

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

In re:  TEHUM CARE SERVICES, INC., <sup>1</sup>  Debtor.	Chapter 11  Case No. 23-90086 (CML)
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**FOURTH MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE  
OF TORT CLAIMANTS FOR THE PERIOD FROM  
MARCH 1, 2024 THROUGH MARCH 31, 2024**

**In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.**

Name of Professional:	Brown Rudnick LLP
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 22, 2023 [ECF No. 1294]
Time Period Covered:	March 1, 2024 – March 31, 2024
Total Fees Sought:	\$813,533.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$805,943.50
Total professional hours covered by this statement:	679.80
Average hourly rate for professionals:	\$1,185.56

<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



Total paraprofessional fees covered by this statement:	\$7,589.50
Total paraprofessional hours covered by this statement:	15.20
Average hourly rate for paraprofessionals:	\$499.31
Reimbursable expenses sought in this statement:	\$50,776.66
Payment requested:	
80% Fees	\$650,826.40
100% Expenses	\$50,776.66
Total:	\$701,603.06

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Tort Claimants as of November 22, 2023 [ECF No. 1294], the law firm of Brown Rudnick LLP (“Brown Rudnick”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Fourth Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from March 1, 2024 to March 31, 2024 (the “Fourth Monthly Fee Statement”). By the Fourth Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$650,826.40 (80% of \$813,533.00) as compensation for professional services rendered to the Committee and (ii) \$50,776.66 for reimbursement of actual and necessary expenses, for a total of \$701,603.06 for

the period March 1, 2024 through and including March 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Fourth Monthly Fee Statement to object to the requested fees and expenses.

**Itemization of Services Rendered and Expenses Incurred**

1. In support of this Fourth Monthly Fee Statement, attached are the following exhibits:

**Exhibit A** is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Brown Rudnick partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Brown Rudnick established in accordance with its internal billing procedures. As reflected in Exhibit A, Brown Rudnick incurred \$813,533.00 in fees during the Fee Period. Pursuant to this Fourth Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$650,826.40 or 80% of such fees

**Exhibit B** is a schedule providing certain information regarding the Brown Rudnick attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Fourth Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 695.00 hours in connection with this chapter 11 case during the Fee Period.

**Exhibit C** is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Fourth Monthly Fee Statement. This Fourth Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$50,776.66.

**Exhibit D** consists of Brown Rudnick’s detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

**Representations**

2. Although Brown Rudnick has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Fourth Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Brown Rudnick reserves the right to seek payment

of such fees and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Brown Rudnick respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$701,603.06, consisting of (i) \$650,826.40, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$50,776.66, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: April 23, 2024  
New York, NY

Respectfully submitted,

**BROWN RUDNICK LLP**

/s/ Eric R. Goodman

David J. Molton (*pro hac vice*)

Eric R. Goodman (*pro hac vice*)

Gerard T. Cicero (*pro hac vice*)

Seven Times Square

New York, NY 10036

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

Email: [dmolton@brownrudnick.com](mailto:dmolton@brownrudnick.com)

[egoodman@brownrudnick.com](mailto:egoodman@brownrudnick.com)

[gcicero@brownrudnick.com](mailto:gcicero@brownrudnick.com)

**CERTIFICATE OF SERVICE**

I certify that on April 23, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

*/s/ Eric R. Goodman*

Eric R. Goodman

**EXHIBIT A**

**Summary of Hours Expended and Fees Incurred by Matter Category**

## FEE APPLICATION DATA

4/9/2024

CLIENT: 040178

1

Bill Date range: 4/9/2024 to 4/9/2024

MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
CASE ADMINISTRATION/DISBURSEMENTS	SIEGER-GRIMM, SUSAN	0.10	\$120.00
	BURNS, THOMAS	2.20	\$1,100.00
		<b>2.30</b>	<b>\$1,220.00</b>
MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	MOXLEY, D. CAMERON	1.60	\$2,000.00
	GOODMAN, ERIC R.	2.80	\$4,480.00
		<b>4.40</b>	<b>\$6,480.00</b>
MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	GOODMAN, ERIC R.	0.80	\$1,280.00
		<b>0.80</b>	<b>\$1,280.00</b>
FEE/EMPLOYMENT APPLICATIONS	BURNS, THOMAS	6.30	\$3,150.00
		<b>6.30</b>	<b>\$3,150.00</b>
CONTESTED MATTERS/LITIGATION (GENERAL)	CICERO, GERARD T.	37.80	\$56,700.00
	MEYERS, JESSICA N.	28.70	\$30,422.00
	MOXLEY, D. CAMERON	130.20	\$162,750.00
	MCCAFFERTY, MEGHAN	69.30	\$65,835.00
	WELLS, KELCEY C.	0.60	\$288.00
	SIEGER-GRIMM, SUSAN	7.00	\$8,400.00
	GOODMAN, ERIC R.	90.10	\$144,160.00
	VEILLEUX, BRITTANY E.	0.10	\$51.50
	CASTANO, ELIZABETH, C.	7.20	\$4,644.00
	RIZKALLA, ANDREW	0.40	\$310.00
	ALICEA, SHARIX A.	3.60	\$2,790.00
	BURNS, THOMAS	6.00	\$3,000.00
		<b>381.00</b>	<b>\$479,350.50</b>
	CICERO, GERARD T.	21.00	\$15,750.00
	MEYERS, JESSICA N.	18.50	\$9,805.00

## FEE APPLICATION DATA

4/9/2024

CLIENT: 040178

1

Bill Date range: 4/9/2024 to 4/9/2024

NON-WORKING TRAVEL @ 50%	MOXLEY, D. CAMERON	23.60	\$14,750.00
	MCCAFFERTY, MEGHAN	17.00	\$8,075.00
	GOODMAN, ERIC R.	13.80	\$11,040.00
		<b>93.90</b>	<b>\$59,420.00</b>
CLAIMS ADMINISTRATION AND OBJECTIONS	CASTANO, ELIZABETH, C.	5.50	\$3,547.50
		<b>5.50</b>	<b>\$3,547.50</b>
COURT ATTENDANCE	CICERO, GERARD T.	45.20	\$67,800.00
	MEYERS, JESSICA N.	30.00	\$31,800.00
	MOXLEY, D. CAMERON	41.80	\$52,250.00
	MCCAFFERTY, MEGHAN	41.30	\$39,235.00
	GOODMAN, ERIC R.	42.50	\$68,000.00
		<b>200.80</b>	<b>\$259,085.00</b>
		<b>695.00</b>	<b>\$813,533.00</b>



**EXHIBIT B**

**Summary of Hours Expended and Fees Incurred by Professional**

**SUMMARY OF TIME & COMPENSATION**

<b>COMPENSATION BY PROFESSIONAL</b>				
<b>Name of Professional Person</b>	<b>Position; Admission Date; Specialty</b>	<b>Hourly Billing Rate</b>	<b>Total Hours</b>	<b>Total Compensation</b>
Eric R. Goodman	Partner; Admitted to Ohio Bar in 2003; Admitted to New York Bar in 2018; Admitted to Illinois Bar in 2020; Admitted to District Court of Columbia Bar in 2021; Admitted to Massachusetts Bar in 2021; Dispute Resolution & Restructuring	\$1,600	150.00	\$228,960.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	104.00	\$140,250.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	197.20	\$231,750.00
Susan Sieger-Grimm	Counsel; Admitted to Virginia Bar in 1994; Admitted to New York Bar 1997; Dispute Resolution & Restructuring	\$1,200	7.10	\$8,520.00
Jessica N. Meyers	Partner; Admitted in Massachusetts Bar in 2015; Admitted to New York Bar in 2017; Dispute Resolution & Restructuring	\$1,060	77.20	\$72,027.00
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$950	127.60	\$113,145.00

<b>COMPENSATION BY PROFESSIONAL</b>				
<b>Name of Professional Person</b>	<b>Position; Admission Date; Specialty</b>	<b>Hourly Billing Rate</b>	<b>Total Hours</b>	<b>Total Compensation</b>
Sharix A. Alicea	Associate; Admitted to Connecticut Bar in 2020; Admitted to New York Bar in 2020; Admitted to District Court of Columbia Bar in 2023; Corporate & Capital Markets	\$775	3.60	\$2,790.00
Andrew Rizkalla	Associate; Admitted to Illinois Bar in 2021; Admitted to Tennessee Bar in 2021	\$775	.40	310.00
Elizabeth C. Castano	Associate; Admitted to New York Bar in 2024; Dispute Resolution & Restructuring	\$645	12.70	\$8,191.50
<b>TOTAL</b>			<b>679.80</b>	<b>\$805,943.50</b>
<b>PROFESSIONAL BLENDED RATE</b>		<b>\$1,185.56</b>		

<b>COMPENSATION BY PARAPROFESSIONAL</b>				
<b>Name of Professional Person</b>	<b>Position</b>	<b>Hourly Billing Rate</b>	<b>Total Hours</b>	<b>Total Compensation</b>
Brittany E. Veilleux	Litigation Technology Specialist	\$515	.10	\$51.50
Thomas Burns	Paralegal	\$500	14.50	\$7,250.00
Kelcey C. Wells	Paralegal	\$480	.60	\$288.00
<b>TOTAL</b>			<b>15.20</b>	<b>\$7,589.50</b>
<b>PARAPROFESSIONAL BLENDED RATE</b>		<b>\$499.31</b>		

**EXHIBIT C**

**Record of Expenses**

**BILLED DISBURSEMENTS**

Client: TEHUM CARE SERVICES, INC., OFFICIAL TORT (040178)

Amounts shown in USD

BILL DATE	COST DESC	BILLED AMT
4/9/2024	Copies	83.20
	Document Production	0.00
	eDiscovery Hosting	2,473.90
	Filing Fee	300.00
	Hotel	1,158.10
	Meals	969.02
	Outside Copies	7,805.72
	Pacer	79.40
	Parking and Tolls	105.00
	Taxi	1,713.29
	Transcripts	34,235.03
	Westlaw Online Transactional Searches / Docs	1,854.00
		<b>50,776.66</b>
		<b>50,776.66</b>

**EXHIBIT D**

**Detailed Record of Time Entries**



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

## INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	1,220.00	50,776.66	51,996.66
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,480.00	0.00	6,480.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	1,280.00	0.00	1,280.00
040178.0008	FEE/EMPLOYMENT APPLICATIONS	3,150.00	0.00	3,150.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	479,350.50	0.00	479,350.50
040178.0011	NON-WORKING TRAVEL @ 50%	59,420.00	0.00	59,420.00
040178.0013	CLAIMS ADMINISTRATION AND OBJECTIONS	3,547.50	0.00	3,547.50
040178.0016	COURT ATTENDANCE	259,085.00	0.00	259,085.00
	<b>Total</b>	<b>813,533.00</b>	<b>50,776.66</b>	<b>864,309.66</b>

Total Current Fees	\$813,533.00
20% Holdback Amount	(162,706.60)
80% CURRENT BALANCE DUE	\$650,826.40
Total Current Costs	\$50,776.66
<b>Total Invoice</b>	<b>\$701,603.06</b>





TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

**INVOICE**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	1,220.00	50,776.66	51,996.66
	<b>Total</b>	<b>1,220.00</b>	<b>50,776.66</b>	<b>51,996.66</b>

Total Current Fees	\$1,220.00
Total Current Costs	\$50,776.66
<b>Total Invoice</b>	<b>\$51,996.66</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
April 9, 2024

Invoice 6976463  
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RE: CASE ADMINISTRATION/DISBURSEMENTS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
03/05/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
03/07/24	BURNS	ORDER TRANSCRIPT FROM 3/5 HEARING	0.20	100.00
03/14/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
03/25/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
03/26/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1); ANALYSIS OF PERTINENT DATES AND DEADLINES (.2)	0.40	200.00
03/27/24	SIEGER-GRIMM	FOLLOW UP WITH T. BURNS RE: CALENDAR ISSUES	0.10	120.00
03/27/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES (.4); REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1);	0.60	300.00
03/29/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
<b>Total Hours and Fees</b>			<b>2.30</b>	<b>1,220.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
SUSAN SIEGER-GRIMM	0.10 hours at	1,200.00	120.00
THOMAS BURNS	2.20 hours at	500.00	1,100.00
<b>Total Fees</b>			<b>1,220.00</b>

**COST SUMMARY**

Description	Value
FILING FEE	300.00
PARKING AND TOLLS	105.00
MEALS	969.02
OUTSIDE COPIES	7,805.72
TRANSCRIPTS	34,235.03



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
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<b>Description</b>	<b>Value</b>
TAXI	1,713.29
HOTEL	1,158.10
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	1,854.00
PACER	79.40
EDISCOVERY HOSTING	2,473.90
COPIES	83.20
<b>Total Costs</b>	<b>50,776.66</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH  
COMMITTEE/CREDITORS

**I N V O I C E**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,480.00	0.00	6,480.00
<b>Total</b>		<b>6,480.00</b>	<b>0.00</b>	<b>6,480.00</b>

Total Current Fees	\$6,480.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$6,480.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
April 9, 2024

Invoice 6976463  
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RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

**TIME DETAIL**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Value</b>
03/04/24	GOODMAN	ATTEND COMMITTEE CALL REGARDING CASE STATUS	1.10	1,760.00
03/04/24	MOXLEY	PARTICIPATE IN TCC MEETING	0.50	625.00
03/12/24	GOODMAN	CONFERENCE CALL WITH THE TCC REGARDING CASE STATUS (ATTEND IN PART)	0.60	960.00
03/19/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING CASE STATUS AND HEARING PREPARATION	1.10	1,760.00
03/19/24	MOXLEY	ATTEND AND PARTICIPATE IN WEEKLY COMMITTEE MEETING REGARDING CASE STATUS AND STRATEGY	1.10	1,375.00
<b>Total Hours and Fees</b>			<b>4.40</b>	<b>6,480.00</b>

**TIME SUMMARY**

<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Value</b>
D. C. MOXLEY	1.60 hours at	1,250.00	2,000.00
ERIC R. GOODMAN	2.80 hours at	1,600.00	4,480.00
<b>Total Fees</b>			<b>6,480.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

**I N V O I C E**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	1,280.00	0.00	1,280.00
	<b>Total</b>	<b>1,280.00</b>	<b>0.00</b>	<b>1,280.00</b>

Total Current Fees	\$1,280.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$1,280.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
April 9, 2024

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RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

**TIME DETAIL**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Value</b>
03/04/24	GOODMAN	MEET AND CONFER WITH THE DEBTOR'S COUNSEL AND THE UCC'S COUNSEL REGARDING HEARING SCHEDULE	0.50	800.00
03/22/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.30	480.00
<b>Total Hours and Fees</b>			<b>0.80</b>	<b>1,280.00</b>

**TIME SUMMARY**

<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Value</b>
ERIC R. GOODMAN	0.80 hours at	1,600.00	1,280.00
<b>Total Fees</b>			<b>1,280.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0008	FEE/EMPLOYMENT APPLICATIONS	3,150.00	0.00	3,150.00
<b>Total</b>		<b>3,150.00</b>	<b>0.00</b>	<b>3,150.00</b>

Total Current Fees	\$3,150.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$3,150.00</b>





TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
 April 9, 2024

Invoice 6976463  
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RE: FEE/EMPLOYMENT APPLICATIONS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
03/06/24	BURNS	WORK ON THIRD MONTHLY FEE APPLICATION	1.20	600.00
03/07/24	BURNS	WORK ON THIRD MONTHLY FEE APPLICATION	0.70	350.00
03/08/24	BURNS	WORK ON THIRD FEE APPLICATION	2.40	1,200.00
03/11/24	BURNS	FURTHER WORK ON THIRD FEE APPLICATION	1.10	550.00
03/29/24	BURNS	WORK ON FOURTH FEE APPLICATION	0.90	450.00
<b>Total Hours and Fees</b>			<b>6.30</b>	<b>3,150.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
THOMAS BURNS	6.30 hours at	500.00	3,150.00
<b>Total Fees</b>			<b>3,150.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**INVOICE**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	479,350.50	0.00	479,350.50
	<b>Total</b>	<b>479,350.50</b>	<b>0.00</b>	<b>479,350.50</b>

Total Current Fees	\$479,350.50
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$479,350.50</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
April 9, 2024

Invoice 6976463  
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RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**TIME DETAIL**

Date	Professional	Description	Hours	Value
02/02/24	MCCAFFERTY	STRATEGIZE WITH TEAM RE 9109 OBJECTION AND DEPOSITIONS (.9); STRATEGIZE REGARDING MOTION TO QUASH AND MOTION FOR SANCTION (.5); RESEARCH AND ANALYZE CASE LAW IN SUPPORT OF MOTION TO QUASH (1.5)	2.90	2,755.00
03/01/24	SIEGER-GRIMM	REVIEW SDNY DOCKET AND FOLLOW UP RE: STATUS OF MOTION TO QUASH (.3); ONGOING HEARING ANALYSIS AND COMMUNICATION WITH TRIAL TEAM RE: SAME (4.9)	5.20	6,240.00
03/01/24	MOXLEY	PREPARE FOR D. BARTON CROSS-EXAMINATION, MOTION IN LIMINE ARGUMENT, AND TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS	16.20	20,250.00
03/01/24	BURNS	DRAFT TRANSCRIPT ORDER FORM FROM MARCH 1, 2024 HEARING (.5); FILE SAME (.3)	0.80	400.00
03/01/24	ALICEA	EXAMINE AND REVISE EXHIBIT LIST; EXAMINE DOCUMENTS TO BE FILED ON THE PUBLIC RECORDS; EXAMINE DOCUMENTS TO BE FILED UNDER SEAL.	3.60	2,790.00
03/01/24	MCCAFFERTY	PREPARE EXHIBITS FOR SUBMISSION POST-TRIAL	0.30	285.00
03/01/24	CICERO	MEET WITH TEAM RE: CONTINUED TRIAL STRATEGY	3.00	4,500.00
03/02/24	GOODMAN	REVIEW AND ANALYZE ATKINSON DEPOSITION TRANSCRIPT (5.4); DRAFT AND EDIT OUTLINE FOR ATKINSON QUESTIONS FOR HEARING (7.1).	12.50	20,000.00
03/02/24	MCCAFFERTY	PREPARE EXHIBITS FOR FILING IN PREPARATION FOR TRIAL (4.3); PREPARE QUESTIONS FOR CROSS EXAMINATION OF D. BARTON (1.5); RESEARCH IN SUPPORT OF WITNESS EXAMINATION OF D. BARTON (1.8); RESEARCH AND PREPARE QUESTIONS FOR WITNESS EXAMINATION FOR TRIAL (2.0)	9.60	9,120.00
03/02/24	CICERO	PREPARATION FOR FORTHCOMING TRIAL DAYS	10.60	15,900.00
03/02/24	MEYERS	DISCUSS STRATEGY FOR BARTON CROSS AND FIND SUPPORTING MATERIALS; DRAFT OUTLINE FOR LEFKOWITZ CROSS EXAMINATION AND DISCUSS STRATEGY FOR SAME.	3.50	3,710.00
03/03/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR ATKINSON DIRECT (5.5); FURTHER REVISE OF EXHIBITS FOR ATKINSON DIRECT (3.3).	8.80	14,080.00



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Date	Professional	Description	Hours	Value
03/03/24	MCCAFFERTY	PREPARE EXHIBITS AND LINES OF QUESTIONING FOR CROSS OF R. PERRY (2.4); PREPARE EXHIBITS AND LINES OF QUESTIONING FOR M. DUNDON (.6); PREPARE FOR HEARING TESTIMONY OF EXPERT WITNESS M. ATKINSON (.6); RESEARCH IN SUPPORT OF CROSS EXAMINATION QUESTIONING OF R.PERRY AND D.BARTON (1.3)	4.90	4,655.00
03/03/24	SIEGER-GRIMM	UPDATE EMAIL TO J. MILIBAND RE: STATUS OF MOTION TO COMPEL AND FIRST DAY HEARING	0.30	360.00
03/03/24	MEYERS	PREPARE OUTLINE FOR LEFKOWITZ CROSS EXAMINATION AND DISCUSS SAME INTERNALLY.	7.00	7,420.00
03/03/24	MOXLEY	PREPARE FOR CROSS EXAMINATIONS OF M. DUNDON AND R. PERRY AND FOR TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS	12.20	15,250.00
03/03/24	CICERO	PREPARE FOR RESTART OF TRIAL AND PREPARATION OF CROSS EXAMINATION OUTLINES RE: SAME	9.00	13,500.00
03/04/24	GOODMAN	EDIT AND REVISE OUTLINE FOR ATKINSON TESTIMONY (3.5); CONFERENCE WITH MR. ATKINSON TO PREPARE FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (3.0); REVIEW REVISED DIP ORDER (.2); TELEPHONE CALL WITH MR. BROOKNER REGARDING DIP ORDER (.2)	6.90	11,040.00
03/04/24	GOODMAN	CONFERENCE WITH MR. MOXLEY AND TEAM REGARDING DUNDON AND PERRY OUTLINES.	2.00	3,200.00
03/04/24	MOXLEY	MEET AND CONFER WITH DEBTOR, UCC AND OTHER PARTIES RE WITNESS TIMING AND SCHEDULE ISSUES (0.5); PREPARE FOR CROSS-EXAMINATION OF R. PERRY AND M. DUNDON (13.0)	13.50	16,875.00
03/04/24	CICERO	PREPARE RUSSELL PERRY AND DUNDON CROSS OUTLINES	9.20	13,800.00
03/04/24	MCCAFFERTY	PREPARE EXHIBITS FOR EXAMINATION OF M.ATKINSON (.8); PREPARE EXHIBITS FOR EXAMINATION OF M.DUNDON (1.0); PREPARE EXHIBITS FOR EXAMINATION OF R.PERRY (2.2); PREPARE CROSS EXAMINATION OF R.PERRY (3.5); PREPARE FOR HEARING ON 9019 MOTION (1.6)	9.10	8,645.00
03/04/24	BURNS	CONFER WITH TRANSCRIPTION COMPANY REGARDING THE STATUS OF TRANSCRIPT REQUEST ON 3/1/24 HEARING (.3); CONFER WITH M. MCCAFFERTY REGARDING SAME (.2)	0.50	250.00



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Date	Professional	Description	Hours	Value
03/04/24	MEYERS	ASSIST IN PREPARATIONS FOR CROSS EXAMINATION OF PERRY AND DUNDON.	2.50	2,650.00
03/05/24	CASTANO	RESEARCH ON 9019 ISSUES FOR J. MEYERS.	0.70	451.50
03/05/24	MOXLEY	PREPARE FOR HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (4.7); CONFER WITH E. GOODMAN AND TEAM POST-HEARING AND PLAN FOR HEARING GOING FORWARD (2.0)	6.70	8,375.00
03/05/24	BURNS	FOLLOW UP PHONE CALL WITH TRANSCRIPTION COMPANY REGARDING STATUS OF TRANSCRIPT	0.20	100.00
03/05/24	SIEGER-GRIMM	ANALYSIS RE: MOTION TO DISMISS HEARING	0.90	1,080.00
03/05/24	VEILLEUX	EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS	0.10	51.50
03/06/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR CLOSING ARGUMENTS.	1.00	1,600.00
03/06/24	SIEGER-GRIMM	INTERNAL FOLLOW UP RE: HEARING STATUS (.1); SUMMARIZE MOTION TO QUASH STATUS AND ISSUES TO CONSIDER (.4)	0.50	600.00
03/06/24	BURNS	DOWNLOAD TRANSCRIPT OF MARCH 1 HEARING, CIRCULATE TO TEAM AND ADD TO DATABASE (.3); CONFER WITH M. MCCAFFERTY REGARDING STATUS OF TRANSCRIPT OF MARCH 5 HEARING (.2)	0.50	250.00
03/06/24	MOXLEY	CALLS WITH E. GOODMAN REGARDING HEARING STRATEGY ISSUES AND PREPARING FOR CONTINUED HEARING	0.70	875.00
03/07/24	GOODMAN	DRAFT AND EDIT REVISED HEARING QUESTIONS FOR TCC WITNESS (2.0); TELEPHONE CALL WITH MR. MOXLEY REGARDING UPDATED QUESTIONS FOR TCC WITNESS AND RELATED MATTERS (.9).	2.90	4,640.00
03/07/24	MOXLEY	CALL WITH E. GOODMAN RE STRATEGY FOR CONTINUED HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION	1.00	1,250.00
03/08/24	GOODMAN	CONFERENCE CALL WITH TCC WITNESS REGARDING HEARING PREPARATION.	1.20	1,920.00
03/08/24	MOXLEY	CONFER WITH S. GRIFFITHS, M. ZIMMERMAN, AND E. GOODMAN REGARDING TRIAL PREPARATION AND PREPARE FOR SAME (1.3); PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (0.2)	1.50	1,875.00
03/09/24	GOODMAN	DRAFT AND EDIT CLOSING ARGUMENT.	1.40	2,240.00
03/11/24	CASTANO	RESEARCH RE: 9019 ISSUES FOR J. MEYERS.	6.50	4,192.50



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Date	Professional	Description	Hours	Value
03/11/24	GOODMAN	DRAFT AND EDIT ADDITIONAL QUESTIONS FOR PERRY (.5); CONFERENCE WITH MR. MOXLEY REGARDING PERRY QUESTIONS AND RELATED MATTERS (.7).	1.20	1,920.00
03/11/24	MOXLEY	PREPARE FOR R. PERRY CROSS-EXAMINATION AND S. GRIFFITHS DIRECT	2.30	2,875.00
03/12/24	MCCAFFERTY	CIRCULATE TRANSCRIPT FROM HEARING (.1)	0.10	95.00
03/12/24	MOXLEY	PREPARE FOR S. GRIFFITHS DIRECT EXAMINATION AND CONTINUED HEARING (2.1); CONFER WITH S. GRIFFITHS AND M. ZIMMERMAN RE DIRECT EXAMINATION (1.1)	3.20	4,000.00
03/12/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR ATKINSON DIRECT	1.80	2,880.00
03/13/24	GOODMAN	TELEPHONE CALLS WITH MR. BARTON REGARDING TRIAL TESTIMONY (.5); EDIT AND REVISE OUTLINE FOR ATKINSON DIRECT (1.7); FURTHER REVIEW OF PERRY CHART (.3).	2.50	4,000.00
03/13/24	MOXLEY	PREPARE FOR D. BARTON CONTINUED CROSS-EXAMINATION (1.0); CONFER WITH S. GRIFFITHS IN PREPARATION FOR DIRECT EXAMINATION (1.0); PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (1.2)	3.20	4,000.00
03/14/24	MCCAFFERTY	PREPARE FOR CONTINUED HEARING ON 9019 MOTION	0.20	190.00
03/14/24	GOODMAN	FURTHER REVISIONS TO OUTLINE FOR ATKINSON DIRECT (.5); TELEPHONE CALL WITH MR. MOXLEY REGARDING TRIAL STRATEGY (.6).	1.10	1,760.00
03/14/24	MOXLEY	PREPARE FOR CONTINUED HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION AND CALL WITH E. GOODMAN RE SAME (1.5); CONFER WITH S. GRIFFITHS IN PREPARING FOR HEARING (1.0)	2.50	3,125.00
03/15/24	WELLS	DRAFT PRO HAC VICE MOTION AND COORDINATE E-FILING ACCESS, RE: MOTION TO QUASH SUBPOENA	0.60	288.00
03/15/24	MOXLEY	PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS	0.30	375.00
03/18/24	MCCAFFERTY	PREPARE ANALYSIS OF I.LEFKOWITZ TESTIMONY FOR CONTINUED HEARING	0.20	190.00
03/18/24	GOODMAN	EDIT AND REVISE SCRIPT FOR CLOSING ARGUMENT.	1.80	2,880.00
03/18/24	MOXLEY	PREPARE FOR CONTINUED CROSS OF R. PERRY AND D. BARTON AND CONFER WITH J. MEYERS RE CROSS OF I. LEFKOWITZ	2.70	3,375.00



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Date	Professional	Description	Hours	Value
03/19/24	MCCAFFERTY	REVIEW AND ANALYZE I.LEFKOWITZ TESTIMONY IN SUPPORT OF HEARING CROSS EXAMINATION	0.50	475.00
03/19/24	MOXLEY	PREPARE FOR CONTINUED CROSS OF R. PERRY AND PREPARE FOR DIRECT EXAMINATION OF S. GRIFFITHS AND SEPARATE CALLS WITH E. GOODMAN AND S. GRIFFITHS RE THE SAME	6.40	8,000.00
03/19/24	MEYERS	REVIEW AMENDED PROPOSED ORDER GRANTING 9019 MOTION AND DRAFT CROSS EXAMINATION QUESTIONS FOR LEFKOWITZ REGARDING THE SAME; DISCUSS LEFKOWITZ CROSS EXAMINATION INTERNALLY.	1.40	1,484.00
03/19/24	GOODMAN	TELEPHONE CALL WITH MR. MOXLEY REGARDING HEARING PREPARATION (1.1); DRAFT AND EDIT QUESTIONS FOR MR. PERRY (1.5); FURTHER REVIEW OF REVISED ORDER FOR RULE 9019 MOTION AND RELATED PLAN PROVISIONS (.6); REVIEW TRIAL TRANSCRIPT (1.9).	5.10	8,160.00
03/20/24	MCCAFFERTY	PREPARE WITNESS BINDERS FOR CONTINUED HEARING ON 9019 MOTION AND MOTION TO DISMISS (1.3); REVIEW AND ANALYZE LEFKOWITZ DEPOSITION TRANSCRIPT IN SUPPORT OF CROSS EXAMINATION AT HEARING (1.2)	2.50	2,375.00
03/20/24	GOODMAN	EDIT AND REVISE QUESTIONS FOR ATKINSON TESTIMONY (1.3); FURTHER REVIEW OF DEPOSITIONS TRANSCRIPT FOR ATKINSON (1.8); COMMUNICATIONS WITH MS. MCCAFFERTY REGARDING HEARING EXHIBITS (.1); TELEPHONE CALL WITH MR. MOXLEY REGARDING PERRY TESTIMONY (.9); CONFERENCE WITH MR. MOXLEY AND MR. GRIFFITHS REGARDING HEARING ON RULE 9019 MOTION (IN PART) (1.7); TELEPHONE CALL WITH MR. MOXLEY REGARDING HEARING PREPARATION (.1).	5.90	9,440.00
03/20/24	BURNS	CONFER WITH M. MCCAFFERTY AND C. MOXLEY REGARDING GRIFFITHS DEPOSITION TRANSCRIPT (.2); RETRIEVE AND CIRCULATE SAME (.3)	0.50	250.00
03/20/24	MOXLEY	PREPARE FOR CONTINUED CROSS-EXAMINATION OF R. PERRY (1.3); PREPARE FOR DIRECT EXAMINATION OF S. GRIFFITHS AND CONFER WITH S. GRIFFITHS AND E. GOODMAN RE THE SAME (7.5)	8.80	11,000.00
03/20/24	MEYERS	INVENTORY ADMITTED EXHIBITS AND EXHIBITS DEBTOR STIPULATED TO ADMIT.	0.30	318.00



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Date	Professional	Description	Hours	Value
03/21/24	GOODMAN	CONFERENCE CALL WITH BROWN RUDNICK TEAM REGARDING CASE STRATEGY (.5); DRAFT AND EDIT QUESTION REGARDING DIP FUNDING (1.2); DRAFT AND EDIT MOTION TO COMPEL PAYMENT OF TCC FEES AND EXPENSES (4.3).	6.00	9,600.00
03/21/24	MCCAFFERTY	STRATEGIZE WITH TRIAL TEAM REGARDING CONTINUED HEARING (1.0); REVIEW AND ANALYZE I.LEFKOWITZ DEPOSITION TRANSCRIPT TO PREPARE CROSS EXAMINATION IMPEACHMENT (2.5); DRAFT SUMMARY OF IMPEACHMENT TESTIMONY FOR I.LEFKOWITZ (2.1); REVIEW AND ANALYZE I.LEFKOWITZ CREDITOR MEETING TRANSCRIPTS FOR IMPEACHMENT TESTIMONY (1.5); DRAFT SUMMARY OF I.LEFKOWITZ TESTIMONY FROM CREDITORS MEETING FOR IMPEACHMENT TESTIMONY (.8); PREPARE WITNESS BINDERS FOR HEARING (.8)	8.70	8,265.00
03/21/24	MEYERS	ATTEND INTERNAL CONFERENCE CALL TO DISCUSS TRIAL PREP AND CROSS EXAMINATION OF LEFKOWITZ; PREPARE OUTLINE FOR CROSS EXAMINATION OF LEFKOWITZ; DISCUSS CONTENT OF 341 TRANSCRIPTS IN PREPARATION FOR LEFKOWITZ CROSS EXAMINATION.	6.00	6,360.00
03/21/24	MOXLEY	PREPARE FOR R. PERRY CROSS-EXAMINATION AND S. GRIFFITHS DIRECT EXAMINATION AT CONTINUED HEARING	10.00	12,500.00
03/21/24	RIZKALLA	CONFER W/ E. CASTANO AND LEGAL RESEARCH RE: PLAN ISSUES	0.40	310.00
03/22/24	MCCAFFERTY	PREPARE WITNESS BINDER AND CROSS EXAMINATION TESTIMONY OF I.LEFKOWITZ FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS (1.4); PREPARE WITNESS BINDER AND CROSS EXAMINATION TESTIMONY OF R.PERRY FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS (1.5); PREPARE WITNESS BINDER AND CROSS EXAMINATION TESTIMONY OF M.ATKINSON FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS (.3);	3.20	3,040.00
03/22/24	MEYERS	ATTEND INTERNAL CALL TO DISCUSS LEFKOWITZ CROSS; DRAFT OUTLINE FOR LEFKOWITZ CROSS EXAMINATION.	3.00	3,180.00
03/22/24	MOXLEY	PREPARE FOR S. GRIFFITHS DIRECT EXAMINATION AND FOR TRIAL	4.10	5,125.00





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Date	Professional	Description	Hours	Value
03/22/24	GOODMAN	DRAFT AND EDIT MOTION TO COMPEL PAYMENT OF INTERIM COMPENSATION (1.5); RESEARCH IN SUPPORT OF MOTION TO COMPEL (1.0); CONFERENCE CALL WITH MS. MEYERS REGARDING LEFKOWITZ TESTIMONY AND HEARING PREPARATION (1.2)	3.70	5,920.00
03/23/24	MEYERS	PREPARE OUTLINE FOR LEFKOWITZ CROSS EXAMINATION AND COORDINATE PREPARATION OF WITNESS BINDERS FOR SAME.	5.00	5,300.00
03/23/24	MOXLEY	REVISE BARTON AND DUNDON CROSS OUTLINES	2.60	3,250.00
03/24/24	MCCAFFERTY	PREPARE S.GRIFFITHS FOR DIRECT AND CROSS EXAMINATION IN SUPPORT OF MOTION TO DISMISS AND 9019 MOTION HEARING (2.2); RESEARCH FACTS AND LAW IN SUPPORT OF CROSS EXAMINATION OF R.PERRY AT 9019 AND DISMISSAL HEARING (2.4); PREPARE EXHIBITS AND DIRECT EXAMINATION FOR M.ATKINSON IN SUPPORT OF 9019 AND DISMISSAL HEARING (3.5); PREPARE EXHIBITS FOR CROSS EXAMINATION OF R.PERRY, D.BARTON, AND M.DUNDON FOR 9019 AND DISMISSAL HEARING (3.5)	11.60	11,020.00
03/24/24	MOXLEY	MEETINGS WITH S. GRIFFITHS AND M. ATKINSON RE TRIAL PREPARATION AND REVISE WITNESS OUTLINES AND PREPARE FOR TRIAL	14.00	17,500.00
03/24/24	GOODMAN	EDIT AND REVISE CLOSING ARGUMENT SCRIPT (2.8); CONFERENCES WITH TRIAL TEAM REGARDING PREPARATION FOR HEARING RULE 9019 MOTION AND MOTION TO DISMISS (6.8).	9.60	15,360.00
03/25/24	MCCAFFERTY	PREPARE FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS	3.70	3,515.00
03/25/24	GOODMAN	LAN AND PREPARING FOR HEARING ON RULE 9019 MOTION (1.5); POST-HEARING CONFERENCE WITH TRIAL TEAM (.5)	2.00	3,200.00
03/25/24	BURNS	DRAFT ECF TRANSCRIPT ORDER FORM FOR MARCH 25TH HEARING (.5); FILED SAME (.3)	0.80	400.00
03/25/24	BURNS	CONFER WITH M. MCCAFFERTY RE TRANSCRIPTS OF 341 MEETINGS	0.30	150.00
03/25/24	MOXLEY	PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION (2.5); FOLLOW-UP AND PREPARE FOR FINAL DAY OF HEARING (1.5)	4.00	5,000.00
03/26/24	MCCAFFERTY	PREPARE EXHIBITS AND CROSS EXAMINATION FOR D.BARTON AND M.DUNDON FOR 9019 MOTION AND MOTION TO DISMISS TRIAL	1.10	1,045.00



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Date	Professional	Description	Hours	Value
03/26/24	GOODMAN	EDIT AND REVISE CLOSING ARGUMENT SCRIPT (2.4); EDIT AND REVISE QUESTIONS FOR MR. ATKINSON (3.4); MEETINGS WITH MR. ATKINSON TO PREPARE FOR COURT HEARING (3.0); CONFERENCE WITH MR. MOXLEY REGARDING BARTON TESTIMONY AND RELATED MATTERS (2.0).	10.80	17,280.00
03/26/24	MOXLEY	PREPARE FOR CROSS OF M. DUNDON AND D. BARTON AND FINAL DAY OF HEARING	12.80	16,000.00
03/26/24	BURNS	CONFER WITH M. MCCAFFERTY REGARDING OBTAINING TRANSCRIPT OF 3/25 HEARING (.2); CONFERRING WITH COURT PERSONNEL REGARDING SAME (.3)	0.50	250.00
03/26/24	MCCAFFERTY	PREPARE HEARING BINDERS FOR TRIAL ON 9019 MOTION AND MOTION TO DISMISS (3.6); DRAFT CROSS EXAMINATION AND PREPARE EXHIBITS FOR D.BARTON AND M. DUNDON IN SUPPORT OF TRIAL ON 9019 MOTION AND MOTION TO DISMISS (2.5); PREPARE DIRECT EXAMINATION AND EXHIBITS FOR M.ATKINSON IN SUPPORT OF TRIAL ON 9019 MOTION AND MOTION TO DISMISS (1.6)	7.70	7,315.00
03/26/24	CICERO	PREPARE FOR TRIAL DAY 4	6.00	9,000.00
03/27/24	MOXLEY	PREPARE FOR HEARING	1.50	1,875.00
03/27/24	BURNS	PREPARE MOTION TO COMPEL PAYMENT TO TCC PROFESSIONALS FOR FILING (.6); FILE SAME (.4);PREPARE ECF TRANSCRIPT REQUEST FOR MARCH 27TH HEARING (.6); FILE SAME (.3)	1.90	950.00
03/27/24	GOODMAN	PLAN AND PREPARE FOR HEARING ON RULE 9019 MOTION (1.5); POST-HEARING CONFERENCE WITH TRIAL TEAM (.4).	1.90	3,040.00
03/27/24	MCCAFFERTY	PREPARE EXHIBITS FOR TRIAL ON 9019 MOTION AND MOTION TO DISMISS	1.50	1,425.00
03/27/24	SIEGER-GRIMM	FOLLOW UP WITH D. MOLTON RE: HEARING	0.10	120.00
03/28/24	MCCAFFERTY	PREPARE EXHIBITS FOR DESTRUCTION POST HEARING	1.50	1,425.00
<b>Total Hours and Fees</b>			<b>381.00</b>	<b>479,350.50</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	37.80 hours at	1,500.00	56,700.00
JESSICA N. MEYERS	28.70 hours at	1,060.00	30,422.00
D. C. MOXLEY	130.20 hours at	1,250.00	162,750.00
MEGHAN MCCAFFERTY	69.30 hours at	950.00	65,835.00



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<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Value</b>
KELCEY C. WELLS	0.60 hours at	480.00	288.00
SUSAN SIEGER-GRIMM	7.00 hours at	1,200.00	8,400.00
ERIC R. GOODMAN	90.10 hours at	1,600.00	144,160.00
BRITTANY E. VEILLEUX	0.10 hours at	515.00	51.50
ELIZABETH C. CASTANO	7.20 hours at	645.00	4,644.00
ANDREW RIZKALLA	0.40 hours at	775.00	310.00
SHARIX A. ALICEA	3.60 hours at	775.00	2,790.00
THOMAS BURNS	6.00 hours at	500.00	3,000.00
<b>Total Fees</b>			<b>479,350.50</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: NON-WORKING TRAVEL @ 50%

**INVOICE**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0011	NON-WORKING TRAVEL @ 50%	59,420.00	0.00	59,420.00
	<b>Total</b>	<b>59,420.00</b>	<b>0.00</b>	<b>59,420.00</b>

Total Current Fees	\$59,420.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$59,420.00</b>



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RE: NON-WORKING TRAVEL @ 50%

**TIME DETAIL**

Date	Professional	Description	Hours	Value
03/06/24	GOODMAN	RETURN TRAVEL FROM HOUSTON FOR HEARINGS ON RULE 9019 MOTION AND MOTION TO DISMISS (NON-WORKING TIME).	5.00	4,000.00
03/06/24	MCCAFFERTY	TRAVEL FROM HEARING IN HOUSTON	3.00	1,425.00
03/06/24	CICERO	RETURN TRAVEL FROM HOUSTON	8.00	6,000.00
03/06/24	MEYERS	RETURN TRAVEL FROM HEARING ON MOTIONS TO DISMISS AND TO APPROVE SETTLEMENT PURSUANT TO RULE 9019.	6.00	3,180.00
03/06/24	MOXLEY	TRAVEL FROM HOUSTON, TEXAS FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION	9.10	5,687.50
03/24/24	CICERO	TRAVEL FROM NJ TO HOUSTON TO HOTEL	7.00	5,250.00
03/24/24	GOODMAN	TRAVEL TO HOUSTON, TEXAS FOR COURT HEARINGS (NON-WORKING TRAVEL TIME)	4.20	3,360.00
03/24/24	MCCAFFERTY	TRAVEL TO HOUSTON FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS	7.00	3,325.00
03/24/24	MEYERS	TRAVEL TO HOUSTON FOR CONTINUATION OF HEARING ON MOTIONS TO DISMISS AND TO APPROVE SETTLEMENT.	6.00	3,180.00
03/24/24	MOXLEY	TRAVEL TO HOUSTON, TX FOR CONTINUED HEARING	4.80	3,000.00
03/28/24	GOODMAN	RETURN TRAVEL FROM HOUSTON, TEXAS FOR COURT HEARING.	4.60	3,680.00
03/28/24	CICERO	RETURN TRAVEL FROM HOUSTON	6.00	4,500.00
03/28/24	MEYERS	RETURN FROM EVIDENTIARY HEARING IN TEXAS ON MOTIONS TO DISMISS AND FOR APPROVAL OF RULE 9019 SETTLEMENT.	6.50	3,445.00
03/28/24	MCCAFFERTY	TRAVEL FROM TEXAS FROM 9019 AND DISMISSAL HEARING	7.00	3,325.00
03/29/24	MOXLEY	TRAVEL FROM TEXAS FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION	9.70	6,062.50
<b>Total Hours and Fees</b>			<b>93.90</b>	<b>59,420.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
GERARD T. CICERO	21.00 hours at	750.00	15,750.00
JESSICA N. MEYERS	18.50 hours at	530.00	9,805.00
D. C. MOXLEY	23.60 hours at	625.00	14,750.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
April 9, 2024

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<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Value</b>
MEGHAN MCCAFFERTY	17.00 hours at	475.00	8,075.00
ERIC R. GOODMAN	13.80 hours at	800.00	11,040.00
<b>Total Fees</b>			<b>59,420.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: CLAIMS ADMINISTRATION AND OBJECTIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0013	CLAIMS ADMINISTRATION AND OBJECTIONS	3,547.50	0.00	3,547.50
	<b>Total</b>	<b>3,547.50</b>	<b>0.00</b>	<b>3,547.50</b>

Total Current Fees	\$3,547.50
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$3,547.50</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
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RE: CLAIMS ADMINISTRATION AND OBJECTIONS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
03/22/24	CASTANO	RESEARCH ON ADMINISTRATIVE EXPENSE CLAIMS FOR G. CICERO.	5.50	3,547.50
<b>Total Hours and Fees</b>			<b>5.50</b>	<b>3,547.50</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
ELIZABETH C. CASTANO	5.50 hours at	645.00	3,547.50
<b>Total Fees</b>			<b>3,547.50</b>





TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: COURT ATTENDANCE

**INVOICE**

For professional services rendered in connection with the above captioned matter through March 31, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0016	COURT ATTENDANCE	259,085.00	0.00	259,085.00
	<b>Total</b>	<b>259,085.00</b>	<b>0.00</b>	<b>259,085.00</b>

Total Current Fees	\$259,085.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$259,085.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
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RE: COURT ATTENDANCE

**TIME DETAIL**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Value</b>
03/01/24	MCCAFFERTY	PREPARE FOR TRIAL (2.5); ATTEND TRIAL ON RULE 9019 MOTION AND DISMISSAL (6.0)	8.50	8,075.00
03/01/24	GOODMAN	PLAN AND PREPARE FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (3.5); ATTEND HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (6.0); POST-HEARING CONFERENCE WITH LITIGATION TEAM REGARDING COURT HEARING (1.5)	11.00	17,600.00
03/01/24	CICERO	PREPARE FOR TRIAL (4.0); PARTICIPATE IN TRIAL (6.0)	10.00	15,000.00
03/01/24	MEYERS	PREPARE FOR AND ATTEND FIRST DAY OF HEARING ON MOTION TO DISMISS AND MOTION FOR RULE 9019 MOTION.	8.00	8,480.00
03/02/24	MOXLEY	PREPARE FOR TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS (3.0); ATTEND TRIAL, INCLUDING ARGUING MOTION IN LIMINE AND CROSS-EXAMINING D. BARTON (6.0); POST-TRIAL DISCUSSIONS AND PREPARE FOR SECOND DATE OF TRIAL (3.0)	12.00	15,000.00
03/05/24	GOODMAN	PLAN AND PREPARE FOR COURT HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (3.5); ATTEND HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (6.0); POST-HEARING CONFERENCE WITH TRIAL TEAM (.5).	10.00	16,000.00
03/05/24	MEYERS	PREPARE FOR AND ATTEND HEARING ON MOTIONS TO DISMISS AND TO APPROVE 9019 SETTLEMENT.	7.00	7,420.00
03/05/24	MCCAFFERTY	PREPARE FOR HEARING ON 9019 MOTION AND DISMISSAL MOTION (1.8); ATTEND HEARING ON 9019 AND DISMISSAL MOTION (8.0)	9.80	9,310.00
03/05/24	CICERO	PREPARE FOR TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS (5.0) PARTICIPATE IN TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS (6.0)	11.00	16,500.00
03/05/24	MOXLEY	ATTEND HEARING AND CROSS-EXAMINE R. PERRY	6.00	7,500.00
03/15/24	MOXLEY	ATTEND HEARING ON MOTION TO DISMISS PERIGROVE 1018 LLC INVOLUNTARY PETITION TO EXTENT RELEVANT TO TEHUM BANKRUPTCY CASE AND DRAFT SUMMARY OF THE SAME	0.80	1,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
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Date	Professional	Description	Hours	Value
03/25/24	CICERO	PREPARE FOR 9019/DISMISSAL HEARING (1.2); PARTICIPATE IN 9019/DISMISSAL HEARING (10.5)	11.70	17,550.00
03/25/24	MEYERS	PREPARE FOR AND ATTEND HEARING ON MOTIONS TO DISMISS AND APPROVE SETTLEMENT.	11.00	11,660.00
03/25/24	GOODMAN	ATTEND HEARING ON RULE 9019 MOTION BEFORE THE BANKRUPTCY COURT IN THE SOUTHERN DISTRICT OF TEXAS	10.50	16,800.00
03/25/24	MOXLEY	PARTICIPATE IN EVIDENTIARY HEARING AND HANDLING CROSS OF R. PERRY AND DIRECT OF S. GRIFFITHS	11.00	13,750.00
03/25/24	MCCAFFERTY	ATTEND HEARING ON 9019 MOTION AND MOTION TO DISMISS	11.00	10,450.00
03/27/24	CICERO	PREPARE FOR TRIAL (1.0); ATTEND TRIAL DAY 4 (11.5)	12.50	18,750.00
03/27/24	MEYERS	ATTEND FINAL DAY OF EVIDENTIARY HEARING ON MOTIONS TO DISMISS AND FOR APPROVAL OF RULE 9019 SETTLEMENT.	4.00	4,240.00
03/27/24	GOODMAN	ATTEND HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS	11.00	17,600.00
03/27/24	MOXLEY	PARTICIPATE IN HEARING CROSSING D. BARTON AND M. DUNDON	12.00	15,000.00
03/27/24	MCCAFFERTY	ATTEND TRIAL ON 9019 MOTION AND MOTION TO DISMISS	12.00	11,400.00
<b>Total Hours and Fees</b>			<b>200.80</b>	<b>259,085.00</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	45.20 hours at	1,500.00	67,800.00
JESSICA N. MEYERS	30.00 hours at	1,060.00	31,800.00
D. C. MOXLEY	41.80 hours at	1,250.00	52,250.00
MEGHAN MCCAFFERTY	41.30 hours at	950.00	39,235.00
ERIC R. GOODMAN	42.50 hours at	1,600.00	68,000.00
<b>Total Fees</b>			<b>259,085.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Invoice 6976463  
Date Apr 9, 2024  
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'  
COMMITTEE

Remittance **remit**

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**Balance Due: \$701,603.06**

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To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 23079  
New York, NY 10087-3079

**Wire Instructions**

JP Morgan Chase  
270 Park Avenue  
New York, NY 10017  
ABA Number: 021000021  
SWIFT Code: CHASUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 760367067