

**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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**EIGHTH 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  
JULY 1, 2024 THROUGH JULY 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:	July 1, 2024 – July 31, 2024
Total Fees Sought:	\$151,150.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$138,100.00
Total professional hours covered by this statement:	96.50
Average hourly rate for professionals:	\$1,431.09

<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:	\$13,050.00
Total paraprofessional hours covered by this statement:	26.10
Average hourly rate for paraprofessionals:	\$500.00
Reimbursable expenses sought in this statement:	\$4,932.80
Payment requested:	
80% Fees	\$120,920.00
100% Expenses	\$4,932.80
Total:	\$125,852.80

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 Eighth 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 July 1, 2024 to July 31, 2024 (the “Eighth Monthly Fee Statement”). By the Eighth Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$120,920.00 (80% of \$151,150.00) as compensation for professional services rendered to the Committee and (ii) \$4,932.80 for reimbursement of actual and necessary expenses, for a total of \$125,852.80 for the

period July 1, 2024 through and including July 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 Eighth Monthly Fee Statement to object to the requested fees and expenses.

**Itemization of Services Rendered and Expenses Incurred**

1. In support of this Eighth 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 \$151,150.00 in fees during the Fee Period. Pursuant to this Eighth Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$120,920.00 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 Eighth Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 122.60 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 Eighth Monthly Fee Statement. This Eighth Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$4,932.80.

**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 Eighth 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 \$125,852.80, consisting of (i) \$120,920.00, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$4,932.80, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: August 20, 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 August 20, 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

8/9/2024

CLIENT: 040178

1

Bill Date range: 8/9/2024 to 8/9/2024

MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
CASE ADMINISTRATION/DISBURSEMENTS	BURNS, THOMAS	1.30	\$650.00
		<b>1.30</b>	<b>\$650.00</b>
MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	CICERO, GERARD T.	1.80	\$2,700.00
	MOXLEY, D. CAMERON	1.30	\$1,625.00
	GOODMAN, ERIC R.	3.00	\$4,800.00
		<b>6.10</b>	<b>\$9,125.00</b>
FEE/EMPLOYMENT APPLICATIONS	GOODMAN, ERIC R.	0.20	\$320.00
	BURNS, THOMAS	24.80	\$12,400.00
		<b>25.00</b>	<b>\$12,720.00</b>
CONTESTED MATTERS/LITIGATION (GENERAL)	GOODMAN, ERIC R.	3.30	\$5,280.00
		<b>3.30</b>	<b>\$5,280.00</b>
NON-WORKING TRAVEL @ 50%	GOODMAN, ERIC R.	10.60	\$8,480.00
		<b>10.60</b>	<b>\$8,480.00</b>
PLAN AND DISCLOSURE STATEMENT	KELLY, BARBARA J.	9.60	\$17,280.00
	CICERO, GERARD T.	10.10	\$15,150.00
	GOODMAN, ERIC R.	11.60	\$18,560.00
	MOTTER, JANE W.	3.20	\$2,480.00
	KASNETZ, ALEXANDER F.	3.80	\$3,610.00
	SHACHMUROVE, AMIR	3.50	\$3,325.00
		<b>41.80</b>	<b>\$60,405.00</b>
MEDIATION/SETTLEMENT	CICERO, GERARD T.	0.90	\$1,350.00
	MOXLEY, D. CAMERON	0.20	\$250.00
	GOODMAN, ERIC R.	14.90	\$23,840.00
		<b>16.00</b>	<b>\$25,440.00</b>

FEE APPLICATION DATA

8/9/2024

CLIENT: 040178

1

Bill Date range: 8/9/2024 to 8/9/2024

FINANCING ISSUES	CICERO, GERARD T.	5.50	\$8,250.00
	GOODMAN, ERIC R.	13.00	\$20,800.00
		<b>18.50</b>	<b>\$29,050.00</b>
		<b>122.60</b>	<b>\$151,150.00</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>
Barabara J. Kelly	Counsel; Admitted to New York Bar in 1982; Tax	\$1,800	9.60	\$17,280.00
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	56.60	\$82,080.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	18.30	\$27,450.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	1.50	\$1,875.00
Alexander F. Kasnetz	Associate; Admitted to Illinois Bar in 2018; Dispute Resolution & Restructuring	\$950	3.80	\$3,610.00
Amir Shachmurove	Associate; Admitted to New York Bar 2014; Admitted to District Court of Columbia Bar in 2018; Bankruptcy & Corporate Restructuring	\$950	3.50	\$3,325.00

<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>
Jane W. Motter	Associate; Admitted to Massachusetts Bar in 2021; Corporate & Capital Markets	\$775	3.20	\$2,480.00
<b>TOTAL</b>			<b>96.50</b>	<b>\$138,100.00</b>
<b>PROFESSIONAL BLENDED RATE</b>		<b>\$1,431.09</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	26.10	\$13,050.00
<b>TOTAL</b>			<b>26.10</b>	<b>\$13,050.00</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
8/9/2024	eDiscovery Hosting	4,917.80
	Westlaw Online Transactional Searches / Docs	15.00
		<b>4,932.80</b>
		<b>4,932.80</b>

**EXHIBIT D**

**Detailed Record of Time Entries**



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

Invoice 6982160  
Date Aug 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 July 31, 2024:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	650.00	4,932.80	5,582.80
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	9,125.00	0.00	9,125.00
040178.0008	FEE/EMPLOYMENT APPLICATIONS	12,720.00	0.00	12,720.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	5,280.00	0.00	5,280.00
040178.0011	NON-WORKING TRAVEL @ 50%	8,480.00	0.00	8,480.00
040178.0014	PLAN AND DISCLOSURE STATEMENT	60,405.00	0.00	60,405.00
040178.0015	MEDIATION/SETTLEMENT	25,440.00	0.00	25,440.00
040178.0018	FINANCING ISSUES	29,050.00	0.00	29,050.00
	<b>Total</b>	<b>151,150.00</b>	<b>4,932.80</b>	<b>156,082.80</b>

Total Current Fees	\$151,150.00
20% Holdback Amount	(30,230.00)
80% CURRENT BALANCE DUE	120,920.00
Total Current Costs	\$4,932.80
<b>Total Invoice</b>	<b>\$125,852.80</b>



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

Invoice 6982160  
Date Aug 9, 2024  
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

**INVOICE**

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

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	650.00	4,932.80	5,582.80
	<b>Total</b>	<b>650.00</b>	<b>4,932.80</b>	<b>5,582.80</b>

Total Current Fees	\$650.00
Total Current Costs	\$4,932.80
<b>Total Invoice</b>	<b>\$5,582.80</b>





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

Invoice 6982160  
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RE: CASE ADMINISTRATION/DISBURSEMENTS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
07/24/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.4)	0.70	350.00
07/25/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
07/29/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
<b>Total Hours and Fees</b>			<b>1.30</b>	<b>650.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
THOMAS BURNS	1.30 hours at	500.00	650.00
<b>Total Fees</b>			<b>650.00</b>

**COST SUMMARY**

Description	Value
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	15.00
EDISCOVERY HOSTING	4,917.80
<b>Total Costs</b>	<b>4,932.80</b>



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

Invoice 6982160  
Date Aug 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 July 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	9,125.00	0.00	9,125.00
<b>Total</b>		<b>9,125.00</b>	<b>0.00</b>	<b>9,125.00</b>

Total Current Fees	\$9,125.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$9,125.00</b>



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

Invoice 6982160  
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RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
07/02/24	GOODMAN	PLAN AND PREPARE FOR COMMITTEE MEETING (.2); ATTEND COMMITTEE MEETING VIA ZOOM REGARDING CASE STATUS (.4)	0.60	960.00
07/09/24	CICERO	PARTICIPATE IN WEEKLY STRATEGY AND UPDATE CALL	0.70	1,050.00
07/09/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING SETTLEMENT PROPOSAL AND RELATED MATTERS	0.80	1,280.00
07/09/24	MOXLEY	PARTICIPATE IN COMMITTEE MEETING RE SETTLEMENT NEGOTIATION STATUS AND NEXT STEPS	0.80	1,000.00
07/23/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING SETTLEMENT AND CASE STATUS	1.00	1,600.00
07/23/24	CICERO	PARTICIPATE IN WEEKLY COMMITTEE MEETINGS	1.10	1,650.00
07/30/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING CASE STATUS AND TRUST DISTRIBUTION PROCEDURES	0.60	960.00
07/30/24	MOXLEY	PARTICIPATE IN COMMITTEE MEETING REGARDING SETTLEMENT STATUS AND CASE STRATEGY	0.50	625.00
<b>Total Hours and Fees</b>			<b>6.10</b>	<b>9,125.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
GERARD T. CICERO	1.80 hours at	1,500.00	2,700.00
D. C. MOXLEY	1.30 hours at	1,250.00	1,625.00
ERIC R. GOODMAN	3.00 hours at	1,600.00	4,800.00
<b>Total Fees</b>			<b>9,125.00</b>



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

Invoice 6982160  
Date Aug 9, 2024  
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

**INVOICE**

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

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0008	FEE/EMPLOYMENT APPLICATIONS	12,720.00	0.00	12,720.00
	<b>Total</b>	<b>12,720.00</b>	<b>0.00</b>	<b>12,720.00</b>

Total Current Fees	\$12,720.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$12,720.00</b>



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

Invoice 6982160  
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RE: FEE/EMPLOYMENT APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
07/02/24	GOODMAN	REVIEW AND EDIT PROPOSED ORDER FOR APPLICATION TO RETAIN APPELLATE COUNSEL	0.20	320.00
07/02/24	BURNS	WORK ON SEVENTH MONTHLY FEE STATEMENT	1.00	500.00
07/03/24	BURNS	CONFER WITH G. CICERO REGARDING SEVENTH MONTHLY FEE STATEMENT	0.20	100.00
07/08/24	BURNS	CONFER WITH G. CICERO REGARDING SECOND INTERIM FEE APPLICATION	0.30	150.00
07/09/24	BURNS	CONFER WITH G. CICERO REGARDING SECOND INTERIM FEE APPLICATION (.3); CONFER WITH G. CICERO REGARDING SEVENTH MONTHLY FEE STATEMENT (.3); WORK ON SEVENTH MONTHLY FEE STATEMENT (.8); WORK ON SECOND INTERIM FEE APPLICATION (.8)	2.20	1,100.00
07/10/24	BURNS	WORK ON SEVENTH MONTHLY FEE STATEMENT (.5); WORK ON SECOND INTERIM FEE APPLICATION (.6)	1.10	550.00
07/11/24	BURNS	CONFER WITH G. CICERO REGARDING SEVENTH MONTHLY FEE STATEMENT (.3); WORK ON SEVENTH MONTHLY FEE STATEMENT (.6); WORK ON SECOND INTERIM FEE APPLICATION (.6)	1.50	750.00
07/15/24	BURNS	WORK ON SECOND INTERIM FEE APPLICATION	0.80	400.00
07/16/24	BURNS	FURTHER WORK ON SEVENTH MONTHLY FEE STATEMENT (.6) ; WORK ON SECOND INTERIM FEE APPLICATION (.8); CONFER WITH G. CICERO REGARDING EIGHTH MONTHLY FEE STATEMENT (.4); CONFER WITH WITH G.CICERO AND E. GOODMAN REGARDING EIGHTH MONTHLY FEE STATEMENT AND STATUS OF SECOND INTERIM FEE APPLICATION (.4)	2.20	1,100.00
07/17/24	BURNS	WORK ON SECOND INTERIM FEE APPLICATION (.6); CONFER WITH G. CICERO REGARDING SECOND INTERIM FEE APPLICATION (.4)	1.00	500.00
07/18/24	BURNS	CONFER WITH E. GOODMAN REGARDING SEVENTH MONTHLY FEE STATEMENT (.4); CONFER WITH M. ZIMMERMAN REGARDING COMMITTEE'S REVIEW OF SEVENTH MONTHLY FEE STATEMENT (.2); CONFER WITH E. GOODMAN REGARDING SECOND INTERIM FEE APPLICATION (.4); WORK ON SECOND INTERIM FEE APPLICATION (.5)	1.50	750.00



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

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Date	Professional	Description	Hours	Value
07/19/24	BURNS	CONFER WITH E. GOODMAN AND G. CICERO REGARDING SECOND INTERIM FEE APPLICATION	0.40	200.00
07/22/24	BURNS	CONFER WITH G. CICERO REGARDING GILBERT RETENTION APPLICATION (.4); WORK ON GILBERT RETENTION APPLICATION (.9); CONFER WITH G. CICERO AND E. GOODMAN REGARDING CNO FOR FIRST INTERIM FEE APPLICATION (.4); CONFER WITH M. ZIMMERMAN REGARDING JUNE MONTHLY FEE STATEMENT (.3)	2.00	1,000.00
07/23/24	BURNS	CONFER WITH M. ZIMMERMAN REGARDING SEVENTH MONTHLY FEE STATEMENT (.4); CONFER WITH G. CICERO REGARDING AND E. GOODMAN REGARDING THE GILBERT RETENTION APPLICATION (.4); FURTHER WORK ON GILBERT RETENTION APPLICATION (1.2); CONFER WITH M. ZIMMERMAN REGARDING THE GILBERT RETENTION APPLICATION (.4); PREPARE THE CNO FOR BR'S FIRST INTERIM FEE APPLICATION FOR FILING (.4); FILE SAME (.3)	3.10	1,550.00
07/24/24	BURNS	WORK ON CERTIFICATE OF COUNSEL FOR AMENDED INTERIM COMPENSATION ORDER (1.0); CONFER WITH G. CICERO REGARDING AMENDED INTERIM COMPENSATION ORDER (.4); CONFER WITH M. ZIMMERMAN REGARDING SEVENTH MONTHLY FEE STATEMENT (.3); PREPARE SEVENTH MONTHLY FEE STATEMENT FOR FILING (.4)	2.40	1,200.00
07/25/24	BURNS	CONFER WITH M. ATKINSON REGARDING PROVINCE'S SIXTH MONTHLY FEE STATEMENT (.3); PREPARE PROVINCE'S SIXTH MONTHLY FEE STATEMENT FOR FILING (.4); FILE SAME (.3); CONFER WITH G. CICERO REGARDING PROVINCE'S FIRST INTERIM FEE APPLICATION (.4); CONFER WITH M. ATKINSON REGARDING PROVINCE'S FIRST INTERIM FEE APPLICATION (.2) WORK ON PROVINCE'S FIRST INTERIM FEE APPLICATION (.4); PREPARE PROVINCE'S FIRST INTERIM FEE APPLICATION FOR FILING (.4); FILE SAME (.3)	2.70	1,350.00
07/26/24	BURNS	CONFER WITH M. ATKINSON REGARDING PROVINCE'S FIRST INTERIM FEE APPLICATION	0.30	150.00
07/29/24	BURNS	WORK ON EIGHTH MONTHLY FEE STATEMENT	1.00	500.00
07/30/24	BURNS	WORK ON EIGHTH MONTHLY FEE STATEMENT	0.60	300.00
07/31/24	BURNS	WORK ON EIGHTH MONTHLY FEE STATEMENT	0.50	250.00



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

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Date	Professional	Description	Hours	Value
<b>Total Hours and Fees</b>			<b>25.00</b>	<b>12,720.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
ERIC R. GOODMAN	0.20 hours at	1,600.00	320.00
THOMAS BURNS	24.80 hours at	500.00	12,400.00
<b>Total Fees</b>			<b>12,720.00</b>



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

Invoice 6982160  
Date Aug 9, 2024  
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**INVOICE**

For professional services rendered in connection with the above captioned matter through July 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)	5,280.00	0.00	5,280.00
	<b>Total</b>	<b>5,280.00</b>	<b>0.00</b>	<b>5,280.00</b>

Total Current Fees	\$5,280.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$5,280.00</b>





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

Invoice 6982160  
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RE: CONTESTED MATTERS/LITIGATION (GENERAL)

**TIME DETAIL**

Date	Professional	Description	Hours	Value
07/18/24	GOODMAN	REVIEW AND EDIT PROPOSED ORDERS AND COMMUNICATIONS WITH COUNSEL FOR THE UCC AND THE DEBTOR REGARDING THE SAME	0.30	480.00
07/20/24	GOODMAN	COMMUNICATIONS WITH MR. ATKINSON REGARDING BUDGET AND TAX CREDITS	0.30	480.00
07/23/24	GOODMAN	EDIT AND FINALIZE INTERIM COMPENSATION ORDER (.2); COMMUNICATIONS REGARDING INTERIM COMPENSATION ORDER (.2); REVIEW AND EDIT DIP ORDER (.2); REVIEW EXHIBITS TO DIP ORDER (.3); REVIEW AND EDIT CERTIFICATION OF NO OBJECTION FOR INTERIM FEE APPLICATION (.3); COMMUNICATIONS WITH MR. CICERO REGARDING CASE STATUS (.2); REVIEW CLASS PROOF OF CLAIM (.2); TELEPHONE CALL WITH STATE COURT COUNSEL REGARDING INSURANCE ISSUES (.5); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING DIP ORDER (.6)	2.70	4,320.00
<b>Total Hours and Fees</b>			<b>3.30</b>	<b>5,280.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
ERIC R. GOODMAN	3.30 hours at	1,600.00	5,280.00
<b>Total Fees</b>			<b>5,280.00</b>



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

Invoice 6982160  
Date Aug 9, 2024  
Client 040178

RE: NON-WORKING TRAVEL @ 50%

**INVOICE**

For professional services rendered in connection with the above captioned matter through July 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%	8,480.00	0.00	8,480.00
<b>Total</b>		<b>8,480.00</b>	<b>0.00</b>	<b>8,480.00</b>

Total Current Fees	\$8,480.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$8,480.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
August 9, 2024Invoice 6982160  
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RE: NON-WORKING TRAVEL @ 50%

## TIME DETAIL

Date	Professional	Description	Hours	Value
07/16/24	GOODMAN	TRAVEL TO NEW YORK FOR MEDIATION	5.40	4,320.00
07/18/24	GOODMAN	RETURN TRAVEL FROM NEW YORK FOR MEDIATION	5.20	4,160.00
<b>Total Hours and Fees</b>			<b>10.60</b>	<b>8,480.00</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	10.60 hours at	800.00	8,480.00
<b>Total Fees</b>			<b>8,480.00</b>



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

Invoice 6982160  
Date Aug 9, 2024  
Client 040178

RE: PLAN AND DISCLOSURE STATEMENT

**INVOICE**

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

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0014	PLAN AND DISCLOSURE STATEMENT	60,405.00	0.00	60,405.00
<b>Total</b>		<b>60,405.00</b>	<b>0.00</b>	<b>60,405.00</b>

Total Current Fees	\$60,405.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$60,405.00</b>



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

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RE: PLAN AND DISCLOSURE STATEMENT

**TIME DETAIL**

Date	Professional	Description	Hours	Value
07/22/24	GOODMAN	DRAFT AND EDIT TRUST DISTRIBUTION PROCEDURES	7.30	11,680.00
07/23/24	KELLY	CALL WITH CICERO TO DISCUSS TERMS OF SETTLEMENT TRUST	0.50	900.00
07/24/24	GOODMAN	DRAFT AND EDIT TRUST DISTRIBUTION PROCEDURES (2.0); DRAFT EMAIL TO INSURANCE COUNSEL REGARDING TRUST DISTRIBUTION PROCEDURES (.3); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING DIP ORDER, PLAN DOCUMENTS, AND RELATED MATTERS (.7); TELEPHONE CALL WITH MR. CICERO REGARDING REVISIONS TO DIP ORDER (.3)	3.30	5,280.00
07/24/24	KELLY	REVIEW DRAFT TDP REGARDING STRUCTURE OF SETTLEMENT TERMS (1.1); BEGIN FIRST DRAFT OF SETTLEMENT TRUST AGREEMENT (1.9)	3.00	5,400.00
07/25/24	MOTTER	DRAFT/REVISE TRUST AGREEMENT	0.30	232.50
07/25/24	KELLY	WORK ON TEHUM CARE SERVICES SETTLEMENT TRUST AGREEMENT WITH DRAFT TDP CONSIDERATIONS	2.80	5,040.00
07/26/24	MOTTER	DRAFT/REVISE TRUST AGREEMENT	2.90	2,247.50
07/26/24	KELLY	WORK ON TEHUM CARE SERVICES SETTLEMENT TRUST AGREEMENT	3.30	5,940.00
07/29/24	CICERO	CALL WITH A. SACHRUMOVE RE: PLAN DRAFTING (.4); REVIEW PLAN WORD DOCUMENT (.9)	1.30	1,950.00
07/29/24	SHACHMUROVE	BRIEFLY REVIEW TEHUM PLANS, DISCLOSURE STATEMENT, TERM SHEET	0.50	475.00
07/29/24	SHACHMUROVE	CONFER WITH COLLEAGUE, G. CICERO, REGARDING PLAN AND DISCLOSURE STATEMENT	0.20	190.00
07/30/24	CICERO	DRAFT AND REVISE PLAN	4.60	6,900.00
07/30/24	KASNETZ	DRAFT PLAN (1.6) AND CORRESPOND WITH G. CICERO AND A. SCHACHMUROVE RE SAME (1.6)	3.20	3,040.00
07/30/24	GOODMAN	TELEPHONE CALL WITH MR. CICERO REGARDING PLAN ISSUES	1.00	1,600.00
07/30/24	SHACHMUROVE	REVIEW PLAN WITH COLLEAGUES, G. CICERO AND A. KASNETZ, AND DISCUSS PROPOSED CHANGES TO PLAN	2.30	2,185.00
07/30/24	SHACHMUROVE	DISCUSS NEXT STEPS REGARDING PLAN REDRAFT WITH A. KASNETZ	0.20	190.00
07/31/24	KASNETZ	DRAFT PLAN	0.60	570.00



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

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Date	Professional	Description	Hours	Value
07/31/24	SHACHMUROVE	CONFER WITH A. KASNETZ AND G. CICERO REGARDING PLAN MARKUP	0.30	285.00
07/31/24	CICERO	DRAFT AND REVISE PLAN DOCUMENTS (3.1): CALL WITH E. GOODMAN RE: SAME AND ISSUES TO ADDRESS RE: SAME (.7); EMAILS TO A.S. AND A. KASNETZ WITH UPDATED LANGUAGE RE: PLAN DOCUMENTS (.4)	4.20	6,300.00
<b>Total Hours and Fees</b>			<b>41.80</b>	<b>60,405.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
BARBARA J. KELLY	9.60 hours at	1,800.00	17,280.00
GERARD T. CICERO	10.10 hours at	1,500.00	15,150.00
ERIC R. GOODMAN	11.60 hours at	1,600.00	18,560.00
JANE W. MOTTER	3.20 hours at	775.00	2,480.00
ALEXANDER F. KASNETZ	3.80 hours at	950.00	3,610.00
AMIR SHACHMUROVE	3.50 hours at	950.00	3,325.00
<b>Total Fees</b>			<b>60,405.00</b>



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

Invoice 6982160  
Date Aug 9, 2024  
Client 040178

RE: MEDIATION/SETTLEMENT

**INVOICE**

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

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0015	MEDIATION/SETTLEMENT	25,440.00	0.00	25,440.00
<b>Total</b>		<b>25,440.00</b>	<b>0.00</b>	<b>25,440.00</b>

Total Current Fees	\$25,440.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$25,440.00</b>



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

Invoice 6982160  
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RE: MEDIATION/SETTLEMENT

**TIME DETAIL**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Value</b>
07/02/24	GOODMAN	TELEPHONE CALL WITH MEDIATOR REGARDING REVISED PROPOSAL (.3); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING REVISED PROPOSAL (.5); DRAFT AND EDIT REVISED PROPOSAL (.8)	1.60	2,560.00
07/03/24	GOODMAN	DRAFT AND EDIT REVISED PROPOSAL (.7); REVIEW ATKINSON ANALYSIS OF REVISED PROPOSAL (.3); CONFERENCE CALL WITH COUNSEL FOR THE UCC REGARDING REVISED PROPOSAL (.5); FOLLOW-UP CALL WITH MR. ZIMMERMAN REGARDING REVISED PROPOSAL (.3)	1.80	2,880.00
07/04/24	GOODMAN	DRAFT AND EDIT REVISED SETTLEMENT TERM SHEET	1.50	2,400.00
07/05/24	GOODMAN	EDIT AND REVISE SETTLEMENT PROPOSAL AND COMMUNICATIONS WITH COUNSEL FOR THE UCC REGARDING THE SAME	0.50	800.00
07/11/24	GOODMAN	CONFERENCE CALL WITH MR. SONTCH REGARDING SETTLEMENT PROPOSAL (.5); REVIEW REVISED PROPOSAL (.2); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING REVISED PROPOSAL (.1)	0.80	1,280.00
07/12/24	GOODMAN	CONFERENCE CALL WITH COUNSEL FOR THE UCC REGARDING SETTLEMENT PROPOSAL	0.50	800.00
07/15/24	GOODMAN	DRAFT AND EDIT SLIDES FOR SETTLEMENT CONFERENCE IN NEW YORK	0.80	1,280.00
07/16/24	GOODMAN	CONFERENCE WITH MR. ZIMMERMAN REGARDING MEDIATION AND CASE STRATEGY	2.00	3,200.00
07/17/24	GOODMAN	EDIT AND REVISE SETTLEMENT DOCUMENTS (.3); EDIT AND REVISE PRESENTATION ON PROPOSED SETTLEMENT STRUCTURE (.4); CONFERENCE WITH MR. ZIMMERMAN REGARDING PRESENTATION ON PROPOSED SETTLEMENT STRUCTURE (.2); ATTEND MEDIATION IN NEW YORK (4.5)	5.40	8,640.00
07/23/24	CICERO	WORK ON INSURANCE ISSUES	0.90	1,350.00
07/25/24	MOXLEY	ANALYZE TREATMENT OF INSURANCE DISCOVERY MATERIAL UNDER PROTECTIVE ORDER	0.20	250.00
<b>Total Hours and Fees</b>			<b>16.00</b>	<b>25,440.00</b>





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

Invoice 6982160  
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**TIME SUMMARY**

Professional	Hours	Rate	Value
GERARD T. CICERO	0.90 hours at	1,500.00	1,350.00
D. C. MOXLEY	0.20 hours at	1,250.00	250.00
ERIC R. GOODMAN	14.90 hours at	1,600.00	23,840.00
<b>Total Fees</b>			<b>25,440.00</b>



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

Invoice 6982160  
Date Aug 9, 2024  
Client 040178

RE: FINANCING ISSUES

**INVOICE**

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

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
040178.0018	FINANCING ISSUES	29,050.00	0.00	29,050.00
	<b>Total</b>	<b>29,050.00</b>	<b>0.00</b>	<b>29,050.00</b>

Total Current Fees	\$29,050.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$29,050.00</b>

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE  
August 9, 2024Invoice 6982160  
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RE: FINANCING ISSUES

## TIME DETAIL

Date	Professional	Description	Hours	Value
07/18/24	GOODMAN	REVIEW REVISED DIP ORDER (.1); TELEPHONE CALL WITH MR. CICERO REGARDING REVISED DIP ORDER AND RELATED MATTERS (.4)	0.50	800.00
07/18/24	CICERO	DRAFT AND REVISE INTERIM COMP AND DIP ORDERS (1.2); CALLS WITH E. GOODMAN RE: SAME (.6)	1.80	2,700.00
07/19/24	GOODMAN	REVIEW AND EDIT REVISED DIP ORDER AND COMMUNICATIONS REGARDING THE SAME	1.00	1,600.00
07/21/24	GOODMAN	REVIEW AND EDIT REVISED DIP ORDER (1.4); COMMUNICATIONS WITH MR. ATKINSON REGARDING REVISED DIP ORDER (.1); REVIEW UCC COMMENTS TO REVISED DIP ORDER (.2)	1.70	2,720.00
07/22/24	CICERO	DRAFT AND REVISE DIP ORDER (.7); PARTICIPATE IN MEDIATION SESSION WITH UCC RE: SAME (.7)	1.40	2,100.00
07/22/24	GOODMAN	REVIEW AND EDIT DIP ORDER (.2); CONFERENCE CALL WITH COUNSEL FOR THE UCC REGARDING DIP ORDER (.7); CONFERENCE CALL WITH MR. ZIMMERMAN REGARDING DIP ORDER AND RELATED MATTERS (.8); REVIEW REVISED BUDGET (.2)	1.90	3,040.00
07/24/24	CICERO	WORK ON DIP FINANCING AND RELATED MEDIATION ISSUES	1.30	1,950.00
07/25/24	GOODMAN	EDIT AND REVISE PROPOSED FIFTH INTERIM DIP ORDER	1.00	1,600.00
07/26/24	GOODMAN	REVIEW PROPOSED EDITS TO DIP ORDER (.2); TELEPHONE CALL WITH MR. CICERO REGARDING COMMENTS TO DIP ORDER (.1); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING COMMENTS TO DIP ORDER (.2); DRAFT EMAIL TO M2 PARTIES REGARDING COURT HEARING (.1)	0.60	960.00
07/29/24	GOODMAN	EDIT AND REVISE PROPOSED DIP ORDER (4.3); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING PROPOSED DIP ORDER (.4); DRAFT AND EDIT EMAIL TO THE UCC'S COUNSEL REGARDING REVISED DIP ORDER (.5); DRAFT EMAIL TO DIP LENDER'S COUNSEL REGARDING REVISED DIP ORDER (.3)	5.50	8,800.00
07/29/24	CICERO	CALL WITH E. GOODMAN RE: DIP ORDER (.4); REVIEW AND REVISE DIP ORDER (.4); REVIEW EMAILS WITH UCC RE: SAME (.2)	1.00	1,500.00



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

Invoice 6982160  
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Date	Professional	Description	Hours	Value
07/31/24	GOODMAN	REVIEW AND RESPOND TO LETTER FROM M2 LOAN CO. REGARDING SETTLEMENT TERM SHEET (.4); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING LETTER FROM M2 LOAN CO. AND RELATED MATTERS (.2); TELEPHONE CALL WITH COUNSEL FOR THE UCC REGARDING DIP ORDER (.2).	0.80	1,280.00
<b>Total Hours and Fees</b>			<b>18.50</b>	<b>29,050.00</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
GERARD T. CICERO	5.50 hours at	1,500.00	8,250.00
ERIC R. GOODMAN	13.00 hours at	1,600.00	20,800.00
<b>Total Fees</b>			<b>29,050.00</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 6982160  
Date Aug 9, 2024  
Client 040178

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

Remittance **remit**



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**Balance Due: \$125,852.80**

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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