

**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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**SUMMARY COVERSHEET TO SECOND INTERIM FEE  
APPLICATION OF BROWN RUDNICK LLP FOR COMPENSATION  
FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES  
INCURRED AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT  
CLAIMANTS FOR THE PERIOD FROM APRIL 1, 2024 THROUGH JUNE 30, 2024**

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, effective as of November 22, 2023 [ECF No. 1294]
Interim Application (X) Final Application ( )	Second Interim Fee Application
Time Period Covered by this Application for which interim compensation has not previously been awarded:	April 1, 2024 – June 30, 2024
<b>Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case?</b>	<b>Yes</b>
<b>Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed?</b>	<b>Yes</b>
<b>Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases?</b>	<b>Yes</b>
<b>Do expense reimbursements represent actual and necessary expenses incurred?</b>	<b>Yes</b>
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$409,199.50
Total professional hours covered by this statement:	308
Average hourly rate for professionals:	\$1,328.57

<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:	\$27,400.00
Total paraprofessional hours covered by this statement:	54.8
Average hourly rate for paraprofessionals:	\$500.00
Total fees requested in this Application:	\$436,599.50
Total expense reimbursements requested in this Application:	\$129,795.81
Total fees and expenses requested in this Application:	\$566,395.31
Total fees and expenses requested in all prior Applications:	N/A
<b>Plan Status:</b> No current Plan to be prosecuted on file.	
<b>Primary Benefits:</b> Throughout the Application Period, as co-counsel to the TCC, Brown Rudnick: (i) appealed the Court's decisions on the TCC's motion to dismiss the case (D.I. 1260 & 1404); (ii) engaged in comprehensive settlement and Plan mediation; and (iii) met with and advised Committee members and their advisors.	

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)

**SECOND INTERIM FEE APPLICATION OF  
BROWN RUDNICK LLP FOR COMPENSATION FOR  
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES  
INCURRED AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT  
CLAIMANTS FOR THE PERIOD FROM APRIL 1, 2024, THROUGH JUNE 30, 2024**

**If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

Brown Rudnick LLP (“**Brown Rudnick**”), co-counsel to the Official Committee of Tort Claimants (the “**TCC**”), hereby submits its *Second Interim Fee Application of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024, through June 30, 2024* (the “**Application**”) for interim allowance of compensation for professional services provided in the amount of \$436,599.50 and reimbursement of actual and necessary expenses in the amount of \$129,795.81 that Brown Rudnick incurred for the period from April 1, 2024 through June 30, 2024

<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.

(the “**Application Period**”). In support of this Application, Brown Rudnick attaches the following exhibits:

EXHIBIT	DESCRIPTION
A	Fifth Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024, through April 30, 2024 [Docket No. 1568]
B	Sixth Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from May 1, 2024, through May 31, 2024 [Docket No. 1597]
C	Seventh Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from June 1, 2024, through June 30, 2024 [Docket No. 1632]

**NOTICE**

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “**Interim Compensation Order**”), notice of this Fee Application will be provided to the Application Recipients (as defined in the Interim Compensation Order).

*[Remainder of Page Intentionally Left Blank]*

Dated: August 8, 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*)

D. Cameron Moxley (*pro hac vice*)

Gerard T. Cicero (*pro hac vice*)

Meghan McCafferty (*pro hac vice*)

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

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

**CERTIFICATE OF SERVICE**

I certify that on August 8, 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

## **Exhibit A**

**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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**FIFTH 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  
APRIL 1, 2024 THROUGH APRIL 30, 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:	April 1, 2024 – April 30, 2024
Total Fees Sought:	\$233,770.50
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$221,920.50
Total professional hours covered by this statement:	173.80
Average hourly rate for professionals:	\$1,276.87

<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:	\$11,850.00
Total paraprofessional hours covered by this statement:	23.70
Average hourly rate for paraprofessionals:	\$500.00
Reimbursable expenses sought in this statement:	\$66,246.87
Payment requested:	
80% Fees	\$187,016.40
100% Expenses	\$66,246.87
Total:	\$253,263.27

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 Fifth 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 April 1, 2024 to April 30, 2024 (the “Fifth Monthly Fee Statement”). By the Fifth Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$187,016.40 (80% of \$233,770.50) as compensation for professional services rendered to the Committee and (ii) \$66,246.87 for reimbursement of actual and necessary expenses, for a total of \$253,263.27 for the



period April 1, 2024 through and including April 30, 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 Fifth Monthly Fee Statement to object to the requested fees and expenses.

### **Itemization of Services Rendered and Expenses Incurred**

1. In support of this Fifth 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 \$233,770.50 in fees during the Fee Period. Pursuant to this Fifth Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$187,016.40 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 Fifth Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 197.50 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 Fifth Monthly Fee Statement. This Fifth Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$66,246.87.

**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 Fifth 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 \$253,263.27, consisting of (i) \$187,016.40, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$66,246.87, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: May 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*)

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

**CERTIFICATE OF SERVICE**

I certify that on May 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

5/15/2024



CLIENT: 040178

1

Bill Date range: 5/15/2024 to 5/15/2024

MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
CASE ADMINISTRATION/DISBURSEMENTS	GOODMAN, ERIC R.	0.70	\$1,120.00
	BURNS, THOMAS	4.80	\$2,400.00
		<b>5.50</b>	<b>\$3,520.00</b>
MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	CICERO, GERARD T.	7.20	\$10,800.00
	MOXLEY, D. CAMERON	5.10	\$6,375.00
	SIEGER-GRIMM, SUSAN	1.00	\$1,200.00
	GOODMAN, ERIC R.	7.30	\$11,680.00
		<b>20.60</b>	<b>\$30,055.00</b>
MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	GOODMAN, ERIC R.	4.30	\$6,880.00
	BURNS, THOMAS	0.40	\$200.00
		<b>4.70</b>	<b>\$7,080.00</b>
FEE/EMPLOYMENT APPLICATIONS	CICERO, GERARD T.	3.90	\$5,850.00
	MOXLEY, D. CAMERON	0.80	\$1,000.00
	GOODMAN, ERIC R.	7.30	\$11,680.00
	REINING, MICHAEL W.	3.10	\$3,022.50
	BURNS, THOMAS	13.60	\$6,800.00
		<b>28.70</b>	<b>\$28,352.50</b>
CONTESTED MATTERS/LITIGATION (GENERAL)	MEYERS, JESSICA N.	0.20	\$212.00
	MOXLEY, D. CAMERON	6.30	\$7,875.00
	COHEN, HARRIET E.	1.00	\$500.00
	MCCAFFERTY, MEGHAN	8.40	\$7,980.00
	GOODMAN, ERIC R.	52.00	\$83,200.00
	CASTANO, ELIZABETH, C.	37.30	\$24,058.50
	RIZKALLA, ANDREW	0.30	\$232.50
	KASNETZ, ALEXANDER F.	0.30	\$285.00
	BURNS, THOMAS	3.90	\$1,950.00
		<b>109.70</b>	<b>\$126,293.00</b>

FEE APPLICATION DATA

5/15/2024



CLIENT: 040178

1

Bill Date range: 5/15/2024 to 5/15/2024

MEDIATION/SETTLEMENT	CICERO, GERARD T.	5.80	\$8,700.00
	MOXLEY, D. CAMERON	3.90	\$4,875.00
	MCCAFFERTY, MEGHAN	5.00	\$4,750.00
	GOODMAN, ERIC R.	7.40	\$11,840.00
		<b>22.10</b>	<b>\$30,165.00</b>
COURT ATTENDANCE	CICERO, GERARD T.	2.10	\$3,150.00
	MCCAFFERTY, MEGHAN	2.00	\$1,900.00
	GOODMAN, ERIC R.	1.80	\$2,880.00
		<b>5.90</b>	<b>\$7,930.00</b>
DISMISSAL/TRUSTEE/EXAMINER MATTERS	MOXLEY, D. CAMERON	0.30	\$375.00
		<b>0.30</b>	<b>\$375.00</b>
		<b>197.50</b>	<b>\$233,770.50</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	80.80	\$129,280.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	19.00	\$28,500.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	16.40	\$20,500.00
Susan Sieger-Grimm	Counsel; Admitted to Virginia Bar in 1994; Admitted to New York Bar 1997; Dispute Resolution & Restructuring	\$1,200	1.00	\$1,200.00
Jessica N. Meyers	Partner; Admitted in Massachusetts Bar in 2015; Admitted to New York Bar in 2017; Dispute Resolution & Restructuring	\$1,060	.20	\$212.00
Michael W. Reining	Associate; Admitted to New York Bar in 2018; Admitted to California Bar in 2018; Dispute	\$975	3.10	\$3,022.50



<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>
	Resolution & Restructuring			
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$950	15.40	\$14,630.00
Alexander F. Kasnetz	Associate; Admitted to Illinois Bar in 2018; Dispute Resolution & Restructuring	\$950	.30	\$285.00
Andrew Rizkalla	Associate; Admitted to Illinois Bar in 2021; Admitted to Tennessee Bar in 2021	\$775	.30	\$232.50
Elizabeth C. Castano	Associate; Admitted to New York Bar in 2024; Dispute Resolution & Restructuring	\$645	37.30	\$24,058.50
<b>TOTAL</b>			<b>173.80</b>	<b>\$221,920.50</b>
<b>PROFESSIONAL BLENDED RATE</b>		<b>\$1,276.87</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>
Harriet E. Cohen	Paralegal	\$500	1.00	\$500.00
Thomas Burns	Paralegal	\$500	22.70	\$11,350.00
<b>TOTAL</b>			<b>23.70</b>	<b>\$11,850.00</b>
<b>PARAPROFESSIONAL BLENDED RATE</b>		<b>\$500</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
5/15/2024	Airfare	6,839.72
	Document Production	0.00
	Hotel	43,191.17
	Meals	1,935.21
	Mileage	36.18
	Misc. Expenses	74.36
	Outside Copies	8,314.79
	Pacer	51.40
	Parking and Tolls	51.00
	Searches	35.00
	Taxi	1,533.00
	Train Travel	337.00
	Travel Agent Fee	810.00
	Westlaw Online Transactional Searches / Docs	3,038.04
		<b>66,246.87</b>
		<b>66,246.87</b>

**EXHIBIT D**

**Detailed Record of Time Entries**



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

Invoice 6978381  
Date May 15, 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 April 30, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	3,520.00	66,246.87	69,766.87
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	30,055.00	0.00	30,055.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	7,080.00	0.00	7,080.00
040178.0008	FEE/EMPLOYMENT APPLICATIONS	28,352.50	0.00	28,352.50
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	126,293.00	0.00	126,293.00
040178.0015	MEDIATION/SETTLEMENT	30,165.00	0.00	30,165.00
040178.0016	COURT ATTENDANCE	7,930.00	0.00	7,930.00
040178.0017	DISMISSAL/TRUSTEE/EXAMINER MATTERS	375.00	0.00	375.00
<b>Total</b>		<b>233,770.50</b>	<b>66,246.87</b>	<b>300,017.37</b>

Total Current Fees	\$233,770.50
20% Holdback Amount	(46,754.10)
80% CURRENT BALANCE DUE	187,016.40
Total Current Costs	\$66,246.87
<b>Total Invoice</b>	<b>\$253,263.27</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	3,520.00	66,246.87	69,766.87
	<b>Total</b>	<b>3,520.00</b>	<b>66,246.87</b>	<b>69,766.87</b>

Total Current Fees	\$3,520.00
Total Current Costs	\$66,246.87
<b>Total Invoice</b>	<b>\$69,766.87</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024Invoice 6978381  
Page 3

RE: CASE ADMINISTRATION/DISBURSEMENTS

## TIME DETAIL

Date	Professional	Description	Hours	Value
04/03/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
04/05/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.50	250.00
04/08/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.4); OBTAINING TRANSCRIPT FROM MARCH 21ST SALE HEARING (.2) CIRCULATING SAME (.2)	1.10	550.00
04/09/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
04/11/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.3)	0.40	200.00
04/16/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
04/17/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.40	200.00
04/18/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
04/19/24	GOODMAN	TELEPHONE CALL WITH PRO SE CLAIMANT REGARDING CASE STATUS.	0.70	1,120.00
04/22/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.40	200.00
04/26/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
04/30/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.3)	0.60	300.00
<b>Total Hours and Fees</b>			<b>5.50</b>	<b>3,520.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	0.70 hours at	1,600.00	1,120.00
THOMAS BURNS	4.80 hours at	500.00	2,400.00
<b>Total Fees</b>			<b>3,520.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024Invoice 6978381  
Page 4**COST SUMMARY**

<b>Description</b>	<b>Value</b>
PARKING AND TOLLS	51.00
MEALS	1,935.21
OUTSIDE COPIES	8,314.79
MISC. EXPENSES	74.36
TRAVEL AGENT FEE	810.00
TRAIN TRAVEL	337.00
SEARCHES	35.00
AIRFARE	6,839.72
MILEAGE	36.18
TAXI	1,533.00
HOTEL	43,191.17
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	3,038.04
PACER	51.40
<b>Total Costs</b>	<b>66,246.87</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	30,055.00	0.00	30,055.00
	<b>Total</b>	<b>30,055.00</b>	<b>0.00</b>	<b>30,055.00</b>

Total Current Fees	\$30,055.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$30,055.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
04/02/24	CICERO	PARTICIPATE IN CALL WITH COMMITTEE MEMBERS	1.00	1,500.00
04/02/24	GOODMAN	ATTEND TCC MEETING (IN PART) VIA ZOOM.	1.10	1,760.00
04/02/24	MOXLEY	PARTICIPATE IN STRATEGY MEETING WITH COMMITTEE	1.20	1,500.00
04/03/24	GOODMAN	TELEPHONE CALL WITH MR. SONTCHI REGARDING CASE STATUS	0.20	320.00
04/09/24	CICERO	PARTICIPATE IN COMMITTEE MEETING	0.80	1,200.00
04/09/24	GOODMAN	ATTEND MEETING WITH THE COMMITTEE REGARDING CASE STATUS.	0.80	1,280.00
04/09/24	MOXLEY	PREPARE FOR MEETING WITH COMMITTEE (0.1) AND PARTICIPATE IN COMMITTEE MEETING REGARDING CASE ISSUES AND STRATEGY (0.8)	0.90	1,125.00
04/12/24	GOODMAN	ATTEND MEETING WITH THE COMMITTEE TO DISCUSS COURT RULING AND NEXT STEPS.	1.00	1,600.00
04/12/24	SIEGER-GRIMM	COMMITTEE MEETING RE: HEARING OUTCOME AND NEXT STEPS	1.00	1,200.00
04/12/24	CICERO	PARTICIPATE IN WEEKLY MEETING AND UPDATE CALL WITH COMMITTEE MEMBERS (1.2); CALL WITH E. GOODMAN RE: STRATEGY IN ADVANCE OF SAME (.7)	1.90	2,850.00
04/16/24	GOODMAN	ATTEND MEETING WITH THE COMMITTEE REGARDING CASE STATUS.	1.00	1,600.00
04/16/24	CICERO	PARTICIPATE IN WEEKLY COMMITTEE MEETING RE CASE STRATEGY	1.00	1,500.00
04/23/24	CICERO	PARTICIPATE IN WEEKLY COMMITTEE MEMBER MEETING FOR UPDATE AND STRATEGY	1.20	1,800.00
04/23/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING CASE STATUS.	1.40	2,240.00
04/23/24	MOXLEY	PARTICIPATE IN COMMITTEE STRATEGY MEETING	1.40	1,750.00
04/29/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING MEDIATION AND RELATED MATTERS.	1.80	2,880.00
04/29/24	CICERO	PARTICIPATE IN PRE-MEDIATION STRATEGY AND UPDATE CALL WITH COMMITTEE MEMBERS	1.30	1,950.00
04/29/24	MOXLEY	PARTICIPATE IN STRATEGY MEETING WITH COMMITTEE	1.60	2,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
 May 15, 2024

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Date	Professional	Description	Hours	Value
<b>Total Hours and Fees</b>			<b>20.60</b>	<b>30,055.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
GERARD T. CICERO	7.20 hours at	1,500.00	10,800.00
D. C. MOXLEY	5.10 hours at	1,250.00	6,375.00
SUSAN SIEGER-GRIMM	1.00 hours at	1,200.00	1,200.00
ERIC R. GOODMAN	7.30 hours at	1,600.00	11,680.00
<b>Total Fees</b>			<b>30,055.00</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 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	7,080.00	0.00	7,080.00
	<b>Total</b>	<b>7,080.00</b>	<b>0.00</b>	<b>7,080.00</b>

Total Current Fees	\$7,080.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$7,080.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

**TIME DETAIL**

Date	Professional	Description	Hours	Value
04/03/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.20	320.00
04/05/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.50	800.00
04/08/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.10	160.00
04/11/24	GOODMAN	CONFERENCE CALL WITH CO-COUNSEL REGARDING LITIGATION STRATEGY POST-COURT RULING.	0.70	1,120.00
04/21/24	GOODMAN	DRAFT EMAIL TO MR. ZIMMERMAN REGARDING NOTICE OF APPEAL	0.10	160.00
04/22/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.70	1,120.00
04/24/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS AND MEDIATION	1.00	1,600.00
04/25/24	BURNS	CONFER WITH G. CICERO, E. GOODMAN, M. ZIMMERMAN AND M. ATKINSON REGARDING PROVINCE'S THIRD MONTHLY FEE STATEMENT	0.40	200.00
04/26/24	GOODMAN	TELEPHONE CALL WITH MR. ATKINSON REGARDING CLAIMS ANALYSIS AND MEDIATION (.2); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MEDIATION (.8)	1.00	1,600.00
<b>Total Hours and Fees</b>			<b>4.70</b>	<b>7,080.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
ERIC R. GOODMAN	4.30 hours at	1,600.00	6,880.00
THOMAS BURNS	0.40 hours at	500.00	200.00
<b>Total Fees</b>			<b>7,080.00</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0008	FEE/EMPLOYMENT APPLICATIONS	28,352.50	0.00	28,352.50
<b>Total</b>		<b>28,352.50</b>	<b>0.00</b>	<b>28,352.50</b>

Total Current Fees	\$28,352.50
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$28,352.50</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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RE: FEE/EMPLOYMENT APPLICATIONS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
04/01/24	BURNS	WORK ON FOURTH MONTHLY FEE STATEMENT	0.60	300.00
04/02/24	BURNS	WORK ON FOURTH MONTHLY FEE APPLICATION	0.90	450.00
04/08/24	CICERO	REVIEW INTERIM FEE MOTION (.3); REVISE AND DRAFT INTERIM FEE MOTION OBJECTION (1.4); DISCUSSION WITH R. STARK RE: SAME (.3); DISCUSSION WITH E. GOODMAN RE: STRATEGY FOR FEES AND EXPENSES (.5)	2.50	3,750.00
04/08/24	BURNS	CONFER WITH E. GOODMAN AND G.CICERO REGARDING FIRST INTERIM FEE APPLICATION	0.30	150.00
04/09/24	CICERO	REVIEW FEE STATEMENT FOR FILING	0.80	1,200.00
04/12/24	BURNS	WORK ON 4TH MONTHLY FEE APPLICATION	0.90	450.00
04/15/24	BURNS	WORK ON FOURTH MONTHLY FEE STATEMENT (1.1); WORK ON FIRST INTERIM FEE APPLICATION (1.8); CONFER WITH G. CICERO REGARDING THE DISCLOSURES FILED WITH THE BR RETENTION APPLICATION (.1); RETRIEVE AND CIRCULATE SAME (.3)	3.30	1,650.00
04/16/24	BURNS	WORK ON FOURTH MONTHLY FEE APPLICATION (1.0); WORK ON INTERIM FEE APPLICATION (.8)	1.80	900.00
04/17/24	REINING	REVISE FIRST INTERIM FEE APPLICATION	2.10	2,047.50
04/18/24	GOODMAN	DRAFT AND EDIT SUPPLEMENTAL STATEMENT IN SUPPORT OF BROWN RUDNICK INTERIM FEE APPLICATION.	4.00	6,400.00
04/18/24	REINING	REVISE FIRST INTERIM FEE APPLICATION (.3); REVISE SUPPLEMENT TO FIRST INTERIM FEE APPLICATION (.5)	0.80	780.00
04/19/24	GOODMAN	REVIEW AND EDIT FIRST INTERIM FEE APPLICATION AND RELATED DOCUMENTS.	2.30	3,680.00
04/19/24	REINING	ATTENTION TO FINALIZING FIRST INTERIM FEE APPLICATION	0.20	195.00
04/19/24	MOXLEY	COMMENT ON DRAFT FEE APPLICATION	0.80	1,000.00
04/19/24	BURNS	WORK ON FOURTH FEE STATEMENT (.6); WORK ON FIRST INTERIM FEE STATEMENT (.5)	1.10	550.00
04/22/24	BURNS	CONFER WITH G. CICERO REGARDING FOURTH MONTHLY FEE STATEMENT AND FIRST INTERIM FEE STATEMENT	0.50	250.00





TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

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Date	Professional	Description	Hours	Value
04/23/24	CICERO	REVIEW AND FINALIZE INTERIM FEE APPLICATION AND MONTHLY FEE STATEMENT FOR FILING AND WORK WITH E. GOODMAN AND T. BURNS RE: SAME (.6)	0.60	900.00
04/23/24	GOODMAN	EDIT AND FINALIZED FIRST INTERIM FEE APPLICATION	1.00	1,600.00
04/23/24	BURNS	CONFER WITH G. CICERO AND E. GOODMAN REGARDING THE FIRST FEE APPLICATION AND FOURTH FEE STATEMENT (.4); PREPARE FOURTH FEE STATEMENT FOR FILING (.3); FILE SAME (.5); WORK ON FIRST INTERIM FEE APPLICATION (.5); PREPARE FIRST FEE INTERIM FEE APPLICATION FOR FILING (.3); FILE SAME (.4)	2.40	1,200.00
04/26/24	BURNS	PREPARING PROVINCE'S THIRD MONTHLY FEE STATEMENT FOR FILING (.4); FILING SAME (.4)	0.80	400.00
04/29/24	BURNS	WORK ON 5TH MONTHLY FEE STATEMENT	0.60	300.00
04/30/24	BURNS	WORK ON FIFTH FEE STATEMENT	0.40	200.00
<b>Total Hours and Fees</b>			<b>28.70</b>	<b>28,352.50</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	3.90 hours at	1,500.00	5,850.00
D. C. MOXLEY	0.80 hours at	1,250.00	1,000.00
ERIC R. GOODMAN	7.30 hours at	1,600.00	11,680.00
MICHAEL W. REINING	3.10 hours at	975.00	3,022.50
THOMAS BURNS	13.60 hours at	500.00	6,800.00
<b>Total Fees</b>			<b>28,352.50</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	126,293.00	0.00	126,293.00
	<b>Total</b>	<b>126,293.00</b>	<b>0.00</b>	<b>126,293.00</b>

Total Current Fees	\$126,293.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$126,293.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**TIME DETAIL**

Date	Professional	Description	Hours	Value
04/01/24	MOXLEY	CALL WITH E. GOODMAN RE EVIDENTIARY RECORD ON THE MOTION TO DISMISS AND RULE 9019 MOTION	0.20	250.00
04/02/24	CASTANO	RESEARCH AND ANALYSIS RE: WHETHER AN ORDER ON A MOTION TO DISMISS FOR BAD FAITH IS IMMEDIATELY APPEALABLE.	2.40	1,548.00
04/02/24	KASNETZ	CONDUCT RESEARCH RE ORDER APPEALABILITY.	0.30	285.00
04/02/24	RIZKALLA	LEGAL RESEARCH RE: APPEAL OF DISMISSAL ORDER	0.30	232.50
04/03/24	MCCAFFERTY	COORDINATE REGARDING PAYMENT OF PRINTER INVOICE FOR TRIAL EXHIBITS	0.10	95.00
04/03/24	CASTANO	RESEARCH RE: WHETHER APPEALABILITY OF ORDERS IN THE 5TH CIRCUIT.	4.50	2,902.50
04/03/24	GOODMAN	RESEARCH AND REVIEW SECONDARY RESOURCES FOR APPEAL ISSUES	1.00	1,600.00
04/04/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR APPEALS STRATEGY (IN THE EVENT OF ADVERSE RULING ON MOTION TO DISMISS) (1.0); TELEPHONE CALL WITH MR. MOXLEY REGARDING CASE STATUS (.6); TELEPHONE CALL WITH COUNSEL FOR THE UST REGARDING CASE STATUS (.6).	2.20	3,520.00
04/04/24	CASTANO	REVIEWING CASE LAW AND DRAFTING MEMO RE APPEALABILITY OF A MOTION TO DISMISS (5.4); ADDITIONAL RESEARCH RE FIFTH CIR.'S INTERPRETATION OF FINAL ORDERS FOR APPEALABILITY PURPOSES (.8)	6.20	3,999.00
04/04/24	MCCAFFERTY	COORDINATE RESPONSE TO VENDORS REGARDING TRIAL EXPENSES	0.10	95.00
04/04/24	MOXLEY	CONFER WITH E. GOODMAN RE NEXT STEPS DEPENDING ON RULING ON MOTION TO DISMISS AND RULE 9019 MOTION	0.60	750.00
04/05/24	CASTANO	CONDUCTING ADDITIONAL RESEARCH AND ANALYSIS RE: FINALITY OF BANKRUPTCY COURT ORDERS IN VARIOUS CIRCUITS.	5.50	3,547.50
04/05/24	MCCAFFERTY	RESPOND TO CREDITOR OUTREACH (.5); COORDINATE RESPONSE TO VENDORS FOR TRIAL SERVICES (.2)	0.70	665.00
04/05/24	GOODMAN	REVIEW PROPOSED MOTION TO MODIFY INTERIM COMPENSATION PROCEDURES (.2); MEET AND CONFER WITH COUNSEL FOR THE DEBTOR REGARDING INTERIM COMPENSATION PROCEDURES (.2)	0.40	640.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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Date	Professional	Description	Hours	Value
04/05/24	MOXLEY	CALLS WITH E. GOODMAN AND M. MCCAFFERTY REGARDING PROPOSED AMENDED FEES ORDER AND CASE PLANNING (0.8); CALL WITH DEBTOR'S AND UCC'S COUNSEL AND E. GOODMAN REGARDING PROPOSED AMENDED FEES ORDER (0.2)	1.00	1,250.00
04/08/24	GOODMAN	REVIEW DEBTOR'S MOTION TO AMEND INTERIM COMPENSATION ORDER (.6); DRAFT AND EDIT OBJECTION TO THE DEBTOR'S MOTION AND CROSS MOTION FOR AMENDED INTERIM COMPENSATION ORDER (3.4); DRAFT AND EDIT PROPOSED AMENDED INTERIM COMPENSATION ORDER (1.5)	5.50	8,800.00
04/08/24	CASTANO	REVIEWING AND SUMMARIZING CASE LAW RE: FINALITY OF ORDERS ON MOTIONS TO DISMISS CH. 11 FOR BAD FAITH.	3.00	1,935.00
04/09/24	GOODMAN	FURTHER REVISIONS TO MOTION TO AMEND INTERIM COMPENSATION PROCEDURES AND PROPOSED ORDER.	1.50	2,400.00
04/09/24	MCCAFFERTY	CIRCULATE TRIAL TRANSCRIPTS TO M. ZIMMERMAN	0.10	95.00
04/09/24	CASTANO	ADDITIONAL RESEARCH ON THE FINALITY OF ORDERS DENYING MOTIONS TO DISMISS CH. 11 CASES FOR BAD FAITH.	3.30	2,128.50
04/09/24	MOXLEY	REVIEW AND COMMENT ON OBJECTION TO FEE AMENDMENT MOTION AND CALLS WITH E. GOODMAN RE THE SAME AND OVERALL CASE STRATEGY ISSUES	1.00	1,250.00
04/10/24	CASTANO	ADDITIONAL RESEARCH RE: REPRECUSIONS OF DISMISSAL OF CH. 11 CASE.	3.70	2,386.50
04/10/24	MCCAFFERTY	REVIEW COMPLAINT FILING AND M. ATKINSON ANALYSIS	0.10	95.00
04/11/24	CASTANO	ADDITIONAL RESEARCH RE IMPLICATIONS OF CASE DISMISSAL.	6.30	4,063.50
04/11/24	BURNS	CONFER WITH M. MCCAFFERTY REGARDING LOGISTICS FOR APRIL 11 HEARING (.3); PREPARE TRANSCRIPT ORDER FORM FOR APRIL 11 HEARING (.5); FILE SAME (.3)	1.10	550.00
04/11/24	MOXLEY	CONFER WITH TEAM RE RULE 9029 MOTION AND MOTION TO DISMISS DECISION	0.50	625.00
04/12/24	GOODMAN	DRAFT AND EDIT NOTICE OF APPEAL (1.2); DRAFT AND EDIT MOTION FOR LEAVE TO FILE INTERLOCUTORY APPEAL AND FOR CERTIFICATION (4.8); FURTHER REVIEW OF HEARING TRANSCRIPTS ON MOTION TO DISMISS (.8).	6.80	10,880.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

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Date	Professional	Description	Hours	Value
04/14/24	GOODMAN	EDIT AND REVISE MOTION FOR LEAVE TO FILE APPEAL AND FOR CERTIFICATION.	6.50	10,400.00
04/15/24	GOODMAN	FURTHER REVISIONS TO MOTION FOR LEAVE TO FILE APPEAL OF COURT'S RULING DENYING MOTION TO DISMISS (2.2); COMMUNICATIONS WITH MS. MCCAFFERTY REGARDING APPEAL DOCUMENTS (.1).	2.30	3,680.00
04/15/24	MCCAFFERTY	DRAFT REVISIONS TO NOTICE OF APPEAL AND MOTION FOR LEAVE TO APPEAL (.9)	0.90	855.00
04/15/24	CASTANO	ADDITIONAL RESEARCH RE: IMPLICATIONS OF DISMISSAL AND APPEALABILITY IN THE 5TH CIRCUIT.	1.30	838.50
04/15/24	BURNS	CONFER WITH M. MCCAFFERTY REGARDING THE STATUS OF THE APRIL 11 HEARING TRANSCRIPT (.1); OBTAIN AND CIRCULATE SAME (.2)	0.30	150.00
04/16/24	GOODMAN	EDIT AND REVISE MOTION FOR LEAVE (3.5); REVIEW AND EDIT NOTICE OF APPEAL (.2)	3.70	5,920.00
04/16/24	MCCAFFERTY	DRAFT AND REVISE NOTICE OF APPEAL OF COURT'S ORDER ON TCC'S MOTION TO DISMISS (.9); REVISE MOTION FOR LEAVE TO APPEAL COURT'S ORDER ON TCC'S MOTION TO DISMISS (1.2)	2.30	2,185.00
04/17/24	GOODMAN	FURTHER REVISIONS TO MOTION FOR LEAVE.	0.90	1,440.00
04/17/24	BURNS	CONFER WITH G. CICERO REGARDING TRANSCRIPT OF DECEMBER 18, 2023 HEARING	0.30	150.00
04/18/24	GOODMAN	TELEPHONE CALL WITH CO-COUNSEL REGARDING MOTION FOR LEAVE.	1.00	1,600.00
04/19/24	GOODMAN	FURTHER REVISIONS TO MOTION FOR LEAVE FOR INTERLOCUTORY APPEAL.	0.80	1,280.00
04/20/24	GOODMAN	REVIEW EDITS TO MOTION FOR LEAVE FROM APPELLATE COUNSEL (.6); EDIT AND REVISE MOTION FOR LEAVE (1.7)	2.30	3,680.00
04/21/24	GOODMAN	FURTHER REVIEW OF HEARING TRANSCRIPTS (3.2); EDIT AND REVISE MOTION FOR LEAVE (1.0); EDIT AND REVISE NOTICE OF APPEAL (.3)	4.50	7,200.00
04/22/24	CASTANO	ANALYZING AND ORGANIZING RESEARCH RE IMPLICATIONS OF DISMISSAL AND POST-DISMISSAL ACTIONS	1.10	709.50
04/22/24	GOODMAN	EDIT AND REVIEW MOTION FOR LEAVE (2.5); REVIEW ADDITIONAL CASE LAW IN SUPPORT OF MOTION FOR LEAVE (2.0); TELEPHONE CALL WITH MR. MOXLEY REGARDING CASE STATUS (.4)	4.90	7,840.00
04/22/24	MOXLEY	REVIEW AND COMMENT ON DRAFT MOTION FOR LEAVE TO APPEAL	2.10	2,625.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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Date	Professional	Description	Hours	Value
04/23/24	GOODMAN	EDIT AND REVISE MOTION FOR LEAVE (1.5); EDIT AND REVIEW NOTICE OF APPEAL (.4); COMMUNICATIONS WITH TEAM REGARDING EXHIBITS AND FILING ISSUES (.1)	2.00	3,200.00
04/23/24	MCCAFFERTY	FINALIZE NOTICE OF APPEAL AND MOTION FOR LEAVE TO APPEAL FOR FILING (.9)	0.90	855.00
04/23/24	BURNS	PREPARE EXHIBITS FOR NOTICE OF APPEAL (.8); CITE CHECK MOTION TO LEAVE (.9)	1.70	850.00
04/24/24	GOODMAN	EDIT AND FINALIZE MOTION FOR LEAVE AND NOTICE OF APPEAL (2.8); TELEPHONE CALL WITH COUNSEL FOR THE UST REGARDING CASE STATUS (.5)	3.30	5,280.00
04/24/24	MCCAFFERTY	FILE NOTICE OF APPEAL AND MOTION FOR LEAVE TO APPEAL (.6)	0.60	570.00
04/24/24	COHEN	STRATEGIZE REGARDING JOINT NOTICE OF APPEAL AND EXHIBITS (.3); EFFECTUATE FILING OF NOTICE OF APPEAL AND EXHIBITS (.4); COMMUNICATIONS WITH M. MCCAFFERTY (.2); CIRCULATE FILED NOTICE OF APPEAL TO TEAM (.1)	1.00	500.00
04/25/24	GOODMAN	DRAFT AND EDIT DESIGNATION OF THE RECORD FOR APPEAL AND STATEMENT OF ISSUES FOR APPEAL (.8); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING SERVICE OF NOTICE OF APPEAL (.1)	0.90	1,440.00
04/25/24	MOXLEY	CONFER WITH M. MCCAFFERTY RE PREPARATION OF DESIGNATION OF RECORD FOR APPEAL AND CONFER WITH E. GOODMAN AND M. ZIMMERMAN REGARDING SERVICE OF NOTICE OF APPEAL	0.90	1,125.00
04/25/24	BURNS	PREPARE NOTICE OF SERVICE FOR NOTICE OF APPEAL FOR FILING (.2); FILE SAME (.3)	0.50	250.00
04/29/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.30	480.00
04/30/24	MCCAFFERTY	DRAFT LIST OF DESIGNATED MATERIALS FOR APPEAL (2.6)	2.60	2,470.00
04/30/24	GOODMAN	DRAFT AND EDIT PRESENTATION FOR TCC/UCC CHAPTER 11 PLAN.	1.20	1,920.00
04/30/24	MEYERS	DISCUSS PREPARATION OF APPEAL APPENDIX AND MEDIATION EFFORTS.	0.20	212.00
<b>Total Hours and Fees</b>			<b>109.70</b>	<b>126,293.00</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
JESSICA N. MEYERS	0.20 hours at	1,060.00	212.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
 May 15, 2024

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<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Value</b>
D. C. MOXLEY	6.30 hours at	1,250.00	7,875.00
HARRIET E. COHEN	1.00 hours at	500.00	500.00
MEGHAN MCCAFFERTY	8.40 hours at	950.00	7,980.00
ERIC R. GOODMAN	52.00 hours at	1,600.00	83,200.00
ELIZABETH C. CASTANO	37.30 hours at	645.00	24,058.50
ANDREW RIZKALLA	0.30 hours at	775.00	232.50
ALEXANDER F. KASNETZ	0.30 hours at	950.00	285.00
THOMAS BURNS	3.90 hours at	500.00	1,950.00
<b>Total Fees</b>			<b>126,293.00</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: MEDIATION/SETTLEMENT

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0015	MEDIATION/SETTLEMENT	30,165.00	0.00	30,165.00
<b>Total</b>		<b>30,165.00</b>	<b>0.00</b>	<b>30,165.00</b>

Total Current Fees	\$30,165.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$30,165.00</b>





TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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RE: MEDIATION/SETTLEMENT

**TIME DETAIL**

Date	Professional	Description	Hours	Value
04/15/24	CICERO	DRAFT MEDIATION RELATED COMMUNICATION TO DEBTOR/UCC	0.80	1,200.00
04/16/24	GOODMAN	TELEPHONE CALL WITH MS. MCCAFFERTY REGARDING SETTLEMENT PROPOSAL AND RELATED MATTERS (.6); DRAFT EMAIL TO OPPOSING COUNSEL REGARDING MEDIATION (.4)	1.00	1,600.00
04/16/24	MCCAFFERTY	STRATEGISE WITH E.GOODMAN REGARDING MEDIATION PRESENTATION AND STRATEGY	0.60	570.00
04/17/24	GOODMAN	TELEPHONE CALL WITH JUDGE SONTCHI REGARDING MEDIATION (.8); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MEDIATION UPDATE (.4).	1.20	1,920.00
04/22/24	CICERO	CALL WITH E. GOODMAN RE: MEDIATION (.7); CALL WITH E. GOODMAN RE: RESPONSE TO DEBTOR AND UCC EMAILS RE: MEDIATION (.6); COMMUNICATIONS WITH M. ATKINSON RE: MEDIATION (.9)	2.20	3,300.00
04/22/24	MOXLEY	REVIEW PROPOSED MEDIATION ORDER	0.70	875.00
04/22/24	GOODMAN	REVIEW EMAILS FROM THE DEBTOR AND THE UCC REGARDING MEDIATION	0.40	640.00
04/24/24	MOXLEY	REVISE DRAFT MEDIATION ORDER AND EMAILS WITH DEBTOR, UCC COUNSEL, AND MEDIATOR RS THE SAME AND CONFER WITH E. GOODMAN RE THE SAME	1.70	2,125.00
04/24/24	GOODMAN	REVIEW AND EDIT MEDIATION ORDER (.4); REVIEW AND RESPOND TO EMAILS REGARDING MEDIATION ORDER (.5); TELEPHONE CALL WITH STATE COURT COUNSEL REGARDING MEDIATION (1.1)	2.00	3,200.00
04/25/24	MCCAFFERTY	PREPARE MEDIATION PRESENTATION (1.9)	1.90	1,805.00
04/26/24	MCCAFFERTY	RESEARCH CONSENSUAL THIRD-PARTY RELEASE PLANS IN SUPPORT OF MEDIATION PRESENTATION (1.1); DRAFT MEDIATION PRESENTATION (1.5)	2.50	2,375.00
04/26/24	MOXLEY	REVIEW COMMENTS ON PROPOSED MEDIATION ORDER AND PREPARE FOR MEDIATION	0.40	500.00
04/26/24	GOODMAN	TELEPHONE CALL WITH MS. HAYWARD REGARDING MEDIATION (.5); TELEPHONE CALL WITH MR. CICERO REGARDING MEDIATION AND RELATED MATTERS (.5)	1.00	1,600.00
04/27/24	GOODMAN	EDIT AND REVISE MEDIATION PRESENTATION REGARDING POSSIBLE SETTLEMENT STRUCTURE	1.00	1,600.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024

Invoice 6978381  
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Date	Professional	Description	Hours	Value
04/29/24	CICERO	STRATEGIZE RE: POTENTIAL UCC/TCC SETTLEMENTS AND CASE PLAN SHOULD GLOBAL MEDIATION WITH LITIGATION TARGETS BE UNSUCCESSFUL	2.80	4,200.00
04/29/24	MOXLEY	PREPARE FOR AND CONFER WITH E. GOODMAN RE MEDIATION STRATEGY	0.80	1,000.00
04/29/24	GOODMAN	EDIT AND REVISE MEDIATION PRESENTATION	0.80	1,280.00
04/30/24	MOXLEY	PREPARE FOR MEDIATION AND CONFER WITH J. MEYERS RE SAME	0.30	375.00
<b>Total Hours and Fees</b>			<b>22.10</b>	<b>30,165.00</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	5.80 hours at	1,500.00	8,700.00
D. C. MOXLEY	3.90 hours at	1,250.00	4,875.00
MEGHAN MCCAFFERTY	5.00 hours at	950.00	4,750.00
ERIC R. GOODMAN	7.40 hours at	1,600.00	11,840.00
<b>Total Fees</b>			<b>30,165.00</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: COURT ATTENDANCE

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0016	COURT ATTENDANCE	7,930.00	0.00	7,930.00
	<b>Total</b>	<b>7,930.00</b>	<b>0.00</b>	<b>7,930.00</b>

Total Current Fees	\$7,930.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$7,930.00</b>

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

## TIME DETAIL

Date	Professional	Description	Hours	Value
04/11/24	CICERO	ATTEND 9019 AND DISMISSAL HEARING (.8); DISCUSS THEREAFTER WITH CO-COUNSEL (.8); CALL WITH E. GOODMAN AND M. ZIMMERMAN RE: SAME (.5)	2.10	3,150.00
04/11/24	GOODMAN	ATTEND HEARING ON RULING ON MOTION TO DISMISS AND RULE 9019 MOTION (.9); POST HEARING CONFERENCE WITH LITIGATION TEAM REGARDING COURT'S RULING (.9).	1.80	2,880.00
04/11/24	MCCAFFERTY	ATTEND HEARING ON MOTION TO DISMISS AND 9019 MOTION (1.0); STRATEGIZE WITH TEAM REGARDING POST HEARING STRATEGY (1.0)	2.00	1,900.00
<b>Total Hours and Fees</b>			<b>5.90</b>	<b>7,930.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	2.10 hours at	1,500.00	3,150.00
MEGHAN MCCAFFERTY	2.00 hours at	950.00	1,900.00
ERIC R. GOODMAN	1.80 hours at	1,600.00	2,880.00
<b>Total Fees</b>			<b>7,930.00</b>



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

Invoice 6978381  
Date May 15, 2024  
Client 040178

RE: DISMISSAL/TRUSTEE/EXAMINER MATTERS

**INVOICE**

For professional services rendered in connection with the above captioned matter through April 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0017	DISMISSAL/TRUSTEE/EXAMINER MATTERS	375.00	0.00	375.00
	<b>Total</b>	<b>375.00</b>	<b>0.00</b>	<b>375.00</b>

Total Current Fees	\$375.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$375.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
May 15, 2024Invoice 6978381  
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RE: DISMISSAL/TRUSTEE/EXAMINER MATTERS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
04/21/24	MOXLEY	REVIEW AND COMMENT ON DRAFT APPELLATE MOTION RE DECISION ON MOTION TO DISMISS	0.30	375.00
<b>Total Hours and Fees</b>			<b>0.30</b>	<b>375.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
D. C. MOXLEY	0.30 hours at	1,250.00	375.00
<b>Total Fees</b>			<b>375.00</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 6978381  
Date May 15, 2024  
Client 040178

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

Remittance **remit**

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**Balance Due: \$253,263.27**

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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

## **Exhibit B**



**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)

**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

<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.



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](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 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
		<b>4.40</b>	<b>\$2,200.00</b>
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
		<b>7.40</b>	<b>\$10,985.00</b>
MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	CICERO, GERARD T.	1.20	\$1,800.00
	GOODMAN, ERIC R.	1.50	\$2,400.00
		<b>2.70</b>	<b>\$4,200.00</b>
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
		<b>8.60</b>	<b>\$5,234.00</b>
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
		<b>47.70</b>	<b>\$52,180.00</b>
NON-WORKING TRAVEL @ 50%	GOODMAN, ERIC R.	4.40	\$3,520.00
		<b>4.40</b>	<b>\$3,520.00</b>
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
		<b>54.50</b>	<b>\$80,105.00</b>
		<b>129.70</b>	<b>\$158,424.00</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	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



<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>
	Resolution & Restructuring			
<b>TOTAL</b>			<b>108.20</b>	<b>\$147,674.00</b>
<b>PROFESSIONAL BLENDED RATE</b>		<b>\$1,364.82</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>
Thomas Burns	Paralegal	\$500	21.50	\$10,750.00
<b>TOTAL</b>			<b>21.50</b>	<b>\$10,750.00</b>
<b>PARAPROFESSIONAL BLENDED RATE</b>		<b>\$500</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
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
		<b>47,340.14</b>
		<b>47,340.14</b>

**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
<b>Total</b>		<b>158,424.00</b>	<b>47,340.14</b>	<b>205,764.14</b>

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
<b>Total Invoice</b>	<b>\$174,079.34</b>



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:

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

Total Current Fees	\$2,200.00
Total Current Costs	\$47,340.14
<b>Total Invoice</b>	<b>\$49,540.14</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
June 11, 2024Invoice 6979314  
Page 3

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
<b>Total Hours and Fees</b>			<b>4.40</b>	<b>2,200.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	4.40 hours at	500.00	2,200.00
<b>Total Fees</b>			<b>2,200.00</b>

## COST SUMMARY

Description	Value
FILING FEE	628.00
EXPERT FEES	38,172.32



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

Invoice 6979314  
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<b>Description</b>	<b>Value</b>
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
<b>Total Costs</b>	<b>47,340.14</b>





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
	<b>Total</b>	<b>10,985.00</b>	<b>0.00</b>	<b>10,985.00</b>

Total Current Fees	\$10,985.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$10,985.00</b>



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

Invoice 6979314  
Page 6

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
<b>Total Hours and Fees</b>			<b>7.40</b>	<b>10,985.00</b>

**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
<b>Total Fees</b>			<b>10,985.00</b>



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:

<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	4,200.00	0.00	4,200.00
	<b>Total</b>	<b>4,200.00</b>	<b>0.00</b>	<b>4,200.00</b>

Total Current Fees	\$4,200.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$4,200.00</b>



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

Invoice 6979314  
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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
<b>Total Hours and Fees</b>			<b>2.70</b>	<b>4,200.00</b>

**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
<b>Total Fees</b>			<b>4,200.00</b>



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:

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

Total Current Fees	\$5,234.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$5,234.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
June 11, 2024Invoice 6979314  
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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
<b>Total Hours and Fees</b>			<b>8.60</b>	<b>5,234.00</b>

## 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
<b>Total Fees</b>			<b>5,234.00</b>



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:

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

Total Current Fees	\$52,180.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$52,180.00</b>



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
<b>Total Hours and Fees</b>			<b>47.70</b>	<b>52,180.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
June 11, 2024Invoice 6979314  
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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
<b>Total Fees</b>			<b>52,180.00</b>



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:

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

Total Current Fees	\$3,520.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$3,520.00</b>



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

Invoice 6979314  
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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
<b>Total Hours and Fees</b>			<b>4.40</b>	<b>3,520.00</b>

**TIME SUMMARY**

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



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:

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

Total Current Fees	\$80,105.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$80,105.00</b>



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

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RE: MEDIATION/SETTLEMENT

**TIME DETAIL**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Value</b>
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

Invoice 6979314  
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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

Invoice 6979314  
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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
<b>Total Hours and Fees</b>			<b>54.50</b>	<b>80,105.00</b>

**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
<b>Total Fees</b>			<b>80,105.00</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 6979314  
Date Jun 11, 2024  
Client 040178

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

Remittance **remit**



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**Balance Due: \$174,079.34**

---

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

## **Exhibit C**

**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)

**SEVENTH 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  
JUNE 1, 2024 THROUGH JUNE 30, 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:	June 1, 2024 – June 30, 2024
Total Fees Sought:	\$44,405.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$39,605.00
Total professional hours covered by this statement:	26.00
Average hourly rate for professionals:	\$1,523.27
Total paraprofessional fees covered by this	\$4,800.00

<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.



statement:	
Total paraprofessional hours covered by this statement:	9.60
Average hourly rate for paraprofessionals:	\$500.00
Reimbursable expenses sought in this statement:	\$16,208.80
Payment requested:	
80% Fees	\$35,524.00
100% Expenses	\$16,208.80
Total:	\$51,732.80

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 Seventh 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 June 1, 2024 to June 30, 2024 (the “Seventh Monthly Fee Statement”). By the Seventh Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$35,524.00 (80% of \$44,405.00) as compensation for professional services rendered to the Committee and (ii) \$16,208.80 for reimbursement of actual and necessary expenses, for a total of \$51,732.80 for the period June 1, 2024 through and including June 30, 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 Seventh Monthly Fee Statement to object to the requested fees and expenses.

**Itemization of Services Rendered and Expenses Incurred**

1. In support of this Seventh 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 \$44,405.00 in fees during the Fee Period. Pursuant to this Seventh Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$35,524.00 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 Seventh Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 35.60 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 Seventh Monthly Fee Statement. This Seventh Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$16,208.80.

**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 Seventh 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 \$51,732.80, consisting of (i) \$35,524.00, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$16,208.80, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: July 25, 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 July 25, 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

7/9/2024



CLIENT: 040178

1

Bill Date range: 7/9/2024 to 7/9/2024

MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
CASE ADMINISTRATION/DISBURSEMENTS	BURNS, THOMAS	2.70	\$1,350.00
		<b>2.70</b>	<b>\$1,350.00</b>
MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	CICERO, GERARD T.	0.50	\$750.00
	MOXLEY, D. CAMERON	1.90	\$2,375.00
	GOODMAN, ERIC R.	2.00	\$3,200.00
		<b>4.40</b>	<b>\$6,325.00</b>
FEE/EMPLOYMENT APPLICATIONS	CICERO, GERARD T.	2.50	\$3,750.00
	BURNS, THOMAS	6.90	\$3,450.00
		<b>9.40</b>	<b>\$7,200.00</b>
CONTESTED MATTERS/LITIGATION (GENERAL)	MOXLEY, D. CAMERON	1.00	\$1,250.00
	MCCAFFERTY, MEGHAN	0.10	\$95.00
		<b>1.10</b>	<b>\$1,345.00</b>
MEDIATION/SETTLEMENT	CICERO, GERARD T.	1.20	\$1,800.00
	MOXLEY, D. CAMERON	0.50	\$625.00
	GOODMAN, ERIC R.	9.50	\$15,200.00
		<b>11.20</b>	<b>\$17,625.00</b>
COURT ATTENDANCE	MOLTON, DAVID J.	0.40	\$900.00
	CICERO, GERARD T.	0.50	\$750.00
	GOODMAN, ERIC R.	0.60	\$960.00
		<b>1.50</b>	<b>\$2,610.00</b>
FINANCING ISSUES	CICERO, GERARD T.	5.30	\$7,950.00
		<b>5.30</b>	<b>\$7,950.00</b>
		<b>35.60</b>	<b>\$44,405.00</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>
David J. Molton	Partner; Admitted to New York Bar in 1983; Admitted to New Jersey Bar in 1990; Admitted to California Bar in 2009; Dispute Resolution & Restructuring	\$2,250.00	.40	\$900.00
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	12.10	\$19,360.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	10.00	\$15,000.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	3.40	\$4,250.00
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$950	.10	\$95.00
<b>TOTAL</b>			<b>26.00</b>	<b>\$39,605.00</b>
<b>PROFESSIONAL BLENDED RATE</b>		<b>\$1,523.27</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>
Thomas Burns	Paralegal	\$500	9.60	\$4,800.00
<b>TOTAL</b>			<b>9.60</b>	<b>\$4,800.00</b>
<b>PARAPROFESSIONAL BLENDED RATE</b>		<b>\$500</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
7/9/2024	Document Production	0.00
	Discovery and Service of Process Related Fees	1,866.00
	Filing Fee	100.00
	Pacer	8.70
	Taxi	1,192.55
	Transcripts	13,041.55
		<b>16,208.80</b>
		<b>16,208.80</b>

**EXHIBIT D**

**Detailed Record of Time Entries**





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

Invoice 6980461  
Date Jul 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 June 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	1,350.00	16,208.80	17,558.80
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,325.00	0.00	6,325.00
040178.0008	FEE/EMPLOYMENT APPLICATIONS	7,200.00	0.00	7,200.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	1,345.00	0.00	1,345.00
040178.0015	MEDIATION/SETTLEMENT	17,625.00	0.00	17,625.00
040178.0016	COURT ATTENDANCE	2,610.00	0.00	2,610.00
040178.0018	FINANCING ISSUES	7,950.00	0.00	7,950.00
<b>Total</b>		<b>44,405.00</b>	<b>16,208.80</b>	<b>60,613.80</b>

Total Current Fees	\$44,405.00
20% Holdback Amount	(8,881.00)
80% CURRENT BALANCE DUE	\$35,524.00
Total Current Costs	\$16,208.80
<b>Total Invoice</b>	<b>\$51,732.80</b>



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

Invoice 6980461  
Date Jul 9, 2024  
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

**INVOICE**

For professional services rendered in connection with the above captioned matter through June 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	1,350.00	16,208.80	17,558.80
	<b>Total</b>	<b>1,350.00</b>	<b>16,208.80</b>	<b>17,558.80</b>

Total Current Fees	\$1,350.00
Total Current Costs	\$16,208.80
<b>Total Invoice</b>	<b>\$17,558.80</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
July 9, 2024Invoice 6980461  
Page 3

RE: CASE ADMINISTRATION/DISBURSEMENTS

## TIME DETAIL

Date	Professional	Description	Hours	Value
06/06/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
06/10/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
06/11/24	BURNS	REVIEWING RECENTLY DOCKETED FILINGS AND CALENDARING DATES	0.30	150.00
06/12/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
06/18/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
06/20/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
06/21/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
06/24/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
06/27/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
<b>Total Hours and Fees</b>			<b>2.70</b>	<b>1,350.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	2.70 hours at	500.00	1,350.00
<b>Total Fees</b>			<b>1,350.00</b>

## COST SUMMARY

Description	Value
FILING FEE	100.00
EXPERT FEES	1,866.00
TRANSCRIPTS	13,041.55
TAXI	898.96
PACER	8.70
<b>Total Costs</b>	<b>16,208.80</b>



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

Invoice 6980461  
Date Jul 9, 2024  
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH  
COMMITTEE/CREDITORS

**INVOICE**

For professional services rendered in connection with the above captioned matter through June 30, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,325.00	0.00	6,325.00
	<b>Total</b>	<b>6,325.00</b>	<b>0.00</b>	<b>6,325.00</b>

Total Current Fees	\$6,325.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$6,325.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
July 9, 2024Invoice 6980461  
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RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

## TIME DETAIL

Date	Professional	Description	Hours	Value
06/04/24	GOODMAN	PLAN AND PREPARE FOR COMMITTEE MEETING (.2); ATTEND COMMITTEE MEETING (.8)	1.00	1,600.00
06/04/24	MOXLEY	PARTICIPATE IN MEETING WITH COMMITTEE CONCERNING SETTLEMENT/MEDIATION STATUS	0.70	875.00
06/06/24	MOXLEY	PARTICIPATE IN COMMITTEE STRATEGY CALL	0.40	500.00
06/10/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING CASE STATUS	0.20	320.00
06/18/24	GOODMAN	ATTEND COMMITTEE MEETING REGARDING CASE STATUS	0.30	480.00
06/18/24	CICERO	ATTEND WEEKLY COMMITTEE MEETING	0.50	750.00
06/25/24	GOODMAN	CONFERENCE CALL WITH THE TCC REGARDING CASE STATUS	0.50	800.00
06/25/24	MOXLEY	PARTICIPATE IN COMMITTEE MEETING RE CASE STATUS AND FOLLOW-UP EMAILS WITH E. GOODMAN AND M. ZIMMERMAN RE SAME	0.80	1,000.00
<b>Total Hours and Fees</b>			<b>4.40</b>	<b>6,325.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	0.50 hours at	1,500.00	750.00
D. C. MOXLEY	1.90 hours at	1,250.00	2,375.00
ERIC R. GOODMAN	2.00 hours at	1,600.00	3,200.00
<b>Total Fees</b>			<b>6,325.00</b>



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

Invoice 6980461  
Date Jul 9, 2024  
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter through June 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0008	FEE/EMPLOYMENT APPLICATIONS	7,200.00	0.00	7,200.00
	<b>Total</b>	<b>7,200.00</b>	<b>0.00</b>	<b>7,200.00</b>

Total Current Fees	\$7,200.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$7,200.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
July 9, 2024Invoice 6980461  
Page 7

RE: FEE/EMPLOYMENT APPLICATIONS

## TIME DETAIL

Date	Professional	Description	Hours	Value
06/04/24	BURNS	WORK ON SIXTH MONTHLY FEE STATEMENT	0.80	400.00
06/05/24	BURNS	WORK ON SIXTH MONTHLY FEE STATEMENT	0.70	350.00
06/06/24	BURNS	WORK ON SIXTH MONTHLY FEE STATEMENT (.9); CONFER WITH E. GOODMAN AND G. CICERO REGARDING SIXTH MONTHLY FEE STATEMENT (.3)	1.20	600.00
06/07/24	BURNS	WORK ON SIXTH MONTHLY FEE STATEMENT (.7); CONFER WITH G. CICERO REGARDING SIXTH FEE STATEMENT (.2)	0.90	450.00
06/10/24	BURNS	WORK ON SIXTH MONTHLY FEE STATEMENT (.5); CONFER WITH G. CICERO REGARDING THE SIXTH FEE STATEMENT (.4) CONFER WITH E. GOODMAN REGARDING THE SIXTH FEE STATEMENT (.2)	1.10	550.00
06/17/24	CICERO	DRAFT AND REVISE MONTHLY APPLICATION (.8); COMMUNICATIONS WITH CO-COUNSEL RE: SAME (.9)	1.70	2,550.00
06/17/24	BURNS	CONFER WITH G. CICERO REGARDING THE SIXTH MONTHLY FEE STATEMENT (.6); CONFER WITH E. GOODMAN REGARDING THE SIXTH MONTHLY FEE STATEMENT (.3); CONFER WITH M. ZIMMERMAN REGARDING THE SIXTH MONTHLY FEE STATEMENT (.3)	1.20	600.00
06/18/24	CICERO	FINALIZE MONTHLY FEE APPLICATION	0.80	1,200.00
06/18/24	BURNS	CONFER WITH G. CICERO REGARDING SIXTH MONTHLY FEE STATEMENT (.2); PREPARE SIXTH MONTHLY FEE STATEMENT FOR FILING (.4); FILE SAME (.4)	1.00	500.00
<b>Total Hours and Fees</b>			<b>9.40</b>	<b>7,200.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	2.50 hours at	1,500.00	3,750.00
THOMAS BURNS	6.90 hours at	500.00	3,450.00
<b>Total Fees</b>			<b>7,200.00</b>



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

Invoice 6980461  
Date Jul 9, 2024  
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**INVOICE**

For professional services rendered in connection with the above captioned matter through June 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	1,345.00	0.00	1,345.00
	<b>Total</b>	<b>1,345.00</b>	<b>0.00</b>	<b>1,345.00</b>

Total Current Fees	\$1,345.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$1,345.00</b>



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
July 9, 2024Invoice 6980461  
Page 9

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**TIME DETAIL**

Date	Professional	Description	Hours	Value
06/03/24	MCCAFFERTY	COORDINATE WITH E.GOODMAN REGARDING APPELLATE FILING AND 8009(F) MOTION	0.10	95.00
06/11/24	MOXLEY	CONFER WITH E. GOODMAN PRIOR TO STATUS CONFERENCE AND ATTEND STATUS CONFERENCE	0.80	1,000.00
06/24/24	MOXLEY	ANALYZE DISTRICT COURT DECISION ON MOTION FOR LEAVE TO APPEAL	0.20	250.00
<b>Total Hours and Fees</b>			<b>1.10</b>	<b>1,345.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
D. C. MOXLEY	1.00 hours at	1,250.00	1,250.00
MEGHAN MCCAFFERTY	0.10 hours at	950.00	95.00
<b>Total Fees</b>			<b>1,345.00</b>



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

Invoice 6980461  
Date Jul 9, 2024  
Client 040178

RE: MEDIATION/SETTLEMENT

**INVOICE**

For professional services rendered in connection with the above captioned matter through June 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0015	MEDIATION/SETTLEMENT	17,625.00	0.00	17,625.00
<b>Total</b>		<b>17,625.00</b>	<b>0.00</b>	<b>17,625.00</b>

Total Current Fees	\$17,625.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$17,625.00</b>



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

Invoice 6980461  
Page 11

RE: MEDIATION/SETTLEMENT

**TIME DETAIL**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Value</b>
06/02/24	GOODMAN	TELEPHONE CALL WITH MEDIATOR REGARDING COUNTER-OFFER (.6); TELEPHONE CALL WITH MR. ATKINSON REGARDING OFFER (.1); TELEPHONE CALL WITH MR. CICERO REGARDING OFFER (.1)	0.80	1,280.00
06/03/24	GOODMAN	DRAFT AND EDIT REVISED PROPOSAL (1.1); TELEPHONE CALL WITH MR. ATKINSON REGARDING PROPOSAL (.1); TELEPHONE CALL WITH COUNSEL FOR THE UCC REGARDING PROPOSAL (.3); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS AND MEDIATION (.3)	1.80	2,880.00
06/03/24	MOXLEY	CONFER WITH E. GOODMAN RE STATUS OF SETTLEMENT DISCUSSIONS AND NEXT STEPS	0.10	125.00
06/04/24	GOODMAN	EDIT AND REVISE PROPOSAL (.8); REVIEW ANALYSIS FROM MR. ATKINSON REGARDING PROPOSAL (.3); TELEPHONE CALL WITH COUNSEL FOR THE UCC REGARDING PROPOSAL (.2); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING PROPOSAL (.2)	1.50	2,400.00
06/05/24	GOODMAN	DRAFT EMAIL TO MEDIATOR REGARDING PROPOSAL (.4); CONFERENCE CALL WITH MEDIATOR REGARDING PROPOSAL (.5); CONFERENCE CALL WITH CO-COUNSEL AND MR. ATKINSON REGARDING PROPOSAL (.3)	1.20	1,920.00
06/06/24	GOODMAN	EDIT AND REVISE MEDIATION PROPOSAL (.6); REVIEW ANALYSIS FROM MR. ATKINSON REGARDING PROPOSAL (.5); MEETING WITH THE TCC REGARDING PROPOSAL (.5); TELEPHONE CALL WITH TCC REPRESENTATIVE REGARDING PROPOSAL (.3); DRAFT AND EDIT HEARING SCRIPT (.3)	2.20	3,520.00
06/06/24	MOXLEY	CONFER WITH E. GOODMAN RE SETTLEMENT STATUS (.1) AND CONFIRM STATUS OF UPCOMING HEARING (.3)	0.40	500.00
06/07/24	GOODMAN	EDIT AND REVISE STATEMENT REGARDING MEDIATION	0.40	640.00
06/10/24	CICERO	REVIEW, REVISE AND DRAFT INTERIM COMPENSATION ORDER	1.20	1,800.00



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

Invoice 6980461  
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Date	Professional	Description	Hours	Value
06/10/24	GOODMAN	EDIT AND REVISE PROPOSED ORDERS ON PENDING MOTION TO FACILITATE POTENTIAL SETTLEMENT (.6); TELEPHONE CALL WITH MR. CICERO REGARDING MEDIATION AND CASE STATUS (.4); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MEDIATION AND CASE STATUS (.3).	1.30	2,080.00
06/11/24	GOODMAN	COMMUNICATIONS REGARDING INSURANCE ISSUES RELATED TO SETTLEMENT	0.30	480.00
<b>Total Hours and Fees</b>			<b>11.20</b>	<b>17,625.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
GERARD T. CICERO	1.20 hours at	1,500.00	1,800.00
D. C. MOXLEY	0.50 hours at	1,250.00	625.00
ERIC R. GOODMAN	9.50 hours at	1,600.00	15,200.00
<b>Total Fees</b>			<b>17,625.00</b>



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

Invoice 6980461  
Date Jul 9, 2024  
Client 040178

RE: COURT ATTENDANCE

**INVOICE**

For professional services rendered in connection with the above captioned matter through June 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0016	COURT ATTENDANCE	2,610.00	0.00	2,610.00
<b>Total</b>		<b>2,610.00</b>	<b>0.00</b>	<b>2,610.00</b>

Total Current Fees	\$2,610.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$2,610.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
July 9, 2024Invoice 6980461  
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RE: COURT ATTENDANCE

## TIME DETAIL

Date	Professional	Description	Hours	Value
06/11/24	CICERO	PARTICIPATE IN 6.11.2024 STATUS CONFERENCE	0.50	750.00
06/11/24	GOODMAN	ATTEND COURT HEARING (VIA ZOOM) REGARDING CASE STATUS (.4); POST-HEARING CALL WITH COUNSEL FOR THE UCC (.2)	0.60	960.00
06/11/24	MOLTON	ATTEND ZOOM COURT HEARING RE CASE STATUS	0.40	900.00
<b>Total Hours and Fees</b>			<b>1.50</b>	<b>2,610.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
DAVID J. MOLTON	0.40 hours at	2,250.00	900.00
GERARD T. CICERO	0.50 hours at	1,500.00	750.00
ERIC R. GOODMAN	0.60 hours at	1,600.00	960.00
<b>Total Fees</b>			<b>2,610.00</b>



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

Invoice 6980461  
Date Jul 9, 2024  
Client 040178

RE: FINANCING ISSUES

**INVOICE**

For professional services rendered in connection with the above captioned matter through June 30, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0018	FINANCING ISSUES	7,950.00	0.00	7,950.00
	<b>Total</b>	<b>7,950.00</b>	<b>0.00</b>	<b>7,950.00</b>

Total Current Fees	\$7,950.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$7,950.00</b>



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

Invoice 6980461  
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RE: FINANCING ISSUES

**TIME DETAIL**

Date	Professional	Description	Hours	Value
06/10/24	CICERO	CALL WITH E. GOODMAN RE: INTERIM DIP AND RELATED ISSUES (.8); REVIEW SETTLEMENT COMMUNICATIONS RE: SAME (.5); DRAFT AND REVISE DIP ORDER CONSISTENT WITH POTENTIAL MEDIATION SETTLEMENTS (2.3); CALL WITH E. GOODMAN RE: SAME (.3)	3.90	5,850.00
06/11/24	CICERO	CONTINUED REVISIONS OF DIP DOCUMENT AND ORDER REVISIONS (.8); REVIEW EARLIER DIP ORDERS AND DIP DOCUMENTS RE: SAME (.6)	1.40	2,100.00
<b>Total Hours and Fees</b>			<b>5.30</b>	<b>7,950.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
GERARD T. CICERO	5.30 hours at	1,500.00	7,950.00
<b>Total Fees</b>			<b>7,950.00</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 6980461  
Date Jul 9, 2024  
Client 040178

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

Remittance **remit**

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**Balance Due: \$51,732.80**

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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

**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)

Re: Docket No. \_\_\_\_\_

**ORDER GRANTING SECOND INTERIM FEE  
APPLICATION OF BROWN RUDNICK LLP FOR COMPENSATION  
FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES  
INCURRED AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT  
CLAIMANTS FOR THE PERIOD FROM APRIL 1, 2024, THROUGH JUNE 30, 2024**

The Court has considered the *Second Interim Fee Application of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024, through June 30, 2024* (the "Application") filed by Brown Rudnick LLP (the "Applicant"). The Court hereby orders that:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$566,395.31 for the period set forth in the Application.
2. The Debtor is authorized to disburse any unpaid amounts allowed by Paragraph 1 of this Order.
3. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon entry.
4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

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<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.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: \_\_\_\_\_, 2024

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Christopher López  
United States Bankruptcy Judge