2.60	1,534.00
10/02/25	Leah O'Farrell	Revise solicitation materials per comments from K. Kansa.	0.90	531.00
10/02/25	Leah O'Farrell	Draft non-voting notice and opt-out ballot.	0.80	472.00
10/02/25	Leah O'Farrell	Review of K. Kansa's comments on motion to approve solicitation procedures (.2); edit per comments and research answers to questions presented (.4).	0.60	354.00
10/02/25	Leah O'Farrell	Attention to edits to solicitation order and opt-out notice (.1); review K. Kansa's answer to question on executory contracts in plan (.1).	0.20	118.00
10/02/25	Leah O'Farrell	Attention to final revisions by K. Kansa on motion to approve solicitation procedures (.2); email to K. Kansa with zip file of solicitation materials (.1).	0.30	177.00
10/02/25	Kenneth Kansa	Office conference with M. Bonnici on Disclosure	11.60	12,412.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Statement review (.2); t/c T. Schmeltz on status conference and plan schedule (.2); emails to T. Schmeltz on same (.2); emails to L. O'Farrell on solicitation procedures (.3); participate in team call on plan/DS/solicitation process (.5); email to A. Popescu on general unsecured claims (.1); further emails to T. Schmeltz on confirmation timing and document revisions (.2); emails to/from S. Schultz on same (.1); review and revise disclosure statement (3.5); email BT team on liquidation analysis (.1); email client on disclosure statement (.2); outline solicitation timeline and email BT team on same (.2); review and revise solicitation materials (4.5); emails to/from L. O'Farrell on same (.5); email to C. Underwood on disclosure statement review (.1); review R. Mates email on PSA and Term Sheet (.1); t/cs with P. Lohse on disclosure statement revisions and LKC objection (.2); t/cs to L. O'Farrell on solicitation materials (.2); email to SAFE AHG on disclosure statement and solicitation materials (.2).		
10/02/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.3); attend status conference (.7); call with K. Kansa regarding disclosure statement revisions and LKC objection (.2); follow up from status conference (3.2); continue preparations for upcoming evidentiary hearings (2.5).	6.90	4,416.00
10/02/25	Carrie M. Raver	Draft notice letters to Allied World and XL regarding derivative investigation cost demands/claims.	0.60	507.00
10/02/25	Melissa Bonnici	Office conference with K. Kansa regarding Disclosure Statement review (.2); research documents in case docket and summarized documents, rulings, and events in case timeline for the purposes of assisting K. Kansa with drafting the Disclosure Statement (6.2).	6.40	2,752.00
10/02/25	Anna Brinski	Review investigation team correspondence relating to state court filings as well as plan filing (.1); correspond with C. Underwood regarding to do list (.1).	0.20	90.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/02/25	Charlotte Underwood	Communications with team regarding plan preparations (.5); organization and management of plan and other litigation related discovery (.5); review draft disclosure statement (.4); revise carrier supplemental notices (.2); review legal research relating to privilege (.6).	2.20	2,090.00
10/02/25	Trace (Vincent P.) Schmeltz	Confer with Akin Gump in advance of hearing (.4); confer with clients in advance of hearing (.4); prepare for status conference (.3); call with K. Kansa regarding same (.2); attend status conference with Court (.7); confer with M. Robinson and A. Popescu (.6).	2.60	2,600.00
10/02/25	Kathleen L. Matsoukas	Review communications from C. Topping regarding fee dispute and related evidence (.8); review and comment on work plan (.4).	1.20	936.00
10/02/25	Ning He	Confer with team regarding LKC matter and plan issues.	0.50	385.00
10/03/25	Joseph Kipp	Compile LKC and Special Committee briefings into centralized chart and provide descriptions of each for P. Lohse's review.	3.60	1,548.00
10/03/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.3); continue preparations for upcoming evidentiary hearings (3.2); call with H. Casper regarding matter background and strategy (1.0); LKC discovery (2.6).	7.10	4,544.00
10/03/25	Anita Peterson	Assist attorneys in executing strategy per request of C. Underwood focusing on work plan (.5); review incoming LKC discovery requests to Debtors and assist attorneys in executing strategy per request of P. Lohse (.2); precise tracking and timely updates of deadlines and filings (.5); assist attorneys in executing strategy per request of P. Lohse focusing on pleadings from Transcend bankruptcy matter Case No. 25-03413 (1.8); update pleadings index relating for Transcend bankruptcy matter Case No. 25-03413 at request of P. Lohse (.5); communications with billing clerk (K. Phillips) regarding monthly fee statement (.2); review and revise monthly fee statement (.8); communications with T. Schmeltz regarding	5.90	2,183.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		insurance coverage and follow up regarding same (.2); review communications with insurers and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communication with C. Potter requesting draft plan (.1); review communications with B. Funk regarding term sheet (.2); review communication with M. Hurley regarding draft plan (.1); communications with investigative team regarding discovery requests and assist attorneys in executing strategy per request of T. Schmeltz (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4).		
10/03/25	Kevin Warren	Conduct legal research for C. Underwood.	3.10	1,333.00
10/03/25	Aaron Gavant	Review developments on plan negotiations (.3); communications with BT team regarding same (.2).	0.50	402.50
10/03/25	Carrie M. Raver	Address notice letters to insurers and submission of defense costs and proof of payment.	0.50	422.50
10/03/25	Leah O'Farrell	Attention to emails from C. Underwood regarding work plan and calendaring of plan deadlines.	0.10	59.00
10/03/25	Leah O'Farrell	Prepare calendar of plan deadlines (.1); email to A. Peterson regarding calendaring for BT team same (.1).	0.20	118.00
10/03/25	Kenneth Kansa	Email C. Underwood on disclosure statement revisions (.1); email to SAFEs' counsel regarding redline of disclosure statement (.2); t/c T. Schmeltz on plan revisions (.1); review T. Schmeltz plan revisions (.6); t/c A. Popescu on disclosure statement revisions (.1); review and respond to C. Underwood emails on unsecured claim (.2); email to A. Wissel on timing of plan objections research (.2); review Transcend/A shareholders' emails on plan and disclosure statement (.2); email to litigation team on timing of objections (.1); review and revise Plan draft and email to SAFE AHG/T. Schmeltz/C. Underwood on same (3.3); t/c C. Underwood on	5.40	5,778.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		plan process and timing (.2); t/c D. Eaton on disclosure statement revisions (.1).		
10/03/25	Leah O'Farrell	Attention to email conversation regarding sharing plan and solicitation materials with interested parties.	0.10	59.00
10/03/25	Haley Casper	Call with P. Lohse regarding matter background and strategy for LKC and Transcend disputes (1.0); begin review of documents in furtherance of same (.2).	1.20	630.00
10/03/25	Charlotte Underwood	Review plan (1.2); review and revise disclosure statement (1.1); review and revise D&O term sheet (.5); draft follow up notices (.6); communications with team regarding planning for upcoming plan confirmation, discovery, and motion practice (1.5); confer with T. Schmeltz (.4) and K. Kansa (.2) on plan related matters.	5.50	5,225.00
10/03/25	Anna Brinski	Correspond with P. Lohse regarding upcoming evidentiary proceedings (.2); review investigation team correspondence regarding discovery requests (.1).	0.30	135.00
10/03/25	Trace (Vincent P.) Schmeltz	Draft Plan (4.9); call with K. Kansa regarding plan revisions (.1); confer with C. Underwood regarding plan related matters (.4).	5.40	5,400.00
10/03/25	Kathleen L. Matsoukas	Review and provide comments on Debtors' omnibus claim objection.	0.90	702.00
10/03/25	Abigail Wissel	Research Fifth Circuit and Southern District of Texas case law regarding the proper timing for objections to liquidation analysis (3.8); summarize same for K. Kansa (.9).	4.70	1,762.50
10/04/25	Paige Lohse	Continue preparations for upcoming evidentiary hearings.	4.70	3,008.00
10/04/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse continuing to focus on pleadings from Transcend bankruptcy matter Case No. 25-03413 (1.1); update pleadings index relating for Transcend bankruptcy matter Case No. 25-03413 at request of P. Lohse (.9).	2.00	740.00
10/04/25	Leah O'Farrell	Revise solicitation order and motion per instructions regarding multiple ballots.	0.50	295.00
10/04/25	Leah O'Farrell	Draft cure notice and publication notice.	1.10	649.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/04/25	Joseph Kipp	Compile LKC and Special Committee briefings into centralized chart and provide descriptions of each for P. Lohse's review.	0.20	86.00
10/04/25	Haley Casper	Communicate with P. Lohse regarding chronology of facts and case preparation (.2); evaluate P. Lohse updates regarding LKC and Transcend disputes and next steps and communicated internally regarding same (.3); analyze April 2025 mediation statement, LKC dispute briefing, and discovery and create chronology of key facts and transactions and simultaneously create list of key people and entities (4.0).	4.50	2,362.50
10/04/25	Kenneth Kansa	Email to S. Schultz on revised plan and disclosure statement (.2); email to S. Schultz on SAFEs' plan voting (.1); email L. O'Farrell on same (.1); review UST objection to prior plan terms and email BT team on same (.5); follow up email to L. O'Farrell on same (.1); review S. Baham revisions to SAFEs' voting materials (.4); email to BT team on same (.1); review and revise solicitation materials (1.2); email to L. O'Farrell on same (.1); review A. Wissel email on injunction question (.1); further review and revision of settlement materials (.8).	3.70	3,959.00
10/04/25	Kathleen L. Matsoukas	Communicate with P. Lohse regarding action items on preparing for LKC hearing.	0.40	312.00
10/04/25	Abigail Wissel	Email to K. Kansa on research regarding gatekeeper provision in Chapter 11 plan.	0.10	37.50
10/05/25	Paige Lohse	Work on LKC discovery.	5.70	3,648.00
10/05/25	Anita Peterson	Communication with L. Parks regarding fourth interim fee statement (.1); review Special Committee's First Set of Requests for Production of Documents to LKC and assist attorneys in executing strategy per request or P. Lohse (.2); precise tracking and timely updates of deadlines and filings (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	0.80	296.00
10/05/25	Leah O'Farrell	Attention to email with revisions to solicitation	0.10	59.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		order and motion from Akin team and follow up email from K. Kansa regarding same.		
10/05/25	Leah O'Farrell	Review revisions to cure notice and publication notice (.2); email drafts regarding same to Akin team (.1).	0.30	177.00
10/05/25	Lydia Parks	Draft the Fourth Interim Fee Application (2.8); draft Certification to accompany the Application (.7).	3.50	1,505.00
10/05/25	Haley Casper	Continue analysis of Barnes and Thornburg April 2025 mediation statement, requests for discovery, and pleadings regarding dispute with LKC including supplement chronology with key facts, disputes, and transactions.	4.80	2,520.00
10/05/25	Kenneth Kansa	Review publication notice and cure notice and revise same (.4); email to L. O'Farrell regarding same (.1); review L. O'Farrell email on rejection notice (.1); further review of disclosure statement and plan materials regarding settlement (1.3); further review of solicitation materials on settlement points (.6).	2.50	2,675.00
10/05/25	Trace (Vincent P.) Schmeltz	Revise plan documents (1.3); call with clients and SAFE AHG on plan documents (.9).	2.20	2,200.00
10/05/25	Kathleen L. Matsoukas	Review and comment on draft document requests to LKC.	0.90	702.00
10/06/25	Joseph Kipp	Gather key facts pertaining to LKC's fee dispute with Special Committee and synthesize into written form to be used in Special Committee's Motion to Enforce Purchase and Sale Agreement.	0.60	258.00
10/06/25	Joseph Kipp	Research Fifth Circuit bankruptcy cases discussing enforcement of Settlement Agreement.	1.20	516.00
10/06/25	Joseph Kipp	Draft and revise Special Committee's Motion to Enforce the Purchase and Sale Agreement.	1.40	602.00
10/06/25	Anita Peterson	Review and revise monthly fee statement (3.8); communications with T. Schmeltz regarding monthly fee statement (.1); precise tracking and timely updates of deadlines and filings (.2); communications with P. Lohse regarding same (.2); communication with L. Parks regarding	6.30	2,331.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		fourth interim fee statement (.1); review multiple communications with Akin, R. Mates regarding PSA and term sheet and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with Quinn Emanuel regarding same, solicitation materials (.2); review communications with Akin, R. Mates regarding solicitation materials and assist attorneys in executing strategy per request of C. Underwood (.2); review additional communications with Akin regarding PSA solicitation materials (.1); review communications with D. Eaton, S. Wells, D. Dunn, M. Robinson, Quinn Emanuel regarding same (.2); review communications with Akin, R. Mates, R.J. Shannon, S. Schultz regarding PSA and term sheet (.3); review communications with Akin regarding draft Joint Chapter 11 Plan of Liquidation (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3); review communications with Porter Hedges regarding discovery requests and assist attorneys in executing strategy per request of T. Schmeltz (.2).		
10/06/25	Joseph Kipp	Research bankruptcy cases on fee reimbursement for LKC dispute.	1.20	516.00
10/06/25	Leah O'Farrell	Call with K. Kansa regarding solicitation exhibits.	0.20	118.00
10/06/25	Leah O'Farrell	Review revisions on emergency motion for conditional approval of disclosure statement (.2); compare drafts (.4); further revise motion per review (.5).	1.10	649.00
10/06/25	Leah O'Farrell	Revise order on solicitation motion per edits to motion (.2); review and accept changes from Akin to solicitation exhibit documents (.4); create beneficial and master ballots for classes 10 and 11 (.2).	0.80	472.00
10/06/25	Leah O'Farrell	Call with K. Kansa regarding solicitation materials (.3); draft notice of PSA (.1).	0.40	236.00
10/06/25	Paige Lohse	Preparations for hearing on LKC dispute (6.4);	7.20	4,608.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		call with K. Kansa regarding claims issues (.2); analyze and send correspondence and filings regarding recent developments (.3); confer with T. Schmeltz regarding Temple claims (.1); prepare motion practice against Whinstone (.2).		
10/06/25	Carrie M. Raver	Address insurance coverage issues.	0.20	169.00
10/06/25	Charlotte Underwood	Review and finalize D&O settlement (1.8); review revise and finalize Plan Support Agreement, Plan, and Disclosure Statement (3.8); confer with client and Province regarding plan and other related updates (.6); finalize Special Committee resolution related to plan support agreement (.3); analyze materials related to Kirkland claim (.3); call with K. Kansa regarding plan (.2); communication with T. Schmeltz regarding same (.2).	7.20	6,840.00
10/06/25	Lydia Parks	Revise the Fourth Interim Fee Application.	1.00	430.00
10/06/25	Kenneth Kansa	T/c L. O'Farrell on solicitation materials (.3); communication with A. Wissel on research question (.1); t/c P. Lohse on claims issues (.2); t/c T. Schmeltz on plan questions (.2); t/c C. Underwood on same (.2); t/c L. O'Farrell on solicitation exhibits (.2); conference with S. Schultz on plan/DS/solicitation materials (.5); email to S. Baham on solicitation materials (.1); email to BT team on status of all settlement-related materials (.4); email L. O'Farrell on notice of PSA (.1); email L. O'Farrell on solicitation materials (.1); email A. Popescu regarding plan draft (.1); email to C. Underwood on plan status (.1); email to L. O'Farrell on settlement opt outs (.1); email to C. Underwood on plan revisions (.1); email to T. Schmeltz on disclosure statement (.1); review Akin revisions to disclosure statement (.9); email to client and BT team on same (.1); review Akin comments on Plan (.4); email to client and BT team on same (.1); email to L. O'Farrell on solicitation procedures (.1); email to P. Tomasco and Quinn Emanuel team on plan, disclosure statement, and related materials (.4); review PSA and email to C. Underwood on same (.4); review and revise plan draft regarding settlement (2.0);	10.20	10,914.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		email to client on same (.1); further email to client on same (.1); review and revise disclosure statement regarding settlement (2.2); email to client on same (.1); email to Quinn Emanuel team on same (.1); review final versions of PSA and term sheet (.3).		
10/06/25	Kevin Warren	Review mediation statement, along with pleadings with respect to LKC dispute to prepare to assist P. Lohse in LKC dispute.	2.50	1,075.00
10/06/25	Haley Casper	Evaluate strategy regarding Motion to Enforce PSA from P. Lohse (.2); communicate with P. Lohse and J. Kipp regarding same (.1); collect and send relevant documents to J. Kipp including communications relating to same (.4).	0.70	367.50
10/06/25	Haley Casper	Evaluate question and dispute regarding privilege with respect to Transcend litigation (.2); communicate with P. Lohse and K. Warren regarding same in furtherance of evaluation and strategy (.1).	0.30	157.50
10/06/25	Haley Casper	Finalize review of LKC dispute discovery documents and pleadings and supplement chronology of key transactions and disputes in furtherance of investigation and litigation strategy and simultaneously supplement list of key individuals and entities in furtherance of same.	3.30	1,732.50
10/06/25	Haley Casper	Begin review of Transcend dispute documents and pleadings, create chronology of key transactions and disputes in furtherance of investigation and litigation strategy and simultaneously supplement list of key individuals and entities in furtherance of same.	6.80	3,570.00
10/06/25	Trace (Vincent P.) Schmeltz	Revise plan documents (2.2); call with K. Kansa regarding plan questions (.2); conference call with C. Topping (.4); confer with P. Lohse on Temple claims (.1); confer with Special Committee on plan issues (.5).	3.40	3,400.00
10/06/25	Kathleen L. Matsoukas	Prepare for and lead discussion with M. Robinson regarding Whinstone timeline of events (1.3); communicate with M. Robinson regarding payment of a portion of fees to LKC	1.80	1,404.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.2); review caselaw regarding Court's ability to revise contingency fee award (.3).		
10/06/25	Ning He	Analyze materials regarding production of report and potential privilege.	0.50	385.00
10/07/25	Joseph Kipp	Research bankruptcy cases regarding fee awards for LKC dispute.	1.60	688.00
10/07/25	Joseph Kipp	Review LKC invoices attached to fee application and prepare chart of same.	1.60	688.00
10/07/25	Joseph Kipp	Draft Motion to Enforce Purchase and Sale Agreement between Debtors and Whinstone.	2.10	903.00
10/07/25	Leah O'Farrell	Attention to emails regarding signatures on PSA and filing of PSA (.2); attention to emails regarding open items prior to filing plan (.2); attention to emails regarding edits to plan and disclosure statement (.1).	0.50	295.00
10/07/25	Leah O'Farrell	Attention to emails from Quinn Emanuel team regarding notice agent (.1); draft email to notice agent regarding solicitation timeline (.1).	0.20	118.00
10/07/25	Leah O'Farrell	Finalize solicitation materials.	1.20	708.00
10/07/25	Leah O'Farrell	Attention to emails from Verita and Akin regarding master ballot including set conference with both regarding same.	0.10	59.00
10/07/25	Leah O'Farrell	Call with Verita and Akin regarding ballot issue.	0.50	295.00
10/07/25	Leah O'Farrell	Revise class 10 ballots per comments from Verita and draft standard ballots for all three classes.	0.50	295.00
10/07/25	Leah O'Farrell	Update solicitation exhibits with new release language.	0.40	236.00
10/07/25	Leah O'Farrell	Attention to email from Akin regarding edits to solicitation motion and order (.2); review same and consolidate versions of motion (.3).	0.50	295.00
10/07/25	Leah O'Farrell	Attention to email from K. Kansa regarding Akin updating solicitation motion and allowing SAFEs to vote.	0.10	59.00
10/07/25	Leah O'Farrell	Review Disclosure statement and add additional dates and edits (.3); review edits on plan and disclosure statement from Akin (.2).	0.50	295.00
10/07/25	Leah O'Farrell	Review edits to ballots and conform current	0.70	413.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		ballots to same (.5); update solicitation document chart regarding status and versions (.1); review changes to motion related to e-ballots (.1).		
10/07/25	Leah O'Farrell	Implement Akin's revisions to plan per K. Kansa's instructions (.4); call with C. Underwood and K. Kansa regarding plan and disclosure statement (1.2).	1.60	944.00
10/07/25	Leah O'Farrell	Attention to message from K. Kansa to send solicitation materials including draft email to Quinn Emanuel team regarding solicitation materials.	0.10	59.00
10/07/25	Leah O'Farrell	Attention to email regarding further release language changes (.1); communications with K. Kansa and C. Underwood regarding same (.2); revise solicitation materials regarding same (.3); update plan regarding same (.1).	0.70	413.00
10/07/25	Leah O'Farrell	Attention to final edits on plan and disclosure statement (.2); emails regarding same (.2); implement final revisions and compile documents with exhibits (.4).	0.80	472.00
10/07/25	Leah O'Farrell	Edit revisions to signature pages per request from Akin (.3); edits to final revisions to signature pages per further request from Akin (.2).	0.50	295.00
10/07/25	Anita Peterson	Communications with investigative team regarding PSA and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with R.J. Shannon regarding solicitation materials (.1); review communications with R. Mates, R.J. Shannon regarding draft Joint Chapter 11 Plan of Liquidation, Disclosure Statement (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); review as-filed 2025-10-07 (Dkt 1747) Notice of Filing Plan Support Agreement and assist attorneys in executing strategy per request of C. Underwood (.2); review 2025-10-06 Illustrative Summary of Principal Terms for Settlement of Rhodium D and O Claims (Execution Copy) and	6.30	2,331.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		assist attorneys in executing strategy per request of C. Underwood (.2); review and revise monthly fee statement (4.4); review communications with R. Mates regarding requested footnote relating to Disclosure Statement and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with Quinn Emanuel regarding draft Omnibus Objection documents and assist attorneys in executing strategy per request of C. Underwood (.2).		
10/07/25	Kathleen L. Matsoukas	Prepare for and participate in discussion with J. Wolfshohl regarding potential settlement or progress on settlement with LKC.	0.40	312.00
10/07/25	Kathleen L. Matsoukas	Prepare for and participate in interview of K. Hays in connection with preparation for litigation of fee dispute with LKC (1.2); review research on success fees (.5).	1.70	1,326.00
10/07/25	Charlotte Underwood	Call with SAFE AHG, client, and others related to plan revisions (.6); call with SAFE AHG and Founders regarding plan revisions (.5); confer with client regarding plan-related revisions (.3); review, revise, and finalize plan materials (7.5); conferences with K. Kansa and L. O'Farrell regarding plan and disclosure statement (1.2); draft emails related to LKC matter (.3); correspond with client regarding Kirkland claim (.3).	10.70	10,165.00
10/07/25	Kenneth Kansa	Telephone conference D. Eaton on settlement revisions (.3); call with client/Debtors/SAFE AHG on finalization of settlement terms and next steps (.6); call with Imperium/Founders/SAFE AHG on next steps (.4); numerous telephone conferences with S. Schultz on document finalization (.6); emails to S. Schultz on same (.3); telephone conference with C. Topping on revisions to plan and related documents (.6); numerous conferences with C. Underwood and L. O'Farrell on finalization of plan documents (1.2); conferences with T. Schmeltz on same (.2); conference with client, T. Schmeltz, C. Underwood on final revisions to plan documents (.3); review materials on	14.60	15,622.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		schedule amendments (.5); telephone conferences S. Schultz on same (.3); emails to S. Schultz on same (.2); email to D. Eaton on substantial contribution claim language (.1); morning review of plan and disclosure statement documents on settlement and revise same (1.2); emails to C. Topping on plan revisions (.3); further review and revision to plan provisions on settlement (1.6); circulate same to SAFEs/Imperium/Founders/client team with covering comments (.3); review and revise release language in plan regarding settlement (.2); review solicitation issues for settlement parties (.4); emails to client on settlement terms and incorporation into plan (.4); review and revise disclosure statement provisions on settlement (1.7); emails to S. Schultz on same (.4); emails to BT team on same (.6); email to M. Robinson and A. Popescu on schedule amendments regarding SAFEs (.1); finalize plan and disclosure statement documents for settlement, including numerous communications with C. Underwood and L. O'Farrell (1.8).		
10/07/25	Paige Lohse	Preparations for hearing on LKC dispute (4.6); analyze and send correspondence and filings regarding recent developments (.6).	5.20	3,328.00
10/07/25	Kevin Warren	Draft analysis, with related research, of privilege issues related to the LKC dispute to assist L. Paige, K. Matsoukas, and H. Casper regarding the same.	3.10	1,333.00
10/07/25	Haley Casper	Communicate with C. Underwood regarding status of PSA and signature (.1); continue evaluation of Transcend pleadings and supplement chronology of facts and transactions and list of key individuals and entities (1.2).	1.30	682.50
10/07/25	Haley Casper	Draft definitions, instructions, and begin drafting document requests to Transcend in furtherance of discovery and litigation strategy (2.2); evaluate related document requests to LKC in furtherance of same (2.5).	4.70	2,467.50
10/07/25	Haley Casper	Strategize with P. Lohse regarding call with B.	2.00	1,050.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Riley (.1); analyze K. Warren research and findings regarding privilege implications and waivers in furtherance of same (.2); analyze K. Hays interview outline and prepare for interview (.2); participate in interview of K. Hays (1.2); evaluate LKC document requests and review document requests to K. Hays in furtherance of relevant production (.3).		
10/07/25	Haley Casper	Edit and supplement draft Motion to Enforce the PSA (1.6); communication regarding comments internally (.2).	1.80	945.00
10/07/25	Trace (Vincent P.) Schmeltz	Review and revise plan documents (1.9); call with SAFE AHG and Special Committee (.5); strategy call with P. Tomasco (.2); plan related call with K. Kansa, C. Underwood and Special Committee (.3); call with Chase Blackmon (.2); plan related calls with S. Schultz and M. Hurley (.5).	3.60	3,600.00
10/07/25	Ning He	Analyze data regarding factual investigation (5.2); analyze interview memos (1.2).	6.40	4,928.00
10/07/25	Ning He	Analyze documents regarding proposed plan.	0.50	385.00
10/08/25	Joseph Kipp	Review and evaluate LKC invoices attached to fee application and prepare chart of same.	1.20	516.00
10/08/25	Joseph Kipp	Draft Motion to Enforce Purchase and Sale Agreement between Debtors and Whinstone.	0.30	129.00
10/08/25	Joseph Kipp	Review and analyze Purchase and Sale Agreement between Debtors and Whinstone to ascertain whether claims arising under prior energy contracts are viable.	1.00	430.00
10/08/25	Joseph Kipp	Research TX caselaw discussing elements of bad faith breach of contract and calculation of lost profits.	0.60	258.00
10/08/25	Anita Peterson	Review and revise monthly fee statement (2.4); emails with timekeepers regarding monthly fee statement (.3); communications with billing clerk (K. Phillips) regarding monthly fee statement (.3); communications with K. Kansa regarding monthly fee statement (.1); precise tracking and timely updates of deadlines and filings (.3); review as-filed 2025-10-07 (Dkt 1750) Amended Joint Chapter 11 Plan of Liquidation for	6.50	2,405.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		<p>Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtor and SAFE AG, 2025-10-07 (Dkt 1751) Disclosure Statement for Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and its Affiliated Debtors and assist attorneys in executing strategy per request of C. Underwood (.2); review communications with Akin regarding draft Omnibus Objection documents and assist attorneys in executing strategy per request of C. Underwood (.2); review multiple incoming communications from C. Potter regarding proposed discovery (.2); communications with investigation team regarding same (.3); review incoming communications with Akin and C Potter regarding discovery schedule (.2); review incoming communication with P. Tomasco regarding request for deposition dates (.1); review multiple communications with Quinn Emanuel regarding draft Debtors' Second Omnibus Claim Objection and assist attorneys in executing strategy per request of T. Schmeltz (.4); review communications with Company regarding September invoice estimate (.2); review multiple communications from A. Popescu to Akin forwarding draft claim objection materials (.3); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); review incoming communication with Porter Hedges forwarding as-filed pleadings (.1); review as-filed 2025-10-08 (Dkt 1754) LKC's Response to Special Committee's Emergency Motion to Strike, 2025-10-08 (Dkt 1755) [SEALED] LKC Response to Special Committee's Emergency Motion to Strike and assist attorneys in executing strategy per request of P. Lohse (.2); communications with K. Kansa, L. Parks regarding Fourth Interim Fee Statement (.2); review communications with A. Popescu regarding amended schedules (.1).</p>		
10/08/25	Leah O'Farrell	<p>Attention to emails amending schedule (.1); email with K. Kansa regarding same (.1).</p>	0.20	118.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/08/25	Aaron Gavant	Review revised drafts of plan and disclosure statement (.4); communications relating to same (.1).	0.50	402.50
10/08/25	Paige Lohse	Preparations for hearing on LKC dispute (1.8); review third-party claims (2.9); telephone conference with K. Kansa regarding same (.4); preparations for hearing on Transcend dispute (1.6); additional telephone conference with K. Kansa regarding third-party analysis regarding Temple Green (.2).	6.90	4,416.00
10/08/25	Kevin Warren	Assist P. Lohse and K. Matsoukas in interview of C. Topping with respect to LKC dispute.	1.80	774.00
10/08/25	Charlotte Underwood	Attention to plan related discovery (1.0); confer with plan proponents regarding objection (.5); correspond with C. Topping regarding filed plan (.2); attention to second omnibus objection (1.6); confer with T. Schmeltz regarding outstanding items (.3); draft correspondence related to common interest research and review the same (.8).	4.40	4,180.00
10/08/25	Charlotte Underwood	Review and finalize plan.	0.50	475.00
10/08/25	Kenneth Kansa	Review third-party claims analysis regarding Temple Green (.3); email P. Lohse on same (.1); t/c to P. Lohse on same (.4); further review of Temple Green analysis (.8); further t/c to P. Lohse on same (.2); email to C. Underwood on Transcend claims objection (.1); email to C. Topping on plan settlement edits (.1); conference with BT and Akin teams on Transcend claims objection (.5); review Transcend claims objection (.4); email to M. Robinson on liquidation analysis (.1); draft language for P. Lohse on Temple Green and email P. Lohse on same (.2); emails to C. Underwood and L. O'Farrell on schedule amendments (.2); email L. Parks on Fourth Interim Fee Application (.1); review emails on schedule amendments (.4); review emails on plan/DS revisions (.2); review further materials on claims objections (.3).	4.40	4,708.00
10/08/25	Haley Casper	Continue supplementing draft document	2.40	1,260.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		requests to Transcend and circulate internally (1.6); evaluate discovery email from Transcend team and scope of sought discovery (.2); communication with P. Lohse regarding strategy for Transcend discovery and potential impact on privilege (.2); review K. Warren prior initial research regarding privilege and communicate with K. Warren regarding supplementing research (.4).		
10/08/25	Haley Casper	Edit and supplement Motion to Enforce PSA (.6): email with P. Lohse regarding same (.2).	0.80	420.00
10/08/25	Haley Casper	Communicate with team regarding supplementing draft J. Salin investigation outline and strategy (.1); commence initial review in furtherance of same (.2).	0.30	157.50
10/08/25	Haley Casper	Analyze LKC's Response to the Motion to Strike and supplement chronology in furtherance of litigation strategy and factual analysis (.6); analyze documents from K. Hays and supplement chronology in furtherance of same (.5).	1.10	577.50
10/08/25	Charity Seaborn	Review case file, including prior correspondence, pleadings, and key evidence, to gain familiarity with factual and legal issues in preparation for assuming case responsibilities.	3.10	1,488.00
10/08/25	Kathleen L. Matsoukas	Prepare for interview of C. Topping relating to LKC fee dispute (.6); participate in interview of C. Topping (1.0).	1.60	1,248.00
10/08/25	Trace (Vincent P.) Schmeltz	Text exchanges with M. Hurley and R. Mates regarding plan issues (.3); attend Rhodium Board meeting (1.0); conferences with D. Eaton and M. Robinson regarding strategy (.9); confer with C. Topping regarding plan issues (.3); confer with C. Underwood regarding strategy (.3); call with M. Hurley (.1).	2.90	2,900.00
10/09/25	Joseph Kipp	Review CourtLink filings regarding Porter Hedges.	0.10	43.00
10/09/25	Anita Peterson	Communications with K. Kansa, L. Parks and A. Wissel regarding Fourth Interim Fee Statement (.4); follow up regarding same per request of K. Kansa (.6); precise tracking and timely updates	3.10	1,147.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		of deadlines and filings (.2); review multiple communications with Quinn Emanuel regarding draft Debtors' Second Omnibus Claim Objection and assist attorneys in executing strategy per request of T. Schmeltz (.6); review communications with Akin regarding same (.3); review communications with D. Eaton, S. Wells regarding draft Debtors' Second Omnibus Claim Objection (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.6); review communications with Company regarding requested documents (.1); review communications from A. Popescu regarding amended schedules (.1).		
10/09/25	Charity Seaborn	Review and analyze pleadings related to the Special Committee, including Plaintiffs' state court complaint, Defendants' motion to transfer, and Special Committee's motion to intervene.	1.60	768.00
10/09/25	Lydia Parks	Correspond with A. Wissel regarding the upcoming fee application.	0.30	129.00
10/09/25	Leah O'Farrell	Attention to email from S. Bahan at Akin requesting Word versions of filed documents, including compile and send same.	0.10	59.00
10/09/25	Leah O'Farrell	Call with P. Lohse regarding hearings and plan discovery.	0.30	177.00
10/09/25	Joseph Kipp	Research Local Rules for S.D. Texas Bankruptcy Court.	0.90	387.00
10/09/25	Paige Lohse	Preparations for hearing on LKC dispute (1.5); call with L. O'Farrell regarding hearings and plan discovery (.3); preparations for plan confirmation discovery (2.3); third-party claim evaluation (.5); analyze and send correspondence and filings regarding recent developments (.2); revise motion to enforce Purchase and Sale Agreement against Whinstone (1.7).	6.50	4,160.00
10/09/25	Charity Seaborn	Continue to analyze pleadings in preparation of determining discovery needs, including the recorded hearing.	1.20	576.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/09/25	Charlotte Underwood	Confer with Quinn Emanuel regarding objection (.6); review, revise, and confer with team regarding omnibus objection (1.3); call with K. Kansa regarding ancillary settlement/plan documents (.2); attention to amended schedules (.3); confer with client regarding objection (.2); correspond with team regarding LKC fee (.2); manage ongoing plan discovery and other projects (.5); confer with T. Schmeltz regarding various open issues (.4).	3.70	3,515.00
10/09/25	Aaron Gavant	Review plan negotiation communications (.4); communications with BT team regarding same (.1).	0.50	402.50
10/09/25	Haley Casper	Send update to P. Lohse regarding status of tasks and next steps.	0.10	52.50
10/09/25	Anita Peterson	Review communications with Quinn Emanuel regarding Debtors' Second Omnibus Objection (.3); review communication with Akin regarding same (.2); review as-filed 2025-10-09 (Dkt 1764) Debtors' Second Omnibus Objection to Certain Claims (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.00	370.00
10/09/25	Kathleen L. Matsoukas	Participate in meet and confer with C. Potter and other counsel on discovery (.5); communicate with team regarding claim objection (.3).	0.80	624.00
10/09/25	Kenneth Kansa	Conference with Akin and Province teams on liquidation analysis (1.0); email to A. Popescu on liquidation analysis call (.1); review footnotes to liquidation analysis and email to A. Popescu on same (.6); review revisions to amended schedules (.4); email to Quinn Emanuel team on same (.1); review T. Schmeltz email on claims objection (.1); communications with T. Schmeltz on same (.3); review additional emails on claims objection (.4); review further emails on schedule amendments and revisions to same (.3); t/c D. Eaton on settlement research (.2); t/c T. Schmeltz on claims objection (.2); t/c C. Underwood regarding preparation of ancillary	4.20	4,494.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		settlement/plan documents (.2); t/c with A. Wissel on preparation of interim fee application (.3).		
10/09/25	Trace (Vincent P.) Schmeltz	Strategy calls with D. Eaton and S. Wells (.6); S. Schultz and M. Hurley (1.1); M. Robinson (.4); K. Kansa (.2); P. Tomasco (.6); C. Underwood (.4); and LKC litigation team (.5). attend formal meeting with Special Committee and Rhodium (.6).	4.40	4,400.00
10/09/25	Abigail Wissel	Email to L. Parks on Fourth Interim Fee Application (.1); call with K. Kansa on same (.3).	0.40	150.00
10/10/25	Joseph Kipp	Research TX caselaw discussing the economic loss doctrine, gross negligence, consequential damages, and the implied warranty of suitability.	3.10	1,333.00
10/10/25	Joseph Kipp	Analyze Temple Green lease and extract key information pertaining to damages waivers and reservations of control.	0.50	215.00
10/10/25	Joseph Kipp	Confer with P. Lohse regarding TX caselaw discussing economic loss doctrine and consequential damages.	0.30	129.00
10/10/25	Joseph Kipp	Produce memorandum for P. Lohse's review summarizing TX caselaw.	2.10	903.00
10/10/25	Joseph Kipp	Synthesize TX caselaw memorandum into succinct email format for P. Lohse's review.	0.50	215.00
10/10/25	Paige Lohse	Preparations for hearing on LKC dispute (4.9); third-party claim evaluation (2.9); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (1.1); confer with J. Kipp regarding requested research (.3).	9.20	5,888.00
10/10/25	Leah O'Farrell	Attention to question from P. Lohse regarding language for motion for emergency determination (.1); draft language regarding same (.2).	0.30	177.00
10/10/25	Leah O'Farrell	Review and provide comment on draft motion to continue hearing and draft proposed order regarding same.	0.40	236.00
10/10/25	Charlotte Underwood	Confer with plan proponents regarding LKC (.2); coordinate follow up with Kirkland (.1); follow up from plan filing (.2); correspond with client regarding amended schedules (.1).	0.60	570.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/10/25	Kenneth Kansa	Meeting with A. Wissel on settlement research (.4); call with T. Schmeltz regarding strategy (.3); review A. Popsecu email on schedules and email A. Popescu on same (.1); conference call with Province and Akin teams on liquidation analysis (1.0); review solicitation and disclosure statement materials (1.2).	3.00	3,210.00
10/10/25	Haley Casper	Prepare for (.3); and participate in interview call with C. Wheeler including take notes and circulate internally in furtherance of same (1.0).	1.30	682.50
10/10/25	Haley Casper	Communicate with K. Warren and P. Lohse regarding privilege research regarding Transcend matter in furtherance of case strategy (.2); prepare and send K. Warren overview and background on Transcend matter in furtherance of same (.2).	0.40	210.00
10/10/25	Haley Casper	Communication with P. Lohse regarding responding to LKC discovery requests (.2); begin review of requests and preparation of same (.2).	0.40	210.00
10/10/25	Anita Peterson	Review communication with M. Hurley regarding coordinating common interest call regarding discovery (.1); review communication with C. Potter regarding deposition (.1); communication with investigation team regarding same (.1); review communication with Akin regarding LKC dispute (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.60	222.00
10/10/25	Trace (Vincent P.) Schmeltz	Strategy calls with D. Eaton (.2); Special Committee Legal Team (.3); P. Tomasco (.3); SAFE AHG (.6); K. Kansa (.3); K. Matsoukas (.2); and M. Hurley (.2); text exchange with P. Lohse (.3).	2.40	2,400.00
10/10/25	Abigail Wissel	Meeting with K. Kansa to discuss legal research on the scope of considerations available in approving a settlement plan.	0.40	150.00
10/10/25	Kathleen L. Matsoukas	Prepare for and participate in discussion with C. Wheeler regarding tax allocation (1.0); communicate with team regarding possible	1.90	1,482.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		payment to LKC (.2); call with T. Schmeltz regarding strategy (.2); review and revise emergency motion (.3); communicate with team regarding same (.2).		
10/11/25	Joseph Kipp	Revise Exhibits attached to Special Committee's Motion to Enforce PSA against Whinstone.	0.30	129.00
10/11/25	Joseph Kipp	Research TX caselaw discussing the factors that courts consider when assessing punitive damage awards.	0.60	258.00
10/11/25	Joseph Kipp	Research TX caselaw describing the elements for fraudulent inducement.	0.40	172.00
10/11/25	Charlotte Underwood	Confer with plan proponents regarding discovery and related follow up (1.3); communications with T. Schmeltz and team regarding plan discovery and other ongoing briefing (1.1); correspond with C. Potter regarding discovery (.3).	2.70	2,565.00
10/11/25	Paige Lohse	Preparations for hearing on LKC dispute (1.7); preparations for plan confirmation discovery (.6); third-party claim evaluation (1.3).	3.60	2,304.00
10/11/25	Kenneth Kansa	Participate in morning call with Special Committee and SAFE teams on settlement terms and plan process (1.0); participate in pm call with Province, Special Committee, and SAFE teams on liquidation analysis (1.0); review emails on discovery disputes (.2); review C. Underwood emails on discussions and allocation of responsibilities on settlement issues with SAFE AHG (.1); review P. Lohse email on Temple Green (.1).	2.40	2,568.00
10/11/25	Anita Peterson	Communication with investigative team regarding LKC dispute (.1); communications with Akin regarding same (.2); review communications with Akin regarding depositions (.2); review communications regarding request for deposition dates, motion to compel (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.90	333.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/11/25	Kevin Warren	Evaluate scope of questioning for discovery plan and conduct related legal research.	5.20	2,236.00
10/11/25	Kathleen L. Matsoukas	Review and revise emergency motion on LKC hearing and payment of portion of fee, with related communication with team.	0.70	546.00
10/11/25	Trace (Vincent P.) Schmeltz	Participate in p.m. call with Province, Special Committee and SAFE teams on liquidation analysis.	1.00	1,000.00
10/12/25	Charlotte Underwood	Attention to plan discovery (.5); communications with P. Lohse regarding the same (.2); coordinate tax allocation meeting (.2).	0.90	855.00
10/12/25	Leah O'Farrell	Attention to emails regarding depositions and need for research on privilege related to motion to quash same (.1); review judge's procedures regarding calendaring, emergency motions and continuances and communication with P. Lohse regarding findings of same (.2); per conversation with P. Lohse add language regarding date of continued hearing and comment regarding judge's local procedures (.1).	0.40	236.00
10/12/25	Paige Lohse	Preparations for plan confirmation discovery (.2); preparations for hearing on Transcend dispute (.2); analyze and send correspondence and filings regarding recent developments (.7).	1.10	704.00
10/12/25	Kenneth Kansa	Review discovery dispute emails (.3); review materials for Wednesday hearing (.2).	0.50	535.00
10/12/25	Haley Casper	Analyze regarding privilege issues and communicate internally regarding strategy relating to same (.4); prepare analysis and overview regarding Transcend dispute and communicate internally regarding same (.4).	0.80	420.00
10/12/25	Haley Casper	Prepare responses to LKC discovery requests and communicate internally regarding strategy and next steps.	4.60	2,415.00
10/12/25	Anita Peterson	Review communication with Akin regarding draft Special Committee's emergency motion to continue LKC hearing (.1); review communications regarding call to discuss tax allocation and settlement (.2); review communications regarding request for	0.70	259.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		deposition dates (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).		
10/12/25	Trace (Vincent P.) Schmeltz	Prepare for (.3) and attend morning strategy call with Special Committee and SAFE teams on settlement terms and plan process (1.0); work on tax planning (.3); attend to discovery planning (.3).	1.90	1,900.00
10/12/25	Kathleen L. Matsoukas	Input changes to draft emergency motion to pay LKC fees and communicate with team regarding same.	0.60	468.00
10/13/25	Leah O'Farrell	Emails to K. Matsoukas regarding objection to motion to compel and draft regarding same (.1); attention to emails regarding setting call with PIC on ballot issues (.1); emails to K. Kansa, P. Lohse, and K. Matsoukas regarding pro hac (.1).	0.30	177.00
10/13/25	Leah O'Farrell	Attention to emails regarding list of voting parties for Class 10 and Class 11 (.1); attention to question from Clerk regarding filing of pro hac (.1).	0.20	118.00
10/13/25	Leah O'Farrell	Attention to messages from C. Underwood regarding voting lists, email to A. Popescu at Province regarding same (.1); call with K. Kansa regarding solicitation (.2); conversation with C. Underwood regarding objection to motion to compel (.1); email to K. Matsoukas regarding same (.1).	0.50	295.00
10/13/25	Leah O'Farrell	Draft email to Verita with information from Province and update address from Akin regarding voting lists (.2); attention to emails regarding meet and confer as to deposition (.1).	0.30	177.00
10/13/25	Leah O'Farrell	Research regarding motion to compel depositions including review motion to quash from Debtor.	1.80	1,062.00
10/13/25	Leah O'Farrell	Draft objection to motion to compel depositions.	1.10	649.00
10/13/25	Paige Lohse	Preparations for hearing on LKC dispute (5.8); confer with K. Matsoukas regarding outstanding discovery action items (.4); preparations for plan confirmation discovery (.2); preparations for	6.60	4,224.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		hearing on Transcend dispute (.2).		
10/13/25	Charlotte Underwood	Confer with client and Province, T. Schmeltz, K. Kansa regarding plan (.5); communication with T. Schmeltz regarding same (.2); attention to plan related discovery (.2); coordinate and manage plan preparation (.3).	1.20	1,140.00
10/13/25	Aaron Gavant	Review drafts relating to plan, disclosure statement and related discovery (.4); communications with BT team regarding same (.1).	0.50	402.50
10/13/25	Kenneth Kansa	Team call with Special Committee, Province, T. Schmeltz, C. Underwood (.5); conference call with Akin team on approach for Wednesday hearing (.5); t/c S. Schultz on disclosure statement and solicitation (.3); t/c L. O'Farrell on solicitation (.2); t/c to A. Popescu on solicitation (.2); review Transcend discovery motion (.3); email to A. Gavant on same (.1); review and respond to S. Schultz email on UCC inquiry (.1); review interim fee application (partial) (.2); review T. Schmeltz email on solicitation timeline (.1); review incoming pleadings (.3).	2.80	2,996.00
10/13/25	Anita Peterson	Review incoming 2025-10-13 (Pkt 1773) Transend's Notice of Deposition of Patricia Tomasco (.1); review incoming 2025-10-13 (Dkt 1774) LKC's Cross-Notice of Deposition of Patricia Tomasco (.1); review incoming 2025-10-09 (Dkt 33) Notice of Hearing in Transcend matter (.1); communication with investigation team regarding same (.1); review communication from Porter Hedges forwarding deposition notices and subpoenas (.2); review communication from C. Potter forwarding 2025-10-13 (Dkt 1776) Transcend Group's Emergency Motion to Compel Depositions (.1); review as-filed 2025-10-13 (Dkt 1777) Emergency Motion of the Special Committee to Continue Hearing on Objection to LKC (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3); review communications regarding request for deposition dates (.2);	2.10	777.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		review communications regarding motion to compel (.1); review communications regarding call to discuss tax allocation and settlement (.2); review communication from Porter Hedges forwarding 2025-10-13 LKC's Response to Special Committee's First Set of Requests for Production of Documents (.2); review communication from J. Miller regarding solicitation materials (.1); review communication with Akin regarding plan (.1).		
10/13/25	Haley Casper	Evaluate case updates and supplement internal records regarding status of depositions and pleadings (.3); communications with P. Lohse regarding next steps (.2).	0.50	262.50
10/13/25	Haley Casper	Draft and circulate responses to LKC dispute interrogatories and document requests (6.1); communicate with discovery team regarding strategy for same (.2).	6.30	3,307.50
10/13/25	Trace (Vincent P.) Schmeltz	Review materials on discovery disputes (.7); confer with K. Matsoukas regarding action items (.2); address tax allocation questions (.6); consider LKC strategy (.8); communicate with Riot/Whinstone counsel (.7); review and assess approach to plan confirmation (1.5).	4.50	4,500.00
10/13/25	Ning He	Analyze issues regarding energy credit claims.	1.20	924.00
10/13/25	Abigail Wissel	Review and revise draft of the Fourth Interim Fee Application (.9); draft Exhibit A for same (.8); communication with K. Kansa on same (.1).	1.80	675.00
10/13/25	Kathleen L. Matsoukas	Participate in discussion with SAFE AHG counsel and professionals regarding success fee negotiations (1.0); confer with T. Schmeltz regarding action items (.2); participate in follow-up discussion with SAFE AHG regarding LKC fee negotiations (.4); confer with P. Lohse regarding outstanding discovery action items (.4); multiple communications with counsel for Debtors and counsel for SAFE AHG regarding motion to quash depositions and strategy for same (1.8); review and revise emergency motion to continue LKC hearing and communicate with T. Schmeltz and P. Lohse regarding same (1.7).	5.50	4,290.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/13/25	Trace (Vincent P.) Schmeltz	Call with Special Committee, Province, K. Kansa, C. Underwood (.5); conference call with Akin team regarding hearing approach (.5).	1.00	1,000.00
10/14/25	Anna Bninski	Update matter tracking indices, including discovery responses and notices of deposition (.4); review team correspondence regarding depositions and objections (.2).	0.60	270.00
10/14/25	Paige Lohse	Preparations for hearing on LKC dispute (2.6); preparations for plan confirmation discovery (.2); analyze and send correspondence and filings regarding recent developments (.3); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (3.1).	6.20	3,968.00
10/14/25	Leah O'Farrell	Revise draft objection to motion to compel and conducting further research regarding same.	1.10	649.00
10/14/25	Leah O'Farrell	Call with Verita regarding non-voting opt out notice (.2); revise opt-out notice regarding same (.1).	0.30	177.00
10/14/25	Leah O'Farrell	Review objection filed by Transcend Group to solicitation and conditional approval.	0.30	177.00
10/14/25	Leah O'Farrell	Email to K. Kansa and C. Underwood regarding change to opt out notice (.1); email to Plan Proponents regarding change to opt out notice (.1).	0.20	118.00
10/14/25	Leah O'Farrell	Review redlines on objection to motion to compel from K. Matsoukas and propose further revisions.	0.30	177.00
10/14/25	Leah O'Farrell	Research regarding objection to disclosure statement and contested matter and discovery related to same.	1.00	590.00
10/14/25	Leah O'Farrell	Review and finalize objection to motion to compel for filing.	0.10	59.00
10/14/25	Leah O'Farrell	Attention to inquiry from K. Matsoukas related to deadline to file objection to motion to compel (.1); coordinate filing with Clerk (.1).	0.20	118.00
10/14/25	Charlotte Underwood	Review objection to plan (.8); coordinate response (.3); call with Kirkland (.2); related follow up (.2); preparations for hearing (.8); review related materials, draft, and revise response to objection (1.2).	3.50	3,325.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/14/25	Randal J. Kaltenmark	Review proposed purchase price allocation in Motion and Declaration (.5); emails with P. Lohse regarding same (.3).	0.80	732.00
10/14/25	Kenneth Kansa	Review and update plan and disclosure statement (.6); circulate same to Plan Proponents with covering comments (.2); review Transcend objections to disclosure statement (.3); email to BT team on same (.1); review divestiture of jurisdiction case law (.3); email outline of responses on same to BT team (.4); email to L. O'Farrell on release opt-outs (.1); emails to S. Schultz on document revisions (.2); review Whinstone motion to enforce and email P. Lohse with comment on same (.1); draft responses to Transcend objections (.6); email to K. Matsoukas on same (.1); teleconference with T. Schmeltz on response to Transcend and discussions with Quinn Emanuel on same (.2); call with Quinn Emanuel and BT teams on discovery (.5); call with T. Schmeltz and K. Matsoukas on DS objection response (.5); call with Akin on meet and confer with Transcend (.5); meet and confer with Plan Proponents and Transcend (1.0); review Transcend objection to fee application (preliminary) (.2); communications with BT team on DS hearing and pleading revisions (.5).	6.40	6,848.00
10/14/25	Anita Peterson	Review communications regarding coordinating meet and confer relating to discovery matters (.3); review communication with Court regarding emergency hearing (.1); communication with investigation team regarding same (.1); review communication from C. Potter forwarding 2025-10-14 Transcend's Notice of Objection to Barnes & Thornburg's Twelfth Monthly Fee Statement (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.90	333.00
10/14/25	Haley Casper	Strategize regarding document review and production and create protocol in furtherance of same (2.5); review documents and communicate internally in furtherance of initial	5.20	2,730.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		production (2.3); communication with P. Lohse in furtherance of same (.4).		
10/14/25	Kevin Warren	Supplemental research based on scope of privilege waiver with respect to fee disputes.	4.30	1,849.00
10/14/25	Trace (Vincent P.) Schmeltz	Strategy call with client (.5); call with Kirkland & Ellis (.4); review and consider further disclosure statement amendments (1.2); teleconference with K. Kansa on response to Transcend and discussions with Quinn Emanuel on same (.2); call with P. Tomasco (Quinn Emanuel) and BT teams regarding strategy (.5); call with K. Matsoukas and K. Kansa to discuss further strategy (.5).	3.30	3,300.00
10/14/25	Abigail Wissel	Email to T. Schmeltz regarding Fourth Interim Fee Application.	0.10	37.50
10/14/25	Kathleen L. Matsoukas	Review and provide comments on motion to quash/response to motion to compel from Transcend and communicate with L. O'Farrell regarding same (2.3); communicate with P. Lohse regarding deposition notices for LKC (.2); review prior communications with Transcend in connection with opposition to discovery (.5); communicate with P. Tomasco regarding draft objection to the Transcend motion to compel (.2); work on additional disclosures in connection with Disclosure Statement proceedings and Transcend requests (2.4); call with T. Schmeltz and K. Kansa regarding supplemental disclosures and response to Transcend (.5); communicate with counsel for the SAFE AHG regarding supplemental disclosures and discovery (.5); prepare for and participate in discussion with Transcend counsel and other interested parties regarding resolving disclosure statement supplement and plan discovery (.6).	7.20	5,616.00
10/15/25	Joseph Kipp	Research TX and BK caselaw defining "reasonable notice" under FRCP 30.	0.80	344.00
10/15/25	Paige Lohse	Preparations for hearing on LKC dispute (3.9); confer with t. Schmeltz regarding discovery (.3); preparations for plan confirmation discovery (.3); analyze and send correspondence and	5.90	3,776.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		filings regarding recent developments (1.4).		
10/15/25	Aaron Gavant	Multiple communications with BT team regarding hearing developments and anticipated next steps.	0.50	402.50
10/15/25	Leah O'Farrell	Review confirmation dates per December 3 confirmation hearing (.1); revise confirmation dates per note from K. Kansa to move objection deadline earlier (.1) email to BT and Akin regarding same (.1).	0.30	177.00
10/15/25	Leah O'Farrell	Attention to emails suggestions on confirmation timeline.	0.10	59.00
10/15/25	Kenneth Kansa	T/c C. Underwood on disclosure statement-related filings (.2); t/c A. Wissel on fee application (.1); prepare for disclosure statement/solicitation procedures hearing, including numerous conferences with T. Schmeltz, S. Schultz (.4), M. Hurley (.5); email to N. He and M. Mathur on response to fee application objection (.2); email to T. Schmeltz and A. Wissel on interim fee application (.2); review solicitation materials in advance of hearing (1.7); review R. Izakelian email on disclosure statement (.1); revise disclosure statement draft and email to R. Izakelian on same (.9); email to R. Izakelian on disclosure statement revisions (.1); review further disclosure statement revisions (.9); call with T. Schmeltz, M. Hurley, and S. Schultz in preparation for DS hearing (.3); call with Debtors'/SC team on DS hearing (.5); all-parties call regarding settlement proposals in advance of hearing (.4); conferences with T. Schmeltz in advance of DS hearing (.6); prepare for disclosure statement hearing (2.0); participate in in-person pre-discussions for disclosure statement hearing (.7); participate in disclosure statement hearing (.5); follow up discussions with SAFE AHG and Debtors on revisions to liquidation analysis and disclosure statement (.6); revise release provisions of Plan per Court comments at DS hearing (partial) (2.0); review Proof Capital settlement materials at T. Schmeltz request (.7); email to T. Schmeltz on	13.80	14,766.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		same (.2).		
10/15/25	Anita Peterson	Communication with investigation team regarding hearing and assist attorneys in executing strategy per request of P. Lohse focusing on precise tracking and timely updates of deadlines and filings (.2); communications with investigative team regarding depositions (.1); review incoming 2025-10-14 (Dkt 1788) LKC's Response to Special Committee's Emergency Motion to Continue (.1); review incoming 2025-10-14 (Dkt 1789) LKC's Emergency Motion to Compel Responses to Discovery Requests (.1); review incoming SAFE AHG's Objection to LKC's Emergency Motion to Compel Responses to Discovery Requests (.1); review communications regarding coordinating meet and confer relating to discovery matters (.2); review communications from C. Potter forwarding Transcend Group's First Request for Production and First Set of Interrogatories to SAFE AHG (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3); review communications from Akin regarding proposed SAFE AHG filings (.1); review communications with Quinn Emanuel regarding Court dates (.1); review communications with Porter Hedges forwarding letter regarding depositions, initial production in response to discovery requests (.2).	1.60	592.00
10/15/25	Anna Bninski	Review correspondence from P. Lohse regarding letter to LKC regarding depositions.	0.10	45.00
10/15/25	Haley Casper	Evaluate case filings regarding LKC dispute and communicate internally regarding status.	0.10	52.50
10/15/25	Haley Casper	Coordinate regarding preparation and review of documents in furtherance of production in LKC dispute including review documents and communicate internally regarding same.	0.70	367.50
10/15/25	Charlotte Underwood	Draft response to objection to disclosure statement (1.1); pre-hearing calls (.8); call with K. Kansa regarding disclosure statement filings	5.00	4,750.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.2); communications with team regarding plan confirmation (.8); communications with T. Schmeltz regarding conflict matters (.4); provide support to hearing (.5); review and revise disclosure statement changes (.4); review discovery served to SAFE AHG (.2); confer with relevant parties regarding insurance reimbursement (.3); confer with K. Kansa regarding plan (.3).		
10/15/25	Trace (Vincent P.) Schmeltz	Calls with M. Robinson (.2); D. Eaton (.4); and S. Schultz and K. Kansa (.4) to discuss court strategy; prepare for and attend court (5.2).	6.20	6,200.00
10/15/25	Abigail Wissel	Call with K. Kansa regarding the Fourth Interim Fee Application.	0.10	37.50
10/15/25	Carrie M. Raver	Strategize regarding ways to get reimbursed for derivative investigation costs.	0.60	507.00
10/15/25	Carrie M. Raver	Correspond with insurer and client regarding insurance agreement to reimburse derivative investigation costs.	0.20	169.00
10/15/25	Kathleen L. Matsoukas	Review current draft of supplemental disclosures and communicate with team regarding same (.3); prepare for and participate in discussion with counsel for Debtors and counsel for SAFE AHG regarding supplemental disclosures and discovery plan (.6); participate in discussion with Transcend group and other counsel regarding discovery plan for plan confirmation and disclosure statement (.5); communicate with team regarding objection to subpoena for testimony in LKC matter (1.2); draft and revise letter objecting to deposition notices (1.7); prepare for and participate in hearings on discovery issues and conditional plan approval (.8).	5.10	3,978.00
10/15/25	Trace (Vincent P.) Schmeltz	Call with M. Hurley and K. Kansa (.5); call with M. Hurley, and S. Schultz and K. Kansa in preparation for disclosure statement hearing (.3); conferences with K, Kansa in advance of disclosure statement hearing (.6).	1.40	1,400.00
10/16/25	Charlotte Underwood	Confer with Debtors and Province regarding upcoming briefing and plan confirmation (.9);	1.80	1,710.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		related follow up (.2); communications with P. Lohse regarding LKC related discovery (.4); review disclosure statement and plan revisions (.3).		
10/16/25	Joseph Kipp	Research caselaw on deposition and fee award issues (4.5); synthesize findings and send to P. Lohse for review (.5).	5.00	2,150.00
10/16/25	Joseph Kipp	Research Fifth Circuit caselaw distinguishing whether moving for a protective order is necessary or sufficient to overcome a notice of deposition.	0.30	129.00
10/16/25	Leah O'Farrell	Attention to message from K. Kansa to update Verita with proposed confirmation dates and email to Verita regarding same.	0.20	118.00
10/16/25	Leah O'Farrell	Review docket regarding applications to employ per request of P. Lohse (.2); investigate docket regarding same and discuss hearing audio with P. Lohse (.4); follow up regarding same as it relates to LKC emergency motion to compel discovery (.2).	0.80	472.00
10/16/25	Anita Peterson	Communication with investigative team regarding expedited discovery schedule (.1); review communications with K. Hays regarding deposition (.2); review communications with Chase Blackmon regarding deposition (.2); review communications with Porter Hedges regarding conferral, depositions, expedited discovery schedule (.2); review communications with C. Potter regarding liquidation analysis (.2); review communication with Akin regarding plan (.1); review communication with J. Miller regarding hearing (.1); review as-filed 2025-10-16 (Dkt 1811) Notice of Service regarding Discovery (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.50	555.00
10/16/25	Paige Lohse	Preparations for discovery and hearing on LKC dispute (6.1); review and revise LKC discovery responses and documents (6.0).	12.10	7,744.00
10/16/25	Anna Bninski	Correspond with P. Lohse regarding discovery	0.50	225.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		requests (.1); review production (.1); update log regarding same (.2); correspond with P. Lohse regarding document review (.1).		
10/16/25	Haley Casper	Draft and prepare notice of service regarding Special Committee's discovery responses to LKC.	0.30	157.50
10/16/25	Haley Casper	Communication with P. Lohse regarding C. Wheeler and K. Hays deposition preparation (.1); analyze documents and prepare for depositions (5.5); communicate with investigative team regarding same (.2).	5.80	3,045.00
10/16/25	Megha Mathur	Draft pro hac vice forms.	0.70	336.00
10/16/25	Kevin Warren	Draft analysis of scope of waiver with respect to LKC dispute for P. Lohse in furtherance of supporting discovery plan.	2.20	946.00
10/16/25	Kevin Warren	Draft notice of deposition for J. Cohn and LKC for P. Lohse to prepare for depositions in LKC fee dispute, with related evaluation of the topics and categories to be inquired into at deposition.	3.40	1,462.00
10/16/25	Kevin Warren	Communications with P. Lohse regarding approach to document review and production plan.	1.20	516.00
10/16/25	Trace (Vincent P.) Schmeltz	Address LKC claims (.7); work on tax allocation questions and motion (.9); confer with P. Lohse regarding discovery (.3); confer with D. Dunn and M. Robinson regarding administrative issues (.4); attend to emails on case (1.5).	3.80	3,800.00
10/16/25	Kenneth Kansa	Call with Debtors/Province/Special Committee on liquidation analysis (.5); t/c D. Dunn on plan revisions (.1); t/cs A. Popescu on liquidation analysis (.2); t/cs S. Schultz on plan releases (.3); review and revise plan release language (.5); confer with M. Mathur and N. He regarding fee objection response (.4); circulate same to Debtors/SAFE AHG/BT teams with covering comments (.3); email to Special Committee on same (.1); email to S. Schultz on release language (.1); email S. Schultz regarding plan release language (.1); email to P. Tomasco on release language (.1); emails to S. Schultz on plan revisions (.1); email to Province and SAFE	6.40	6,848.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		AHG teams on liquidation analysis revisions (.3); email to C. Potter on liquidation analysis (.1); further review liquidation analysis and emails to A. Popescu on same (.4); review SAFE AHG comments on disclosure statement and email to BT team on same (.6); email to Province and SAFE AHG on liquidation analysis (.1); email to C. Potter on liquidation analysis (.1); email to Special Committee on same (.1); email to R. Izakelian on disclosure statement revisions (.3); email to D. Eaton on liquidation analysis (.1); email to L. Weber on Plan releases (.1); further email to S. Schultz on DS filing (.1); further review of disclosure statement revisions following from 10/15 hearing (.6); further review of release provisions and research on comparables for same (.4); review solicitation scheduling materials (.3).		
10/16/25	Ning He	Analyze documents regarding LKC fee issues.	3.30	2,541.00
10/16/25	Carrie M. Raver	Address status of bankruptcy issues with AIG regarding Proman claim.	0.30	253.50
10/16/25	Carrie M. Raver	Address payment of derivative investigation cost issues.	0.20	169.00
10/16/25	Kathleen L. Matsoukas	Multiple communications with P. Lohse regarding plan for LKC discovery and progress of document reviews and collection (.8); review Transcend pleadings and consider potential discovery issues for motion to remand (.8).	1.60	1,248.00
10/17/25	Anita Peterson	Review communications regarding deposition logistics (.2); review communications with R. Mates regarding depositions (.2); review communications with C. Wheeler regarding deposition (.1); review communications with C. Potter regarding liquidation analysis (.2); review communication from C. Potter forwarding 2025-10-15 Transcend Group's Notice of Objection to Quinn Emanuel Twelfth Monthly Fee Statement (.1); review communication with K. Hays regarding deposition (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.20	444.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/17/25	Paige Lohse	Preparations for hearing on LKC dispute (4.4); confer with M. Mathur regarding LKC document review (.7); LKC discovery and document responses (2.9); confer with C. Underwood and N. He regarding LKC dispute (.7); LKC conferrals (1.2); analyze and send correspondence and filings regarding recent developments (.6); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (1.1).	11.60	7,424.00
10/17/25	Anna Bninski	Collect information from prior Chase Blackmon interview and forward same to C. Underwood.	0.20	90.00
10/17/25	Melissa Bonnici	Strategize approach to document review for LKC dispute per request of P. Lohse.	1.20	516.00
10/17/25	Haley Casper	Analyze documents and prepare for C. Wheeler deposition including simultaneously analyze and prepare documents in furtherance of production in response to LKC requests for production (9.7); analyze materials and documents in furtherance of Chase Blackmon deposition and strategize internally regarding same (.2); communications with discovery team regarding same and strategy for production (1.2).	11.10	5,827.50
10/17/25	Thomas G. Haskins	Analysis of strategy regarding LKC dispute.	0.20	159.00
10/17/25	Kenneth Kansa	T/c M. Robinson on plan status (.2); t/c L. O'Farrell on solicitation issues (.3); t/cs S. Schultz on DS revisions (.3); review RJ Shannon email on liquidation analysis (.1); email to C. Underwood on same (.1); review and revise disclosure statement (.5); circulate same to C. Potter and Plan Proponents with covering comments (.1); review C. Potter request on liquidation analysis and email Province and Plan Proponents on same (.1); emails to L. O'Farrell on plan and disclosure statement (.1); email to R. Izakelian on liquidation analysis (.1); emails to R. Izakelian on revised disclosure statement (.2); email to M. Mathur on pleadings (.1); review 502(d) motion and email BT team on same (.2); email to Plan Proponents on liquidation analysis (.1); review	2.80	2,996.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		liquidation analysis and further emails to Plan Proponents on same (.3).		
10/17/25	Megha Mathur	File notice of appearance for T. Haskins.	0.10	48.00
10/17/25	Megha Mathur	Review Document Review Protocol at direction of P. Lohse.	0.60	288.00
10/17/25	Megha Mathur	Confer with P. Lohse regarding background on LKC dispute and needed document review.	0.70	336.00
10/17/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	0.60	288.00
10/17/25	Leah O'Farrell	Revise dates in disclosure statement per email from K. Kansa.	0.40	236.00
10/17/25	Leah O'Farrell	Update solicitation materials with revised dates and release language (1.5); call with K. Kansa regarding same (.3).	1.80	1,062.00
10/17/25	Leah O'Farrell	Call with J. Miller from Verita regarding open items on solicitation.	0.20	118.00
10/17/25	Charity Seaborn	Communications with document review team regarding the document review protocol in preparation of reviewing and identifying relevant client documents responsive to requests for production.	1.40	672.00
10/17/25	Charlotte Underwood	Confer with N. He and P. Lohse regarding LKC dispute (.7); review notice of objection to fee app (.1); manage and oversee document review for LKC response (.9).	1.70	1,615.00
10/17/25	Kevin Warren	Identify and review key documents related to LKC's discovery requests to assist P. Lohse in preparing for depositions.	4.70	2,021.00
10/17/25	Kevin Warren	Evaluate draft Rule 502(d) Order to assist P. Lohse and N. He in revising the same.	0.80	344.00
10/17/25	Kevin Warren	Draft initial exhibit index and witness preparation outline for Chase Blackmon and related key documents regarding LKC fee dispute.	4.10	1,763.00
10/17/25	Trace (Vincent P.) Schmeltz	Attend tax allocation strategy call (1.0); conference calls with A. Popescu, M. Robinson and K. Hays regarding strategy (.6); attend meet and confer on LKC discovery (.5).	2.10	2,100.00

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Date	Name	Description	Hours	Amount
10/17/25	Ning He	Revise motion and order regarding 502(d) protection (2.9); confer with P. Lohse and C. Underwood regarding LKC (.7).	3.60	2,772.00
10/17/25	Carrie M. Raver	Receive call from Allied World (outside coverage counsel) regarding wire transfer and ETA for payment issues and email to team regarding same.	0.20	169.00
10/17/25	Kathleen L. Matsoukas	Continue work on arguments for motion to remand and potential discovery issues and communicate with team regarding same (1.2); work on outline for Chase Blackmon deposition preparation (.6); review draft Rule 502 motion and communicate with team regarding same (.5).	2.30	1,794.00
10/18/25	Paige Lohse	Preparations for hearing on LKC dispute (4.1); LKC discovery and document responses (5.3).	9.40	6,016.00
10/18/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	3.20	1,536.00
10/18/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	3.30	1,584.00
10/18/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	2.40	1,152.00
10/18/25	Melissa Bonnici	Perform document review for the dispute with LKC.	7.30	3,139.00
10/18/25	Haley Casper	Review documents and prepare for C. Wheeler and K. Hays depositions including communicate with investigative team regarding same and strategy (7.8); communications with P. Lohse regarding preparation for depositions and next steps (.7).	8.50	4,462.50
10/18/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	0.50	240.00
10/18/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on precise tracking and timely updates of deadlines and filings (.2); review communications with K. Hays regarding deposition (1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.1); review	0.80	296.00

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Date	Name	Description	Hours	Amount
		communication from Akin regarding liquidation analysis (.1); review communication from Quinn Emanuel regarding liquidation analysis (.1); review incoming LKC Notice of Deposition of Chase Blackmon, LKC Notice of Deposition of Cameron Blackmon, LKC Notice of Deposition of Kevin Hays, Notice of Rule 30(B)(6) Deposition of the Debtors' Corporate Representative, LKC's Second Set of Requests for Production to Debtors and assist attorneys in executing strategy per request of P. Lohse focusing on precise tracking and timely updates of deadlines and filings (.2).		
10/18/25	Joseph Tate	Communications with P. Lohse and K. Warren to discuss search terms and document review workflows (.3); prepare search term reports, perform database searches, and create multiple document review batching assignments for multiple associate reviewers (2.9).	3.20	1,216.00
10/18/25	Kevin Warren	Evaluate documents implicated by the Chase Blackmon searches for responsiveness to assist P. Lohse to prepare for production.	4.80	2,064.00
10/18/25	Kevin Warren	Strategize approach to review with P. Lohse and review team.	2.30	989.00
10/18/25	Kevin Warren	Review 'key documents' identified by review team related to revised engagement letter negotiations and related issues in LKC dispute to prepare initial draft of witness exhibit index.	2.50	1,075.00
10/18/25	Kevin Warren	Draft initial witness exhibit list of Chase Blackmon with key documents with respect to LKC fee dispute to assist P. Lohse and K. Matsoukas in preparation for depositions.	3.10	1,333.00
10/18/25	Kathleen L. Matsoukas	Work with P. Lohse regarding motion to enforce PSA and Wheeler testimony.	0.50	390.00
10/19/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	4.60	2,208.00
10/19/25	Charity Seaborn	Verify tagged documents to ensure responsive per document review protocol.	1.10	528.00
10/19/25	Paige Lohse	Preparations for hearing on LKC dispute (5.4); call with T. Schmeltz regarding strategy (1.1); LKC discovery and document responses (5.1);	12.90	8,256.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		confer with K. Mangan regarding document review (1.3).		
10/19/25	Melissa Bonnici	Perform document review for dispute with LKC.	3.50	1,505.00
10/19/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on deposition preparation (.7); review communications with Chase Blackmon regarding deposition, deposition preparation (.2); review communications with K. Hays regarding deposition, deposition preparation (.2); review communications regarding 2025-10-19 Special Committee's deposition of Jonathan Cohn (.2); review communications regarding disclosure statement (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.80	666.00
10/19/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	7.00	3,360.00
10/19/25	Kenneth Kansa	Email Quinn Emanuel and Akin teams on liquidation analysis (.1); email to T. Schmeltz on status of revised Plan and DS (.1); review Akin comments on plan release language revisions to pick up Judge Pérez's comments (.2); email S. Baham on same (.2); prepare draft notice of filing of revised plan and DS (.3); circulate same to Akin team with covering comments (.1); email to K. Matsoukas on LKC order (.1); email to S. Schultz and Akin team on notice of filing (.1); review revisions to Plan and Disclosure Statement (.9); email to Quinn Emanuel and Akin teams on same (.1); t/c T. Schmeltz on LKC order (.1); emails to P. Lohse and L. O'Farrell on same (.1); further review of disclosure statement revisions and email to R. Izakelian on same (.6); further emails to Akin and Quinn Emanuel teams on plan and disclosure statement filing (.3); review C. Potter response to disclosure statement revisions (.1); email to S. Schultz on same (.1); review N. He email on 502(d) motion (.1); review LKC discovery emails (.2).	3.80	4,066.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/19/25	Kathleen Mangan	Review and tag Chase Blackmon documents for relevance and production.	12.10	5,203.00
10/19/25	Kathleen Mangan	Confer with P. Lohse regarding case overview and document review assignment.	1.30	559.00
10/19/25	Mariah A. Whitner	Review client documents for responsiveness to discovery requests, in satisfaction of discovery obligations.	2.60	1,534.00
10/19/25	Mariah A. Whitner	Communications with P. Lohse regarding document review protocol.	1.30	767.00
10/19/25	Haley Casper	Prepare for K. Hays and C. Wheeler depositions, review documents, and simultaneously prepare documents for production in response to LKC document requests.	13.80	7,245.00
10/19/25	Joseph Tate	Perform database searches and create and assign document review batch assignments for associate review teams (2.5); prepare .CSV file of corrupt files and send to client for analysis (.4).	2.90	1,102.00
10/19/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/19/25	Addison Smith	Review background materials and document review protocol (.7); review documents to respond to LKC's discovery requests (4.0).	4.70	2,773.00
10/19/25	Kevin Warren	Coordinate batch review of documents responsive to sub-set searches with restrictive date ranges to associate review team to assist P. Lohse in preparing for production, with related evaluation of documents identified by review team as further review with respect to responsiveness to respond to LKC requests in preparation of hearing on LKC fee application.	3.50	1,505.00
10/19/25	Kevin Warren	Evaluate documents in review database with respect to Chase Blackmon searches to identify responsive documents for production, along with supplement of key exhibit list to prepare for depositions and hearing related to LKC fee dispute.	3.20	1,376.00
10/19/25	Kevin Warren	Supplement key exhibit index to prepare to draft witness outlines for depositions to assist T.	3.40	1,462.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Schmeltz and P. Lohse to prepare for depositions in LKC fee dispute.		
10/19/25	Trace (Vincent P.) Schmeltz	Communications with larger team regarding LKC strategy and privilege concerns (1.2); call with K. Kansa regarding LKC order (.1); call with D. Eaton regarding strategy and next steps (.4); call with P. Lohse to outline strategy (1.1); call with P. Tomasco (.2); call with R. Mates regarding remand hearing and LKC discovery (.3); call with M. Robinson regarding LKC (.4); call with C. Topping regarding LKC discovery (.3).	4.00	4,000.00
10/19/25	Glenn R. de Roziere	Communicate with K. Warren regarding factual research regarding upcoming deponents.	0.10	38.50
10/19/25	Ning He	Revise motion for 502(d) protection for filing.	0.50	385.00
10/19/25	Kathleen L. Matsoukas	Communicate with K. Kansa and L. O'Farrell regarding submission of order on transfer of funds to LKC.	0.40	312.00
10/20/25	Joseph Kipp	Draft Special Committee's Responses and Objections to LKC's Second Set of Requests for Production.	0.50	215.00
10/20/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	2.50	1,200.00
10/20/25	Joseph Kipp	Revise Special Committee's Responses and Objections to LKC's Second Set of Requests for Production.	0.20	86.00
10/20/25	Scott Peloza	Review and analyze documents in preparation for deposition of Cameron Blackmon and draft related deposition outline.	1.70	1,088.00
10/20/25	Leah O'Farrell	Draft order on partial payment of fee application (.3); attention to emails with edits and incorporating same into order (.2).	0.50	295.00
10/20/25	Leah O'Farrell	Review local procedures on proposed order and draft notice of proposed order (.4); confer with N. He regarding motion to seal hearing (.2).	0.60	354.00
10/20/25	Aaron Gavant	Review revised disclosure statement and related filings (.5); follow up communications with BT team regarding same and next steps (.6).	1.10	885.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/20/25	Kenneth Kansa	Participate in hearing prep call with Quinn Emanuel and Akin teams (.5); participate in disclosure statement hearing (.2); review materials in preparation for disclosure statement hearing (.3); t/c with S. Schultz post-hearing (.1); review proposed order authorizing payment to LKC and email L. O'Farrell with comments on same (.3); review revisions to disclosure statement order (.2); email to R. Izakelian on same (.1); revisions to notice of proposed order on LKC payment (.1); email to J. Wolfshohl on same (.1); review and revise solicitation materials (1.8); emails to Quinn Emanuel and Akin teams on same (.5); email to N. He on 502(d) order (.1); review incoming pleadings (.3); review discovery emails (.3); review confirmation timeline and note settlement-related tasks to be prepared in advance of confirmation (.6).	5.50	5,885.00
10/20/25	Charlotte Underwood	Coordinate calls with stakeholders (.1); confer with N. He regarding production (.2); support to team working on LKC dispute (.3).	0.60	570.00
10/20/25	Anita Peterson	Review as-filed 2025-10-19 (Dkt 1824) Special Committee's Amended Emergency Motion for Entry of Protective Order, 2025-10-19 (Dkt 1824-1) (proposed) Order Granting Emergency Motion for Entry of Protective Order (.2); assist attorneys in executing strategy per request of P. Lohse focusing on deposition preparation, logistics (1.0); assist attorneys in executing strategy per request of P. Lohse regarding deposition of J. Cohn including coordinating logistics, court reporter (.9); communication with counsel forwarding instructions for joining 10/29/2025 deposition of J. Cohn (.2); precise tracking and timely updates of deadlines and filings (.8); communications with K. Kansa regarding monthly fee application (.2); communications with investigative team regarding draft responses to LKC's second set of requests of production of documents (.2); review incoming 2025-10-20 (Dkt 1827) Order Resetting LKC Fee Hearing (.1); communications with investigation team	5.90	2,183.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding same (.1); review communications with Chase Blackmon regarding deposition, deposition preparation (.3); review communications regarding deposition of K. Hays (.2); review communications regarding depositions (.3); review communications with Cameron Blackmon regarding deposition, deposition preparation (.2); review communications with Akin regarding motion, requested information (.2); review communication with C. Wheeler regarding requested information (.2); review communications with Company regarding document requests and assist attorneys in executing strategy per request of N, He (.3); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.5).		
10/20/25	Paige Lohse	Preparations for hearing on LKC dispute (6.1); LKC discovery and document responses (8.3).	14.40	9,216.00
10/20/25	Mariah A. Whitner	Review client documents to assess responsiveness in compliance with discovery obligations.	6.10	3,599.00
10/20/25	Mariah A. Whitner	Review documents prior to production.	1.90	1,121.00
10/20/25	Melissa Bonnici	Review documents for purposes of production at the direction of P. Lohse.	3.20	1,376.00
10/20/25	Anna Bninski	Update case file to track moving projects and deadlines, including documentation of individual and 30(b)(6) deposition notices by LKC and discovery request.	0.70	315.00
10/20/25	Charity Seaborn	Conduct quality control check on responsive documents in preparation for document production.	4.30	2,064.00
10/20/25	Haley Casper	Prepare for K. Hays deposition; review documents, strategize, and coordinate document productions in response to LKC requests in furtherance of same.	12.50	6,562.50
10/20/25	Haley Casper	Prepare for and attend call with J. Cohn, including take and circulate notes regarding	1.20	630.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		same (1.0); call with T. Schmeltz and communicate and coordinate internally regarding next steps regarding same (.2).		
10/20/25	Megha Mathur	Review documents for revisions to Purchase and Sale Agreement.	0.50	240.00
10/20/25	Addison Smith	Review documents to respond to LKC's discovery requests.	4.40	2,596.00
10/20/25	Kevin Warren	Evaluate documents with respect to the underlying Whinstone dispute and exit financing to support discovery strategy in LKC dispute and in furtherance of preparing for Chase Blackmon deposition.	3.20	1,376.00
10/20/25	Kevin Warren	Evaluate documents within key exhibit list related to LKC dispute identified by review team to narrow down to key documents for Chase Blackmon deposition.	4.40	1,892.00
10/20/25	Kevin Warren	Draft initial witness module sets utilizing key documents identified by review team to support strategy on key issues related to LKC fee dispute.	4.30	1,849.00
10/20/25	Kevin Warren	Coordinate preparation of witness exhibits in respective issue modules to A. Peterson and K. Murphy, to prepare for upcoming depositions in LKC fee dispute, with related review of the same.	1.90	817.00
10/20/25	Trace (Vincent P.) Schmeltz	LKC meet and confer (.7); work on LKC discovery (2.1); call with H. Casper regarding next steps (.2); address matter strategy (1.6); tax allocation brief revisions (.9).	5.50	5,500.00
10/20/25	Glenn R. de Roziere	Review background information (.2); correspond with K. Warren (.2); follow up regarding same including outline steps for deposition preparation, review background on two of the subjects to be deposed, compile facts into a short report, and outline relevant findings (3.8).	4.20	1,617.00
10/20/25	Janelle Peters	Run search terms and provide total document counts to case team (1.5); create assignment group for case team to review documents (.5); create searches for case team and share with case team (1.0).	3.00	795.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/20/25	Kathleen L. Matsoukas	Prepare for and participate in LKC discovery conferral call (.7); work on deposition outlines and preparation for upcoming depositions in LKC matter, including Chase Blackmon, and review pertinent documents (5.5); communicate with team regarding coverage and key points for deposition preparation (1.5).	7.70	6,006.00
10/20/25	Ning He	Analyze cases regarding motion to seal (1.5); draft motion to seal (4.3); confer with C. Underwood regarding production (.2); analyze documents regarding LKC dispute (3.3); confer with L. O'Farrell regarding motion to seal hearing (.2).	9.50	7,315.00
10/21/25	Charlotte Underwood	Call with Riveron regarding schedules (1.0); communications with T. Schmeltz regarding ongoing matters (.2); communications with P. Lohse and N. He regarding production and ongoing projects (.4).	1.60	1,520.00
10/21/25	Joseph Kipp	Review Whinstone trial transcripts and analyze testimony discussing power credits (2.0); analyze findings and send summary to P. Lohse (.4).	2.40	1,032.00
10/21/25	Joseph Kipp	Communications with N. He regarding Whinstone trial transcripts.	0.20	86.00
10/21/25	Leah O'Farrell	Attention to inquiry from P. Lohse regarding pro hac applications and teams conversation regarding same (.1); email to Clerk regarding same (.1). attention to email from Clerk regarding status of pro hacs for P. Lohse and K. Matsoukas (.1).	0.30	177.00
10/21/25	Joseph Kipp	Review Whinstone trial transcripts to identify testimony regarding the value of Rhodium's power contracts and send findings to N. He and P. Lohse for review.	1.40	602.00
10/21/25	Aaron Gavant	Review discovery developments (.3); communications with BT team regarding potential bankruptcy impact on same (.2).	0.50	402.50
10/21/25	Melissa Bonnici	Review documents and perform quality check regarding documents to be produced.	5.80	2,494.00
10/21/25	Scott Peloza	Draft deposition preparation outline for deposition of Cameron Blackmon including	7.00	4,480.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		review and analyze related documents.		
10/21/25	Anita Peterson	Review as-filed 2025-10-21 (Dkt 1834) Order approving Disclosure Statement, Scheduling Hearing (.2); communications with investigative team regarding same (.2); precise tracking and timely updates of deadlines and filings (.2); assist attorneys in executing strategy per request of T. Schmeltz focusing on preparation for depositions (2.8); conference with Chase Blackmon, T. Schmeltz, K. Warren, K. Matsoukas regarding deposition preparation (3.6); communication with R. Mates, C. Topping, M. Soule, P. Tomasco regarding Zoom link for 10/22/2025 deposition of Chase Blackmon (.1); communications with R. Mates regarding deposition of Chase Blackmon, Cameron Blackmon (.2); communications with C. Topping regarding LKC discovery responses (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); review communications with Porter Hedges, LKC regarding document production, 2025-10-21 Special Committee's Objections to LKC's Second Set of Document Requests (.3); review communications with Akin regarding supplemental document production, 2025-10-21 Special Committee's Objections to LKC's Second Set of Document Requests (.3); review communications with Cameron Blackmon regarding deposition (.2); review communications with Chase Blackmon regarding deposition preparation (.2); review communications regarding 30(b)(6) depositions (.2); review communications with C. Wheeler regarding requested documents (.2); review communication with A. Popescu regarding financing (.1); review communication with A. Popescu regarding September MORs (.1); communications with R. Mates regarding depositions of Chase and Cameron Blackmon (.2); review communications with C. Topping regarding deposition of Chase Blackmon (.2).	9.90	3,663.00
10/21/25	Paige Lohse	Address LKC discovery and document	14.40	9,216.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		responses.		
10/21/25	Charity Seaborn	Continue document review in preparation for identifying responsive documents to LKC discovery requests and exhibits for depositions.	2.70	1,296.00
10/21/25	Charity Seaborn	Conduct quality control review of documents marked responsive to ensure accuracy and identify privileged documents to be withheld.	2.00	960.00
10/21/25	Kenneth Kansa	Review disclosure statement order and circulate same to BT team (.2); emails to Quinn Emanuel team on severance benefits exhibit to Plan (.6); email to SAFE AHG counsel on same (.2); further emails to SAFE AHG on same (.3); participate in coordination call with Quinn Emanuel team (.5); review solicitation emails (.2); review A. Wissel memo on settlement considerations in Fifth Circuit (.2); review additional emails from noticing agent and Quinn Emanuel team on commencement of plan solicitation (.4); review incoming pleadings (.2); outline next steps on implementation of settlements in plan and tasks to be completed in advance of confirmation (.6).	3.40	3,638.00
10/21/25	Haley Casper	Prepare for K. Hays deposition and assist in preparation for Chase and Cameron Blackmon depositions including review of documents and coordination of document production regarding same.	15.50	8,137.50
10/21/25	Megha Mathur	Review documents for revisions to Purchase and Sale Agreement.	1.70	816.00
10/21/25	Lydia Parks	Assist with preparing for Cameron Blackmon deposition preparation including document review for hot documents.	2.10	903.00
10/21/25	Anna Bninski	Review privilege update from P. Lohse.	0.10	45.00
10/21/25	Megha Mathur	Analyze recent correspondence regarding recent developments.	1.00	480.00
10/21/25	Addison Smith	Review documents to respond to LKC's discovery requests.	6.60	3,894.00
10/21/25	Kevin Warren	Supplement witness outline for Chase Blackmon with final modules, with related finalizing of exhibits for deposition preparation	6.70	2,881.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		to assist T. Schmeltz and K. Matsoukas with the same to support approach to LKC fee dispute.		
10/21/25	Kevin Warren	Prepare for deposition preparation session with Chase Blackmon (.7); participate in Chase Blackmon deposition preparation session in LKC fee dispute with T. Schmeltz and K. Matsoukas (3.6).	4.30	1,849.00
10/21/25	Kevin Warren	Assist S. Pelozza to prepare Cameron Blackmon for deposition in LKC dispute with related coordination of identifying key documents by L. Parks and E. Carpenter.	2.80	1,204.00
10/21/25	Trace (Vincent P.) Schmeltz	Work on LKC litigation (4.1); call regarding tax allocation (.7).	4.80	4,800.00
10/21/25	Glenn R. de Roziere	Review and analyze Illinois public records regarding the background of witness (.4); prepare full report with findings and conclusions (.8); email to K. Warren on findings (.2).	1.40	539.00
10/21/25	Kathleen L. Matsoukas	Participate in team call with Debtors' counsel (.3); prepare for deposition preparation session for Chase Blackmon (1.1); participate in preparation session for Chase Blackmon with T. Schmeltz and K. Warren in advance of his deposition (3.6).	5.00	3,900.00
10/21/25	Abigail Wissel	Research case law regarding the scope of considerations available in approving a settlement plan (2.4); summarize same for K. Kansa (.9).	3.30	1,237.50
10/21/25	Elisabeth Carpenter	Preparation for deposition of Cameron Blackmon including analysis of documents with exhibit index.	4.10	1,230.00
10/21/25	Elisabeth Carpenter	Analyze batched documents to identify relevant issues, privileged communications, issues, hot documents, and documents relating to Cameron Blackmon to assist with deposition preparation and strategy.	0.90	270.00
10/21/25	Kathleen A. Murphy	Review and organize documents to be used in preparing for depositions.	1.40	441.00
10/21/25	Mariah A. Whitner	Review documents in preparation for production.	3.30	1,947.00
10/21/25	Janelle Peters	Create various QC searches for production	7.00	1,855.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(1.0); run privilege term search (.5); provide case team with search requests (4.0); create production PROD004 for case team (1.5).		
10/21/25	Ning He	Revise motion to seal (2.2); analyze documents regarding Whinstone trial (3.5).	5.70	4,389.00
10/21/25	Trace (Vincent P.) Schmeltz	Conduct deposition preparation session for Chase Blackmon with K. Matsoukas and K. Warren.	3.60	3,600.00
10/22/25	Leah O'Farrell	Email to Clerk regarding K. Warren pro hac and message to K. Warren regarding form (.1); call with J. Kipp regarding 30(b)(6) research (.1); communications with K. Kansa regarding voting and solicitation and email to J. Miller regarding same (.2); communication with K. Kansa regarding scheduling and potential objections to confirmation and confirmation brief (.1).	0.50	295.00
10/22/25	Leah O'Farrell	Attention to emails regarding solicitation and opt-out form.	0.10	59.00
10/22/25	Leah O'Farrell	Call with J. Miller regarding opt-out notice (.1); calls with R. Izakelian regarding opt-out notice (.1); edit opt-out notice per calls and email to solicitation team regarding same (.2).	0.40	236.00
10/22/25	Leah O'Farrell	Attention to emails regarding 30(b)(6) protective order and review of instructions and notes regarding same (.2); communication with J. Kipp regarding same (.1).	0.30	177.00
10/22/25	Leah O'Farrell	Call with N. He regarding motion for protective order and motion to seal proceeding (.1); follow up regarding status of pro hac vices (.1); call with P. Lohse regarding staffing on motion for protective order and motion to compel (.1).	0.30	177.00
10/22/25	Leah O'Farrell	Attention to issues with pro hacs for P. Lohse, K. Matuskas, and K. Warren (.2); perform high level review of motion to seal hearing and send N. He comments regarding same (.2).	0.40	236.00
10/22/25	Leah O'Farrell	Communications with N. He regarding motion to seal hearing.	0.20	118.00
10/22/25	Leah O'Farrell	Begin working on motion for protective order regarding 30(b)(6) notice.	0.20	118.00
10/22/25	Anita Peterson	Preparation for and attend deposition of Chase	12.10	4,477.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Blackmon per request of T. Schmeltz including conferences with T. Schmeltz, K. Warren, Chase Blackmon, R. Mates (8.0); review communications regarding 2025-11-03 hearing (.2); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-11-03 hearing including logistics (.4); preparation for upcoming deposition of J. Cohn (.4); review communications regarding deposition of J. Cohn (.2); communications with C. Topping regarding deposition of Chase Blackmon (.3); review communications regarding deposition of Cameron Blackmon (.2); review communications regarding 30(b)(6) depositions (.3); preparation for 30(b)(6) depositions (.4); assist attorneys in executing strategy per request of P. Lohse focusing on pro hac vice applications for P. Lohse, K. Matsoukas, K. Warren (.4); preparation for upcoming deposition of K. Hays (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); communications with K. Kansa and L. Parks regarding 4th interim fee statement (.2); review communications with Cameron Blackmon regarding cancellation of deposition (.1); review communications with C. Topping regarding deposition of K. Hays and assist attorneys in executing strategy per request of P. Lohse (.2).		
10/22/25	Joseph Kipp	Confer with L. O'Farrell regarding 30(b)(6) corporate representative caselaw research.	0.10	43.00
10/22/25	Joseph Kipp	Research FRCP 30(b)(6) case law.	3.50	1,505.00
10/22/25	Joseph Kipp	Prepare memo on witness testimony.	0.90	387.00
10/22/25	Joseph Kipp	Draft Special Committee's Motion to Compel LKC's Responses to Discovery Requests.	3.40	1,462.00
10/22/25	Scott Peloza	Draft deposition preparation outline for deposition of Cameron Blackmon including review and analyze related documents.	5.60	3,584.00
10/22/25	Paige Lohse	Preparations for hearing on LKC dispute (1.6); LKC discovery and document responses (3.9); call with L. O'Farrell regarding motions (.1);	8.90	5,696.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		analyze and send correspondence and filings regarding recent developments (3.3).		
10/22/25	Kenneth Kansa	Communications with P. Lohse and L. O'Farrell on LKC discovery (.1); t/c S. Schultz on employee schedules (.3); review and propose revisions to employee schedules (.5); email L. Weber on same (.1); email to K. Matsoukas on order regarding LKC payment (.1); review and revise Fourth Interim Fee Application (.8); email to L. Parks on same (.1); review emails on solicitation distribution (.2); review LKC discovery emails (.2).	2.40	2,568.00
10/22/25	Charlotte Underwood	Preparations and management of 30(b)(6) depositions (2.6); communications with T. Schmeltz regarding outstanding items (.3); attention to insurer request regarding reimbursement (.1); coordinate calls with client and stakeholders (.1).	3.10	2,945.00
10/22/25	Megha Mathur	Identify documents related to Engagement Letter negotiations in preparation for J. Cohn deposition.	5.70	2,736.00
10/22/25	Megha Mathur	Identify documents in preparation for J. Cohn deposition.	2.10	1,008.00
10/22/25	Lydia Parks	Identify documents to use during Chase Blackmon's deposition (.2); identify and gather key documents for deposition preparation for Cameron Blackmon (.7).	0.90	387.00
10/22/25	Anna Bninski	Review team correspondence for information to incorporate into case indices.	0.20	90.00
10/22/25	Haley Casper	Communications with P. Lohse and K. Warren regarding 30(b)(6) deposition preparation and strategy (.5); prepare for deposition and prepare outline for K. Hays (6.1); review documents and evaluate updates from depositions in furtherance of same (8.0).	14.60	7,665.00
10/22/25	Charity Seaborn	Continue quality control review of document in preparation for rolling production.	0.50	240.00
10/22/25	Addison Smith	Review documents for J. Cohn deposition preparation.	0.50	295.00
10/22/25	Kevin Warren	Assist T. Schmeltz in defense of Chase	11.50	4,945.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Blackmon in deposition (8.0); related preparation of exhibits for redirect and draft of summary to prepare approach to upcoming depositions in LKC dispute to prepare for hearing on the same (3.5).		
10/22/25	Trace (Vincent P.) Schmeltz	Confer with C. Topping (.4); confer with D. Eaton regarding strategy (.3); confer with M. Robinson regarding matter administration (.1); consider strategy for LKC litigation (.8); produce Chase Blackmon for deposition (8.0) and post-deposition debrief (.6).	10.20	10,200.00
10/22/25	Carrie M. Raver	Address insurers' reimbursement issues.	0.30	253.50
10/22/25	Carrie M. Raver	Confirm points on mediation statement.	0.50	422.50
10/22/25	Carrie M. Raver	Evaluate XL's position letter on derivative investigation costs and corresponded with C. Topping regarding the same.	0.20	169.00
10/22/25	Kathleen L. Matsoukas	Work on outline for meeting with K. Hays to prepare for deposition (1.4); review related documents including set of settlement estimates (2.3); debrief on C. Blackmon deposition and use of documents that were not produced (.8); work on Transcend discovery and research on discovery issues (1.6).	6.10	4,758.00
10/22/25	Janelle Peters	Run various searches for key documents (1.0); run production QC searches for case team (1.0); create production view for case team to approve (1.0).	3.00	795.00
10/22/25	Mariah A. Whitner	Commence drafting Motion to Compel.	1.40	826.00
10/22/25	Ning He	Communications with team regarding 30(b)(6) topics (1.0); analyze documents regarding LKC engagement (1.7); call with L. O'Farrell regarding motion for protective order and motion to seal proceeding (.1).	2.80	2,156.00
10/23/25	Joseph Kipp	Research 5th Circuit caselaw analyzing FRCP 26 and 27 and granting motions to compel production of documents describing damages calculations.	2.20	946.00
10/23/25	Joseph Kipp	Analyze transcript of J. Cohn's deposition of C. Blackmon and extract key facts to be used in	0.90	387.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		the motion to compel.		
10/23/25	Joseph Kipp	Research 5th Circuit caselaw striking Rule 30(b)(6) deposition topics.	0.30	129.00
10/23/25	Joseph Kipp	Research Fifth Circuit caselaw assessing when it is proper to compel responses to discovery requests.	0.50	215.00
10/23/25	Joseph Kipp	Draft Proposed Order granting Special Committee's Emergency Motion for a Protective Order.	0.60	258.00
10/23/25	Joseph Kipp	Draft Special Committee's Motion to Compel LKC's Responses to Discovery Requests.	1.00	430.00
10/23/25	Joseph Kipp	Analyze exhibits used by J. Cohn in his deposition of C. Blackmon and extract key facts to be used in the motion to compel LKC's responses to discovery requests.	2.20	946.00
10/23/25	Joseph Kipp	Confer with M. Whitner regarding Motion to Compel analysis and research.	0.20	86.00
10/23/25	Joseph Kipp	Revise and incorporate feedback for Special Committee's Motion to Compel.	0.20	86.00
10/23/25	Aaron Gavant	Review, provide comments on and revise draft discovery motions (1.5); communications with BT team regarding same (.7).	2.20	1,771.00
10/23/25	Leah O'Farrell	Finalize drafting motion for protective order regarding 30(b)(6) notice.	2.00	1,180.00
10/23/25	Leah O'Farrell	Review LKC's edits to order on \$765k payment (.1); review status of pro hacs (.1).	0.20	118.00
10/23/25	Leah O'Farrell	Review and provide edits to order on motion for protective order regarding 30(b)(6) notice.	0.30	177.00
10/23/25	Leah O'Farrell	Email to BT team regarding edits on LKC order (.1); attention to emails regarding motion to seal and review remote protocols regarding same, email to BT team regarding same and communication with N. He to confirm (.3).	0.40	236.00
10/23/25	Anita Peterson	Review incoming 2025-10-22 Chase Blackmon rough draft transcript and assist attorneys in executing strategy per request of T. Schmeltz (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms	5.90	2,183.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		for attorney use (.4); preparation for deposition of K. Hays (1.4); communications with P. Lohse and H. Hinton regarding same (.2); preparation for 30(b)(6) depositions including logistics (.4); review communications with Porter Hedges regarding same (.2); review communications with witnesses regarding same (.3); communications with C. Underwood regarding same (.3); precise tracking and timely updates of deadlines and filings (.3); communications with C. Topping forwarding 2025-10-22 Chase Blackmon rough draft transcript (.2); review communication with Porter Hedges regarding deposition of K. Hays (.1); review communications with C. Topping regarding schedule for depositions (.3); review communications with LKC, Porter Hedges regarding supplemental production of documents (.2); review communication with Akin regarding supplemental production of documents (.2); communication with court reporter regarding her questions relating to 2025-10-22 Chase Blackmon deposition (.2); review communications with Porter Hedges regarding deposition of J. Cohn (.2); review communication with C. Topping regarding deposition preparation (.2); review communications with A. Popescu regarding update (.2); review communications with K. Kansa and L. Parks regarding 4th interim fee statement (.2); review incoming 2025-10-23 (Dkt 1865) Transcend's Objection to Quinn Emanuel's Third Interim Fee Application (.2).		
10/23/25	Leah O'Farrell	Draft notice of service regarding LKC's 2nd RFPs and email to P. Lohse regarding same.	0.40	236.00
10/23/25	Kenneth Kansa	Participate in team call with Quinn Emanuel team and Province (.5); email to S. Schultz on severance exhibit (.1); email to J. Wolfshohl on LKC payment order (.1); review J. Wolfshohl comments on order (.1); emails to L. Parks on Interim Fee Application (.2).	1.00	1,070.00
10/23/25	Paige Lohse	Preparations for hearing on LKC dispute (3.2); confer with K. Warren regarding deposition	11.70	7,488.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		strategy (.7); review and prepare LKC discovery and document responses (4.5); LKC conferrals (.2); analyze and send correspondence and filings regarding recent developments (1.9); confer with K. Murphy regarding deposition exhibits (.3); confer with C. Underwood regarding deposition preparation and discovery (.7); call with H. Casper regarding supplemental production of documents and strategy for depositions (.2).		
10/23/25	Melissa Bonnici	Review documents pertaining to Section 2.3/PSA agreement and compile chronology of documents.	2.60	1,118.00
10/23/25	Charlotte Underwood	Participate in deposition preparation with K. Hays (1.2); manage preparation and coordination for 30b6 depositions (3.3); confer with P. Lohse regarding discovery and deposition preparation (.7); call with T. Schmeltz on outstanding items (.5); call with T. Schmeltz and K. Warren regarding next steps in LKC litigation (.3).	6.00	5,700.00
10/23/25	Megha Mathur	Identify documents related to Engagement Letter negotiations and success fee for 30(b)(6) depositions.	3.50	1,680.00
10/23/25	Megha Mathur	Draft preparation questions for Engagement Letter and success fee topics for 30(b)(6) depositions.	1.40	672.00
10/23/25	Lydia Parks	Incorporate K. Kansa's edits and revise the Fourth Interim Fee Application and Certification.	1.70	731.00
10/23/25	Haley Casper	Prepare for K. Hays deposition and prepare key documents and materials in furtherance of same (1.5); prepare for and attend call regarding 30(b)(6) deposition preparation and strategy (1.1); continue preparation for depositions and 30(b)(6) depositions including simultaneously coordinating and running supplemental document productions (3.7); prepare for and meet with K. Hays in furtherance of deposition preparation (4.8); supplement notations and continue preparation for upcoming depositions and development of facts (1.4); prepare for and attend call regarding	13.90	7,297.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		exit financing; review documents and information in furtherance of same (1.2); call with P. Lohse regarding supplemental production of documents and strategy for depositions (.2).		
10/23/25	Anna Brinski	Review internal and external correspondence regarding current deposition and discovery developments (.2); edit case indices to reflect same (.3); correspond with P. Lohse regarding deposition transcript (.1).	0.60	270.00
10/23/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/23/25	Addison Smith	Review documents for J. Cohn deposition preparation.	5.80	3,422.00
10/23/25	Carrie M. Raver	Address wire instruction issues related to derivative investigation costs reimbursement.	0.40	338.00
10/23/25	Kevin Warren	Prepare pro hac application to prepare for LKC fee application hearing.	0.80	344.00
10/23/25	Kevin Warren	Strategize approach to upcoming depositions with P. Lohse to prepare for LKC fee application hearing.	0.70	301.00
10/23/25	Kevin Warren	Coordinate preparation of exhibit uploads for J. Cohn deposition to prepare for LKC fee application hearing.	0.80	344.00
10/23/25	Kevin Warren	Review documents and correspondence subject to supplemental production to assist P. Lohse in producing the same to prepare for LKC fee application hearing.	0.90	387.00
10/23/25	Kevin Warren	Strategize approach to hearing and outstanding to-do items to prepare for same with P. Lohse.	0.80	344.00
10/23/25	Kevin Warren	Evaluate documents to review to support K. Hays deposition and deposition of J. Cohn to prepare for hearing on LKC fee application.	1.30	559.00
10/23/25	Kevin Warren	Review database to determine key documents related to K. Hays and J. Cohn to support depositions of both to support T. Schmeltz and team to prepare for hearing on LKC fee application hearing (4.4); call with T. Schmeltz and C. Underwood regarding next steps in LKC litigation (.3).	4.70	2,021.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/23/25	Trace (Vincent P.) Schmeltz	Call with C. Underwood regarding matter strategy and administration (.5); call regarding 30(b)(6) witnesses (.3); call with C. Underwood and K. Warren regarding next steps in LKC litigation (.3); prepare K. Hays for deposition (2.6); work on various emails and briefs related to LKC (3.6).	7.30	7,300.00
10/23/25	Abigail Wissel	Revisions to Fourth Interim Fee Application (.7); email to L. Parks on same (.1).	0.80	300.00
10/23/25	Abigail Wissel	Review time entries for Fourth Interim Fee Application (.9); email to L. Parks on same (.1).	1.00	375.00
10/23/25	Kathleen A. Murphy	Review and index deposition exhibits marked at the deposition of Chase Blackmon (1.6); conference with P. Lohse regarding same (.3).	1.90	598.50
10/23/25	Janelle Peters	Run QC Searches and generate PROD005 for case team.	1.00	265.00
10/23/25	Mariah A. Whitner	Confer with J. Kipp regarding Motion to Compel (.2); finalize additional edits to Motion to Compel (.8).	1.00	590.00
10/23/25	Kathleen L. Matsoukas	Prepare for and lead preparation work with K. Hays (5.4); multiple communications with team regarding collecting and reviewing evidence for deposition preparation (2.5).	7.90	6,162.00
10/23/25	Ning He	Analyze documents regarding LKC engagement and success fee (3.5); analyze deposition transcript of Chase Blackmon (1.5).	5.00	3,850.00
10/24/25	Joseph Kipp	Revise and incorporate feedback for Special Committee's Motion to Compel.	0.50	215.00
10/24/25	Joseph Kipp	Confer with P. Lohse regarding 30(b)(6) witness preparation.	0.90	387.00
10/24/25	Joseph Kipp	Analyze October 15 hearing transcript and extract key facts and quotations.	0.40	172.00
10/24/25	Joseph Kipp	Confer with K. Warren regarding 30(b)(6) witness preparation.	0.20	86.00
10/24/25	Joseph Kipp	Review relevant selected documents from Everlaw database and upload into witness preparation folder.	1.00	430.00
10/24/25	Joseph Kipp	Review drafts and revisions of PSA and incorporate key provisions into chart for P.	2.60	1,118.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Lohse and K. Warren's review.		
10/24/25	Paige Lohse	Preparations for hearing on LKC dispute (5.4); confer with J. Kipp regarding 30(b)(6) witness preparation (.9); address LKC discovery and document responses (4.4); confer with C. Underwood regarding LKC projects (.4); participate in LKC conferrals (.1); preparations for hearing on Transcend dispute (.2); analyze and send correspondence and filings regarding recent developments (1.4); call with H. Casper regarding strategy for upcoming depositions (1.0).	13.80	8,832.00
10/24/25	Charlotte Underwood	Confer with client and Province regarding LKC (.5); confer with SAFE AHG regarding LKC (.5); support to deposition and team handling LKC dispute (.7); correspond with D. Eaton regarding Akin invoices (.2); confer with P. Lohse regarding LKC outstanding projects (.4); coordinate 30(b)(6) depositions (.3).	2.60	2,470.00
10/24/25	Megha Mathur	Draft preparation questions for Engagement Letter and success fee topics for 30(b)(6) depositions.	0.50	240.00
10/24/25	Megha Mathur	Identify documents related to Engagement Letter negotiations and success fee for 30(b)(6) depositions.	5.00	2,400.00
10/24/25	Anna Bninski	Update case management indices.	0.20	90.00
10/24/25	Anita Peterson	Preparation for deposition of K. Hays (1.0); assist attorneys regarding deposition of K. Hays per request or T. Schmeltz (.8); preparation for deposition of J. Cohn (.3); preparation for 30(b)(6) depositions (.4); review multiple communications with LKC regarding depositions, request for meet and confer, witnesses and assist attorneys in executing strategy per request of P. Lohse (.3); communications with P. Lohse regarding deposition preparation (.2); communication with C. Underwood regarding deposition preparation (.3); review incoming Chase Blackmon deposition transcript and exhibits and assist attorneys in executing strategy per request of P. Lohse (.3); precise tracking and timely updates	6.80	2,516.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		of deadlines and filings (.4); review multiple communications with C. Topping regarding deposition preparation (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); communication with R. Mates regarding deposition of K. Hays (.2); communications with LKC regarding deposition of K. Hays (.2); review communications with LKC, Porter Hedges regarding supplemental document production (.3); review communications with Akin regarding supplemental document production (.3); communications with investigative team regarding valuation (.2); review communications with C. Potter regarding remand hearing (.1); review communications with Akin regarding LKC (.2); review communications with Akin regarding redacted invoices (.2); review communication with local counsel forwarding 2025-09-08 Transcript of Status Conference, 2025-10-02 Transcript of Status Conference, 2025-10-15 Transcript of Emergency Hearing regarding Disclosure Statement and Emergency Motions and assist attorneys in executing strategy per request of P. Lohse (.2); communication with investigative team regarding solicitation packages, deadlines (.1).		
10/24/25	Melissa Bonnici	Review documents at the request of P. Lohse, including compiling draft chronology of documents relevant to PSA and Section 2.3 specifically.	3.70	1,591.00
10/24/25	Haley Casper	Work on discovery issues including prepare for K. Hays deposition, prepare and coordinate supplemental document production and prepare potential exhibits and coordinate internally in furtherance of same (5.5); prepare witness and attend and assist in deposition of K. Hays (6.6); evaluate documents and communicate internally regarding deposition takeaways and next steps in furtherance of upcoming depositions (.6); call with P. Lohse regarding strategy and preparation for upcoming	13.70	7,192.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		depositions (1.0).		
10/24/25	Carrie M. Raver	Address reimbursement issues.	0.40	338.00
10/24/25	Kevin Warren	Coordinate supplemental production to assist P. Lohse in responding to LKC requests to prepare for fee application hearing.	2.30	989.00
10/24/25	Kevin Warren	Coordinate production relating to potential financing partners with A. Smith to assist P. Lohse in responding to LKC requests in advance of fee application hearing.	1.20	516.00
10/24/25	Kevin Warren	Evaluate documents to consider with respect to J. Cohn deposition, with related coordination of review to compile relevant documents to M. Whitner, M. Mathur, A. Smith, and J. Kipp to prepare for deposition of J. Cohn in advance of LKC fee application hearing (4.5); confer with J. Kipp regarding 30(b)(6) preparation (.2).	4.70	2,021.00
10/24/25	Trace (Vincent P.) Schmeltz	Work with 30(b)(6) witnesses (1.2); prepare C. Topping for deposition (1.3); produce K. Hays for deposition (6.6); attend to LKC strategy (.4).	9.50	9,500.00
10/24/25	Glenn R. de Roziere	Conduct research at request of K. Warren.	1.20	462.00
10/24/25	Kenneth Kansa	Email to C. Underwood on severance exhibit (.1); email to BT team on solicitation packages (.1).	0.20	214.00
10/24/25	Ning He	Prepare and analyze documents related to Topic 1 of 30(b)(6) issues in LKC dispute.	8.80	6,776.00
10/24/25	Janelle Peters	Create searches of potential production documents for case team(1.4); run production PROD006 for case team (.1).	1.50	397.50
10/24/25	Kathleen L. Matsoukas	Continue preparation of K. Hays for deposition (2.5); review evidence for J. Cohn deposition and compiled notes for questions and topics (3.3); communicate with team regarding analysis of original and revised engagement letters and other LKC matters for deposition preparation (.7).	6.50	5,070.00
10/25/25	Joseph Kipp	Review Rhodium communications discussing purchase price allocation and incorporate into chart for N. He and K. Warren's review.	1.30	559.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/25/25	Charlotte Underwood	Communications with team regarding deposition and trial preparations (1.1); related follow up (.3); confer with T. Schmeltz regarding deposition preparations and open items (.3).	1.70	1,615.00
10/25/25	Joseph Kipp	Revise chart of Rhodium PSA communications and send to N. He to assist in deposition preparation for C. Topping.	0.90	387.00
10/25/25	Anita Peterson	Review communications with LKC regarding 30(b)(6) depositions, deposition of J. Cohn, witnesses, declarations (.3); review communications with C. Wheeler regarding deposition preparation (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.70	259.00
10/25/25	Paige Lohse	Preparations for hearing on LKC dispute (2.4); address LKC discovery and document responses (.5); confer with T. Schmeltz regarding discovery (.9); call regarding 30(b)(6) topics (1.2); revise motions and submissions relating to LKC (2.7).	7.70	4,928.00
10/25/25	Haley Casper	Call regarding 30(b)(6) deposition preparation, motion strategy, and next steps.	1.20	630.00
10/25/25	Haley Casper	Prepare for C. Wheeler deposition, including simultaneously review documents, prepare outline, and communicate internally and with client regarding same.	5.30	2,782.50
10/25/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/25/25	Addison Smith	Review documents for J. Cohn deposition preparation.	1.60	944.00
10/25/25	Addison Smith	Review and redact documents and emails concerning Province funding efforts.	1.70	1,003.00
10/25/25	Kevin Warren	Coordinate preparation of production with respect to communications concerning original LKC engagement letter to prepare for 30(b)(6) deposition in furtherance of preparing for LKC fee application hearing.	1.20	516.00
10/25/25	Kevin Warren	Continue to prepare for LKC fee application hearing.	0.80	344.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/25/25	Kevin Warren	Evaluate communications concerning the allocation determination of the PSA to assist N. He in preparation of Topic 4 of 30(b)(6) notice to support preparation for hearing on LKC fee application.	1.70	731.00
10/25/25	Kevin Warren	Review Chase Blackmon deposition transcript to prepare to designate the same as to certain 30(b)(6) topics to prepare for hearing on LKC fee application (2.5); call regarding 30(b)(6) topics (1.2)..	3.70	1,591.00
10/25/25	Trace (Vincent P.) Schmeltz	Confer with P. Lohse regarding discovery (.9); confer with C. Underwood regarding deposition preparation and open items (.3); confer with N. He regarding LKC negotiation (.5); interview C. Topping (.7); confer with J. Stokes regarding C. Topping's prior testimony (.7).	3.10	3,100.00
10/25/25	Glenn R. de Roziere	Review open source materials for investigation.	1.50	577.50
10/25/25	Kenneth Kansa	Review emails on LKC proposed order (.2); emails to P. Lohse on same (.2); review S. Schultz email on severance exhibit (.1).	0.50	535.00
10/25/25	Ning He	Prepare and analyze materials regarding topics 1 and 2 of 30(b)(6) notices (8.8); draft preparation questions regarding 30(b)(6) questions (4.4); confer with T. Schmeltz and C. Topping regarding LKC negotiation (.5); call with team regarding 30(b)(6) topics (1.2).	14.90	11,473.00
10/25/25	Kathleen A. Murphy	Review, organize and format documents to be used as deposition exhibits.	2.70	850.50
10/25/25	Kathleen L. Matsoukas	Review open discovery action items with team (.5); work on deposition preparation for J. Cohn (2.0); review results of K. Hays deposition (.3).	2.80	2,184.00
10/26/25	Joseph Kipp	Locate ECF numbers on Courtlink to be introduced into motion draft for P. Lohse.	0.50	215.00
10/26/25	Paige Lohse	Preparations for hearing on LKC dispute (2.4); LKC deposition conferrals (1.2); revise motions and submissions relating to LKC (4.9); preparations for plan confirmation discovery (.2); call with H. Casper regarding C. Wheeler deposition preparation (.2); preparations for hearing on Transcend dispute (.2); analyze and	13.60	8,704.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		send correspondence and filings regarding recent developments (3.8); confer with T. Schmeltz and N. He regarding damage analysis (.7).		
10/26/25	Joseph Kipp	Review Everlaw documents regarding J. Cohn communications and classify for J. Cohn deposition preparation.	2.00	860.00
10/26/25	Joseph Kipp	Analyze Rhodium board minutes and extract key information for N. He's review.	1.10	473.00
10/26/25	Anita Peterson	Review communications with C. Potter regarding topics for corporate representative depositions (.2); review communications with M. Robinson, D. Dunn, D. Eaton, S. Wells regarding same (.1); review communications with D. Eaton, S. Wells, D. Dunn, M. Robinson regarding LKC issues (.2); review communications with D. Eaton regarding deposition, deposition preparation (.4); review communications with C. Topping regarding depositions, deposition preparation (.2); review communications with LKC regarding coordinating depositions and assist attorneys in executing strategy per request of P. Lohse (.3); review communications with Akin regarding depositions (.2); review communications with Porter Hedges regarding depositions (.2); review communications with C. Wheeler regarding deposition, deposition preparation (.2); review communications with Quinn Emanuel regarding Motion to Enforce (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	2.40	888.00
10/26/25	Charlotte Underwood	Attention to ongoing discovery and briefing efforts related to LKC dispute and plan confirmation (2.9); communications with T. Schmeltz regarding the same (.5); coordinate depositions and related preparations (.3); confer with client and SAFE AHG regarding upcoming hearing (.8); related follow up (.9).	5.40	5,130.00
10/26/25	Kathleen L.	Review potential exhibits for J. Cohn deposition	7.40	5,772.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
	Matsoukas	(2.5); draft J. Cohn deposition outline (3.8); communicate with team regarding questions for J. Cohn deposition (1.1).		
10/26/25	Kenneth Kansa	Review detail for September monthly application (.7); email to A. Peterson on same (.1); review LKC emails (.1); review deposition topics from C. Potter (.2); review LKC discovery-related emails (.3).	1.40	1,498.00
10/26/25	Haley Casper	Prepare for C. Wheeler deposition and assist in preparation for J. Cohn deposition (2.8); call with P. Lohse regarding C. Wheeler preparation (.2); evaluate K. Hays deposition transcript and prepare analysis regarding 30(b)(6) implications and future deposition preparation (1.6); participate in call with C. Wheeler in furtherance of deposition preparation (1.5); continue preparation of materials and exhibits in furtherance of upcoming depositions (1.8).	7.90	4,147.50
10/26/25	Addison Smith	Review and redact documents and emails concerning Province funding efforts.	1.10	649.00
10/26/25	Kevin Warren	Evaluate board minutes summary analysis of J. Kipp with N. He to prepare for J. Cohn deposition and to determine relevance to LKC dispute to prepare for hearing on fee application.	0.80	344.00
10/26/25	Kevin Warren	Evaluate prior negotiations with LKC for P. Lohse to assist T. Schmeltz in preparing for upcoming depositions and LKC fee application hearing.	0.90	387.00
10/26/25	Kevin Warren	Evaluate revised fee arrangement negotiations with LKC to assess implications of revised compared to prior fee arrangement to assist K. Matsoukas, P. Lohse, and T. Schmeltz to prepare for hearing on LKC fee application.	1.10	473.00
10/26/25	Kevin Warren	Draft initial designation of Chase Blackmon testimony that relates to 30(b)(6) topics for N. He review to prepare for corporate representative depositions to prepare for LKC fee application hearing.	4.40	1,892.00
10/26/25	Kevin Warren	Draft questions, with related identification of relevant documents, to prepare corporate	2.90	1,247.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		representatives for topic 4 of 30(b)(6) notice to assist T. Schmeltz and N. He to prepare for LKC fee application hearing.		
10/26/25	Trace (Vincent P.) Schmeltz	Review documents (2.3); confer with M. Hurley regarding strategy (.6); calls with D. Eaton, S. Wells, and M. Robinson (1.1); calls with N. He and P. Lohse regarding damage analysis (.7); work on all aspects of deposition preparation with C. Topping, D. Eaton and C. Wheeler (4.1); confer with SAFE AHG regarding C. Topping's prior testimony (.9).	9.70	9,700.00
10/26/25	Ning He	Confer with T. Schmeltz and P. Lohse regarding damage analysis (.7); confer with BDO regarding damage analysis (.5); analyze documents regarding damage analysis (5.6); analyze documents regarding topics (3) and (4) of LKC 30b6 (5.5); prepare C. Topping for deposition (3.5).	15.80	12,166.00
10/26/25	Kathleen A. Murphy	Update deposition exhibit index.	0.50	157.50
10/26/25	Janelle Peters	Create searches for case team and confirm whether documents have been previously produced (.3); upload new document sets to database and QC uploads (.3).	0.60	159.00
10/27/25	Joseph Kipp	Analyze filings in Courtlink and extract key information to be used in the Special Committee's Motion for Authority to Pay Fees.	0.80	344.00
10/27/25	Joseph Kipp	Analyze Chase Blackmon deposition transcript and extract key sections highlighted by K. Warren.	2.00	860.00
10/27/25	Joseph Kipp	Analyze Chase Blackmon deposition transcript and extract key sections highlighted by K. Warren.	1.60	688.00
10/27/25	Joseph Kipp	Convert extracted key sections from Chase Blackmon deposition transcript into succinct outline format for K. Warren's review.	3.80	1,634.00
10/27/25	Joseph Kipp	Review direct examination outlines for Chase Blackmon testimony.	0.20	86.00
10/27/25	Kathleen L. Matsoukas	Continue drafting and revising outline for deposition of J. Cohn, with related review of	5.20	4,056.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		documents/exhibits (3.4); call with K. Kansa regarding Transcend 30(b)(6) topics (.7); prepare for and participate in review of and strategy for response Rule 30(b)(6) topics from Transcend (1.1).		
10/27/25	Leah O'Farrell	Attention to email regarding filing proposed order and message P. Lohse regarding notice.	0.10	59.00
10/27/25	Leah O'Farrell	Revise notice of proposed order and reviewing emails regarding same to add to notice.	0.20	118.00
10/27/25	Leah O'Farrell	Attention to emails regarding witness and exhibit list filing needed (.1); attention to email from P. Lohse regarding edits to notice of proposed order and make revisions regarding same (.2).	0.30	177.00
10/27/25	Leah O'Farrell	Attention to emails regarding call on plan discovery conferral (.1); attention to emails regarding LKC depositions to prepare exhibit/witness list (.3); review court and judge's procedures regarding evidentiary hearings and email BT team regarding same (.4); begin draft outline for witness/exhibit list (.5).	1.30	767.00
10/27/25	Leah O'Farrell	Review requested 30(b)(6) topics for plan discovery (.4); communication with K. Matsoukas and K. Kansa regarding plan discovery (.6).	1.00	590.00
10/27/25	Leah O'Farrell	Communications with P. Lohse and Clerk regarding filing of emergency motion for protective order.	0.10	59.00
10/27/25	Leah O'Farrell	Begin reviewing motion to remand to prepare for hearing on motion to remand.	2.40	1,416.00
10/27/25	Leah O'Farrell	Review motion to seal hearing and provide revisions per plan to request hearing on logistics.	0.20	118.00
10/27/25	Leah O'Farrell	Communications with P. Lohse regarding motion to remand and discussion regarding motion to seal.	0.30	177.00
10/27/25	Leah O'Farrell	Continue reviewing motion to remand and research regarding same for hearing on motion to remand.	1.00	590.00
10/27/25	Aaron Gavant	Review various developments relating to plan	0.80	644.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/27/25	Anita Peterson	confirmation hearings and LKC dispute (.4); communications with BT team regarding same and next steps (.4). Review exhibits marked internally at deposition of K. Hays and assist attorneys in executing strategy per request of T. Schmeltz (.2); preparation for and assist regarding upcoming depositions (1.9); communications with P. Lohse regarding same (.2); communications with C. Underwood regarding same (.2); review communications with Akin regarding depositions (.2); review communications with D. Eaton regarding deposition, deposition preparation and assist attorneys in executing strategy per request of C. Underwood (.3); review communications with C. Topping regarding depositions (.2); review communications from Porter Hedges regarding updated 30(B)(6) deposition notices (.2); precise tracking and timely updates of deadlines and filings (.5); review communication with Stris regarding status of deposition of J. Stokes and assist attorneys in executing strategy per request of C. Underwood (.2); review multiple communications with LKC regarding depositions and follow up regarding same (.3); communications regarding monthly fee statement (.2); review and revise monthly fee application (.7); review communication with A. Popescu regarding deposition preparation (.1); review communication regarding SAFE AHG's production to LKC and the Transcend Group (.2); review incoming transcripts and exhibits from 2025-10-24 deposition of K. Hays and assist attorneys in executing strategy per request of T. Schmeltz (.4); review incoming updated transcripts from 2025-10-22 deposition of Chase Blackmon and assist attorneys in executing strategy per request of T. Schmeltz (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); communications with investigative team regarding Building D term	7.40	2,738.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		sheet (.2); review communications with LKC and Porter Hedges regarding supplemental production of documents (.2); review communications with Akin regarding supplemental production of documents (.2).		
10/27/25	Paige Lohse	Preparations for hearing on LKC dispute (3.7); address LKC discovery and document responses (.2); participate in LKC conferrals (.2); revise motions and submissions relating to LKC (5.2); preparations for plan confirmation discovery (.2); preparations for hearing on Transcend dispute (.3); analyze and send correspondence and filings regarding recent developments (1.0); call with T. Schmeltz regarding strategy (.2).	11.00	7,040.00
10/27/25	Charlotte Underwood	Confer with P. Lohse and N. He regarding trial exhibits and outlines (.8); deposition preparations (1.4).	2.20	2,090.00
10/27/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/27/25	Carrie M. Raver	Address XL claim acknowledgment and denial and correspond with T. Schmeltz regarding the same.	0.20	169.00
10/27/25	Kevin Warren	Revise J. Cohn deposition outline with related supplements to exhibit binders to assist T. Schmeltz in preparing for J. Cohn deposition and to prepare for hearing on LKC fee application.	11.50	4,945.00
10/27/25	Kevin Warren	Assist T. Schmeltz with preparation of D. Eaton for deposition, with related review of documents regarding the same, to prepare for hearing on LKC fee application.	2.00	860.00
10/27/25	Trace (Vincent P.) Schmeltz	Prepare C. Topping for deposition (3.2); work on LKC brief (3.4); strategy calls with B. Riley (.4); M. Robinson (.4); P. Lohse (.2); and S. Schultz (.3). work with BDO on expert testimony (.6); prepare D. Eaton for deposition (2.0); confer with P. Tomasco regarding privilege issues (.4); address matter emails (.4).	11.30	11,300.00
10/27/25	Anna Bninski	Draft summary of fact and law regarding Special Committee's actions and position regarding	4.30	1,935.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		privilege waiver vis-a-vis production to LKC (3.9); confer with P. Lohse regarding same (.4).		
10/27/25	Haley Casper	Prepare for 30(b)(6) depositions including coordinate with team and produce supplemental documents in furtherance of same (4.8); analyze K. Hays deposition transcript and notate 30(b)(6) deposition testimony in furtherance of designation (.7).	5.50	2,887.50
10/27/25	Haley Casper	Preparation for hearing and trial exhibits and communications regarding same.	0.80	420.00
10/27/25	Kenneth Kansa	T/c S. Schultz on confirmation issues (.3); review severance exhibit in preparation for call (.2); conference with Quinn Emanuel and Akin teams on severance payments exhibit (.5); t/c K. Matsoukas on Transcend 30(b)(6) topics (.8); email T. Schmeltz regarding advance notice of filing to US Trustee (.1); email to N. He on LKC hearing (.1); review revised plan severance exhibit and S. Schultz edit on same (.1); email to Debtors and SAFE AHG on same (.1); review additional revisions to severance exhibit (.1).	2.30	2,461.00
10/27/25	Kathleen A. Murphy	Communications with J. Kipp and K. Warren regarding deposition outline information (.2); assist attorneys in executing strategy regarding hearing logistics per request of P. Lohse (.5).	0.70	220.50
10/27/25	Mariah A. Whitner	Review deposition outline for J. Cohn and corresponding exhibits ahead of deposition.	1.90	1,121.00
10/27/25	Janelle Peters	Create searches for case team.	0.80	212.00
10/27/25	Ning He	Revise motion to seal hearing (1.5); confer with BDO regarding analysis (1.0); confer with Province regarding damage calculation (.5); analyze documents regarding building D (4.2); analyze documents regarding litigation estimates (2.6); confer with C. Topping regarding deposition preparation (2.0).	11.80	9,086.00
10/28/25	Joseph Kipp	Convert extracted key sections from Chase Blackmon deposition transcript into succinct outline format for K. Warren's review.	2.60	1,118.00
10/28/25	Joseph Kipp	Draft letter to LKC and Porter Hedges objecting to 30(b)(6) deposition topics for P. Lohse's review.	1.80	774.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/28/25	Joseph Kipp	Draft exhibit cover sheets for motion to be filed by P. Lohse.	0.20	86.00
10/28/25	Lydia Parks	Review certain sections of power contracts ahead of the J. Cohn deposition (.6); review exhibits from the Chase Blackmon deposition and note particulars of interest (.6); review and revise the letter responding to the 30(b)(6) topics proposed (.8); review the final draft of the letter (.1).	2.10	903.00
10/28/25	Anita Peterson	Precise tracking and timely updates of deadlines and filings (.4); preparation for and assist with depositions (1.8); review and revise monthly fee statement (2.6); review as-filed 2025-10-27 (Dkt 1873) Notice of Filing of Proposed Order, 2025-10-27 (Dkt 1873-1) (proposed) Order regarding \$765,792.35 payment to LKC, 2025-10-27 (Dkt 1874) Emergency Motion of the Special Committee for Entry of a Protective Order, 2025-10-27 (Dkt 1874) Emergency Motion of the Special Committee for Entry of a Protective Order (with Exhibits A-C), 2025-10-27 (Dkt 1875) Notice of Service, 2025-10-27 (Dkt 1876) Special Committee's Emergency Motion to Seal the LKC Fee Hearing, 2025-10-27 (Dkt 1876-1) (proposed) Order Granting the Special Committee's Emergency Motion to Seal the Hearing on the Final Application for Compensation for LKC and assist attorneys in executing strategy per request of P. Lohse (.8); preparation for emergency hearings (.5); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.5); review communications with LKC regarding deposition scheduling, 30(b)(6) depositions (.4); communications with Company regarding J. Cohn deposition (.2); communications with C. Topping regarding deposition preparation (.4); communications with C. Underwood regarding deposition preparation (.4); review communications with C. Topping regarding deposition preparation (.4); review communications with Court regarding	10.00	3,700.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		hearing on emergency motion to seal (.2); review communications with Akin regarding draft brief (.1); review communications with P. Tomasco regarding 30(b)(6) depositions (.2); communication with investigative team regarding objections and talking points regarding Transcend Plan discovery (.2); review incoming 2025-10-28 (Dkt 1878) Memorandum Opinion and Order on Amended Omnibus Objection Rhodium (Midas Green) (.2); communications with investigative team regarding same (.1); communications with M. Dearman regarding 30(b)(6) depositions (.2); communications with Quinn Emanuel regarding monthly fee statement (.2); review communications with Quinn Emanuel regarding motion to enforce purchase and sale agreement (.2).		
10/28/25	Leah O'Farrell	Draft argument outline for motion to remand.	2.60	1,534.00
10/28/25	Leah O'Farrell	Review docket for hearing dates and times per request from P. Lohse (.1); email to A. Peterson regarding docketing of hearing dates (.1).	0.20	118.00
10/28/25	Leah O'Farrell	Continue researching for motion to remand hearing.	0.60	354.00
10/28/25	Leah O'Farrell	Review email from K. Matsoukas regarding topics for meet and confer on plan discovery (.1); attention to email from K. Kansa regarding plan discovery (.1).	0.20	118.00
10/28/25	Leah O'Farrell	Draft motion to seal exhibits to motion for authority to pay (1.0); attention to email to Clerk regarding motion to file under seal and confirm filing plan (.2).	1.20	708.00
10/28/25	Aaron Gavant	Review and consider impact of decision on Midas Green claims.	0.50	402.50
10/28/25	Charlotte Underwood	Review and designate deposition testimony (1.4); review and identify trial exhibits (1.2); prepare for upcoming depositions and hearings (2.4); communications with T. Schmeltz on open issues (.4).	5.40	5,130.00
10/28/25	Kenneth Kansa	Participate in update call with Province and Quinn Emanuel (.5); review Midas Green	1.10	1,177.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		opinion (.2); email to BT team on same (.1); email to S. Schultz on confirmation brief (.1); email to K. Matsoukas and L. O'Farrell on allocation of 30(b)(6) topics (.2).		
10/28/25	Paige Lohse	Preparations for hearing on LKC dispute (3.9); revise motion to compel (4.9); preparations for plan confirmation discovery (.2); preparations for hearing on Transcend dispute (.2); analyze and send correspondence and filings regarding recent developments (3.1); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (1.1); revise and finalize motion for authority to pay LKC fees (2.1).	15.50	9,920.00
10/28/25	Kevin Warren	Preparation for and assist T. Schmeltz in deposition of J. Cohn to prepare for hearing on LKC fee application (9.6); follow up regarding same (.9).	10.50	4,515.00
10/28/25	Trace (Vincent P.) Schmeltz	Prepare for and take J. Cohn's deposition (9.6); address privilege clawback (.3).	9.90	9,900.00
10/28/25	Kathleen L. Matsoukas	Prepare for argument on Transcend's motion to remand and communicate with L. O'Farrell regarding same (1.4); communicate with team regarding J. Cohn deposition (.2).	1.60	1,248.00
10/28/25	Kathleen L. Matsoukas	Draft and revise chart of objections and responses to Transcend's Rule 30(b)(6) topics and communicate with team regarding same.	1.10	858.00
10/28/25	Anna Bninski	Formulate claw back by assessing and coding documents to reflect privilege (2.8); correspond with P. Lohse regarding same (.1).	2.90	1,305.00
10/28/25	Haley Casper	Communications with discovery team and with C. Underwood regarding preparation of K. Hays and C. Wheeler (.2); supplement review of K. Hays transcript in furtherance of designating for 30(b)(6) (1.5); analyze trial preparation materials and supplement exhibit list (.6); communicate internally regarding same (.2).	2.50	1,312.50
10/28/25	Haley Casper	Evaluate supporting documents and strategize in furtherance of Motion to Compel LKC's discovery.	0.50	262.50
10/28/25	Kathleen A.	Assist attorneys regarding logistics for 2025-11-	0.50	157.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
	Murphy	03 hearing per request of P. Lohse.		
10/28/25	Janelle Peters	Create searches for case team (.8); locate documents in Everlaw database for C. Underwood (.5); create production PROD009 for case team (.2); load documents into database for case team (.2).	1.70	450.50
10/28/25	Ning He	Confer with BDO regarding analysis (.5); confer with C. Topping regarding deposition (2.0); analyze documents regarding trial exhibits (3.5); analyze documents regarding settlement claims (2.5); analyze deposition transcript regarding 30(b)(6) topics (2.2).	10.70	8,239.00
10/29/25	Joseph Kipp	Review communications among the Special Committee, LKC, and Porter Hedges and compile for P. Lohse's review .	2.80	1,204.00
10/29/25	Joseph Kipp	Revise Motion to Compel LKC's Responses to Special Committee's Discovery Requests.	0.30	129.00
10/29/25	Joseph Kipp	Communication with P. Lohse regarding Motion to Compel.	0.10	43.00
10/29/25	Joseph Kipp	Summarize previously compiled emails with LKC and Porter Hedges and send to P. Lohse for review.	2.00	860.00
10/29/25	Joseph Kipp	Research TX caselaw on contract rescission.	2.10	903.00
10/29/25	Lydia Parks	Review and tag certain documents for LKC production (.8); identify and prepare trial exhibits and charts (5.3).	6.10	2,623.00
10/29/25	Kathleen L. Matsoukas	Call with K. Kansa regarding Plan objections (.2); communicate with team regarding exhibits to be designated for hearing exhibit list (.6); communicate with team regarding planning for upcoming Transcend motion to remand (.5); review and revise argument outline for hearing on motion to remand (.7); communicate with L. O'Farrell regarding same (.3).	2.30	1,794.00
10/29/25	Leah O'Farrell	Attention to emails regarding plan discovery and 30(b)(6) topics.	0.20	118.00
10/29/25	Leah O'Farrell	Communication with P. Lohse regarding exchange of exhibits (.1); draft proposed email for P. Lohse to review regarding agreement on exhibits (.1); communications with K. Matsoukas	0.40	236.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding motion to remand (.2).		
10/29/25	Leah O'Farrell	Attention to redrafting exhibit agreement per instructions from P. Lohse.	0.20	118.00
10/29/25	Leah O'Farrell	Update motion to remand argument outline to include factors on permissive/equitable remand.	1.20	708.00
10/29/25	Leah O'Farrell	Draft notice of hearing; (.2); review local procedures on remote witness testimony (.2); enter electronic notice of appearance for P. Lohse (.3).	0.70	413.00
10/29/25	Leah O'Farrell	Attention to comment from K. Matsoukas on argument outline for remand and review pleadings regarding same.	0.30	177.00
10/29/25	Leah O'Farrell	Draft pro hac for K. Warren based on emails with K. Matsoukas and T. Schmeltz.	0.20	118.00
10/29/25	Leah O'Farrell	Draft argument outline for emergency hearings for P. Lohse.	0.50	295.00
10/29/25	Leah O'Farrell	Attention to inquiry from P. Lohse regarding witnesses at Transcend motion to remand (.1); review exhibit and witness list regarding same (.1).	0.20	118.00
10/29/25	Leah O'Farrell	Review draft exhibit list and exhibits.	0.50	295.00
10/29/25	Leah O'Farrell	Communication with P. Lohse regarding motion to compel and review of exhibit list (.2); communication with L. Parks regarding same (.1).	0.30	177.00
10/29/25	Anita Peterson	Review communications with Quinn Emanuel regarding as-filed 2025-10-28 (Dkt 1881) Motion to Enforce the Purchase and Sale Agreement with Whinstone, 2025-10-28 (Dkt 1882) Notice of Hearing (regarding Quinn Emanuel's Third Interim Fee Application), 2025-10-28 (Dkt 1883) Special Committee's Motion to Seal Portions of Emergency Motion, 2025-10-28 (Dkt 1884) Emergency Motion for Authority to Pay Fees to LKC (with Exhibit A), 2025-10-28 (Dkt 1885) Sealed Special Committee's Motion to Seal Portions of Emergency Motion (with Exhibits B-D) and assist attorneys in executing strategy per request of P. Lohse (.8); review communications with Quinn Emanuel regarding	7.00	2,590.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		exhibits filed under seal (.2); review communications with Porter Hedges requesting unredacted motion (.2); review incoming transcript from 2025-10-28 deposition of Jonathan Cohn and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with LKC, Porter Hedges regarding 2025-10-28 supplemental productions (.2); review communications with Akin regarding 2025-10-28 supplemental production (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.5); review communications with LKC regarding deposition scheduling (.1); review communications with C. Topping regarding deposition preparation (.1); review 2025-10-28 communications with LKC, Porter Hedges regarding objections and designations for Rule 30(b)(6) deposition topics (.2); communications with B. Riley regarding November 3 hearing logistics per request of P. Lohse (.3); review additional communications with B. Riley regarding 2025-11-03 hearing logistics (.2); draft Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 with Exhibits A - C (1.3); communications with T. Schmeltz regarding monthly fee statement (.2); review incoming 2025-10-29 (Dkt 1887) Order Granting Emergency Motion for Authority to Pay Fees to LKC and assist attorneys in executing strategy per request of P. Lohse (.2); communications with investigative team regarding same (.2); assist attorneys in executing strategy per request of P. Lohse focusing on 2025-11-03 hearing logistics (1.9).		
10/29/25	Anita Peterson	Communications with investigative team regarding meet and confer with Transcend regarding Rule 30(b)(6) topics, fee objection (.2); communications with investigative team regarding 30(b)(6) depositions (.4); review communications from counsel for N. Cerasuolo	4.00	1,480.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		forwarding 2025-10-28 (Dkt 41) Defendants' Joint Witness and Exhibits for 2025-10-30 Transcend's Motion to Remand and assist attorneys in executing strategy per request of T. Schmeltz (.5); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-10-30 hearings (1.4); review communications with Akin regarding depositions (.2); review communications with C. Potter regarding 30(b)(6) deposition topics (.2); review communications with LKC regarding LKC discovery matters (.2); review communication with LKC regarding LKC fee application (.2); review communications from office of C. Potter forwarding 2025-10-28 Plaintiffs' Joint Witness and Exhibits for 2025-10-30 Transcend's Motion to Remand and assist attorneys in executing strategy per request of T. Schmeltz (.5); review communications with LKC regarding hearing exhibit designations, updated deposition designations (.2).		
10/29/25	Thomas G. Haskins	Preparation for hearing in bankruptcy matter including communication with T. Schmeltz and team regarding same.	0.80	636.00
10/29/25	Paige Lohse	Preparations for hearing on LKC dispute (4.9); LKC discovery and document responses (5.5); revise and delegate on evidence motion (1.2); preparations for hearing on Transcend dispute (.6); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (2.2).	14.40	9,216.00
10/29/25	Addison Smith	Review and tag documents for C. Wheeler trial exhibits.	1.60	944.00
10/29/25	Charlotte Underwood	Review invoices for SAFE contribution claim (.8); prepare for upcoming depositions and hearings (3.7); communications with N. He on LKC related matters (.4); review and revise designations (.7).	5.60	5,320.00
10/29/25	Kevin Warren	Identify potential trial exhibits related to J. Cohn to prepare for hearing on LKC fee application, with related review of J. Cohn exhibits used,	4.70	2,021.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		and additional documents from the database, with related coordination thereof with K. Murphy to prepare trial exhibit list.		
10/29/25	Kevin Warren	Evaluate potential exhibits related to Chase Blackmon, with related review of deposition transcript and additional documents identified from the database to prepare for hearing on LKC fee application.	3.40	1,462.00
10/29/25	Kevin Warren	Evaluate documents within supplemental productions to determine additions to trial exhibit list to prepare for hearing on LKC fee application.	2.30	989.00
10/29/25	Kevin Warren	Communications with BT team (K. Murphy, L. Parks, H. Casper, C. Underwood, A. Smith, P. Lohse) to coordinate initial draft of trial exhibit list, with related quality check of compiled documents.	2.10	903.00
10/29/25	Trace (Vincent P.) Schmeltz	Prepare for 30(b)(6) depositions with C. Topping and D. Eaton (1.9); review AI findings regarding Akin Gump bills (.4); BDO preparation (.3); produce witnesses in 30(b)(6) depositions (7.5); D. Eaton follow-up (.1).	10.20	10,200.00
10/29/25	Anna Bninski	Summarize topics covered in material to claw back, including representative sample documents, at request of P. Lohse (3.2); draft points for oral argument at hearing relating to claw back with factual and case law support (2.1).	5.30	2,385.00
10/29/25	Haley Casper	Conduct supplemental review and notation of K. Hays deposition transcript in furtherance of designating for additional 30(b)(6) topic (.5); communicate regarding same (.2).	0.70	367.50
10/29/25	Haley Casper	Review and supplement C. Wheeler and K. Hays exhibits and materials for trial including internal communications regarding same while attending 30(b)(6) depositions (5.5); continue review and preparation of materials in furtherance of trial and communicate internally regarding status and strategy (.8).	6.30	3,307.50
10/29/25	Kenneth Kansa	Email to K. Matsoukas on objections to discovery (.1); email to P. Lohse on LKC order	2.90	3,103.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.1); email to C. Underwood on plan discovery (.1); email to K. Matsoukas on 30(b)(6) plan confirmation discovery from Transcend (.1); email to T. Schmeltz and K. Matsoukas on Transcend plan objections (.1); t/c to K. Matsoukas on same (.2); review and revise list of 30(b)(6) topics (.4); email to P. Tomasco on same (.1); email to T. Schmeltz on allocation of 30(b)(6) topics (.2); email to K. Matsoukas on same (.2); outline confirmation brief topics (.6); review Transcend 30(b)(6) topics and outline responses to same (.4); review solicitation materials for plan confirmation issues (.3).		
10/29/25	Kathleen A. Murphy	Hearing preparation including coordination with multiple vendors and P. Lohse regarding hearing logistics (2.2); email correspondence with court reporters regarding order for deposition exhibits (.2); review files to format exhibits for hearing exhibit list and prepare draft exhibit list for attorney review (7.8).	10.20	3,213.00
10/29/25	Eric Beard	Assist case team with creation of shared Box folder regarding LKC production document exports.	0.30	84.00
10/29/25	Ning He	Confer with BDO regarding expert report (1.0); analyze materials regarding expert report (3.2); analyze materials regarding Whinstone settlement (3.5); prepare materials for key witnesses in LKC trial (6.0); analyze documents regarding PSA negotiations (2.0).	15.70	12,089.00
10/30/25	Joseph Kipp	Upload C. Blackmon direct examination outline to shared folder for K. Warren's review.	0.10	43.00
10/30/25	Joseph Kipp	Update summaries of Porter Hedges and LKC email correspondence.	0.20	86.00
10/30/25	Joseph Kipp	Confer with P. Lohse and LKC hearing team regarding exhibit lists.	0.20	86.00
10/30/25	Joseph Kipp	Compile J. Cohn exhibit list for K. Warren's review.	0.90	387.00
10/30/25	Joseph Kipp	Revise Motion to Compel to reflect most recent factual developments regarding LKC discovery.	0.30	129.00
10/30/25	Joseph Kipp	Research Fifth Circuit caselaw discussing burden of party moving for 30(b)(6) deposition	0.20	86.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		to describe topics with reasonable particularity.		
10/30/25	Joseph Kipp	Research federal caselaw admitting as FRE 803(6) business records reports.	1.80	774.00
10/30/25	Lydia Parks	Review and revise the motion to compel regarding LKC.	1.90	817.00
10/30/25	Paige Lohse	Preparations for hearing on LKC dispute (4.7); call with t. Schmeltz regarding hearing and next steps (.2); prepare for and attend hearing (2.2); LKC discovery and document responses (.6); LKC conferrals (.3); analyze and send correspondence and filings regarding recent developments (3.2); filings and exhibit exchanges (2.1).	13.30	8,512.00
10/30/25	Anita Peterson	Finalize Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 with Exhibits A - C (.6); communications with Quinn Emanuel to coordinate filing of Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 with Exhibits A – C, Ledes statement (.2); communications with investigative team regarding meet and confer with Transcend regarding Rule 30(b)(6) topics, fee objection (.3); review communications with LKC regarding hearing exhibit designations, updated deposition designations and assist attorneys in executing strategy per request of T. Schmeltz (.3); review communications with LKC, Porter Hedges regarding supplemental production and assist attorneys in executing strategy per request of P. Lohse (.2); review communications with Akin regarding supplemental productions and assist attorneys in executing strategy per request of P. Lohse (.2); review communications with LKC, Porter Hedges regarding discovery clawback assist attorneys in executing strategy per request of P. Lohse (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.5); assist attorneys in executing strategy per request of P.	4.50	1,665.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Lohse focusing on preparation for 2025-11-03 hearing including logistics (2.0).		
10/30/25	Anita Peterson	Review communications with P. Tomasco, C. Potter, R. Mates, Akin, UCC parties regarding coordinating meet and confer on Rule 30(b)(6) topics and assist attorneys in executing strategy per request of K. Matsoukas (.3); review incoming 2025-10-30 (Dkt 1895) LKC's Witness and Exhibit List for Hearing on November 3, 2025 and assist attorneys in executing strategy per request of P. Lohse (.3); review communications with LKC regarding coordinating deposition of J. Nardini (.1); review communications with LKC regarding 30(b)(6) deposition transcripts (.2); preparation for 2025-11-03 hearing per request of P. Lohse (.6); review communication with LKC, Porter Hedges regarding conferral relating to topic 2 for Rule 3(b)(6) deposition notice and assist attorneys in executing strategy per request of P. Lohse (.2); review as-filed 2025-10-30 (Dkt 1894) Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 (.2); emails with fee notice parties regarding 2025-10-30 (Dkt 1894) B&T's Thirteenth Monthly Fee Statement with Exhibits A-C (.2); review communication with United States Trustee regarding 2025-10-30 (Dkt 1894) B&T's Thirteenth Monthly Fee Statement with Exhibits A-C and Ledes data (.2); precise tracking and timely updates of deadlines and filings (.2); review communications with investigative team regarding emergency hearing and assist attorneys in executing strategy per request of P. Lohse (.3); review multiple communications with LKC, Porter Hedges regarding coordinating deposition of BDO representative, report (.3); review communications with LKC, Porter Hedges regarding B. Riley representative will no longer be called (.1); review communications with LKC, Porter Hedges regarding Special Committee's Exhibit List (.2); review communications with LKC, Porter Hedges	4.00	1,480.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding additional clawback (.2); review communications with Akin regarding additional clawback (.2); review communications with Quinn Emanuel regarding clawback (.2).		
10/30/25	Leah O'Farrell	Review and edit draft motion to compel.	1.20	708.00
10/30/25	Leah O'Farrell	Communication regarding motion to compel with M. Whitner (.1); draft notice of withdrawal of claims of misconduct against LKC (.4).	0.50	295.00
10/30/25	Leah O'Farrell	Communications with LKC Dispute team regarding witness and exhibit list (.2); edit witness list and incorporate reservations of rights into witness and exhibit list (.6).	0.80	472.00
10/30/25	Leah O'Farrell	Finalize witness and exhibit list and coordinate filing of same.	0.30	177.00
10/30/25	Leah O'Farrell	Begin draft of supplemental exhibit list (.2); calendar deadline for supplemental list (.1).	0.30	177.00
10/30/25	Leah O'Farrell	Review procedures on exhibits and email with P. Lohse regarding same (0.1); communication with K. Warren regarding sealing exhibits and exhibit list and draft email to LKC dispute team regarding suggestion to raise issue at the hearing on the motion to dismiss (.4).	0.50	295.00
10/30/25	Leah O'Farrell	Revise argument outline for emergency hearings to include logistics on exhibits.	0.20	118.00
10/30/25	Leah O'Farrell	Communications with P. Lohse regarding motion to compel and 4pm emergency hearings.	0.30	177.00
10/30/25	Leah O'Farrell	Revise motion to compel, draft T. Schmeltz declaration in support.	2.90	1,711.00
10/30/25	Leah O'Farrell	Attention to discussions regarding reply from LKC (.2); review rules on reply (.3); commence research on motion to strike reply and need to review LKC exhibits and deposition transcripts (1.2).	1.70	1,003.00
10/30/25	Aaron Gavant	Communications with BT team regarding matter status and next steps.	0.50	402.50
10/30/25	Thomas G. Haskins	Preparation for hearing (.4); attendance at hearing (2.2); communication with T. Schmeltz and team regarding same (.2).	2.80	2,226.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/30/25	Kevin Warren	Review compiled trial exhibits, with related supplementing of certain attachments, to prepare for service to LKC to prepare for hearing on fee application.	3.90	1,677.00
10/30/25	Kevin Warren	Communications regarding approach to finalizing initial exhibit list with P. Lohse and team.	0.80	344.00
10/30/25	Kevin Warren	Communications with J. Kipp to coordinate final review of trial exhibits related to J. Cohn to assist P. Lohse in finalizing exhibit list to prepare for hearing on LKC fee application.	0.40	172.00
10/30/25	Kevin Warren	Conduct final review of potential documents for trial exhibits to prepare to file initial exhibit list to assist P. Lohse to prepare for LKC hearing.	1.20	516.00
10/30/25	Kevin Warren	Serve LKC trial exhibits to prepare for hearing on fee dispute.	0.50	215.00
10/30/25	Trace (Vincent P.) Schmeltz	Email exchange regarding LKC discovery (.8); prepare for remand hearing (2.1); attend remand hearing and discuss resolution of same (1.3); hearing preparation call with BDO (1.3); review expert report (1.2); call with P. Lohse regarding hearing and next steps (.6); call with C. Topping (.3); call with N. He regarding expert (.3).	7.90	7,900.00
10/30/25	Charlotte Underwood	Confer with client regarding valuation (.5); analyze transcripts, coordinate on motions and otherwise prepare for LKC and Transcend hearings (2.5); communications with T. Schmeltz regarding outstanding issues (.4).	3.40	3,230.00
10/30/25	Haley Casper	Coordinate and strategize regarding preparation of exhibit materials for hearing with focus on C. Wheeler and K. Hays supporting materials.	2.60	1,365.00
10/30/25	Haley Casper	Evaluate and supplement Motion to Compel LKC's discovery and simultaneously review document productions in furtherance of same.	0.90	472.50
10/30/25	Kenneth Kansa	Emails to K. Matsoukas on 30(b)(6) topics for confirmation (.2); call with Quinn Emanuel and Province teams on deposition topics, confirmation brief, and related issues (.5); email to C. Underwood on substantial contribution claim analysis (.1); email D. Eaton and C.	1.10	1,177.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Underwood on deposition preparation (.1); email to T. Schmeltz and BT team on deposition topics conferral (.2).		
10/30/25	Kathleen L. Matsoukas	Review LKC reply brief and related exhibits and declaration (1.8); communicate with other outside counsel regarding meet and confer on Transcend's 30(b)(6) topics (.3); work on expert/30(b)(6) witness report and testimony (2.7); multiple communications with N. He regarding expert report (.9); communicate with counsel for LKC regarding expert report (.2); participate in discussions with N. He and expert M. Rosten (1.0).	6.90	5,382.00
10/30/25	Kathleen A. Murphy	Hearing preparation including compiling, organizing, formatting and labeling trial exhibits (10.5); coordinate with Litigation Support Department regarding document to be labeled for production (.1); coordinate regarding hearing logistics (.3).	10.90	3,433.50
10/30/25	Eric Beard	Assist case team with creation of Trial Exhibit stamps and update final versions on shared Box folder.	1.50	420.00
10/30/25	Eric Beard	Assist case team with additional LKC productions.	3.00	840.00
10/30/25	Janelle Peters	Upload document (.1); create searches for case team (.2); run production for case team (.2).	0.50	132.50
10/30/25	Ning He	Confer with M. Rosen (BDO) and K. Matsoukas regarding expert report (1.0); confer with BDO, K. Hays, and C. Topping regarding damage analysis (1.0); analyze documents regarding damage analysis (4.2); call with T. Schmeltz regarding expert (.3); analyze documents regarding trial arguments (5.2); revise prep materials for trial witnesses (2.6).	14.30	11,011.00
10/31/25	Joseph Kipp	Revise memo describing applicability of FRE 803(6) business records exception to report prepared by outside consultant.	0.30	129.00
10/31/25	Joseph Kipp	Confer with T. Schmeltz and LKC hearing team to discuss strategy and logistics.	2.00	860.00
10/31/25	Joseph Kipp	Communication with P. Lohse regarding Federal Rules of Evidence research memo.	0.30	129.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/31/25	Joseph Kipp	Research Fifth Circuit caselaw discussing the admissibility of settlement negotiations under FRE 408 and produce succinct memo summarizing findings.	1.30	559.00
10/31/25	Joseph Kipp	Communication with L. Parks regarding Fifth Circuit contract damages research.	0.10	43.00
10/31/25	Charlotte Underwood	Strategy and preparation call with trial team (2.0); call with D. Eaton and K. Kansa regarding deposition preparation (1.0); related follow up (.1).	3.10	2,945.00
10/31/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-11-03 hearing including logistics (2.1); review communications with LKC, Porter Hedges regarding coordinating deposition of expert M. Rosten (BDO representative) (.1); review communication from LKC forwarding as-filed 2025-10-30 (Dkt 1896) SEALED LKC's Witness and Exhibit List for Hearing on November 3, 2025, 2025-10-30 (Dkt 1901) SEALED LKC's Reply in Support of its Final Fee Application, 2025-10-30 (Dkt 1902) SEALED Declaration of Jon Cohn in Support of LKC's Reply in Support of its Final Fee Application and assist attorneys in executing strategy per request of P. Lohse (.4): review Special Committee's as-filed 2025-10-30 (Dkt 1897) Witness and Exhibit List for November 3, 2025 Hearing and assist attorneys in executing strategy per request of P. Lohse (.2); review incoming transcripts and exhibits from 2025-10-28 deposition of Jonathan Cohn and assist attorneys in executing strategy per request of T. Schmeltz (.4); review communications with Quinn Emanuel regarding meet and confer on Rule 30(b)(6) topics (.1); review communications with Quinn Emanuel regarding 2025-10-30 additional discovery clawback (.1); review communication with LKC, Porter Hedges regarding same (.1); review communication with Akin regarding same (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft	6.10	2,257.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Teams platforms for attorney use (.5); conference with BT team (T. Schmeltz, K. Matsoukas, P. Lohse, N. He, H. Hinton, K. Warren, J. Kipp, C. Underwood) regarding preparation for 2025-11-03 hearing including declarations, exhibits (2.0).		
10/31/25	Anita Peterson	Download incoming transcripts and exhibits for 2025-10-29 30(b)(6) deposition of D. Eaton and assist attorneys in executing strategy per request of T. Schmeltz (.4); download incoming transcripts and exhibits for 2025-10-29 30(b)(6) deposition of C. Topping and assist attorneys in executing strategy per request of T. Schmeltz (.4); download incoming transcripts and exhibits for 2025-10-29 30(b)(6) deposition of C. Wheeler and assist attorneys in executing strategy per request of T. Schmeltz (.4); communications with C. Topping regarding recent 2025-10-29 deposition transcripts and exhibits, errata sheet (.3); review communications with C. Topping regarding deposition transcripts, hearing preparation (.3); communications with D. Eaton forwarding 2025-10-29 deposition transcripts and exhibits (.2); communications with C. Wheeler forwarding 2025-10-29 deposition transcripts and exhibits (.2); communications with T. Schmeltz regarding same (.2); assist attorneys in executing strategy relating to depositions per request of T. Schmeltz (.3); communications with C. Underwood regarding same (.2); review communications with LKC regarding hearing exhibits (.2); communications with investigative team regarding same (.2); review communications with LKC regarding deposition of M. Rosten (BDO) (.2); review communications with Chase Blackmon confirming attendance at 2025-11-03 hearing (.2); review communications with Porter Hedges regarding same (.2); review communications with Akin forwarding 2025-10-30 (Dkt 1896) SEALED LKC's Witness and Exhibit List for Hearing on November 3, 2025 under Common Interest (.1); review communications with Porter	5.90	2,183.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Hedges and Akin regarding clawback request (.2); communications with investigative team regarding same (.1); review communications with Porter Hedges regarding hearing exhibits (.1); review communications with LKC, Porter Hedges regarding Special Committee's clawback request (.2); review communications with LKC, Porter regarding Special Committee's trial exhibits (served via BOX link) (.2); assist attorneys in executing strategy regarding same per request of P. Lohse (.6); review as-filed 2025-10-31 (Dkt 1911) Supplemental Exhibit List for November 3, 2025 Hearing and assist attorneys in executing strategy per request of P. Lohse (.2); communications with Porter Hedges, LKC regarding same (3).		
10/31/25	Charlotte Underwood	Conduct legal research in connection with deponent testimony (.2); review and make notes regarding Transcend discovery requests (.2).	0.40	380.00
10/31/25	Charlotte Underwood	Review draft interview outline.	0.30	285.00
10/31/25	Anita Peterson	Continue to assist attorneys in executing strategy per request of P. Lohse focusing on after-hours preparation for 2025-11-03 hearing including logistics (.7); review communications with Akin regarding Special Committee's clawback request (.2); review incoming rough draft transcript from 2025-10-31 deposition of M. Rosten (BDO) and assist attorneys in executing strategy per request of K. Matsoukas (.2); review communications with expert M. Rosten regarding challenges and assist attorneys in executing strategy per request of N. He (.2); review communication from C. Potter regarding the Transcend Group's First Request for Production to Debtors and assist attorneys in executing strategy per request of P. Lohse (.2); review communication from C. Potter forwarding The Transcend Group's First Request for Production to the Special Committee and assist attorneys in executing strategy per request of P. Lohse (.2).	1.70	629.00
10/31/25	Kevin Warren	Hearing preparation meeting to strategize	2.20	946.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		approach to KLC dispute with T. Schmeltz and team (2.0); follow up regarding same (.2).		
10/31/25	Kevin Warren	Produce supplemental production to LKC to prepare for fee application hearing.	2.70	1,161.00
10/31/25	Kevin Warren	Finalize trial exhibit list, with additions and supplements, including coordination with K. Murphy, L. O'Farrell, H. Casper, and Clerk.	4.40	1,892.00
10/31/25	Lydia Parks	Research and summarize the ability to sequester witnesses during the LKC trial and limit the role of an attorney-witness (2.4); review and discuss additional research from J. Kipp (.2); draft a motion to seal exhibits and supplemented exhibit and witness list for the LKC trial (1.5).	4.10	1,763.00
10/31/25	Kathleen L. Matsoukas	Participate in team trial preparation meeting (2.0); participate in preparation session for deposition of M. Rosten (3.0); defend deposition of M. Rosten (4.7).	9.70	7,566.00
10/31/25	Leah O'Farrell	Attention to message from K. Warren regarding clawing back exhibits.	0.10	59.00
10/31/25	Leah O'Farrell	Attend trial prep meeting with LKC dispute team.	2.00	1,180.00
10/31/25	Leah O'Farrell	Prepare summary of reply and pull research regarding burden of proof at hearing.	1.10	649.00
10/31/25	Leah O'Farrell	Coordinate with L. Parks to draft motion to seal exhibits.	0.20	118.00
10/31/25	Leah O'Farrell	Review exhibits designated by LKC to determine if all produced (.4); email to BT team regarding same (.2).	0.60	354.00
10/31/25	Leah O'Farrell	Draft motion to seal, notice of exhibits and supplemental exhibit list (.4); communication with K. Warren and K. Murphy regarding same (.2); email to Clerk with filing and instructions (.2).	0.80	472.00
10/31/25	Leah O'Farrell	Finalize declaration of T. Schmeltz and revise motion based on reply and exhibit list.	1.20	708.00
10/31/25	Leah O'Farrell	Research regarding 9014 and expert disclosures and challenge to expert.	0.90	531.00
10/31/25	Aaron Gavant	Review various draft filings, and related items	0.70	563.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.4); multiple communications with BT team regarding approach to same (.3).		
10/31/25	Haley Casper	Analyze documents and coordinate internally regarding preparation of trial exhibits for hearing (.7); attend internal strategy meeting regarding preparation for LKC dispute hearing (2.0); participate in portion of call with BDO expert in furtherance of report (.3); continue preparation of trial exhibits and coordinate regarding strategy for hearing (4.3).	7.30	3,832.50
10/31/25	Kenneth Kansa	Participate in deposition preparation session with D. Eaton and C. Underwood (1.0); conference with A. Wissel on confirmation research (.2); email to C. Underwood on meet and confer with C. Potter on fee objection (.1); email to N. He on same (.1); review Transcend Group RFPs (.2).	1.60	1,712.00
10/31/25	Ning He	Prepare M. Rosten for deposition (3.0); confer with team regarding trial prep (2.0); confer with C. Topping, K. Hays, C. Wheeler, and M. Rosten regarding background (1.0); attend M. Rosten deposition (4.7); research and analyze issues regarding admissibility of expert deposition (.8).	11.50	8,855.00
10/31/25	Paige Lohse	Preparations for hearing on LKC dispute.	3.70	2,368.00
10/31/25	Abigail Wissel	Conference with K. Kansa to discuss legal research regarding on liquidation analysis (.2); follow up regarding same (.3).	0.50	187.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/31/25	Kathleen A. Murphy	Hearing preparation including assist with locating, formatting and updating hearing exhibits and Supplemental Trial Exhibit List (4.8); coordinate filing hearing exhibits with court and formatting pleadings (1.0); coordinate with vendor regarding printing of hearing exhibits for court (1.1); coordinate hearing logistics per request of P. Lohse (.9); prepare email correspondence to P. Lohse and A. Peterson summarizing hearing (.2).	8.00	2,520.00
Fees for Services				\$ 1,240,444.00

	Hours	Rate	Amount
Charlotte Underwood	93.70	\$950.00	\$89,015.00
Randal J. Kaltenmark	0.80	\$915.00	\$732.00
Carrie M. Raver	5.50	\$845.00	\$4,647.50
Aaron Gavant	9.00	\$805.00	\$7,245.00
Thomas G. Haskins	3.80	\$795.00	\$3,021.00
Kathleen L. Matsoukas	114.50	\$780.00	\$89,310.00
Ning He	143.00	\$770.00	\$110,110.00
Paige Lohse	281.50	\$640.00	\$180,160.00
Scott Pelosa	14.30	\$640.00	\$9,152.00
Leah O'Farrell	73.00	\$590.00	\$43,070.00
Addison Smith	28.00	\$590.00	\$16,520.00
Mariah A. Whitner	19.50	\$590.00	\$11,505.00
Haley Casper	208.80	\$525.00	\$109,620.00
Megha Mathur	38.10	\$480.00	\$18,288.00
Charity Seaborn	31.40	\$480.00	\$15,072.00
Anna Brinski	16.20	\$450.00	\$7,290.00
Melissa Bonnici	33.70	\$430.00	\$14,491.00
Joseph Kipp	100.00	\$430.00	\$43,000.00
Kathleen Mangan	13.40	\$430.00	\$5,762.00
Lydia Parks	23.80	\$430.00	\$10,234.00
Kevin Warren	186.60	\$430.00	\$80,238.00

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FIDUCIARY DUTY INVESTIGATION

	Hours	Rate	Amount
Glenn R. de Roziere	8.40	\$385.00	\$3,234.00
Joseph Tate	6.10	\$380.00	\$2,318.00
Abigail Wissel	13.20	\$375.00	\$4,950.00
Anita Peterson	141.30	\$370.00	\$52,281.00
Kathleen A. Murphy	36.80	\$315.00	\$11,592.00
Elisabeth Carpenter	5.00	\$300.00	\$1,500.00
Eric Beard	4.80	\$280.00	\$1,344.00
Janelle Peters	19.10	\$265.00	\$5,061.50
Kenneth Kansa	128.30	\$1,070.00	\$137,281.00
Trace (Vincent P.) Schmeltz	152.40	\$1,000.00	\$152,400.00
TOTALS	1,954.00		\$1,240,444.00

0

Other Charges:

09/30/25	168-Pacer Court Filing System Charges 09/01/2025 - 09/30/2025	7.80
09/30/25	168-Pacer Court Filing System Charges 09/01/2025 - 09/30/2025	4.70
09/30/25	168-Pacer Court Filing System Charges 09/01/2025 - 09/30/2025	3.30
10/01/25	Westlaw - Computerized Legal Research	1,619.71
10/01/25	E-Filing Court Documents - E-Filing documents with Court 10-01-2025	50.00
10/01/25	E-Filing Court Documents - E-Filing documents with Court 10-01-2025	50.00
10/03/25	American Express - American Express - SCHMELTZ III/VINCENT PAUL - Hotel - "JW MARRIOTT HOUSTON DOWNTOWN, HOUSTON, TX" - INV137970	462.14
10/03/25	E-Filing Court Documents - E-Filing documents with Court 10-03-2025	100.00
10/06/25	Westlaw - Computerized Legal Research	2,327.00
10/07/25	Westlaw - Computerized Legal Research	404.93
10/07/25	E-Filing Court Documents - E-Filing documents	50.00

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with Court 10-07-2025

10/08/25	Westlaw - Computerized Legal Research	674.88
10/09/25	Copying Charges	34.80
10/10/25	Westlaw - Computerized Legal Research	6,883.78
10/10/25	E-Filing Court Documents - E-Filing documents with Court 10-10-2025	100.00
10/11/25	Westlaw - Computerized Legal Research	2,159.62
10/13/25	E-Filing Court Documents - E-Filing documents with Court 10-13-2025	50.00
10/13/25	E-Filing Court Documents - E-Filing documents with Court 10-13-2025	50.00
10/13/25	E-Filing Court Documents - E-Filing documents with Court 10-13-2025	100.00
10/14/25	American Express - Airfare American Express - SCHMELTZ III/VINCENT PAUL - IAH ORD - 10/16/2025 - 10/16/2025 - INV141145	474.34
10/15/25	Westlaw - Computerized Legal Research	3,779.33
10/16/25	Westlaw - Computerized Legal Research	8,464.86
10/16/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/13/2025 Filing fees for filing pro hac vice. - 10/13/2025	100.00
10/16/25	E-Filing Court Documents - E-Filing documents with Court 10-16-2025	50.00
10/17/25	E-Filing Court Documents - E-Filing documents with Court 10-17-2025	50.00
10/19/25	E-Filing Court Documents - E-Filing documents with Court 10-19-2025	100.00
10/20/25	American Express - American Express - WARREN/KEVIN - ORD DFW ORD - 10/20/2025 - 10/22/2025 - INV142623	705.97
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	6.25

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10/20/25	TransUnion-searches in investigative database	24.50
10/20/25	TransUnion-searches in investigative database	5.00
10/20/25	TransUnion-searches in investigative database	5.00
10/20/25	TransUnion-searches in investigative database	24.50
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	5.00
10/21/25	American Express - Airfare American Express - PETERSON/ANITA - ORD DFW ORD - 10/20/2025 - 10/24/2025 - INV142741	867.55
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	6.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	6.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	5.00
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	24.50
10/21/25	TransUnion-searches in investigative database	6.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	5.00
10/22/25	Westlaw - Computerized Legal Research	6,305.24
10/22/25	Color Copies - Resource center	24.00
10/22/25	E-Filing Court Documents - E-Filing documents with Court 10-22-2025	50.00
10/22/25	E-Filing Court Documents - E-Filing documents with Court 10-22-2025	50.00
10/23/25	Westlaw - Computerized Legal Research	4,049.28

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FIDUCIARY DUTY INVESTIGATION

10/23/25	American Express - Airfare American Express - PETERSON/ANITA - DAL MDW - 10/23/2025 - 10/23/2025 - INV143453	605.48
10/23/25	E-Filing Court Documents - E-Filing documents with Court 10-23-2025	50.00
10/24/25	Jamie Stapleton - Mastercard - EAST HAMPTON CRESCENT : Lunch Order for Chase Blackmon Deposition Prep - 10/21/2025	45.40
10/24/25	E-Filing Court Documents - E-Filing documents with Court 10-24-2025	100.00
10/24/25	E-Filing Court Documents - E-Filing documents with Court 10-24-2025	50.00
10/24/25	E-Filing Court Documents - E-Filing documents with Court 10-24-2025	50.00
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	24.50
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/25/25	American Express - Airfare American Express - PETERSON/ANITA - DFW ORD - 10/23/2025 - 10/23/2025 - INV143360	-833.27
10/25/25	American Express - American Express - PETERSON/ANITA - DFW ORD - 10/23/2025 - 10/23/2025 - INV143360	399.50
10/25/25	TransUnion-searches in investigative database	5.00
10/25/25	TransUnion-searches in investigative database	5.00
10/25/25	TransUnion-searches in investigative database	6.25
10/26/25	American Express - Airfare American Express - PETERSON/ANITA - DAL MDW - 10/23/2025 - 10/23/2025 - INVC143701	-100.00
10/27/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/22/2025 Filing fees for filing pro hac vice. -	100.00

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FIDUCIARY DUTY INVESTIGATION

10/22/2025

10/27/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/22/2025 Filing fees for filing pro hac vice. - 10/22/2025	100.00
10/27/25	American Express - Airfare American Express - WARREN/KEVIN - ORD IAD - 10/27/2025 - 10/27/2025 - INV144311	352.94
10/27/25	E-Filing Court Documents - E-Filing documents with Court 10-27-2025	100.00
10/27/25	E-Filing Court Documents - E-Filing documents with Court 10-27-2025	100.00
10/27/25	E-Filing Court Documents - E-Filing documents with Court 10-27-2025	50.00
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Hotel to office - 10/21/2025	17.30
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Office to hotel - 10/21/2025	18.40
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - TRAVEL TO DALLAS AT REQUEST OF TRACE SCHMELTZ FOR RHODIUM DEPOSITIONS Home to Airport - 10/20/2025	80.70
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Hotel to office - 10/22/2025	30.38
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Airport to hotel - 10/20/2025	145.48
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Airport to home - 10/23/2025	62.96
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Hotel to office - 10/23/2025	38.00
10/28/25	Jamie Stapleton - Mastercard - 10/23/2025: Tiff's Treats for Chase Blackmon Deposition	110.39
10/28/25	Jamie Stapleton - Mastercard - MENDOCINOFARMS - 10/22/2025: Lunch for Chase Blackmon Deposition	169.53
10/28/25	Deposition Solutions LLC dba Lexitas - Deposition Solutions LLC dba Lexitas - Certified copy of transcript of Kevin Hays Inv Number:	3,516.29

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FIDUCIARY DUTY INVESTIGATION

1002801725752 10/27/2025

10/28/25	American Express - American Express - WARREN/KEVIN - DCA AUS - 10/28/2025 - 10/28/2025 - INV144441	919.48
10/28/25	Kevin Warren - Kevin Warren - Lodging - Hotel stay to prepare for and help defend a witness for deposition. - 10/20/2025 - 10/23/2025	1,381.22
10/28/25	E-Filing Court Documents - E-Filing documents with Court 10-28-2025	100.00
10/29/25	Westlaw - Computerized Legal Research	6,710.17
10/29/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/24/2025 Filing fees for filing pro hac vice. - 10/24/2025	100.00
10/29/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/23/2025 Filing fees for filing pro hac vice for Kevin Warren. - 10/23/2025	100.00
10/29/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/23/2025 Filing fees for filing pro hac vice for Leah O'Farrel. - 10/23/2025	100.00
10/29/25	E-Filing Court Documents - E-Filing documents with Court 10-29-2025	100.00
10/29/25	E-Filing Court Documents - E-Filing documents with Court 10-29-2025	50.00
10/30/25	Westlaw - Computerized Legal Research	3,972.02
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride - Return from Dinner at LAS PALMAS, 2708 Routh St. Dallas, TX to 650 North Pearl St., Dallas, TX - 10/22/2025	18.65
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from Dallas Love Field Airport (DAL) Dallas, TX to 2100 McKinney Ave., Dallas, TX - 10/21/2025	37.64

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FIDUCIARY DUTY INVESTIGATION

10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride - TO Dinner at LAS PALMAS, 2708 Routh St. Dallas, TX FROM 650 North Pearl St., Dallas, TX - 10/21/2025	17.51
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from 2121 N Pearl St., Dallas, TX to 650 N. Pearl St., Dallas, TX - 10/23/2025	17.68
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from Midway Airport (MDW) Chicago, IL to 926 Maple Ave., Downers Grove, IL - 10/23/2025	84.48
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from 2121 North Pearl Street, Dallas, TX to 8008 Herb Kelleher Way Dallas, TX - 10/23/2025	55.45
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from 650 N Pearl St., Dallas, TX to 2100 McKinney Ave, Dallas, TX - 10/23/2025	29.22
10/30/25	Trace (Vincent P.) Schmeltz III - Breakfast - Preparation Session Breakfast with Witness at BEATRIX Loop, 155 N. Upper Wacker Dr., Chicago, IL - K. Hays,T. (Vincent P.) Schmeltz - 10/24/2025	56.18
10/30/25	Deposition Solutions LLC dba Lexitas - Deposition Solutions LLC dba Lexitas - Certified copy transcript of Chase Blackmon - Confidential Inv Number: 1002801725990 10/27/2025	4,508.89
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Texas for Rhodium Preparation Session Flight from Dallas, TX (DAL) airport to MDW Chicago, airport - Flight	493.48

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FIDUCIARY DUTY INVESTIGATION

Date - 10/23/2025 - From Dallas, TX to Chicago,
IL - Transaction Date - 10/22/2025

10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Texas for Rhodium Preparation Session Flight from Washington D. C. (Reagan) airport to DAL, Dallas (love) airport - Flight Date - 10/21/2025 - Dallas, Texas - Transaction Date - 10/20/2025	425.48
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - T. Schmeltz Lodging - Trip to Texas for Rhodium Preparation Session Dallas Marriott Downtown,650 North Pearl Street, Dallas, TX - 10/21/2025 - 10/23/2025	1,314.14
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - A. Peterson Lodging - Trip to Texas for Rhodium Preparation Session Dallas Marriott Downtown,650 North Pearl Street, Dallas, TX - 10/21/2025 - 10/23/2025	1,314.14
10/30/25	E-Filing Court Documents - E-Filing documents with Court 10-30-2025	100.00
10/31/25	Westlaw - Computerized Legal Research	1,349.76
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Parking - Parking at DFW (1/3) - split 3 ways. Tommy had a recruiting trip, this BK hearing and another site visit for separate client in Houston - 10/30/2025	51.70
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Taxi/Car Service - Uber to hotel downtown - Travel: Houston TX / BK Hearing - 10/29/2025	63.37
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Taxi/Car Service - Uber from hotel to Houston airport - Travel: Houston TX / BK Hearing - 10/30/2025	164.80
10/31/25	Linda Padron - Linda Padron - Lunch - Mastercard - SPO WESTWINGCAFE - 10/28/2025 - Lunch for deposition in the Rhodium matter - Jon Cohn,Thomas Dissher,Erick Thacker,Trace (Vincent P.) Schmeltz,Kevin Warren - 10/28/2025	103.01
10/31/25	Emily Roberts - Mastercard - HANNAH'S	240.28

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FIDUCIARY DUTY INVESTIGATION

BRETZEL Lunch provided for K. Hays
Deposition - 10/24/2025

10/31/25	FedEx PS Ship - Fedex - Inv#905833645 - to Paige Lohse (Guest), The Lancaster Hotel, HOUSTON, TX, US from Kathleen Murphy	134.31
10/31/25	FedEx PS Ship - Fedex - Inv#905833645 - to Paige Lohse (Guest), The Lancaster Hotel, HOUSTON, TX, US from Kathleen Murphy	155.35
10/31/25	FedEx PS Ship - Fedex - Inv#905833645 - to Paige Lohse (Guest), The Lancaster Hotel, HOUSTON, TX, US from Kathleen Murphy	127.98
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Return flight - Travel: Houston TX / BK Hearing - Flight Date - 10/30/2025 - Dallas TX - Transaction Date - 10/29/2025	407.48
10/31/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Dallas, Texas - Client meeting Trip from Dallas, TX, airport (DFW) to Chicago, airport (ORD) - Flight Date - 10/24/2025 - Chicago Airport ORD - Transaction Date - 10/20/2025	2,320.89
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Lodging - Hotel / Houston TX - Travel: Houston TX / BK Hearing - 10/29/2025 - 10/30/2025	384.93
10/31/25	Court Reporters Clearinghouse Inc - Court Reporters Clearinghouse Inc - Deposition copy - Charles Topping Inv Number: 210015 10/31/2025	729.81
10/31/25	Everlaw Inc - Professional Services; Active Review - eDiscovery Hosting Services Subscription Fees 10-31-2025	2,520.00
10/31/25	Everlaw Inc - Professional Services; Early Case Assessment - eDiscovery Hosting Services Subscription Fees 10-31-2025	1,432.00
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	100.00
10/31/25	E-Filing Court Documents - E-Filing documents	100.00

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FIDUCIARY DUTY INVESTIGATION

with Court 10-31-2025

10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	100.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	100.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	750.00	
			\$ 79,453.46

BARNES & THORNBURG LLP

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Chicago, Illinois 60606 U.S.A.
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(312) 357-1313

SPECIAL COMMITTEE OF THE BOARD OF
DIRECTORS OF RHODIUM
DAVID EATON
251 LITTLE FALLS DRIVE
WILMINGTON, DE 19808
DAVIDEATON@RHDM.COM

Invoice 3499556

November 19, 2025
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	1,240,444.00
Other Charges	\$	79,453.46
Total This Invoice	\$	1,319,897.46

To remit payments by check, please return this page with remittance to:

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