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

| |) |
|-----------------------------|---------------------------|
| In re: |) Chapter 11 |
| TEHUM CARE SERVICES, INC.,1 |) Case No. 23-90086 (CML) |
| Debtor. |) |
| |) |

SEVENTH MONTHLY FEE STATEMENT OF PROVINCE, LLC FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR TO THE OFFICIAL TORT CLAIMANTS' COMMITTEE FOR THE PERIOD FROM JULY 1, 2024 THROUGH JULY 31, 2024

Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 357] entered by the Court on April 14, 2022 (the "Interim Compensation Order"), Province, LLC ("Province"), financial advisor to the Official Tort Claimants' Committee of Tehum Care Services, Inc. (the "TCC"), submits this monthly statement (the "Statement") of services rendered and expenses incurred in this case for the period from July 1, 2024 through July 31, 2024 (the "Statement Period").

I. <u>Itemization of Services Rendered by Province</u>

A. The following is a list of individuals and their respective titles that provided services during the Statement Period. It includes information regarding their respective billing rates and the total number of hours spent by each individual providing services during the Statement Period for which Province seeks compensation.

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

SUMMARY

| Name of Professional Individual | Position of the Applicant, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise | Hourly Billing Rate | Total Hours Billed | Total Compensation |
|--|---|---------------------------|---------------------------|---------------------------------|
| Michael Atkinson, MBA, CPA, CIRA, ABV, CVA, CFE, CFF | Principal – Financial consulting, bankruptcy consulting, and litigation analysis since 1991. | \$1,420 | 35.2 | \$49,984.00 |
| Jason Crockett, MBA, CIRA | Principal - Financial consulting, corporate restructuring, and litigation analysis since 2002. | \$1,100 | 21.3 | \$23,430.00 |
| James Bland | Director - Financial analysis and management consulting since 2016. | \$820 | 41.9 | \$34,358.00 |
| Mitchell Boal, CFA | Vice President - Financial and data analytics. | \$670 | 2.2 | \$1,474.00 |
| Timothy Strickler | Senior Associate - Corporate restructuring, litigation and financial investigation. | \$590 | 6.2 | \$3,658.00 |
| Reymundo Delgado | Analyst | \$400 | 6.7 | \$2,680.00 |
| | Subtotal | | 113.5 | \$115,584.00 |
| Para Professionals | | Hourly Billing Rate | Total Hours Billed | Total Compensation |
| Eric Mattson | Matter Manager | \$300 | 0.8 | \$240.00 |
| Laura Conn | Matter Administrator | \$270 | 2.6 | \$702.00 |
| | Subtotal | | 3.4 | \$942.00 |
| | | | Fee Statement Hours 116.9 | Total Compensation \$116,526.00 |
| | Grand Total | | 110.9 | \$110,320.00 |

B. The time records of Province consisting of a daily breakdown of the time spent by each person on each day and detail as to the disbursements incurred are attached as **Exhibit A** to this Statement.

II. Itemization of Services Rendered and Disbursements Incurred by Category

The following itemization presents the services rendered by Province by task category and provides a summary of disbursements incurred by category of disbursement.

1. Services Rendered

The following services were rendered in the following task categories:

| Project Categories | Total Hours | Total Fees |
|--------------------------------|-------------|-------------------|
| Business Analysis / Operations | 53.4 | \$51,630.00 |
| Claims Analysis and Objections | 6.9 | \$4,428.00 |
| Committee Activities | 9.1 | \$10,074.00 |
| Court Filings | 1.8 | \$720.00 |
| Fee / Employment Applications | 4.4 | \$1,612.00 |
| Financing Activities | 16.1 | \$19,406.00 |
| Litigation | 21.2 | \$24,256.00 |
| Plan and Disclosure Statement | 4.0 | \$4,400.00 |
| Grand Total | 116.9 | \$116,526.00 |

A detailed itemization of the services rendered in each of the above task categories is set forth in **Exhibit A**.

2. Disbursements Incurred

The disbursements incurred by Province for this Statement are as follows:

| Expense Category | Description | Total Expenses |
|-------------------------|-------------|----------------|
| | | |
| Total Expenses | | \$0.00 |

A detailed itemization of the disbursements incurred in each of the above expense categories is set forth in **Exhibit A**.

3. Total Amount Payable

Accordingly, the amount of compensation and expenses <u>payable for this Statement Period</u> is \$93,220.80 which is calculated as follows:

| Total | \$93,220.80 |
|--|--------------|
| Costs (100%) | \$0.00 |
| Fees Minus Holdback | \$93,220.80 |
| Twenty Percent (20%) Holdback | \$23,305.20 |
| Total Fees for Services Rendered During Statement Period | . , |
| m . 1 D . C . G . D . 1 . 1 D Ctatament David | \$116,526.00 |

WHEREFORE, pursuant to the Interim Compensation Order, Province requests payment of (i) compensation in the amount of \$93,220.80 (80% of \$116,526.00) on account of actual, reasonable and necessary professional services rendered to the TCC by Province and (ii)

reimbursement of actual and necessary costs and expenses in the amount of \$0.00 incurred on behalf of the TCC by Province.

Dated: August 16, 2024

Respectfully submitted,

By: /s/ Michael Atkinson

Michael Atkinson, Principal Province, LLC 2360 Corporate Circle, Suite 340 Henderson, NV 89074 (702) 685-5555 matkinson@provincefirm.com

Financial Advisor to the Official Tort Claimants' Committee

CERTIFICATE OF SERVICE

I certify that on August 16, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Michael Atkinson

MICHAEL ATKINSON

EXHIBIT A

BILLING DETAILS

| Entry Date | Person | Comments | Task | Hours | Billing Rate | Amount |
|------------|---------------------|--|--------------------------------------|-------|--------------|------------|
| 7/1/2024 | Reymundo Delgado | Created an internal update on the Debtor's latest docket filings. | Court Filings | 0.30 | 400.00 | \$120.00 |
| 7/2/2024 | Michael Atkinson | Reviewed and analyzed proposal from settling party. | Business Analysis / Operations | 0.80 | 1,420.00 | \$1,136.00 |
| 7/2/2024 | Jason Crockett | Analyzed potential plan and settlement structure and recovery for creditors. | Plan and Disclosure Statement | 0.90 | 1,100.00 | \$990.00 |
| 7/2/2024 | James Bland | Created draft go-forward budget. | Business Analysis / Operations | 2.60 | 820.00 | \$2,132.00 |
| 7/3/2024 | Jason Crockett | Modeled potential settlement framework with payment over time and net recoveries for creditors. | Litigation | 0.50 | 1,100.00 | \$550.00 |
| 7/3/2024 | Michael Atkinson | Reviewed proposal and work with counsel on counter. | Business Analysis / Operations | 1.70 | 1,420.00 | \$2,414.00 |
| 7/3/2024 | James Bland | Updated professional fee paydown schedule. | Business Analysis / Operations | 2.80 | 820.00 | \$2,296.00 |
| 7/3/2024 | Jason Crockett | Analyzed professional fee repayment schedule and options under latest proposal. | Plan and Disclosure Statement | 0.60 | 1,100.00 | \$660.00 |
| 7/3/2024 | James Bland | Analyzed latest Lefkowitz proposal. | Committee Activities | 2.50 | 820.00 | \$2,050.00 |
| 7/3/2024 | Jason Crockett | Reviewed economic detail in latest proposal and impact on creditors. | Litigation | 0.30 | 1,100.00 | \$330.00 |
| 7/4/2024 | Michael Atkinson | Reviewed and created supporting analysis for counsel related to counter proposal. | Business Analysis / Operations | 1.30 | 1,420.00 | \$1,846.00 |
| 7/4/2024 | Michael Atkinson | Update counsel on proposal math. | Business Analysis / Operations | 0.80 | 1,420.00 | \$1,136.00 |
| 7/4/2024 | James Bland | Updated professional fee paydown schedule per counsel request. | Business Analysis / Operations | 2.10 | 820.00 | \$1,722.00 |
| 7/4/2024 | Jason Crockett | Analyzed and model various scenarios for catchup payment on professional fees and addressing shortfalls. | Litigation | 0.80 | 1,100.00 | \$880.00 |
| 7/5/2024 | Michael Atkinson | Reviewed updated proposal. | Business Analysis / Operations | 0.80 | 1,420.00 | \$1,136.00 |
| 7/5/2024 | Mitchell Boal | Reviewed colleagues time entries ahead of fee app creation. | Fee / Employment Applications | 0.70 | 670.00 | \$469.00 |
| 7/6/2024 | Michael Atkinson | Reviewed settlement proposal. | Litigation | 0.80 | 1,420.00 | \$1,136.00 |
| 7/7/2024 | Michael Atkinson | Reviewed and prepared materials for committee and counsel on settlement. | Litigation | 1.70 | 1,420.00 | \$2,414.00 |

| Entry Date | Person | Comments | Task | Hours | Billing Rate | Amount |
|------------|---------------------|--|---|-------|--------------|------------|
| 7/7/2024 | James Bland | Created deck related to latest proposed settlement offer. | Litigation | 2.20 | 820.00 | \$1,804.00 |
| 7/7/2024 | Jason Crockett | Reviewed and prepared updates to waterfall model and creditor recoveries under latest proposal, | Plan and Disclosure Statement | 1.20 | 1,100.00 | \$1,320.00 |
| 7/7/2024 | James Bland | Analyzed proposed settlement offer. | Litigation | 1.20 | 820.00 | \$984.00 |
| 7/8/2024 | Michael Atkinson | Reviewed and prepared materials for committee call. | Committee Activities | 1.10 | 1,420.00 | \$1,562.00 |
| 7/8/2024 | Jason Crockett | Prepared materials for committee meeting regarding most recent proposal. | Committee Activities | 0.60 | 1,100.00 | \$660.00 |
| 7/8/2024 | James Bland | Revised settlement offer-related deck. | Litigation | 1.20 | 820.00 | \$984.00 |
| 7/8/2024 | James Bland | Assisted M. Atkinson in preparing for committee call. | Committee Activities | 1.50 | 820.00 | \$1,230.00 |
| 7/8/2024 | Eric Mattson | Corresponded with internal team re: interim fee app. | Fee / Employment Applications | 0.10 | 300.00 | \$30.00 |
| 7/9/2024 | Jason Crockett | Analyzed impact of opt outs on remaining trust creditor recoveries, based on various assumptions. | Claims Analysis and Objections | 0.70 | 1,100.00 | \$770.00 |
| 7/9/2024 | Jason Crockett | Prepared analysis for Committee regarding most recent settlement offer and potential recovery for claimants, with certain opt out assumptions. | Litigation | 1.00 | 1,100.00 | \$1,100.00 |
| 7/9/2024 | Michael Atkinson | Reviewed and prepared for committee presentation. | Committee Activities | 1.80 | 1,420.00 | \$2,556.00 |
| 7/9/2024 | Jason Crockett | Participated in TCC call regarding negotiation status. | Committee Activities | 0.80 | 1,100.00 | \$880.00 |
| 7/9/2024 | Michael Atkinson | Attended committee call, | Committee Activities | 0.80 | 1,420.00 | \$1,136.00 |
| 7/9/2024 | James Bland | Analyzed latest settlement proposal. | Litigation | 2.80 | 820.00 | \$2,296.00 |
| 7/10/2024 | Michael Atkinson | Reviewed litigation assets for counsel. | Litigation | 0.80 | 1,420.00 | \$1,136.00 |
| 7/11/2024 | James Bland | Updated professional fee paydown schedule. | Business Analysis / Operations | 2.20 | 820.00 | \$1,804.00 |
| 7/11/2024 | Michael Atkinson | Reviewed response and provided analysis and thoughts to counsel. | Business Analysis / Operations | 1.20 | 1,420.00 | \$1,704.00 |
| 7/11/2024 | Jason Crockett | Prepared updated schedules regarding use of settlement funds for admin costs. | Litigation | 0.70 | 1,100.00 | \$770.00 |
| 7/14/2024 | Michael Atkinson | Reviewed professional fee budgets. | Business Analysis / Operations | 0.80 | 1,420.00 | \$1,136.00 |
| 7/15/2024 | Laura Conn | Drafted Sixth (June) Monthly Fee Statement (1.0). Emailed to R. Busto for review (0.1). | Fee / Employment Applications | 1.10 | 270.00 | \$297.00 |
| 7/15/2024 | Michael Atkinson | Reviewed and analyzed new settlement. | Litigation | 1.30 | 1,420.00 | \$1,846.00 |
| 7/16/2024 | Michael Atkinson | Reviewed and analyzed questions from counsel. | Business Analysis / Operations | 0.90 | 1,420.00 | \$1,278.00 |

| Entry Date | Person | Comments | Task | Hours | Billing Rate | Amount |
|------------|---------------------|---|--------------------------------------|-------|--------------|------------|
| 7/16/2024 | James Bland | Updated professional fee payment schedule. | Business Analysis / Operations | 2.10 | 820.00 | \$1,722.00 |
| 7/17/2024 | Reymundo Delgado | Created an internal update on the Debtor's latest docket filings. | Court Filings | 0.30 | 400.00 | \$120.00 |
| 7/17/2024 | Jason Crockett | Analyzed and modeled varying protocols for payment of admin expenses accrued and budgeted. | Litigation | 0.80 | 1,100.00 | \$880.00 |
| 7/17/2024 | James Bland | Updated professional fee payment schedule per counsel request. | Business Analysis / Operations | 2.70 | 820.00 | \$2,214.00 |
| 7/17/2024 | James Bland | Made further revisions to professional fee payment schedule per counsel request. | Business Analysis / Operations | 2.30 | 820.00 | \$1,886.00 |
| 7/17/2024 | Michael Atkinson | Call with counsel regarding settlement. | Litigation | 0.60 | 1,420.00 | \$852.00 |
| 7/17/2024 | Michael Atkinson | Reviewed proposal and provided counsel scenarios for negotiations. | Business Analysis / Operations | 0.90 | 1,420.00 | \$1,278.00 |
| 7/19/2024 | Jason Crockett | Reviewed and analyzed draft DIP documents and potential uses of advances for professional fees. | Financing Activities | 1.40 | 1,100.00 | \$1,540.00 |
| 7/19/2024 | Michael Atkinson | Reviewed and prepared slides for committee regarding settlement. | Litigation | 0.90 | 1,420.00 | \$1,278.00 |
| 7/19/2024 | Michael Atkinson | Reviewed and prepared slides for committee regarding settlement. | Litigation | 0.90 | 1,420.00 | \$1,278.00 |
| 7/19/2024 | Reymundo Delgado | Created an internal update on the Debtor's latest docket filings. | Court Filings | 0.30 | 400.00 | \$120.00 |
| 7/20/2024 | Jason Crockett | Reviewed and analyzed professional fee accruals by period and model of repayment per settlement agreement. | Financing Activities | 1.20 | 1,100.00 | \$1,320.00 |
| 7/20/2024 | James Bland | Assisted M. Atkinson in preparing for call with counsel. | Business Analysis / Operations | 1.10 | 820.00 | \$902.00 |
| 7/20/2024 | James Bland | Updated professional fee payment schedule. | Business Analysis / Operations | 2.70 | 820.00 | \$2,214.00 |
| 7/20/2024 | Michael Atkinson | Reviewed settlement, cash and professional fees and email debtor regarding same. | Business Analysis / Operations | 1.70 | 1,420.00 | \$2,414.00 |
| 7/20/2024 | Jason Crockett | Reviewed and prepared comments to DIP financing proposed order and analyzed professional fee payment waterfall. | Financing Activities | 1.10 | 1,100.00 | \$1,210.00 |
| 7/20/2024 | Michael Atkinson | Call with counsel regarding settlement. | Litigation | 0.60 | 1,420.00 | \$852.00 |
| 7/21/2024 | Michael Atkinson | Reviewed and analyzed DIP agreement. | Financing Activities | 0.90 | 1,420.00 | \$1,278.00 |
| 7/21/2024 | Reymundo Delgado | Updated the Debtor's Balance Sheet based on the latest MOR. | Business Analysis / Operations | 2.60 | 400.00 | \$1,040.00 |
| 7/21/2024 | Jason Crockett | Reviewed language edits in latest draft DIP order and prepared comments for counsel. | Financing Activities | 0.90 | 1,100.00 | \$990.00 |

| Entry Date | Person | Comments | Task | Hours | Billing Rate | Amount |
|------------|----------------------|---|---|-------|--------------|------------|
| 7/21/2024 | Jason Crockett | Prepared updated analysis of waterfall of payment of costs associated with DIP financing and accrued professional fees in potential settlement agreement. | Financing Activities | 1.00 | 1,100.00 | \$1,100.00 |
| 7/21/2024 | Michael Atkinson | Reviewed and created updated materials for committee on settlement. | Litigation | 0.90 | 1,420.00 | \$1,278.00 |
| 7/21/2024 | Reymundo Delgado | Updated the Debtor's Income Statement based on the latest MOR. | Business Analysis / Operations | 2.30 | 400.00 | \$920.00 |
| 7/22/2024 | James Bland | Revised professional fee payment schedule (part 1 of 2). | Business Analysis / Operations | 2.50 | 820.00 | \$2,050.00 |
| 7/22/2024 | Michael Atkinson | Reviewed and discussed DIP agreement with counsel. | Financing Activities | 0.60 | 1,420.00 | \$852.00 |
| 7/22/2024 | Reymundo Delgado | Reviewed dockets to report the firm's latest application. | Court Filings | 0.60 | 400.00 | \$240.00 |
| 7/22/2024 | Jason Crockett | Reviewed draft exhibits to DIP financing proposed order. | Financing Activities | 0.90 | 1,100.00 | \$990.00 |
| 7/22/2024 | James Bland | Revised professional fee payment schedule (part 2 of 2). | Business Analysis / Operations | 2.80 | 820.00 | \$2,296.00 |
| 7/22/2024 | Michael Atkinson | Reviewed and analyzed budget issues. | Business Analysis / Operations | 0.90 | 1,420.00 | \$1,278.00 |
| 7/22/2024 | Jason Crockett | Reviewed and prepared updates to financing exhibits and proposed DIP order. | Financing Activities | 1.60 | 1,100.00 | \$1,760.00 |
| 7/22/2024 | Michael Atkinson | Reviewed and implemented changes provided by counsel for DIP issues. | Financing Activities | 0.80 | 1,420.00 | \$1,136.00 |
| 7/22/2024 | Michael Atkinson | Reviewed DIP and created exhibits for counsel regarding. | Financing Activities | 2.30 | 1,420.00 | \$3,266.00 |
| 7/22/2024 | Jason Crockett | Reviewed and analyzed draft DIP order and prepared comments. | Financing Activities | 0.80 | 1,100.00 | \$880.00 |
| 7/23/2024 | James Bland | Analyzed and redlined draft trust distribution procedures. | Business Analysis / Operations | 2.10 | 820.00 | \$1,722.00 |
| 7/23/2024 | Timothy Strickler | Reviewed and analyzed litigation claims filed. | Claims Analysis and Objections | 1.60 | 590.00 | \$944.00 |
| 7/23/2024 | Jason Crockett | Reviewed draft TDP framework and prepared comments for counsel. | Plan and Disclosure Statement | 1.30 | 1,100.00 | \$1,430.00 |
| 7/23/2024 | Michael Atkinson | Reviewed and analyzed DIP issues for counsel. | Financing Activities | 0.70 | 1,420.00 | \$994.00 |
| 7/24/2024 | Michael Atkinson | Reviewed and analyzed TDP and provide comments to counsel. | Business Analysis / Operations | 1.80 | 1,420.00 | \$2,556.00 |
| 7/24/2024 | Reymundo Delgado | Reviewed court filings re: certificate of counsel. | Court Filings | 0.30 | 400.00 | \$120.00 |
| 7/24/2024 | Jason Crockett | Prepared updated waterfall of professional fee payment schedule as agreed. | Financing Activities | 0.80 | 1,100.00 | \$880.00 |
| 7/24/2024 | Michael Atkinson | Reviewed and organized insurance materials for insurance counsel. | Business Analysis / Operations | 0.60 | 1,420.00 | \$852.00 |

| Entry Date | Person | Comments | Task | Hours | Billing Rate | Amount |
|------------|----------------------|--|---|-------|--------------|------------|
| 7/24/2024 | Timothy Strickler | Continued reviewing/analyzing litigation claims filed. | Claims Analysis and Objections | 2.50 | 590.00 | \$1,475.00 |
| 7/24/2024 | Michael Atkinson | Reviewed and updated exhibits for counsel. | Business Analysis / Operations | 1.20 | 1,420.00 | \$1,704.00 |
| 7/24/2024 | James Bland | Revised professional fee payment schedule. | Business Analysis / Operations | 2.50 | 820.00 | \$2,050.00 |
| 7/25/2024 | Laura Conn | Drafted 1st Interim (Dec - June 2024) (1.4). Sent to J. Bland and R. Busto for review (0.1). | Fee / Employment Applications | 1.50 | 270.00 | \$405.00 |
| 7/25/2024 | Jason Crockett | Reviewed updated draft DIP order and budget. | Financing Activities | 0.50 | 1,100.00 | \$550.00 |
| 7/25/2024 | Eric Mattson | Revised interim fee app (0.6). Emailed to L. Conn for review (0.1). | Fee / Employment Applications | 0.70 | 300.00 | \$210.00 |
| 7/25/2024 | Michael Atkinson | Reviewed claims and questions from counsel related to potential class claims. | Business Analysis / Operations | 0.80 | 1,420.00 | \$1,136.00 |
| 7/25/2024 | Timothy Strickler | Continued review/analysis of litigation claims filed. | Claims Analysis and Objections | 2.10 | 590.00 | \$1,239.00 |
| 7/26/2024 | Mitchell Boal | Analyzed professional fee spend and burn rate. | Business Analysis / Operations | 1.20 | 670.00 | \$804.00 |
| 7/26/2024 | Mitchell Boal | Reviewed latest draft fee application before filing. | Fee / Employment Applications | 0.30 | 670.00 | \$201.00 |
| 7/29/2024 | Michael Atkinson | Reviewed question from counsel, analyzed and responded. | Business Analysis / Operations | 0.60 | 1,420.00 | \$852.00 |
| 7/29/2024 | Jason Crockett | Reviewed latest edits to draft DIP order and prepared comments for counsel. | Financing Activities | 0.60 | 1,100.00 | \$660.00 |
| 7/29/2024 | Michael Atkinson | Reviewed settlement proposal and discussed with counsel. | Litigation | 0.90 | 1,420.00 | \$1,278.00 |
| 7/31/2024 | Jason Crockett | Reviewed letter from proposed fee examiner process and prepared comments for counsel. | Litigation | 0.30 | 1,100.00 | \$330.00 |