

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

In re:

 TEHUM CARE SERVICES, INC.,¹

 Debtor.

Chapter 11

 Case No. 23-90086 (CML)

**SIXTH 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
MAY 1, 2024 THROUGH MAY 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:	May 1, 2024 – May 31, 2024
Total Fees Sought:	\$158,424.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$147,674.00
Total professional hours covered by this statement:	108.20
Average hourly rate for professionals:	\$1,364.82
Total paraprofessional fees covered by this	\$10,750.00

¹ 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.



statement:	
Total paraprofessional hours covered by this statement:	21.50
Average hourly rate for paraprofessionals:	\$500.00
Reimbursable expenses sought in this statement:	\$47,340.14
Payment requested:	
80% Fees	\$126,739.20
100% Expenses	\$47,340.14
Total:	\$174,079.34

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 Sixth 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 May 1, 2024 to May 31, 2024 (the “Sixth Monthly Fee Statement”). By the Sixth Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$126,739.20 (80% of \$158,424.00) as compensation for professional services rendered to the Committee and (ii) \$47,340.14 for reimbursement of actual and necessary expenses, for a total of \$174,079.34 for the period May 1, 2024 through and including May 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 Sixth Monthly Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Sixth 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 \$158,424.00 in fees during the Fee Period. Pursuant to this Sixth Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$126,739.20 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 Sixth Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 129.70 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 Sixth Monthly Fee Statement. This Sixth Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$47,340.14.

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 Sixth 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 \$174,079.34, consisting of (i) \$126,739.20, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$47,340.14, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: June 18, 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

egoodman@brownrudnick.com

gcicero@brownrudnick.com

CERTIFICATE OF SERVICE

I certify that on June 18, 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

6/11/2024

CLIENT: 040178

1

Bill Date range: 6/11/2024 to 6/11/2024

MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
CASE ADMINISTRATION/DISBURSEMENTS	BURNS, THOMAS	4.40	\$2,200.00
		4.40	\$2,200.00
MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	CICERO, GERARD T.	3.30	\$4,950.00
	MOXLEY, D. CAMERON	1.50	\$1,875.00
	GOODMAN, ERIC R.	2.60	\$4,160.00
		7.40	\$10,985.00
MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	CICERO, GERARD T.	1.20	\$1,800.00
	GOODMAN, ERIC R.	1.50	\$2,400.00
		2.70	\$4,200.00
FEE/EMPLOYMENT APPLICATIONS	CICERO, GERARD T.	0.70	\$1,050.00
	BURNS, THOMAS	6.70	\$3,350.00
	CALHOUN, ETHAN H.	1.20	\$834.00
		8.60	\$5,234.00
CONTESTED MATTERS/LITIGATION (GENERAL)	MEYERS, JESSICA N.	0.50	\$530.00
	MOXLEY, D. CAMERON	9.70	\$12,125.00
	MCCAFFERTY, MEGHAN	13.90	\$13,205.00
	GOODMAN, ERIC R.	13.20	\$21,120.00
	BURNS, THOMAS	10.40	\$5,200.00
		47.70	\$52,180.00
NON-WORKING TRAVEL @ 50%	GOODMAN, ERIC R.	4.40	\$3,520.00
		4.40	\$3,520.00
MEDIATION/SETTLEMENT	CICERO, GERARD T.	6.90	\$10,350.00
	MOXLEY, D. CAMERON	18.30	\$22,875.00
	GOODMAN, ERIC R.	29.30	\$46,880.00
		54.50	\$80,105.00
		129.70	\$158,424.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

SUMMARY OF TIME & COMPENSATION

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
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	51.00	\$78,080.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	12.10	\$18,150.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	29.50	\$36,875.00
Jessica N. Meyers	Partner; Admitted in Massachusetts Bar in 2015; Admitted to New York Bar in 2017; Dispute Resolution & Restructuring	\$1,060	.50	\$530.00
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$950	13.90	\$13,205.00
Ethan H. Calhoun	Associate; Admitted to Alabama Bar in 2021; Admitted to New York Bar in 2023; Dispute	\$695	1.20	\$834.00

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
	Resolution & Restructuring			
TOTAL			108.20	\$147,674.00
PROFESSIONAL BLENDED RATE		\$1,364.82		

COMPENSATION BY PARAPROFESSIONAL				
Name of Professional Person	Position	Hourly Billing Rate	Total Hours	Total Compensation
Thomas Burns	Paralegal	\$500	21.50	\$10,750.00
TOTAL			21.50	\$10,750.00
PARAPROFESSIONAL BLENDED RATE		\$500		

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
6/11/2024	Document Production	0.00
	eDiscovery Hosting	4,947.80
	Expert Fees	38,172.32
	Filing Fee	628.00
	Hotel	937.33
	Meals	205.40
	Outside Copies	1,747.97
	Pacer	37.00
	Taxi	75.32
	Westlaw Online Transactional Searches / Docs	589.00
		47,340.14
		47,340.14

EXHIBIT D

Detailed Record of Time Entries



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

Invoice 6979314
Date Jun 11, 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 May 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	2,200.00	47,340.14	49,540.14
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	10,985.00	0.00	10,985.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	4,200.00	0.00	4,200.00
040178.0008	FEE/EMPLOYMENT APPLICATIONS	5,234.00	0.00	5,234.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	52,180.00	0.00	52,180.00
040178.0011	NON-WORKING TRAVEL @ 50%	3,520.00	0.00	3,520.00
040178.0015	MEDIATION/SETTLEMENT	80,105.00	0.00	80,105.00
	Total	158,424.00	47,340.14	205,764.14

Total Current Fees	\$158,424.00
20% Holdback Amount	(31,684.80)
80% CURRENT BALANCE DUE	\$126,739.20
Total Current Costs	\$47,340.14
Total Invoice	\$174,079.34



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

Invoice 6979314
Date Jun 11, 2024
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	2,200.00	47,340.14	49,540.14
	Total	2,200.00	47,340.14	49,540.14

Total Current Fees	\$2,200.00
Total Current Costs	\$47,340.14
Total Invoice	\$49,540.14



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

Invoice 6979314
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RE: CASE ADMINISTRATION/DISBURSEMENTS

TIME DETAIL

Date	Professional	Description	Hours	Value
05/01/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.3); ANALYSIS OF PERTINENT DATES AND DEADLINES (.4)	0.80	400.00
05/02/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
05/03/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
05/09/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.3)	0.60	300.00
05/10/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
05/13/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
05/14/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.3)	0.60	300.00
05/15/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.3)	0.60	300.00
05/28/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
05/30/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
Total Hours and Fees			4.40	2,200.00

TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	4.40 hours at	500.00	2,200.00
Total Fees			2,200.00

COST SUMMARY

Description	Value
FILING FEE	628.00
EXPERT FEES	38,172.32



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
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Description	Value
MEALS	205.40
OUTSIDE COPIES	1,747.97
TAXI	75.32
HOTEL	937.33
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	589.00
PACER	37.00
EDISCOVERY HOSTING	4,947.80
Total Costs	47,340.14



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

Invoice 6979314
Date Jun 11, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH
COMMITTEE/CREDITORS

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	10,985.00	0.00	10,985.00
	Total	10,985.00	0.00	10,985.00

Total Current Fees	\$10,985.00
Total Current Costs	\$0.00
Total Invoice	\$10,985.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

Invoice 6979314
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RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

TIME DETAIL

Date	Professional	Description	Hours	Value
05/14/24	CICERO	ATTEND WEEKLY COMMITTEE STRATEGY AND UPDATE CALL	0.80	1,200.00
05/14/24	CICERO	PREPARE FOR COMMITTEE CALL AND WORK ON TERM SHEET	0.50	750.00
05/14/24	GOODMAN	ATTEND MEETING WITH THE TCC REGARDING MEDIATION AND CASE STATUS	0.80	1,280.00
05/14/24	MOXLEY	PREPARE FOR AND PARTICIPATE IN COMMITTEE MEETING RE CASE STRATEGY	0.80	1,000.00
05/21/24	CICERO	PARTICIPATE IN WEEKLY CALL WITH COMMITTEE MEMBERS RE: STRATEGY	1.00	1,500.00
05/21/24	GOODMAN	ATTEND MEETING WITH TCC REGARDING SETTLEMENT OFFER AND CASE STATUS	0.90	1,440.00
05/28/24	CICERO	PREPARE FOR AND ATTEND WEEKLY COMMITTEE MEETING, STRATEGY AND UPDATE CALL	1.00	1,500.00
05/28/24	GOODMAN	PLAN AND PREPARE FOR COMMITTEE CALL (.3); ATTEND CALL WITH THE COMMITTEE REGARDING CASE STATUS (.6).	0.90	1,440.00
05/28/24	MOXLEY	PARTICIPATE IN COMMITTEE STRATEGY MEETING AND REVIEW LATEST SETTLEMENT PROPOSAL IN CONNECTION WITH PREPARING FOR COMMITTEE MEETING	0.70	875.00
Total Hours and Fees			7.40	10,985.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	3.30 hours at	1,500.00	4,950.00
D. C. MOXLEY	1.50 hours at	1,250.00	1,875.00
ERIC R. GOODMAN	2.60 hours at	1,600.00	4,160.00
Total Fees			10,985.00



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

Invoice 6979314
Date Jun 11, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	4,200.00	0.00	4,200.00
	Total	4,200.00	0.00	4,200.00

Total Current Fees	\$4,200.00
Total Current Costs	\$0.00
Total Invoice	\$4,200.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

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RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

TIME DETAIL

Date	Professional	Description	Hours	Value
05/01/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS, MEDIATION, AND RULE 2004 DISCOVERY	0.50	800.00
05/09/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS AND OPTIONS IF NO SETTLEMENT IS REACHED	0.40	640.00
05/10/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING OPT-OUTS	0.20	320.00
05/13/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MEDIATION AND RELATED MATTERS	0.40	640.00
05/27/24	CICERO	PREPARE FOR COUNSEL STRATEGY AND UPDATE CALL (.6); ATTEND COUNSEL STRATEGY AND UPDATE CALL (.6)	1.20	1,800.00
Total Hours and Fees			2.70	4,200.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	1.20 hours at	1,500.00	1,800.00
ERIC R. GOODMAN	1.50 hours at	1,600.00	2,400.00
Total Fees			4,200.00



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

Invoice 6979314
Date Jun 11, 2024
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0008	FEE/EMPLOYMENT APPLICATIONS	5,234.00	0.00	5,234.00
Total		5,234.00	0.00	5,234.00

Total Current Fees	\$5,234.00
Total Current Costs	\$0.00
Total Invoice	\$5,234.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

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RE: FEE/EMPLOYMENT APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
05/02/24	BURNS	WORK ON FIFTH FEE APPLICATION	0.60	300.00
05/09/24	BURNS	WORK ON FIFTH MONTHLY FEE APPLICATION	0.70	350.00
05/14/24	CALHOUN	ANALYZING EMPLOYMENT APPLICATION RELATED TO EMPLOYMENT OF APPELLATE COUNSEL.	1.20	834.00
05/14/24	BURNS	WORK ON FIFTH MONTHLY FEE STATEMENT	1.30	650.00
05/15/24	CICERO	DRAFT AND REVISE FIFTH MONTHLY APPLICATION	0.70	1,050.00
05/15/24	BURNS	WORK ON 5TH MONTHLY FEE STATEMENT (.5); CONFER WITH M.MCCAFFERTY REGARDING PREVIOUSLY FILED MONTHLY FEE STATEMENTS FROM BR, PROVINCE AND BERRY RIDDELL (.3); RETRIEVE AND CIRCULATE SAME (.4); CONFER WITH G. CICERO REGARDING BILLING TOTALS (.4); CONFER WITH G. CICERO AND E. GOODMAN REGARDING 5TH MONTHLY FEE STATEMENT (.3)	1.90	950.00
05/20/24	BURNS	CONFER WITH G. CICERO REGARDING FIFTH MONTHLY FEE STATEMENT (.3); CONFER WITH COMMITTEE REGRADING SAME (.2)	0.50	250.00
05/22/24	BURNS	CONFER WITH G. CICERO REGARDING FIFTH MONTHLY FEE STATEMENT (.3); CONFER WITH LOCAL COUNSEL REGARDING THE FIFTH MONTHLY FEE STATEMENT (.3)	0.60	300.00
05/23/24	BURNS	CONFER WITH COMMITTEE COUNSEL REGARDING THE FIFTH MONTHLY FEE STATEMENT (.3); PREPARE FOR FILING THE FIFTH MONTHLY FEE STATEMENT (.4); FILE SAME (.4)	1.10	550.00
Total Hours and Fees			8.60	5,234.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	0.70 hours at	1,500.00	1,050.00
THOMAS BURNS	6.70 hours at	500.00	3,350.00
ETHAN H. CALHOUN	1.20 hours at	695.00	834.00
Total Fees			5,234.00



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

Invoice 6979314
Date Jun 11, 2024
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	52,180.00	0.00	52,180.00
	Total	52,180.00	0.00	52,180.00

Total Current Fees	\$52,180.00
Total Current Costs	\$0.00
Total Invoice	\$52,180.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

Invoice 6979314
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RE: CONTESTED MATTERS/LITIGATION (GENERAL)

TIME DETAIL

Date	Professional	Description	Hours	Value
05/01/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR RULE 2004 MOTION (1.4); COMMUNICATIONS WITH MR. MOXLEY REGARDING RULE 2004 MOTION (.1)	1.50	2,400.00
05/01/24	MOXLEY	DRAFT RULE 2004 MOTION FOR AUTHORITY TO SUBPOENA YESCARE FINANCIAL INFORMATION	0.20	250.00
05/01/24	MEYERS	REVIEW DRAFT APPEAL MATERIALS AND DESIGNATION OF RECORD	0.50	530.00
05/02/24	GOODMAN	DRAFT AND EDIT STATEMENT OF ISSUES FOR APPEAL AND DESIGNATION OF THE RECORD	1.00	1,600.00
05/02/24	MCCAFFERTY	PREPARE LIST OF DESIGNATED MATERIALS FOR APPEAL	0.20	190.00
05/02/24	BURNS	CONFER WITH M. MCCAFFERTY REGARDING TRANSCRIPTS NEEDED FOR DESIGNATION OF ISSUES AND RECORD	0.30	150.00
05/02/24	MOXLEY	DRAFT RULE 2004 MOTION FOR YESCARE FINANCIAL INFORMATION	1.40	1,750.00
05/03/24	MCCAFFERTY	IDENTIFY DISCOVERY CONFERENCE HEARING DATES AND TRANSCRIPTS FOR DESIGNATION OF RECORD FOR APPEAL (.5); PREPARE DESIGNATION OF TRANSCRIPTS FOR APPEAL RECORD DESIGNATION AND ORDER DISCOVERY CONFERENCE TRANSCRIPTS (.4)	0.90	855.00
05/03/24	GOODMAN	REVIEW AND EDIT RULE 2004 MOTION	1.00	1,600.00
05/03/24	MOXLEY	DRAFT RULE 2004 MOTION AND ACCOMPANYING SUBPOENAS TO YESCARE CORP., CHS TX, INC., AND PERIGROVE 1018, LLC	5.40	6,750.00
05/03/24	BURNS	CONFER WITH M. MCCAFFERTY REGARDING TRANSCRIPTS NEEDED FOR DESIGNATION OF RECORD FOR APPEAL(.2); RETRIEVE TRANSCRIPTS AND CIRCULATE (.2); PREPARE ECF TRANSCRIPT REQUEST FOR MISSING TRANSCRIPTS (.5); FILE SAME (.2)	1.10	550.00
05/04/24	MOXLEY	ANALYZE AND INCORPORATE COMMENTS TO DRAFT RULE 2004 MOTION	0.20	250.00
05/05/24	GOODMAN	EDIT AND REVISE STATEMENT OF ISSUES FOR APPEAL AND DESIGNATION OF THE RECORD	0.40	640.00
05/05/24	GOODMAN	FURTHER REVISIONS TO RULE 2004 MOTION	0.50	800.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

Invoice 6979314
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Date	Professional	Description	Hours	Value
05/06/24	MCCAFFERTY	DRAFT SUBPOENAS TO CHS TX, YESCARE, AND PERIGROVE FOR FINANCIAL STATEMENTS	0.60	570.00
05/06/24	MOXLEY	DRAFT SUBPOENAS TO YESCARE, PERIGROVE, AND CHS TX FOR FINANCIAL INFORMATION AND REVISE DRAFT RULE 2004 MOTION SEEKING AUTHORITY TO SERVE THE SAME	1.20	1,500.00
05/06/24	BURNS	PHONE CALLS AND EMAIL WITH COURT PERSONNEL REGARDING THE STATUS OF REQUESTED OLDER HEARING TRANSCRIPTS NEEDED FOR DESIGNATION OF RECORD FOR APPEAL (.4); EMAILS WITH ASSIGNED TRANSCRIPTION COMPANY RE SAME (.3); CONFER WITH M.MCCAFFERTY REGARDING EXHIBITS FOR THE DESIGNATION OF RECORD FOR APPEAL (.6); ASSIST IN DRAFTING SUBPOENAS FOR PERIGROVE, YESCARE AND CHS TX (.7)	2.00	1,000.00
05/07/24	MCCAFFERTY	REVISE AND FINALIZE DESIGNATION OF RECORD AND ISSUES FOR FILING (1.8); RESEARCH BANKRUPTCY RULE 8009(F) REQUIREMENTS RELATED TO SEALED DOCUMENTS IN SUPPORT OF RECORD DESIGNATION (.4); FINALIZE AND FILE DESIGNATION OF RECORD AND ISSUES ON APPEAL FOR FILING (.5)	2.70	2,565.00
05/07/24	BURNS	CONFER WITH G. CICERO AND M. MCCAFFERTY REGARDING APPEAL DESIGNATION OF ISSUES AND RECORD (.5); ASSIST IN PREPARING FINAL VERSION OF SAME (1.2); PREPARE DESIGNATION OF ISSUES AND RECORD FOR FILING (.2); FILE SAME (.4)	2.30	1,150.00
05/07/24	MOXLEY	ATTENTION TO FINALIZING DESIGNATION OF APPELLATE RECORD	0.20	250.00
05/08/24	MCCAFFERTY	DRAFT RULE 8009(F) MOTION FOR APPEAL COURT TO ACCEPT DOCUMENTS UNDER SEAL	0.30	285.00
05/08/24	BURNS	CONFER WITH M. MCCAFFERTY REGARDING PRO HAC PROCESS IN DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS (.3); RESEARCH SAME (.4); DRAFT PRO HAC VICE MOTIONS FOR E. GOODMAN AND C. MOXLEY (1.2); EFFECTUATE REQUEST FOR ECF FILING PRIVILEGES FOR E. GOODMAN AND C. MOXLEY IN DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS (.5)	2.40	1,200.00
05/08/24	MOXLEY	ANALYZE OPPOSITION TO MOTION FOR LEAVE TO APPEAL AND AMICUS SUBMISSION IN SUPPORT OF APPEAL	0.30	375.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

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Date	Professional	Description	Hours	Value
05/09/24	GOODMAN	DRAFT AND EDIT TERM SHEET FOR JOINT PLAN	4.60	7,360.00
05/09/24	MCCAFFERTY	PREPARE PRO HAC VICE MOTIONS FOR APPEAL FILING (.2); DRAFT RULE 8009(F) MOTION FOR APPEAL COURT TO ACCEPT DOCUMENTS UNDER SEAL AND PREPARE ATTENDANT EXHIBITS (1.8)	2.00	1,900.00
05/10/24	MCCAFFERTY	PREPARE PRO HAC VICE MOTIONS AND 8009(F) MOTION AND RESOLVE APPELLANT DOCKETING ISSUE	0.40	380.00
05/10/24	BURNS	CONFER WITH APPEAL COUNSEL REGARDING THE NEED TO CORRECT COURT'S DOCKET (.3); FURTHER WORK ON PRO HAC VICE MOTIONS FOR E. GOODMAN AND C. MOXLEY (.5)	0.80	400.00
05/11/24	GOODMAN	DRAFT AND EDIT CONTINGENCY MOTION (IF MEDIATION IS UNSUCCESSFUL)	1.00	1,600.00
05/12/24	GOODMAN	DRAFT AND EDIT CONTINGENCY MOTION.	1.50	2,400.00
05/13/24	BURNS	PREPARED THE AS-FILED VERSION OF THE NOTICE OF APPEAL WHICH WAS FILED IN THE BANKRUPTCY MATTER TO BE FILED IN THE MOTION TO DISMISS APPEAL MATTER (.4); FILED SAME (.4); PREPARED MOLOLAMKEN'S RETENTION APPLICATION FOR FILING (.3); FILED SAME (.4)	1.50	750.00
05/13/24	MOXLEY	REVISE DRAFT JOINDER TO POTENTIAL MOTION TO DISMISS	0.50	625.00
05/14/24	MCCAFFERTY	RESEARCH SECTION 105 CASE LAW IN SUPPORT OF JOINDER TO TRUSTEE'S MOTION TO DISMISS	3.70	3,515.00
05/15/24	MCCAFFERTY	RESEARCH SECTION 105 CASE LAW IN SUPPORT OF JOINDER TO TRUSTEE'S MOTION TO DISMISS (1.1); DRAFT JOINDER MOTION TO TRUSTEE'S MOTION TO DISMISS (1.6)	2.70	2,565.00
05/15/24	MOXLEY	REVIEW REVISIONS TO POTENTIAL DRAFT JOINDER TO MOTION TO DISMISS	0.30	375.00
05/17/24	MCCAFFERTY	STRATEGIZE REGARDING 8009(F) MOTION FILING	0.10	95.00
05/20/24	MCCAFFERTY	COORDINATE WITH VENDORS REGARDING INVOICE PAYMENT (.1); PREPARE 8009(F) APPELLATE FILING (.2)	0.30	285.00
05/21/24	GOODMAN	TELEPHONE CALL WITH APPELLATE COUNSEL REGARDING CASE STATUS	1.00	1,600.00
05/30/24	GOODMAN	TELEPHONE CALL WITH MS. DAYTON REGARDING BRIEFING SCHEDULE.	0.20	320.00
05/31/24	GOODMAN	EDIT AND REVISE CONTINGENCY MOTION.	0.50	800.00
Total Hours and Fees			47.70	52,180.00

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

Professional	Hours	Rate	Value
JESSICA N. MEYERS	0.50 hours at	1,060.00	530.00
D. C. MOXLEY	9.70 hours at	1,250.00	12,125.00
MEGHAN MCCAFFERTY	13.90 hours at	950.00	13,205.00
ERIC R. GOODMAN	13.20 hours at	1,600.00	21,120.00
THOMAS BURNS	10.40 hours at	500.00	5,200.00
Total Fees			52,180.00



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

Invoice 6979314
Date Jun 11, 2024
Client 040178

RE: NON-WORKING TRAVEL @ 50%

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0011	NON-WORKING TRAVEL @ 50%	3,520.00	0.00	3,520.00
	Total	3,520.00	0.00	3,520.00

Total Current Fees	\$3,520.00
Total Current Costs	\$0.00
Total Invoice	\$3,520.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
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RE: NON-WORKING TRAVEL @ 50%

TIME DETAIL

Date	Professional	Description	Hours	Value
05/05/24	GOODMAN	TRAVEL TO NEW YORK, NEW YORK FOR MEDIATION	4.40	3,520.00
Total Hours and Fees			4.40	3,520.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	4.40 hours at	800.00	3,520.00
Total Fees			3,520.00



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

Invoice 6979314
Date Jun 11, 2024
Client 040178

RE: MEDIATION/SETTLEMENT

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0015	MEDIATION/SETTLEMENT	80,105.00	0.00	80,105.00
Total		80,105.00	0.00	80,105.00

Total Current Fees	\$80,105.00
Total Current Costs	\$0.00
Total Invoice	\$80,105.00



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

TIME DETAIL

Date	Professional	Description	Hours	Value
05/02/24	CICERO	REVIEW AND COMMENTS TO MEDIATION WORK PRODUCT	1.80	2,700.00
05/03/24	CICERO	FURTHER REVIEW OF MEDIATION WORK PRODUCT (.4); CALL WITH E. GOODMAN RE: SAME (.5)	0.90	1,350.00
05/05/24	GOODMAN	PLAN AND PREPARE FOR MEDIATION IN NEW YORK, INCLUDING COMMUNICATIONS WITH MR. MOXLEY AND MR. ATKINSON (1.0); REVIEW AND RESPOND TO EMAILS FROM DEBTOR'S COUNSEL REGARDING MEDIATION (.4)	1.40	2,240.00
05/05/24	MOXLEY	CONFER WITH E. GOODMAN IN PREPARATION FOR MEDIATION	0.50	625.00
05/06/24	GOODMAN	PLAN AND PREPARE FOR MEDIATION (CONFERENCE WITH MR. ZIMMERMAN AND MR. HILKERT) (1.0); ATTEND MEDIATION IN NEW YORK, NEW YORK WITH MR. SONTCHI (10.7)	11.70	18,720.00
05/06/24	CICERO	ATTENTION TO MEDIATION UPDATES FROM MEMBERS IN ROOM	1.60	2,400.00
05/06/24	MOXLEY	ANALYZE PROVINCE ANALYSIS FOR MEDIATION IN PREPARATION FOR MEDIATION (0.3); ATTEND AND PARTICIPATE IN MEDIATION SESSION (11.0); CONFER WITH E. GOODMAN AND M. ZIMMERMAN REGARDING STRATEGY POST-MEDIATION (1.0)	12.30	15,375.00
05/07/24	GOODMAN	DRAFT AND EDIT TERM SHEET FOR PLAN SETTLEMENT.	1.80	2,880.00
05/07/24	MOXLEY	REVIEW DEBTOR'S CLAIM ANALYSIS PROVIDED FOR MEDIATION PURPOSES	0.50	625.00
05/08/24	MOXLEY	REVIEW DRAFT TERM SHEET FOR CONSENSUAL PLAN	0.80	1,000.00
05/09/24	CICERO	REVIEW AND ANALYZE, DRAFT AND REVISE PLAN AND SETTLEMENT TERM SHEET	1.30	1,950.00
05/09/24	MOXLEY	REVIEW DRAFT TERM SHEET AND EMAILS AMONG MEDIATION PARTIES WITH RESPECT TO POTENTIAL RESOLUTION AND CALLS WITH E. GOODMAN RE THE SAME	2.00	2,500.00
05/09/24	GOODMAN	REVIEW FINANCIAL INFORMATION DISCLOSED IN MEDIATION	1.50	2,400.00
05/10/24	GOODMAN	CONFERENCE CALL WITH COUNSEL FOR THE UCC REGARDING SETTLEMENT PROPOSAL (.5); FURTHER REVISIONS TO SETTLEMENT PROPOSAL (.2)	0.70	1,120.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
June 11, 2024

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Date	Professional	Description	Hours	Value
05/10/24	CICERO	CALL WITH E. GOODMAN RE: MEDIATION STRATEGY (.6); REVIEW DRAFT PLEADING RE: SAME (.7)	1.30	1,950.00
05/13/24	GOODMAN	TELEPHONE CALL WITH COUNSEL FOR THE UCC REGARDING SETTLEMENT PROPOSAL	0.30	480.00
05/13/24	MOXLEY	REVIEW DOCUMENTS PRODUCED IN CONNECTION WITH MEDIATION AND QUESTIONS CONCERNING THE SAME	0.80	1,000.00
05/14/24	GOODMAN	EDIT AND REVISE SETTLEMENT PROPOSAL (.6); COMMUNICATIONS WITH MR. ZIMMERMAN REGARDING REVISED SETTLEMENT PROPOSAL (.1)	0.70	1,120.00
05/14/24	MOXLEY	COMMENT ON DRAFT SETTLEMENT PROPOSAL AND EMAILS WITH E. GOODMAN RE THE SAME	0.30	375.00
05/15/24	GOODMAN	REVIEW REVISED SETTLEMENT OFFER (.4); REVIEW PROVINCE ANALYSIS OF SETTLEMENT OFFER (.3); TELEPHONE CALL WITH THE UCC'S COUNSEL REGARDING SETTLEMENT OFFER (.2); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING SETTLEMENT ISSUES (.8)	1.70	2,720.00
05/17/24	GOODMAN	TELEPHONE CALL WITH MEDIATOR REGARDING REVISED PROPOSAL (1.1); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MEDIATION (.2)	1.30	2,080.00
05/17/24	MOXLEY	CONFER WITH E. GOODMAN RE MEDIATION ISSUES	0.10	125.00
05/19/24	GOODMAN	DRAFT EMAIL TO MR. ZIMMERMAN REGARDING REVISED SETTLEMENT PROPOSAL	0.40	640.00
05/20/24	GOODMAN	TELEPHONE CALLS WITH MR. ZIMMERMAN REGARDING SETTLEMENT PROPOSAL (.8); TELEPHONE CALL WITH COUNSEL FOR THE UCC REGARDING SETTLEMENT PROPOSAL (1.0)	1.80	2,880.00
05/21/24	GOODMAN	TELEPHONE CALLS WITH MR. ZIMMERMAN REGARDING SETTLEMENT PROPOSAL (1.0)(.2); EDIT AND REVISE SETTLEMENT RESPONSE (1.0); TELEPHONE CALL WITH MEDIATOR REGARDING SETTLEMENT PROPOSAL (.8)	3.00	4,800.00
05/21/24	MOXLEY	REVIEW MEDIATION OFFER AND PROPOSED COUNTER AND CONFER WITH THE COMMITTEE RE THE SAME	1.00	1,250.00
05/22/24	GOODMAN	EDIT AND REVISE SETTLEMENT PROPOSAL (.4); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING SETTLEMENT PROPOSAL AND RELATED MATTERS (.7); REVIEW EMAIL FROM MR. ATKINSON REGARDING SETTLEMENT PROPOSAL (.2)	1.30	2,080.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 June 11, 2024

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Date	Professional	Description	Hours	Value
05/23/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MEDIATION AND RELATED MATTERS	0.80	1,280.00
05/24/24	GOODMAN	TELEPHONE CALL WITH MEDIATOR REGARDING UCC RESPONSE (.2); EDIT AND REVISE TERM SHEET (.3); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MEDIATION (.4)	0.90	1,440.00
Total Hours and Fees			54.50	80,105.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	6.90 hours at	1,500.00	10,350.00
D. C. MOXLEY	18.30 hours at	1,250.00	22,875.00
ERIC R. GOODMAN	29.30 hours at	1,600.00	46,880.00
Total Fees			80,105.00

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 6979314
Date Jun 11, 2024
Client 040178

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

Remittance **remit**



Balance Due: \$174,079.34

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

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

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270 Park Avenue
New York, NY 10017
ABA Number: 021000021
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Account Number: 760367067