

**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.)	

**COVERSHEET TO THE FIRST COURT-FILED INTERIM APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM MARCH 24, 2023 THROUGH MAY 31, 2024**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
INTERIM COURT-FILED APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	03/24/2023	05/31/2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

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.



Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$586,428.21
Total professional hours covered by this Application:	1,174.5
Average hourly rate for professionals:	\$508.71
Total expense reimbursements requested in this Application:	\$11,052.40
Total fees and expenses requested in this Application:	\$597,480.61 (After voluntary rate reduction of \$132,662.40)
Total fees and expenses awarded final in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023. Remediation occurred 12/14/2023 and again on May 6, 2024	

MONTHLY APPLICATIONS COVERING THE DATES HEREIN WERE PREVIOUSLY SENT TO NOTICE PARTIES THROUGHOUT THE CASE AND ARE ATTACHED HEREIN AS EXHIBIT C

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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.)	

SUMMARY OF FIRST COURT-FILED INTERIM APPLICATION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD MARCH 24, 2023 THROUGH AND INCLUDING MAY 31, 2024

Name of Applicant: Dundon Advisers LLC

Authorized to provide professional services to: The Official Committee of Unsecured Creditors

Petition Date: February 13, 2023

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and reimbursement is sought: MARCH 24, 2023 through MAY 31, 2024

Amount of compensation sought as actual, reasonable, and necessary: \$586,428.21

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$11,052.40

This is a(n): _ monthly X interim final application

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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023-07/31/2023	\$167,893.10	\$0.00	\$82,158.44 Sept. 2023	None
08/01/2023-08/31/2023	\$100,700.41	4,956.38	\$137,675.15 Dec. 2023	None
09/01/2023-09/30/2023	\$25,470.80	\$3,213.55	\$0.00	None
10/01/2023-10/31/2023	\$39,577.60	\$0.00	\$0.00	None
11/01/2023-11/30/2023	\$19,005.60	\$0.00	\$0.00	None
12/01/2023-01/31/2024	\$39,948.40	\$202.55	\$0.00	None
As of 02/01/2024	<i>\$392,595.91 Total Fees to Date</i>	<i>\$8,372.48 Total Expenses to Date</i>	<i>\$219,833.59 Paid Fees and Expenses to Date (80% Fees and 100% Expenses through August 2023) \$60,000.00 received 8/22/2024</i>	
02/01/2024-02/29/2024	\$71,240.00	\$2,238.61	\$0.00	None
03/01/2024-03/31/2024	\$78,413.60	\$289.39	\$0.00	None
04/01/2024-05/31/2024	\$44,178.70	151.92	\$0.00	None
TOTAL	\$586,428.21	\$11,052.40	\$279,833.59	Due by 09/16/2024

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD MARCH 24, 2023 THROUGH MAY 31, 2024**

Professional	Title	Rate July 1, 2022 – June 30, 2023³	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	245.3	\$169,303.00
Heather Barlow	Managing Director	\$604.00	\$604.00	302.9	\$182,951.60
Lee Rooney*	Senior Director	\$420.00	\$420/\$504	327.7	\$149,766.50
David Chen	Associate	\$288.00	\$288.00	113.8	\$29,563.41
Jordan Olsen	Associate	\$288.00	\$288.00	164.3	\$47,869.60
Michael Garbe	Senior Director	\$504.00	\$504.00	19.0	\$6,465.60
Christopher Podesfinski	Senior Associate	\$339.00	\$339.00	1.5	\$508.50
<i>* Promoted 1/1/2024; new rate is a proportional reduction from his \$700 per hour</i>					
Voluntarily Reduced and Requested Fees					\$586,428.21
Expenses					<u>\$11,052.40</u>
Total					\$597,480.61
Total Hours					1,174.5
Blended Hourly Rate					\$508.71

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They were again adjusted on July 1, 2024, and each year thereafter. The Total \$586,428.21 here shows a voluntary rate reduction of \$132,622.40 off our standard fees.

**COMPENSATION BY PROJECT CATEGORY
FOR THE PERIOD MARCH 24, 2023 THROUGH MAY 31, 2024**

Category	Hours Billed	Fees with regular billing and reduced billing amounts
Business Analysis	805.9	\$411,360.40
Case Administration	23.9	\$11,460.50
Post-Effective Date Planning	0.5	\$445.00
Claims Administration	12.6	\$10,060.00
Committee Member/Professional Meetings & Communications	161	\$100,497.30
Debtor Professional and Client Meeting	15.7	\$6,523.20
Investigations	2.6	\$1,820.00
Plan and Disclosure Statement	122.1	\$98,838.80
Retention and Fee Applications	30.2	\$22,351.20
TOTAL	1,174.5	\$663,356.40 plus \$55,734.40 already reflected reduced fees from the 3/24/2023- 7/31/2023 first monthly period = \$719,090.61
Voluntarily Reduced Fees reflected in the Total		(\$132,662.40)
	TOTAL FEES REQUESTED	\$586,428.21

Blended Hourly Rate	\$508.71
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

**FIRST INTERIM APPLICATION OF DUNDON ADVISERS LLC AS FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
MARCH 24, 2023 THROUGH AND INCLUDING MAY 31, 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/](https://ecf.txsb.uscourts.gov/)
WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED.
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), and the updated order from August 2024, Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured

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.

Creditors (the “Committee”) of Tehum Care Services, Inc. (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its First Court-Filed Interim application (the “Application”) for allowance of compensation and reimbursement of expenses for the period of March 24, 2023 through and including May 31, 2024 (the “Compensation Period”). Pursuant to this Application, Dundon seeks an allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of \$586,428.21. Additionally, approval of reasonable expenses of \$11,052.40 were recorded during the fee period. These are payable pursuant to the updated Court approved procedures. In support of this Application, Dundon respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the “Court”) has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

BACKGROUND

3. On February 13, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the “U.S. Trustee”) appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke’s Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman

Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell.

5. On March 9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

6. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

7. On April 14, 2023, (Docket No. 0357) the Court entered the Interim Compensation Order.

8. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24, 2023* [Docket No. 0796] (the “Dundon Retention Order”).

COMPENSATION PAID AND ITS SOURCE

9. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

10. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

11. The nine monthly fee statements for the Compensation Period are attached hereto as **Exhibit C**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application

complies with sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 20162, applicable law and the Interim Compensation Order.

12. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached via the nine monthly fee applications hereto as **Exhibit C**.

SUMMARY OF SERVICES RENDERED

13. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

14. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

15. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

**COMPENSATION BY PROJECT CATEGORY
MARCH 24, 2023 – MAY 31, 2024**

Category	Hours Billed	Fees
Business Analysis	805.9	\$411,360.40
Case Administration	23.9	\$11,460.50
Post-Effective Date Planning	0.5	\$445.00
Claims Administration	12.6	\$10,060.00

Committee Member/Professional Meetings & Communications	161.0	\$100,497.30
Debtor Professional and Client Meeting	15.7	\$6,523.20
Investigations	2.6	\$1,820.00
Plan and Disclosure Statement	122.1	\$98,838.80
Retention and Fee Applications	30.2	\$22,351.20
Total	1174.5	\$663,356.40 + 55,734.40 = \$719,090.61
	Net Fees After Voluntary Reduction of Rates	\$586,428.21
	Expenses	\$11,052.40
	Total	\$597,480.61
	Total Hours Blended	1174.5
	Hourly Rate	\$508.71

16. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	805.9	\$411,360.40
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17. This category includes time spent on analysis of the Debtors and issues related therein.

18. This category includes time spent with claims administration of the Debtors and issues related therein.

Claims Administration	12.6	\$10,060.00
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19. This category includes time spent with case administration of the Debtors and issues

Post-Effective Date Planning	0.5	\$445.00
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20. This category includes time spent with post-effective date planning of the Debtors and issues related therein.

Case Administration	23.9	\$11,460.50
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21. This category includes time spent working with the UCC and its professionals with the Debtors case issues therein.

Committee Member/Professional Meetings & Communications	161.0	\$100,497.30
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22. This category includes all time spent with Debtors professionals, Committee members or professionals and communications therein.

Debtor Professionals and client	15.7	\$6,523.20
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23. This category includes time spent with mediation plan discussions and communications therein.

Investigations	2.6	\$1,820.00
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24. This category includes time spent with counsel related to an investigation of case issues.

Plan & Disclosure Statement /Mediation	122.1	\$98,838.80
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25. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Retention and Fee	30.2	\$22,351.20
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26. This category includes all time spent preparing and reviewing Dundon's Fee Applications and for Monthly and interim in these proceedings and reviewing other party retentions.

VALUATION OF SERVICES

27. Dundon's professionals expended a total of 1,174.5 hours in connection with this matter during the Compensation Period as follows:

Professional	Title	Rate through 6/30/2023²	Rate through 6/30/2024³	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	245.3	\$169,303.00
Heather Barlow	Managing Director	\$604.00	\$604.00	302.9	\$182,951.60
Lee Rooney*	Senior Director	\$420.00	\$420/\$504	327.7	\$149,766.50
David Chen	Associate	\$288.00	\$288.00	113.8	\$29,563.41
Jordan Olsen	Associate	\$288.00	\$288.00	164.3	\$47,869.60
Michael Garbe	Senior Director	\$504.00	\$504.00	19.0	\$6,465.60
Christopher Podesfinski	Senior Associate	\$339.00	\$339.00	1.5	\$508.50
<i>** Promoted January 1, 2024</i>				Fees	\$586,428.21
				Expenses	<u>\$11,052.40</u>
				Total	\$597,480.61
				Voluntarily Reduced Billing Rates	\$132,662.40
				Total Hours	1174.5
				Blended Hourly Rate	\$508.71

28. The nature of the work performed by these persons is fully set forth in Exhibit C attached hereto. These are Dundon's normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is \$586,428.21. Expenses of \$11,052.40 are set forth in Exhibit C.

² As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2022 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

³ As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2023 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$132,662.40 during this period.

CERTIFICATION

29. A certification of Matthew J. Dundon is attached hereto as Exhibit B and made part of this Application.

NO PRIOR REQUEST

30. No prior court request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based upon all relevant criteria, including the results achieved in the case - as a whole.

31. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Dundon is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Dundon has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

NOTICE

32. Notice of this Application will be provided to the Fee Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

**NOTICE OF FEE APPLICATION
CERTIFICATE OF SERVICE**

The undersigned affirms that I served the following Fee Notice Parties via e-mail on August 26, 2024, pursuant to the Interim Compensation Order.

- The Debtors: Tehum Care Services, Inc., Attn: Russell Perry (russell.perry@ankura.com);
- Counsel to the Debtor: Gray Reed (tehumbk@grayreed.com), Attn: Jason S. Brookner; Aaron M. Kaufman; Lydia R. Webb; and Amber M. Carson;
- The Office of the United States Trustee for the Southern District of Texas, Attn: Ha Nguyen (Ha.Nguyen@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov);
- Counsel to M2 LoanCo, LLC, Norton Rose Fulbright, Attn: Kristian W. Gluck (Kristian.gluck@nortonrosefulbright.com);

- Counsel to the UCC: Stinson LLP, Attn: Nicholas Zluticky (nicholas.zluticky@stinson.com), and Zachary Hemenway (zachary.hemenway@stinson.com); and
- Counsel to the TCC, Brown Rudnick LLP (BRTEhumTeam@brownrudnick.com), Attn: Eric R. Goodman, D. Cameron Moxley, Gerard T. Cicero; and Berry Riddell, LLC, Attn: Michael W. Zimmerman (mz@berryriddell.com)

CONCLUSION

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$586,428.21** as compensation for necessary professional services rendered and **\$11,052.40** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: AUGUST 26, 2024

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon
10 Bank Street, Suite 1100
White Plains, NY 10606
Telephone: (914) 341-1188
[Email: md@dundon.com](mailto:md@dundon.com)

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

EXHIBIT A

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

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

**ORDER ALLOWING INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES**
(Docket No. ____)

The Court has considered the *First Interim Application of Dundon Advisers LLC As Financial Advisor To The Official Committee Of Unsecured Creditors For Allowance Of Compensation For Services Rendered And Reimbursement Of Expenses For The Period March 24, 2023 Through and Including May 31, 2024* filed by Dundon Advisers LLC (the “Applicant”). The Court orders:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$586,428.21, and \$11,052.40, respectively, for the period set forth in the Application.
2. The Debtor is authorized and directed to pay Application any unpaid amounts allowed by paragraph 1 of this Order.

Signed: _____, 2024

Christopher Lopez
United States Bankruptcy Judge

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.

EXHIBIT B

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

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

**CERTIFICATION OF MATTHEW J.
DUNDON**

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the First Court-Filed Interim Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period MARCH 24, 2023 Through and Including MAY 31, 2024* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of **SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION** (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated: AUGUST 26, 2024

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

EXHIBIT C

**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.	§	
	§	

**COVERSHEET TO THE FIRST MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM MARCH 24, 2023 THROUGH JULY 31, 2023**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	03/24/2023	07/31/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		
Compensation Breakdown for Time Period Covered by this Application		

¹ 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.

Total professional fees requested in this Application:	\$167,896.10
Total professional hours covered by this Application:	395.1
Average hourly rate for professionals:	\$424.95
Total expense reimbursements requested in this Application:	\$0.00
Total fees and expenses requested in this Application:	\$167,896.10 (After voluntary rate reduction of \$55,734.40)
Total fees and expenses awarded in all prior Applications:	\$0.00
Plan Status: TBD - Mediation scheduled for August 21-23, 2023	

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Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on September 26, 2023, pursuant to the Interim Compensation Order.

OFFICE OF THE UNITED STATES TRUSTEE for the Southern District of Texas:
Ha M. Nguyen, Esq.
Ha.Nguyen@usdoj.gov

Andrew Jimenez, Esq.
Andrew.Jimenez@usdoj.gov

NORTON ROSE FULBRIGHT as Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.
kristian.gluck@nortonrosefulbright.com

Julie Goodrich Harrison, Esq.
julie.harrison@nortonrosefulbright.com

STINSON LLP as Counsel to the Committee
Nicholas Zluticky, Esq.
nicholas.zluticky@stinson.com

Phillip Ashfield, Esq.
Phillip.Ashfield@stinson.com

Edwin H. Caldie, Esq.
ed.caldie@stinson.com

Tehum Care Services, Inc., Debtor and Debtor in Possession
Jason S. Brookner
jbrookner@grayreed.com

Aaron M. Kaufman
akaufman@grayreed.com

Lydia R. Webb

lwebb@grayreed.com

Amber M. Carson

acarson@grayreed.com

/s/ Matthew J Dundon

Dundon Advisers, LLC

Matthew J Dundon

Principal

10 Bank St., Suite 1100 White Plains, NY 10606

Telephone: (917) 838-1930

Email: md@dundon.com

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD MARCH 24, 2023 THROUGH JULY 31, 2023²**

Professional	Title	Rate July 1, 2022 – June 30, 2023²	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	47.6	\$32,368.00
Heather Barlow	Managing Director	\$604.00	\$604.00	67.0	\$40,468.00
Lee Rooney	Director	\$420.00	\$420.00	104.3	\$43,806.00
David Chen	Associate	\$288.00	\$288.00	113.8	\$32,774.40
Jordan Olsen	Associate	\$288.00	\$288.00	58.9	\$16,963.20
Michael Garbe		\$504.00	\$504.00	2.0	\$1,008.00
Christopher Podesfinski		\$339.00	\$339.00	1.5	\$508.50
Blended Hourly Rate				\$424.95	
				80%	134,316.88
				20%	33,579.22
				100%	\$167,896.10

² As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2023 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total here shows a voluntary reduction of \$55,734.40 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
MARCH 24, 2023 THROUGH JULY 31, 2023

Category	Hours Billed	Fees (including voluntary rate discount)
Business Analysis	336.5	135,480.90
Committee Member/Professional Meetings & Communications	44.7	\$24,246.40
Plan and Disclosure Statement	12.3	\$7,080.80
Retention and Fee Applications	1.6	\$1,008.00
Total	395.1	\$167,896.10

Billing Detail Description of Fees, Hours and Descriptions by Category**Exhibit A**

Date	User	Activity	Description	Billable Time	Full Rate	Voluntary Discount Rate	Full Scheduled Rate Fee	Voluntary Discount Fee
03/27/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Initial meeting of UCC members and professionals	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00
03/27/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting to discuss case.	0.6	\$625.00			
						\$420.00	\$375.00	\$252.00
03/27/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Initial UCC meeting attendance	0.6	\$760.00			
						\$604.00	\$456.00	\$362.40
03/28/2023	Matthew Dundon	Business Analysis	Data room processing and initial review	3.8	\$850.00			
						\$680.00	\$3,230.00	\$2,584.00
03/28/2023	Matthew Dundon	Business Analysis	Review of UCC counsel data request material	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00

03/29/2023	Matthew Dundon	Business Analysis	Data request editing and transmission	2.5	\$850.00			
						\$680.00	\$2,125.00	\$1,700.00
03/29/2023	Lee Rooney	Business Analysis	Preparation of the diligence request list	3.4	\$625.00			
						\$420.00	\$2,125.00	\$1,428.00
03/29/2023	Lee Rooney	Business Analysis	Review of financing filings	1.7	\$625.00			
						\$420.00	\$1,062.50	\$714.00
03/29/2023	Heather Barlow	Business Analysis	Prepare DD list with L Rooney. Review same with M Dundon	1.4	\$760.00			
						\$604.00	\$1,064.00	\$845.60
03/29/2023	Heather Barlow	Business Analysis	Reviewed due diligence list with Healthier Barlow.	0.4	\$760.00			
						\$604.00	\$304.00	\$241.60
04/02/2023	Matthew Dundon	Business Analysis	Review of ordinary course professional retention motion.	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00
04/02/2023	Heather Barlow	Business Analysis	Review data from Debtors - draft analysis re same	0.7	\$760.00			
						\$604.00	\$532.00	\$422.80
04/02/2023	Matthew Dundon	Retention and Fee Applications	Preparation of retention application for Dundon.	1.1	\$850.00			
						\$680.00	\$935.00	\$748.00
04/03/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic UCC meeting	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00
04/03/2023	Lee Rooney	Committee Member/Professional	Attended the committee meeting	0.5	\$625.00			
						\$420.00	\$312.50	\$210.00

		Meetings & Communications	with N. Zluticky, M. Dundon and others					
04/03/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate in regular UCC meeting.	0.5	\$760.00			
04/06/2023	Matthew Dundon	Business Analysis	Initial processing of 4/6 data production	0.6	\$850.00	\$604.00	\$380.00	\$302.00
04/06/2023	David Chen	Business Analysis	Reviewed, renamed, reorganized, and summarized files in the dataroom and M2 production.	1.5	\$370.00	\$680.00	\$510.00	\$408.00
04/06/2023	David Chen	Business Analysis	Continued reviewing, renaming, reorganizing, and summarizing files in the dataroom and M2 production.	3.6	\$370.00	\$288.00	\$555.00	\$432.00
04/07/2023	David Chen	Business Analysis	Continued reviewing, renaming, reorganizing, and summarizing files in the dataroom and M2 production.	3.4	\$370.00	\$288.00	\$1,332.00	\$1,036.80
04/08/2023	David Chen	Business Analysis	Continued reviewing, renaming, reorganizing, and summarizing files in the dataroom and M2 production.	4.6	\$370.00	\$288.00	\$1,258.00	\$979.20
						\$288.00	\$1,702.00	\$1,324.80

04/08/2023	David Chen	Business Analysis	Continued reviewing, renaming, reorganizing, and summarizing files in the dataroom and M2 production.	2.7	\$370.00				
04/09/2023	Matthew Dundon	Business Analysis	Discussion on status of data review with H. Barlow and L. Rooney	0.3	\$850.00	\$288.00	\$999.00	\$777.60	
04/09/2023	Lee Rooney	Business Analysis	Review of data room, analysis of contents contracts	1.4	\$625.00	\$680.00	\$255.00	\$204.00	
04/09/2023	David Chen	Business Analysis	Continued reviewing, renaming, reorganizing, and summarizing files in the dataroom and M2 production.	2.5	\$370.00	\$420.00	\$875.00	\$588.00	
04/09/2023	David Chen	Business Analysis	Continued reviewing, renaming, reorganizing, and summarizing files in the dataroom and M2 production.	2.3	\$370.00	\$288.00	\$925.00	\$720.00	
04/09/2023	Heather Barlow	Business Analysis	Document review strategy and calls with D Chen, L Rooney	1.2	\$760.00	\$288.00	\$851.00	\$662.40	
04/10/2023	Matthew Dundon	Business Analysis	Discussions of M2 LoanCo initial production with L. Rooney and H. Barlow	0.3	\$850.00	\$604.00	\$912.00	\$724.80	
						\$680.00	\$255.00	\$204.00	

04/10/2023	Lee Rooney	Business Analysis	Review contents of data room with M. Dundon and H. Barlow.	0.5	\$625.00			
						\$420.00	\$312.50	\$210.00
04/10/2023	Matthew Dundon	Business Analysis	Review contents of data room with L Rooney and H Barlow.	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00
04/10/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee call with P. Ashfield, N. Zluticky, and others	0.4	\$625.00			
						\$420.00	\$250.00	\$168.00
04/10/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic UCC meeting	0.4	\$850.00			
						\$680.00	\$340.00	\$272.00
04/10/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participated in recurring UCC meeting.	0.3	\$760.00			
						\$604.00	\$228.00	\$181.20
04/11/2023	Matthew Dundon	Business Analysis	DIP Loan objection review	0.8	\$850.00			
						\$680.00	\$680.00	\$544.00
04/11/2023	Heather Barlow	Business Analysis	DIP motion analysis and report discussion with M Dundon and L Rooney	0.4	\$760.00			
						\$604.00	\$304.00	\$241.60
04/11/2023	David Chen	Business Analysis	Checked and updated the newly uploaded dockets to the team	0.8	\$370.00			
						\$288.00	\$296.00	\$230.40
04/12/2023	David Chen	Business Analysis	Analyzed the dataroom and answered questions	1.2	\$370.00			
						\$288.00	\$444.00	\$345.60

04/13/2023	David Chen	Business Analysis	regarding the cash position and DIP financing process from Lee Analyzed the dataroom and answered questions regarding the cash position and DIP financing process from Lee	1.1	\$370.00			
04/13/2023	David Chen	Business Analysis	Helped Lee find the corporate structure of the Debtor	0.3	\$370.00	\$288.00	\$407.00	\$316.80
04/13/2023	Heather Barlow	Business Analysis	Review objections, DIP budget update and strategy. Discussion with L Rooney and M Dundon re: same	1.8	\$760.00	\$288.00	\$111.00	\$86.40
04/13/2023	Matthew Dundon	Business Analysis	Discussion of objections, DIP budget update and strategy with L Rooney and H Barlow.	0.4	\$850.00	\$604.00	\$1,368.00	\$1,087.20
04/14/2023	Lee Rooney	Business Analysis	Review and analysis of revised DIP budget	2.0	\$625.00	\$680.00	\$340.00	\$272.00
04/16/2023	Lee Rooney	Business Analysis	Review of data room materials for financial materials	3.3	\$625.00	\$420.00	\$1,250.00	\$840.00
						\$420.00	\$2,062.50	\$1,386.00

04/16/2023	Lee Rooney	Business Analysis	Review of documents related to Funding Agreement	1.4	\$625.00			
						\$420.00	\$875.00	\$588.00
04/16/2023	David Chen	Business Analysis	Helped Lee find certain documents in the dataroom	0.1	\$370.00			
						\$288.00	\$37.00	\$28.80
04/16/2023	Heather Barlow	Business Analysis	Review Dundon draft work analysis and discuss supporting materials and needs with L Rooney and M Dundon.	1.9	\$760.00			
						\$604.00	\$1,444.00	\$1,147.60
04/16/2023	Matthew Dundon	Retention and Fee Applications	Review of and comment on Stinson proposed revisions	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00
04/17/2023	Matthew Dundon	Business Analysis	Attendance at 4/17 hearing.	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00
04/17/2023	Matthew Dundon	Business Analysis	Review of L. Rooney / H. Barlow update on DIP materials	0.7	\$850.00			
						\$680.00	\$595.00	\$476.00
04/17/2023	Heather Barlow	Business Analysis	341 Creditors Meeting/UCC Meeting and DIP Interim Hearing	1.6	\$760.00			
						\$604.00	\$1,216.00	\$966.40
04/17/2023	Heather Barlow	Business Analysis	Participate on continued 341 meeting with Us Trustee and Debtors counsel	0.2	\$760.00			
						\$604.00	\$152.00	\$120.80

04/17/2023	Matthew Dundon	Business Analysis	Hearing post-mortem with P. Ashfield.	0.1	\$850.00			
						\$680.00	\$85.00	\$68.00
04/17/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with D. Barton, N. Zluticky, and others	0.6	\$625.00			
						\$420.00	\$375.00	\$252.00
04/17/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00
04/17/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the dip hearing with J. Jones, A. Kaufman, and others	0.4	\$625.00			
						\$420.00	\$250.00	\$168.00
04/18/2023	Matthew Dundon	Business Analysis	Review of Debtor data requests propounded on YesCare	0.4	\$850.00			
						\$680.00	\$340.00	\$272.00
04/19/2023	Matthew Dundon	Business Analysis	Initial overview of Ankura 4/18 production	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00
04/20/2023	David Chen	Business Analysis	Downloaded the newly uploaded data and shared them with the team	0.4	\$370.00			
						\$288.00	\$148.00	\$115.20
04/22/2023	David Chen	Business Analysis	Reviewed, renamed, reorganized, and summarized newly uploaded data in the dataroom.	4.9	\$370.00			
						\$288.00	\$1,813.00	\$1,411.20

04/22/2023	David Chen	Business Analysis	Continued reviewing, renaming, reorganizing, and summarizing newly uploaded data in the dataroom.	4.0	\$370.00			
						\$288.00	\$1,480.00	\$1,152.00
04/24/2023	David Chen	Business Analysis	Discussed New Tehum production from Ankura with Lee, Heather, and Matt.	0.1	\$370.00			
						\$288.00	\$37.00	\$28.80
04/24/2023	David Chen	Business Analysis	Summarized the spreadsheets in the dataroom and shared them with the team	0.3	\$370.00			
						\$288.00	\$111.00	\$86.40
04/24/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participation in regular meeting of UCC	0.6	\$760.00			
						\$604.00	\$456.00	\$362.40
04/24/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in regular meeting of UCC	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00
04/24/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participation in regular meeting of UCC	0.6	\$625.00			
						\$420.00	\$375.00	\$252.00
04/26/2023	Matthew Dundon	Business Analysis	Work with Z. Hemenway of Stinson on new data production logistics	0.4	\$850.00			
						\$680.00	\$340.00	\$272.00

04/26/2023	David Chen	Business Analysis	Downloaded the Stinson-renamed M2 LoanCo docs and in a new parallel Dropbox file to Dundon version of the same productions	0.3	\$370.00			
						\$288.00	\$111.00	\$86.40
04/27/2023	Matthew Dundon	Business Analysis	Recap of Ankura 4/27 meeting for UCC counsel	0.7	\$850.00			
						\$680.00	\$595.00	\$476.00
04/27/2023	Matthew Dundon	Business Analysis	Call with Ankura's P Russell and H Barlow and others re case status and materials production	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00
04/27/2023	Heather Barlow	Business Analysis	Call with Ankura's P Russell and M Dundon and others re case status and materials production	0.6	\$760.00			
						\$604.00	\$456.00	\$362.40
04/28/2023	Matthew Dundon	Business Analysis	Attendance at court hearing regarding DIP extension, budget and scheduling.	0.8	\$850.00			
						\$680.00	\$680.00	\$544.00
04/28/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate on hearing with TH Judge Lopez, M Dundon and others	1.0	\$760.00			
						\$604.00	\$760.00	\$604.00
04/28/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the DIP hearing with J. Lopez, N. Zluticky, and others	0.8	\$625.00			
						\$420.00	\$500.00	\$336.00

04/29/2023	Lee Rooney	Business Analysis	Review of data room productions	1.6	\$625.00			
						\$420.00	\$1,000.00	\$672.00
04/30/2023	Matthew Dundon	Business Analysis	Discussion on data breach matters with Ankura and Stinson	0.4	\$850.00			
						\$680.00	\$340.00	\$272.00
04/30/2023	Lee Rooney	Business Analysis	Review of Debtor's SOFA/SOALs	3.6	\$625.00			
						\$420.00	\$2,250.00	\$1,512.00
04/30/2023	Matthew Dundon	Business Analysis	SOFA/SOAL analysis and broad recap for clients	2.5	\$850.00			
						\$680.00	\$2,125.00	\$1,700.00
04/30/2023	David Chen	Business Analysis	Discussed the schedules filed by the Debtor with Lee Rooney on the phone.	0.3	\$370.00			
						\$288.00	\$111.00	\$86.40
04/30/2023	Heather Barlow	Business Analysis	Discussion with Counsel for Debtors and their FA and UCC Counsel and M Dundon and others re: data issues and case related progress	1.0	\$760.00			
						\$604.00	\$760.00	\$604.00
04/30/2023	Heather Barlow	Business Analysis	Review Debtors Sofa and SOALs -- discussion with M Dundon and review L Rooney re: same.	0.7	\$760.00			
						\$604.00	\$532.00	\$422.80
04/30/2023	Lee Rooney	Business Analysis	Telecom with N. Zluticky, M. Dundon, and Debtors' professionals re:	1.0	\$625.00			
						\$420.00	\$625.00	\$420.00

			potential claims against Debtor					
04/30/2023	Matthew Dundon	Business Analysis	Telecom with N. Zluticky, L. Rooney, and Debtors' professionals re: potential claims against Debtor	1.0	\$850.00			
04/30/2023	David Chen	Business Analysis	Discussed the schedules filed by the Debtor with Lee Rooney on the phone.	0.4	\$370.00	\$680.00	\$850.00	\$680.00
04/30/2023	David Chen	Business Analysis	Worked on a presentation deck about schedules analysis	2.1	\$370.00	\$288.00	\$148.00	\$115.20
05/01/2023	David Chen	Business Analysis	modified the presentation deck based on Heather and Lee's comments	0.8	\$370.00	\$288.00	\$777.00	\$604.80
05/01/2023	Heather Barlow	Business Analysis	SOALS/SoFA review mini deck	1.0	\$760.00	\$288.00	\$296.00	\$230.40
05/01/2023	Heather Barlow	Business Analysis	Review deck for UCC	0.3	\$760.00	\$604.00	\$760.00	\$604.00
05/01/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Attend and participate in the weekly UCC meeting.	1.0	\$850.00	\$604.00	\$228.00	\$181.20
						\$680.00	\$850.00	\$680.00

05/01/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attend and participate in the weekly UCC meeting.	1.0	\$625.00			
						\$420.00	\$625.00	\$420.00
05/01/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend and participate in the weekly UCC meeting.	1.0	\$760.00			
						\$604.00	\$760.00	\$604.00
05/01/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Editing / drafting of committee materials.	1.3	\$625.00			
						\$420.00	\$812.50	\$546.00
05/02/2023	David Chen	Business Analysis	Downloaded, renamed, reorganized, and summarized new data produced by the Debtor	2.4	\$370.00			
						\$288.00	\$888.00	\$691.20
05/03/2023	David Chen	Business Analysis	Continued downloading, renaming, reorganizing, and summarizing new data produced by the Debtor.	3.4	\$370.00			
						\$288.00	\$1,258.00	\$979.20
05/03/2023	David Chen	Business Analysis	Discussed the variance report produced by Ankura with Lee Rooney on the phone	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00
05/04/2023	Matthew Dundon	Business Analysis	Review and clarification of D. Chen data room structure and	0.7	\$850.00			
						\$680.00	\$595.00	\$476.00

			clarification of insurance documents					
05/04/2023	David Chen	Business Analysis	Dug the insurance policies that cover cyber risk and circulated to the team	0.9	\$370.00			
05/04/2023	Lee Rooney	Business Analysis	Review of insurance issue from recent events	2.8	\$625.00	\$288.00	\$333.00	\$259.20
05/05/2023	Matthew Dundon	Business Analysis	Review of D.I. 508 and discussion with David Chen regarding M2 LoanCo productions	0.5	\$850.00	\$420.00	\$1,750.00	\$1,176.00
05/05/2023	David Chen	Business Analysis	Discussed the variance report with Lee and worked on the budget variance spreadsheet	4.3	\$370.00	\$680.00	\$425.00	\$340.00
05/06/2023	Heather Barlow	Business Analysis	Variance and DIP discussion with L Rooney and M Dundon	0.4	\$760.00	\$288.00	\$1,591.00	\$1,238.40
05/06/2023	David Chen	Business Analysis	Discussed the budget with Lee Rooney on the phone.	0.7	\$370.00	\$604.00	\$304.00	\$241.60
05/06/2023	Lee Rooney	Business Analysis	Review of budget variances with editing of committee materials	1.3	\$625.00	\$288.00	\$259.00	\$201.60
						\$420.00	\$812.50	\$546.00

05/07/2023	Lee Rooney	Business Analysis	Review of committee deck presentation	0.6	\$625.00			
						\$420.00	\$375.00	\$252.00
05/07/2023	David Chen	Business Analysis	Worked on the deck for the weekly UCC presentation.	5.0	\$370.00			
						\$288.00	\$1,850.00	\$1,440.00
05/08/2023	Matthew Dundon	Business Analysis	Discussion of productions with D. Chen	0.3	\$850.00			
						\$680.00	\$255.00	\$204.00
05/08/2023	David Chen	Business Analysis	Reviewed and summarized the M2 LoanCo's newly uploaded documents and circulated the summary to the team.	0.6	\$370.00			
						\$288.00	\$222.00	\$172.80
05/08/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of Official Committee	1.1	\$850.00			
						\$680.00	\$935.00	\$748.00
05/09/2023	David Chen	Business Analysis	Downloaded the newly uploaded documents produced by Debtors and circulated to the team with folder links	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00
05/10/2023	Matthew Dundon	Business Analysis	Discussion with Dundon colleagues of what light document productions shed on post-divisional merger economic activities.	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00

05/10/2023	David Chen	Business Analysis	Reviewed and summarized the newly uploaded documents produced by Debtors and circulated the observations to the team	3.2	\$370.00			
						\$288.00	\$1,184.00	\$921.60
05/11/2023	Lee Rooney	Business Analysis	Business performance analysis pre-petition focus	1.6	\$625.00			
						\$420.00	\$1,000.00	\$672.00
05/11/2023	Lee Rooney	Business Analysis	Review of data production	2.3	\$625.00			
						\$420.00	\$1,437.50	\$966.00
05/11/2023	Matthew Dundon	Business Analysis	Review and comment upon Stinson latest document request and prioritization of same	1.6	\$850.00			
						\$680.00	\$1,360.00	\$1,088.00
05/11/2023	David Chen	Business Analysis	Reviewed and summarized the newly uploaded documents produced by Debtors and circulated the observations to the team	1.5	\$370.00			
						\$288.00	\$555.00	\$432.00
05/11/2023	David Chen	Business Analysis	Reviewed and analyzed the Debtors' response to UCC's second set of document requests.	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00

05/11/2023	David Chen	Business Analysis	Reviewed and Updated the newly filed docket to the team	0.4	\$370.00			
						\$288.00	\$148.00	\$115.20
05/12/2023	Lee Rooney	Business Analysis	Review of February MOR and inclusion into financial summary deck	2.6	\$625.00			
						\$420.00	\$1,625.00	\$1,092.00
05/12/2023	David Chen	Business Analysis	Reviewed the newly filed dockets and circulated them to the team	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00
05/12/2023	Heather Barlow	Business Analysis	Attend 341 meeting electronically R Perry and I Lefkowitz	1.8	\$760.00			
						\$604.00	\$1,368.00	\$1,087.20
05/12/2023	Christopher Podesfinski	Business Analysis	Attended Meeting of Creditors; including detailed note taking	1.5	\$475.00			
						\$339.00	\$712.50	\$508.50
05/12/2023	David Chen	Business Analysis	Downloaded and reviewed the newly uploaded documents in the dataroom and circulated them to the team	0.7	\$370.00			
						\$288.00	\$259.00	\$201.60
05/12/2023	David Chen	Business Analysis	Reviewed the newly uploaded documents in the dataroom and summarized them in a high level	3.0	\$370.00			
						\$288.00	\$1,110.00	\$864.00
05/13/2023	Lee Rooney	Business Analysis	Review of March MOR and comparison with February MOR and SOAL	3.4	\$625.00			
						\$420.00	\$2,125.00	\$1,428.00

05/13/2023	David Chen	Business Analysis	Talked with Lee Rooney on the phone regarding a potential analysis for MOR and budget and SOAL comparison.	1.8	\$370.00			
						\$288.00	\$666.00	\$518.40
05/14/2023	David Chen	Business Analysis	Worked on the SOAL and budget and MOR comparison analysis	2.2	\$370.00			
						\$288.00	\$814.00	\$633.60
05/14/2023	David Chen	Business Analysis	Adjusted the comparison analysis per Lee Rooney's request	0.3	\$370.00			
						\$288.00	\$1111.00	\$86.40
05/14/2023	David Chen	Business Analysis	Discussed the MOR, budget, and SOAL comparison analysis with Lee Rooney on Zoom	1.0	\$370.00			
						\$288.00	\$370.00	\$288.00
05/14/2023	David Chen	Business Analysis	Responded to Lee Rooney's questions regarding the analysis and started to work on the UCC presentation deck.	2.0	\$370.00			
						\$288.00	\$740.00	\$576.00
05/14/2023	David Chen	Business Analysis	Worked on the presentation deck	2.0	\$370.00			
						\$288.00	\$740.00	\$576.00
05/15/2023	Matthew Dundon	Business Analysis	Review and comment on initial transmission from Stinson of new production	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00

05/15/2023	Matthew Dundon	Business Analysis	Review of proposed presentation to UCC	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00
05/15/2023	David Chen	Business Analysis	Worked on the presentation deck	1.7	\$370.00			
						\$288.00	\$629.00	\$489.60
05/15/2023	David Chen	Business Analysis	Reviewed the newly uploaded documents this week and sent out a high-level summary to the team	0.6	\$370.00			
						\$288.00	\$222.00	\$172.80
05/15/2023	David Chen	Business Analysis	Worked on the presentation deck	1.0	\$370.00			
						\$288.00	\$370.00	\$288.00
05/15/2023	David Chen	Business Analysis	Caught up with Lee Rooney, Heather Barlow, and Matthew Dundon internally.	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00
05/15/2023	David Chen	Business Analysis	Investigated dataroom with Lee Rooney	0.3	\$370.00			
						\$288.00	\$111.00	\$86.40
05/15/2023	Lee Rooney	Business Analysis	Telecom with M. Dundon, and H. Barlow re: production materials and strategy going forward	0.8	\$625.00			
						\$420.00	\$500.00	\$336.00
05/15/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and D. Chen re: variance reports and financial reporting	0.6	\$625.00			
						\$420.00	\$375.00	\$252.00

05/15/2023	Lee Rooney	Business Analysis	Editing of committee deck for committee meeting	2.9	\$625.00			
						\$420.00	\$1,812.50	\$1,218.00
05/15/2023	David Chen	Business Analysis	Investigated dataroom with Lee Rooney	0.3	\$370.00			
						\$288.00	\$111.00	\$86.40
05/15/2023	David Chen	Business Analysis	Investigated dataroom with Lee Rooney	1.1	\$370.00			
						\$288.00	\$407.00	\$316.80
05/15/2023	Lee Rooney	Business Analysis	Review of production 4 documents	2.7	\$625.00			
						\$420.00	\$1,687.50	\$1,134.00
05/15/2023	Heather Barlow	Business Analysis	Analyze MOR/Variance and document productions. Discussions with L Rooney and D Chen re: same.	1.8	\$760.00			
						\$604.00	\$1,368.00	\$1,087.20
05/15/2023	Matthew Dundon	Business Analysis	Strategy session with H Barlow, L Rooney and team	0.3	\$850.00			
						\$680.00	\$255.00	\$204.00
05/15/2023	Heather Barlow	Business Analysis	Strategy session with M Dundon L Rooney and team	0.3	\$760.00			
						\$604.00	\$228.00	\$181.20
05/15/2023	David Chen	Business Analysis	Downloaded the additional Tehum documents and circulated to the team.	0.4	\$370.00			
						\$288.00	\$148.00	\$115.20
05/15/2023	Matthew Dundon	Committee Member/Professional	Attend weekly UCC meeting,	1.0	\$850.00			
						\$680.00	\$850.00	\$680.00

		Meetings & Communications						
05/15/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC meeting with D Barton and M Dundon and others	1.0	\$760.00			
05/16/2023	David Chen	Business Analysis	Reviewed the newly uploaded documents this week and sent out a high-level summary to the team	2.3	\$370.00	\$604.00	\$760.00	\$604.00
05/17/2023	Lee Rooney	Business Analysis	Review of financial productions in anticipation of call with Ankura	2.4	\$625.00	\$288.00	\$851.00	\$662.40
05/17/2023	David Chen	Business Analysis	Reviewed and summarized the newly filed dockets	0.5	\$370.00	\$420.00	\$1,500.00	\$1,008.00
05/18/2023	Lee Rooney	Business Analysis	Telecom with Ankura, M. Dundon, and others to discuss the Debtor's financials and the effects of the divisional merger.	0.5	\$625.00	\$288.00	\$185.00	\$144.00
05/18/2023	Matthew Dundon	Business Analysis	Telecom with Ankura, Dundon colleagues and others to discuss the Debtor's financials and the effects of the divisional merger.	0.5	\$850.00	\$420.00	\$312.50	\$210.00
						\$680.00	\$425.00	\$340.00

05/18/2023	David Chen	Business Analysis	Reviewed and summarize the newly uploaded FTI-related data	2.3	\$370.00			
						\$288.00	\$851.00	\$662.40
05/18/2023	David Chen	Business Analysis	Prepared the documents and filings for the 11am call with Ankura as per Heather's request	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00
05/18/2023	David Chen	Business Analysis	Participated in the meeting with Ankura team	0.6	\$370.00			
						\$288.00	\$222.00	\$172.80
05/18/2023	Heather Barlow	Business Analysis	Review financial documents MORs Variance and other docs -	1.2	\$760.00			
						\$604.00	\$912.00	\$724.80
05/18/2023	Heather Barlow	Business Analysis	Call with R Perry and M Dundon re ANKURA financial doc review	0.5	\$760.00			
						\$604.00	\$380.00	\$302.00
05/18/2023	Matthew Dundon	Business Analysis	Participate on Tehum UCC Meeting.	1.0	\$850.00			
						\$680.00	\$850.00	\$680.00
05/18/2023	Heather Barlow	Business Analysis	Participate on Tehum UCC Meeting.	1.0	\$760.00			
						\$604.00	\$760.00	\$604.00
05/21/2023	Lee Rooney	Business Analysis	Review of budget variances with editing of committee materials.	0.6	\$625.00			
						\$420.00	\$375.00	\$252.00

05/21/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and D. Chen re: weekly variance	1.5	\$625.00			
						\$420.00	\$937.50	\$630.00
05/21/2023	David Chen	Business Analysis	Worked on weekly UCC presentation deck with Heather and Lee	1.4	\$370.00			
						\$288.00	\$518.00	\$403.20
05/21/2023	David Chen	Business Analysis	Worked on weekly UCC presentation deck with Heather and Lee	3.4	\$370.00			
						\$288.00	\$1,258.00	\$979.20
05/21/2023	Heather Barlow	Business Analysis	Review variance report. Discussion with D Chen and L Rooney re same.	1.3	\$760.00			
						\$604.00	\$988.00	\$785.20
05/22/2023	David Chen	Business Analysis	Updated the weekly UCC presentation deck with Heather and Lee	2.2	\$370.00			
						\$288.00	\$814.00	\$633.60
05/22/2023	David Chen	Business Analysis	Updated the weekly UCC presentation deck as per Heather and Lee's requests	2.6	\$370.00			
						\$288.00	\$962.00	\$748.80
05/22/2023	Heather Barlow	Business Analysis	Prepare Variance Report with input from M Dundon	1.6	\$760.00			
						\$604.00	\$1,216.00	\$966.40
05/22/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC Meeting with D Barton and N Zluticky and M Dundon and others	1.0	\$760.00			
						\$604.00	\$760.00	\$604.00

05/22/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Attend weekly UCC Meeting.	1.0	\$850.00			
						\$680.00	\$850.00	\$680.00
05/24/2023	Matthew Dundon	Business Analysis	Work with D. Chen on production of data room index	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00
05/24/2023	David Chen	Business Analysis	Prepared the Debtors' financial statements as per Lee Rooney's request	1.8	\$370.00			
						\$288.00	\$666.00	\$518.40
05/24/2023	David Chen	Business Analysis	Participated in the call with Ankura team	1.1	\$370.00			
						\$288.00	\$407.00	\$316.80
05/24/2023	David Chen	Business Analysis	Prepared the call notes about the call with Ankura and circulated to the team	1.2	\$370.00			
						\$288.00	\$444.00	\$345.60
05/24/2023	David Chen	Business Analysis	Created an Excel index of the existing documents in the dataroom	4.1	\$370.00			
						\$288.00	\$1,517.00	\$1,180.80
05/24/2023	Heather Barlow	Business Analysis	Discussion with L Rooney re: financial questions	0.9	\$760.00			
						\$604.00	\$684.00	\$543.60
05/24/2023	Lee Rooney	Business Analysis	Telecom with Ankura with H. Barlow re: case financials	1.2	\$625.00			
						\$420.00	\$750.00	\$504.00
05/24/2023	Lee Rooney	Business Analysis	Review of the Debtor's historical financials	3.2	\$625.00			
						\$420.00	\$2,000.00	\$1,344.00

05/29/2023	David Chen	Business Analysis	Prepared for the weekly budget variance deck	2.4	\$370.00			
						\$288.00	\$888.00	\$691.20
05/30/2023	David Chen	Business Analysis	Discussed the weekly budget variance deck with Lee and Heather on Zoom	0.6	\$370.00			
						\$288.00	\$222.00	\$172.80
05/30/2023	David Chen	Business Analysis	Updated the weekly budget variance deck	1.6	\$370.00			
						\$288.00	\$592.00	\$460.80
05/30/2023	Lee Rooney	Business Analysis	Review of DIP reporting package	1.3	\$625.00			
						\$420.00	\$812.50	\$546.00
05/30/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and D. Chen re: committee deck	0.7	\$625.00			
						\$420.00	\$437.50	\$294.00
05/30/2023	Heather Barlow	Business Analysis	Draft Variance Report update to UCC and M Dundon with L Rooney and D Chen	0.8	\$760.00			
						\$604.00	\$608.00	\$483.20
05/30/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate in Weekly UCC Call with N Zluticky and M Dundon and others re: case related issues update	0.5	\$760.00			
						\$604.00	\$380.00	\$302.00
05/30/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participate in Weekly UCC Call.	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00

05/31/2023	David Chen	Business Analysis	Reviewed and summarized the newly uploaded dataroom	4.2	\$370.00			
						\$288.00	\$1,554.00	\$1,209.60
06/04/2023	Lee Rooney	Business Analysis	Review of weekly business performance / variance report	1.4	\$625.00			
						\$420.00	\$875.00	\$588.00
06/04/2023	Heather Barlow	Business Analysis	Review variance report with D Chen and L Rooney. Correspond with R Perry re same	0.3	\$760.00			
						\$604.00	\$228.00	\$181.20
06/05/2023	Lee Rooney	Business Analysis	Editing of committee materials with call to D. Chen and H. Barlow	2.1	\$625.00			
						\$420.00	\$1,312.50	\$882.00
06/05/2023	Heather Barlow	Business Analysis	Review variance analysis with D Chen and L Rooney. Send to M Dundon	1.1	\$760.00			
						\$604.00	\$836.00	\$664.40
06/05/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of UCC.	0.4	\$850.00			
						\$680.00	\$340.00	\$272.00
06/05/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with S. Westermeir, N. Zluticky and others	0.5	\$625.00			
						\$420.00	\$312.50	\$210.00
06/05/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend UCC meeting with M Dundon and N Zutlicky and others	0.5	\$760.00			
						\$604.00	\$380.00	\$302.00

06/07/2023	Lee Rooney	Business Analysis	Telecom with J. Olsen re: discovery issues	1.1	\$625.00			
						\$420.00	\$687.50	\$462.00
06/09/2023	Matthew Dundon	Business Analysis	Internal telecom with L. Rooney and H. Barlow re: data production and future diligence request	0.5	\$850.00			
						\$680.00	\$425.00	\$340.00
06/09/2023	Lee Rooney	Business Analysis	Internal telecom with M. Dundon and H. Barlow re: data production and future diligence request	0.5	\$625.00			
						\$420.00	\$312.50	\$210.00
06/09/2023	Heather Barlow	Business Analysis	Data room discussion with L Rooney	0.5	\$760.00			
						\$604.00	\$380.00	\$302.00
06/11/2023	Jordan Olsen	Business Analysis	Weekly Variance Report	2.5	\$370.00			
						\$288.00	\$925.00	\$720.00
06/11/2023	Matthew Dundon	Business Analysis	Initial review of amended SOFA/SOAL matter	0.8	\$850.00			
						\$680.00	\$680.00	\$544.00
06/11/2023	Heather Barlow	Business Analysis	Review variance report with J Olsen and L Rooney. Correspond with R Perry re same	0.3	\$760.00			
						\$604.00	\$228.00	\$181.20
06/12/2023	Jordan Olsen	Business Analysis	Data Room Index	7.0	\$370.00			
						\$288.00	\$2,590.00	\$2,016.00

06/12/2023	Heather Barlow	Business Analysis	Update UCC presentation for Variance and Schedules. Discussions with M Dundon, L Rooney and J Olsen re same	1.4	\$760.00			
06/12/2023	Matthew Dundon	Business Analysis	Discussion of weekly variance report and updated SAL and SFA with Dundon colleagues and UCC counsel	0.4	\$850.00	\$604.00	\$1,064.00	\$845.60
06/12/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: variance production	0.6	\$625.00	\$680.00	\$340.00	\$272.00
06/12/2023	Lee Rooney	Business Analysis	Review of weekly variance with drafting of committee materials	1.9	\$625.00	\$420.00	\$375.00	\$252.00
06/12/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with N. Zluticky, D. Barton and others	0.8	\$625.00	\$420.00	\$1,187.50	\$798.00
06/12/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Participation in weekly meeting of UCC.	0.5	\$370.00	\$420.00	\$500.00	\$336.00
06/12/2023	Heather Barlow	Committee Member/Professional	Participate on UCC weekly meeting	0.8	\$760.00	\$288.00	\$185.00	\$144.00
			Update re Schedules			\$604.00	\$608.00	\$483.20

		Meetings & Communications	and Variance with M Dundon and D Barton and others					
06/12/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of UCC.	0.7	\$850.00			
06/13/2023	Lee Rooney	Business Analysis	Review of data room and productions	2.5	\$625.00	\$680.00	\$595.00	\$476.00
06/13/2023	Jordan Olsen	Business Analysis	Monitoring in 341 meeting.	2.0	\$370.00	\$420.00	\$1,562.50	\$1,050.00
06/13/2023	Lee Rooney	Business Analysis	Attended the 341 meeting with I. Lefkowitz and others	2.1	\$625.00	\$288.00	\$740.00	\$576.00
06/13/2023	Heather Barlow	Business Analysis	Attend 341 continued meeting with Lefkowitz, US Trustee and others	2.0	\$760.00	\$420.00	\$1,312.50	\$882.00
06/13/2023	Jordan Olsen	Business Analysis	Rebuilding Variance Report Master File	6.0	\$370.00	\$604.00	\$1,520.00	\$1,208.00
06/14/2023	Jordan Olsen	Business Analysis	Rebuilding Variance Report Master File	5.0	\$370.00	\$288.00	\$2,220.00	\$1,728.00
06/17/2023	Jordan Olsen	Business Analysis	Weekly Variance Report	2.5	\$370.00	\$288.00	\$1,850.00	\$1,440.00
						\$288.00	\$925.00	\$720.00

06/18/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: Debtor's financials	0.8	\$625.00			
						\$420.00	\$500.00	\$336.00
06/18/2023	Lee Rooney	Business Analysis	Review of variance report with preparation of committee materials	2.3	\$625.00			
						\$420.00	\$1,437.50	\$966.00
06/18/2023	Heather Barlow	Business Analysis	Variance Report - Team discussion with J Olsen and L Rooney	0.8	\$760.00			
						\$604.00	\$608.00	\$483.20
06/19/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: Company financials	0.8	\$625.00			
						\$420.00	\$500.00	\$336.00
06/19/2023	Heather Barlow	Business Analysis	Review Dundon report re: variance and DIP budget	1.4	\$760.00			
						\$604.00	\$1,064.00	\$845.60
06/19/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Participation in regular UCC meeting	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00
06/19/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with J. Olsen re: company financials	0.4	\$625.00			
						\$420.00	\$250.00	\$168.00
06/19/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting	0.5	\$625.00			
						\$420.00	\$312.50	\$210.00
06/19/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC Call with M Dundon, B Glover and others	0.5	\$760.00			
						\$604.00	\$380.00	\$302.00

06/19/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of UCC	0.6	\$850.00			
						\$680.00	\$510.00	\$408.00
06/21/2023	Lee Rooney	Business Analysis	Review of Debtor's bank records	2.2	\$625.00			
						\$420.00	\$1,375.00	\$924.00
06/22/2023	Heather Barlow	Business Analysis	Bank reconciliation with M Dundon R Perry and others	1.0	\$760.00			
						\$604.00	\$760.00	\$604.00
06/22/2023	Matthew Dundon	Business Analysis	Bank reconciliation with M Dundon R Perry and others	1.0	\$850.00			
						\$680.00	\$850.00	\$680.00
06/25/2023	Jordan Olsen	Business Analysis	Weekly Variance Report	2.0	\$370.00			
						\$288.00	\$740.00	\$576.00
06/26/2023	Heather Barlow	Business Analysis	Variance analysis review with L Rooney and J Olsen	0.9	\$760.00			
						\$604.00	\$684.00	\$543.60
06/26/2023	Jordan Olsen	Business Analysis	Ankura Bank Recon Data Room Reconciliation	3.0	\$370.00			
						\$288.00	\$1,110.00	\$864.00
06/26/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Monday Meeting	0.5	\$370.00			
						\$288.00	\$185.00	\$144.00
06/26/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	UCC weekly call with D Barton, N Zutlicky, M Dundon and others	0.9	\$760.00			
						\$604.00	\$684.00	\$543.60

06/26/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting.	0.9	\$850.00			
						\$680.00	\$765.00	\$612.00
06/26/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting with N. Zluticky, D. Barton, and others	0.9	\$625.00			
						\$420.00	\$562.50	\$378.00
06/26/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow re: committee deck and budget variances	0.9	\$625.00			
						\$420.00	\$562.50	\$378.00
06/27/2023	Jordan Olsen	Business Analysis	Ankura Bank Recon Data Room Reconciliation	5.0	\$370.00			
						\$288.00	\$1,850.00	\$1,440.00
06/30/2023	Matthew Dundon	Business Analysis	Review Chapter 11 Trustee motion as Filed.	0.8	\$850.00			
						\$680.00	\$680.00	\$544.00
06/30/2023	Heather Barlow	Business Analysis	Review Chapter 11 Trustee Motion filed on docket	1.2	\$760.00			
						\$604.00	\$912.00	\$724.80
07/01/2023	Jordan Olsen	Business Analysis	Weekly Variance Report	2.5	\$350.00			
						\$288.00	\$875.00	\$720.00
07/01/2023	Heather Barlow	Plan and Disclosure Statement	Mediation session via zoom (less breaks)	3.2	\$790.00			
						\$604.00	\$2,528.00	\$1,932.80
07/03/2023	Heather Barlow	Business Analysis	Call with J Olsen and L Rooney re: weekly variance analysis. Review original docs and send to M	0.7	\$790.00			
						\$604.00	\$553.00	\$422.80

			Dundon for review/distribution						
07/03/2023	Heather Barlow	Business Analysis	Review variance report and update to M Dundon and L Rooney and J Olsen	0.5	\$790.00				
07/03/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow re: Tehum financials and requests	0.7	\$650.00	\$604.00	\$395.00	\$302.00	
07/03/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom re: variance reporting with H. Barlow and J. Olsen	0.5	\$650.00	\$420.00	\$455.00	\$294.00	
07/03/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Monday Meeting	0.5	\$350.00	\$420.00	\$325.00	\$210.00	
07/03/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly call with UCC members.	0.7	\$790.00	\$288.00	\$175.00	\$144.00	
07/03/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of Committee.	0.7	\$650.00	\$604.00	\$553.00	\$422.80	
07/03/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of Committee.	0.7	\$890.00	\$420.00	\$455.00	\$294.00	
						\$680.00	\$623.00	\$476.00	

07/05/2023	Matthew Dundon	Business Analysis	Discussion of insurance matters with Dundon colleagues	0.2	\$890.00			
						\$680.00	\$178.00	\$136.00
07/05/2023	Matthew Dundon	Business Analysis	Discussion of insurance matters with Stinson	0.3	\$890.00			
						\$680.00	\$267.00	\$204.00
07/07/2023	Heather Barlow	Business Analysis	Insurance discussion prep for mediation with Zach and Christina from Stinson and L Rooney	1.1	\$790.00			
						\$604.00	\$869.00	\$664.40
07/07/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with C. Arnone, H. Barlow, and others re: insurance policies and upcoming mediation	1.1	\$650.00			
						\$420.00	\$715.00	\$462.00
07/08/2023	Jordan Olsen	Business Analysis	Variance Update	2.0	\$350.00			
						\$288.00	\$700.00	\$576.00
07/09/2023	Lee Rooney	Business Analysis	Review of Debtor's variance reporting with editing of committee deck	1.1	\$650.00			
						\$420.00	\$715.00	\$462.00
07/09/2023	Heather Barlow	Business Analysis	Review variance report and review with L Rooney and J Olsen. Send to M Dundon re same	0.4	\$790.00			
						\$604.00	\$316.00	\$241.60
07/10/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate in weekly ucc meeting re variance report, and other workstreams	0.5	\$790.00			
						\$604.00	\$395.00	\$302.00

		with N Zutlicky and M Dundon							
07/10/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC	0.5	\$890.00				
						\$680.00	\$445.00	\$340.00	
07/12/2023	Heather Barlow	Business Analysis	Review insurance documents and discuss with L Rooney pre mediation.	1.4	\$790.00				
						\$604.00	\$1,106.00	\$845.60	
07/12/2023	Lee Rooney	Business Analysis	Review of insurance document and insurance coverage	1.4	\$650.00				
						\$420.00	\$910.00	\$588.00	
07/12/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and M. Dundon re: mediation strategy	0.4	\$650.00				
						\$420.00	\$260.00	\$168.00	
07/12/2023	Matthew Dundon	Business Analysis	Telecom with H. Barlow and L. Rooney re: mediation strategy	0.4	\$890.00				
						\$680.00	\$356.00	\$272.00	
07/13/2023	Lee Rooney	Business Analysis	Review of Corizon trial balance by contract	2.9	\$650.00				
						\$420.00	\$1,885.00	\$1,218.00	
07/13/2023	Matthew Dundon	Plan and Disclosure Statement	Consulting with UCC counsel and DA colleagues regarding emerging issues in the medical malpractice insurer mediation	0.5	\$890.00				
						\$680.00	\$445.00	\$340.00	

07/13/2023	Lee Rooney	Plan and Disclosure Statement	Participated in the insurance mediation process with N. Zluticky, H. Barlow and others	2.1	\$650.00			
						\$420.00	\$1,365.00	\$882.00
07/13/2023	Heather Barlow	Plan and Disclosure Statement	Participate in active mediation session with TH Judge Jones and N Zutlicky and others	4.1	\$790.00			
						\$604.00	\$3,239.00	\$2,476.40
07/14/2023	Heather Barlow	Plan and Disclosure Statement	Participate in active mediation session with TH Judge Jones and N Zutlicky and others	2.4	\$790.00			
						\$604.00	\$1,896.00	\$1,449.60
07/15/2023	Jordan Olsen	Business Analysis	Weekly Variance Report	1.7	\$350.00			
						\$288.00	\$595.00	\$489.60
07/16/2023	Lee Rooney	Business Analysis	Review of the weekly budget variances	1.6	\$650.00			
						\$420.00	\$1,040.00	\$672.00
07/17/2023	Jordan Olsen	Business Analysis	Reconciliation of weekly actuals	2.5	\$350.00			
						\$288.00	\$875.00	\$720.00
07/17/2023	Matthew Dundon	Business Analysis	Discussion with L. Rooney of recent production and our analysis of same	0.3	\$890.00			
						\$680.00	\$267.00	\$204.00
07/17/2023	Heather Barlow	Business Analysis	Review Variance analysis with L Rooney and J Olsen	0.5	\$790.00			
						\$604.00	\$395.00	\$302.00

07/17/2023	Lee Rooney	Business Analysis	Telecom with J. Olsen and H. Barlow re: budget variances	0.6	\$650.00			
						\$420.00	\$390.00	\$252.00
07/17/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Participation in regular UCC meeting	0.5	\$350.00			
						\$288.00	\$175.00	\$144.00
07/17/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Review of mediation sessions with counsel N Zutlicky and Zach and UCC Members - D Barton and others	1.1	\$790.00			
						\$604.00	\$869.00	\$664.40
07/17/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Regular weekly meeting	1.1	\$890.00			
						\$680.00	\$979.00	\$748.00
07/17/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with D. Barton, N. Zluticky, and others	1.1	\$650.00			
						\$420.00	\$715.00	\$462.00
07/18/2023	Jordan Olsen	Business Analysis	Reconciliation of weekly actuals	3.0	\$350.00			
						\$288.00	\$1,050.00	\$864.00
07/18/2023	Michael Garbe	Business Analysis	Receive and review trial balance, merger spread sheet, and AR payment schedules related to Tehum case, discussion with Lee re: relationships between schedules provided, adjusted	2.0	\$700.00			
						\$504.00	\$1,400.00	\$1,008.00

			trial balance, meaning and usefulness of schedules provided and progress creation and allocations between the two companies after demerger.					
07/18/2023	Lee Rooney	Business Analysis	Telecom with M. Garbe re: April 2022 trial balance review workstream	1.5	\$650.00			
07/18/2023	Lee Rooney	Business Analysis	Telecom with Z. Hemenway, M. Dundon, and others re: financial investigation	0.8	\$650.00	\$420.00	\$975.00	\$630.00
07/18/2023	Matthew Dundon	Business Analysis	Telecom with Z. Hemenway, M. Dundon, and others re: financial investigation	0.8	\$890.00	\$420.00	\$520.00	\$336.00
07/18/2023	Heather Barlow	Business Analysis	Professionals call with M Dundon L Rooney and others re insurance.	1.2	\$790.00	\$680.00	\$712.00	\$544.00
07/19/2023	Jordan Olsen	Business Analysis	Reconciliation of variance report and actuals	3.5	\$350.00	\$604.00	\$948.00	\$724.80
07/23/2023	Lee Rooney	Business Analysis	Review of variance reporting and editing of committee deck	1.8	\$650.00	\$288.00	\$1,225.00	\$1,008.00
						\$420.00	\$1,170.00	\$756.00

07/23/2023	Jordan Olsen	Business Analysis	Variance report	1.7	\$350.00			
						\$288.00	\$595.00	\$489.60
07/24/2023	Heather Barlow	Business Analysis	Variance report discussion with colleauges.	0.4	\$790.00			
						\$604.00	\$316.00	\$241.60
07/24/2023	Jordan Olsen	Business Analysis	Variance report discussion with colleauges.	0.4	\$350.00			
						\$288.00	\$140.00	\$115.20
07/24/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in regular UCC meeting	0.5	\$890.00			
						\$680.00	\$445.00	\$340.00
07/24/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Participation in regular UCC meeting	0.5	\$350.00			
						\$288.00	\$175.00	\$144.00
07/24/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participation in regular UCC meeting	0.5	\$790.00			
						\$604.00	\$395.00	\$302.00
07/25/2023	Lee Rooney	Business Analysis	Review of published MORs	2.6	\$650.00			
						\$420.00	\$1,690.00	\$1,092.00
07/26/2023	Jordan Olsen	Business Analysis	Zoom with Ankura	1.0	\$350.00			
						\$288.00	\$350.00	\$288.00
07/26/2023	Heather Barlow	Business Analysis	Prepare questions for call with Ankura with L Rooney	0.8	\$790.00			
						\$604.00	\$632.00	\$483.20

07/26/2023	Heather Barlow	Business Analysis	R Perry of Ankura team with L Rooney and others	1.0	\$790.00			
						\$604.00	\$790.00	\$604.00
07/26/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with Ankura to discuss budget, disbursements and MOR	1.0	\$650.00			
						\$420.00	\$650.00	\$420.00
07/27/2023	Matthew Dundon	Business Analysis	Discussion with outside counsel to McKesson (trade creditor) of several issues of potential interest to UCC and recap of same to UCC counsel	0.7	\$890.00			
						\$680.00	\$623.00	\$476.00
07/29/2023	Jordan Olsen	Business Analysis	Weekly expenditure report review.	2.0	\$350.00			
						\$288.00	\$700.00	\$576.00
07/30/2023	Lee Rooney	Business Analysis	Review of weekly expenditure reporting packet	0.4	\$650.00			
						\$420.00	\$260.00	\$168.00
07/31/2023	Jordan Olsen	Business Analysis	Budget and (absence of) variance discussion with colleagues.	0.6	\$350.00			
						\$288.00	\$210.00	\$172.80
07/31/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: weekly budget	0.6	\$650.00			
						\$420.00	\$390.00	\$252.00
07/31/2023	Heather Barlow	Business Analysis	Review weekly analysis and variance presentation with J Olsen and L Rooney.	0.5	\$790.00			
						\$604.00	\$395.00	\$302.00

			Prepare for counsel and the UCC					
07/31/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of the UCC.	0.6	\$890.00			
						\$680.00	\$534.00	\$408.00
07/31/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate on weekly UCC call with D Barton, Zach and M Dundon and others	1.1	\$790.00			
						\$604.00	\$869.00	\$664.40
Hours				395.1	Total	\$223,630.50	\$167,896.10	
							80%	\$134,316.88
							20%	\$33,579.22
							100%	\$167,896.10
							Blended Hourly Rate	\$424.95
							Voluntary Reduced Rate Reduction	\$55,734.40

Exhibit B

Expense Detail

Expenses March 24, 2023 Through July 31, 2023	Totals
Total	\$0.00

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**Objection Deadline: September 4, 2023 at 4:00 p.m.
(ET)**

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the FIRST Monthly Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period March 24, 2023 Through and Including July 31, 2023* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).
5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon’s clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the

¹ 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.

amortization of the cost of any investment, equipment, or capital outlay; and

3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated August 14, 2023

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**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.	§	
	§	

**COVERSHEET TO THE SECOND MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM AUGUST 1, 2023 THROUGH AUGUST 31, 2023**

Name of Applicant:	Dundon Advisers LLC	
Applicant’s Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	08/01/2023	08/31/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

¹ 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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$100,700.41
Total professional hours covered by this Application:	193.0
Average hourly rate for professionals:	\$521.76
Total expense reimbursements requested in this Application:	\$4,956.338
Total fees and expenses requested in this Application:	\$100,700.41 (After voluntary rate reduction of \$35,523.59)
Total fees and expenses awarded in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023	

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

In re:

TEHUM CARE SERVICES., INC.²

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Objection Deadline: October 16, 2023 at 4:00 p.m. (ET)

SUMMARY OF SECOND MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
AUGUST 1, 2023 THROUGH AND INCLUDING AUGUST 31, 2023

Name of Applicant: Dundon Advisers LLC

Authorized to provide professional services to: The Official Committee of Unsecured Creditors

Petition Date: February 13, 2023

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and reimbursement is sought: AUGUST 1, 2023 through AUGUST 31, 2023

Amount of compensation sought as actual, reasonable, and necessary: \$100,700.41 (80% = \$80,560.33)

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$4,956.38

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023-07/31/2023	\$167,893.10	N/A	\$0.00	N/A

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on September 26, 2023, pursuant to the Interim Compensation Order.

**OFFICE OF THE UNITED STATES TRUSTEE for the Southern District of Texas:
Ha M. Nguyen, Esq.
Ha.Nguyen@usdoj.gov**

**Andrew Jimenez, Esq.
Andrew.Jimenez@usdoj.gov**

**NORTON ROSE FULBRIGHT as Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.
kristian.gluck@nortonrosefulbright.com**

**Julie Goodrich Harrison, Esq.
julie.harrison@nortonrosefulbright.com**

**STINSON LLP as Counsel to the Committee
Nicholas Zluticky, Esq.
nicholas.zluticky@stinson.com**

**Phillip Ashfield, Esq.
Phillip.Ashfield@stinson.com**

**Edwin H. Caldie, Esq.
ed.caldie@stinson.com**

**Tehum Care Services, Inc., Debtor and Debtor in Possession
Jason S. Brookner
jbrookner@grayreed.com**

**Aaron M. Kaufman
akaufman@grayreed.com**

Lydia R. Webb
lwebb@grayreed.com

Amber M. Carson
acarson@grayreed.com

/s/ Matthew J Dundon

Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930

Email: md@dundon.com

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD AUGUST 1, 2023 THROUGH AUGUST 31, 2023³**

Professional	Title	Rate July 1, 2022 – June 30, 2023³	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	46.6	\$31,688.00
Heather Barlow	Managing Director	\$604.00	\$604.00	61.5	\$37,146.00
Lee Rooney	Director	\$420.00	\$420.00	51.8	\$21,756.00
David Chen	Associate	\$288.00	\$288.00		
Jordan Olsen	Associate	\$288.00	\$288.00	30.5	\$8,784.00
Michael Garbe	Senior Advisor	\$504.00	\$504.00	2.6	\$1,310.4
Christopher Podesfinski	Senior Associate	\$339.00	\$339.00		
		Blended Hourly Rate	193.0 hrs	\$521.76	\$100,700.41
				80%	\$80,560.33
				20%	\$20,140.08
				100%	\$100,700.41

³ As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2023 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total here shows a voluntary reduction of \$55,734.40 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
AUGUST 1, 2023 THROUGH AUGUST 31, 2023

Category	Hours Billed	Fees (excluding voluntary rate discount)
Business Analysis	76.6	\$51,436.00
Case Administration	13.0	\$4,550.00
Claims Administration	6.6	\$5,516.00
Committee Member/Professional Meetings & Communications	35.3	\$23,193.00
Investigations	2.6	\$1,820.00
Plan and Disclosure Statement	52.7	\$44,641.00
Retention and Fee Applications	6.2	\$5,068.00
Total	193.0	\$136,244.00

Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$100,700.41** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$80,560.33** to be currently paid upon no objection, be authorized for payment and for such other and further relief as this Court may deem just and proper. Also, reasonable expenses for \$4,956.38.

Dated: September 26, 2023

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon
10 Bank Street, Suite 1100
White Plains, NY 10606
Telephone: (914) 341-1188
Email: md@dundon.com

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

Billing Detail Description of Fees, Hours and Descriptions by Category**Exhibit A**

Date	Professional	Activity	Description	Billable Time	Hourly Rate	Billable Amt
08/02/2023	Heather Barlow	Business Analysis	ANKURA discussion re data. Correspond with counsel re same	0.20	\$790.00/hr	\$158.00
08/02/2023	Matthew Dundon	Business Analysis	Internal discussion regarding data breach status.	0.30	\$890.00/hr	\$267.00
08/02/2023	Matthew Dundon	Retention and Fee Applications	Review and revision of fee applications for services through July 31st.	1.20	\$890.00/hr	\$1,068.00
08/02/2023	Heather Barlow	Retention and Fee Applications	Prepare Dundon First Monthly Application Effective March 24, 2023 - July 31, 2023	2.10	\$790.00/hr	\$1,659.00
08/04/2023	Heather Barlow	Retention and Fee Applications	Continue fee application with edits from M Dundon	0.60	\$790.00/hr	\$474.00
08/06/2023	Jordan Olsen	Case Administration	Weekly Variance update	1.00	\$350.00/hr	\$350.00
08/06/2023	Lee Rooney	Business Analysis	Review of financials with editing of committee materials	0.50	\$650.00/hr	\$325.00
08/07/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the committee meeting	0.70	\$650.00/hr	\$455.00
08/07/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.30	\$350.00/hr	\$105.00

08/07/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: case financials	0.40	\$650.00/hr	\$260.00
08/07/2023	Matthew Dundon	Claims Analysis	Discussion with KCC regarding timing of initial claims reporting after bar date.	1.20	\$890.00/hr	\$1,068.00
08/07/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting participation	1.00	\$890.00/hr	\$890.00
08/07/2023	Matthew Dundon	Claims Analysis	Discussion of claims processing resources with KCC	0.20	\$890.00/hr	\$178.00
08/07/2023	Heather Barlow	Business Analysis	Weekly actuals report with L Rooney and J Olsen	0.50	\$790.00/hr	\$395.00
08/07/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC meeting with N Zutlicky, D Barton and others.	1.00	\$790.00/hr	\$790.00
08/12/2023	Jordan Olsen	Case Administration	Weekly Variance	2.00	\$350.00/hr	\$700.00
08/13/2023	Heather Barlow	Retention and Fee Applications	Continue to prepare first monthly fee app for counsel	1.80	\$790.00/hr	\$1,422.00
08/14/2023	Lee Rooney	Business Analysis	Telecon with H. Barlow re: document production, strategy	1.20	\$650.00/hr	\$780.00
08/14/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.10	\$350.00/hr	\$35.00
08/14/2023	Heather Barlow	Business Analysis	Weekly reporting update with L Rooney, J Olsen - send to M Dundon for review	0.20	\$790.00/hr	\$158.00
08/14/2023	Heather Barlow	Business Analysis	Read Stinson memo and add values/comments	0.80	\$790.00/hr	\$632.00
08/14/2023	Lee Rooney	Claims Analysis	Telecom with H. Barlow and J. Olsen re: variance analysis	0.20	\$650.00/hr	\$130.00

08/14/2023	Heather Barlow	Business Analysis	Pre mediation financial analysis G/L. Discussion with M Dundon, J Olsen and L Rooney re: same and next steps	1.40	\$790.00/hr	\$1,106.00
08/14/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in regular UCC meeting.	0.70	\$890.00/hr	\$623.00
08/14/2023	Matthew Dundon	Plan and Disclosure Statement	Reviewed and commented upon Stinson draft mediation memorandum	1.20	\$890.00/hr	\$1,068.00
08/14/2023	Michael Garbe	Investigations	Call with Lee re: Tehum Care General Ledger investigations, download year file of Tehum G/Ls to determine if a Trial Balance can be prepared from that G/L data, call. Call with Lee to discuss outcome of 3 year G/L data file review.	1.50	\$700.00/hr	\$1,050.00
08/14/2023	Heather Barlow	Business Analysis	Weekly mediation call with D Barton, N Zutlicky and others	1.00	\$790.00/hr	\$790.00
08/14/2023	Matthew Dundon	Business Analysis	Review and comment upon debtor accounting presentation	1.50	\$890.00/hr	\$1,335.00
08/14/2023	Jordan Olsen	Case Administration	Pre/Post transaction Balance Sheet analysis	3.30	\$350.00/hr	\$1,155.00
08/14/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	1.30	\$350.00/hr	\$455.00

08/14/2023	Heather Barlow	Business Analysis	Review document production with L Rooney, J Olsen. Discussion with M Dundon re:same and workstream pre mediation	1.20	\$790.00/hr	\$948.00
08/14/2023	Lee Rooney	Business Analysis	Review of historical financials in anticipation of mediation prep	2.30	\$650.00/hr	\$1,495.00
08/14/2023	Lee Rooney	Business Analysis	Telecon with H. Barlow and J. Olsen re: review of financials surrounding divisional merger	1.40	\$650.00/hr	\$910.00
08/14/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting	0.70	\$650.00/hr	\$455.00
08/15/2023	Michael Garbe	Investigations	Receive and review Tehum bank statements for limited tracing to G/L cash accounts, call with Lee to discuss finding of limit tracing exercise.	1.00	\$700.00/hr	\$700.00
08/15/2023	Michael Garbe	Investigations	Call with Lee to discuss Tehum G/L journal entries.	0.10	\$700.00/hr	\$70.00
08/15/2023	Matthew Dundon	Business Analysis	Discussion with Ankura regarding revision/expansion of recent accounting production.	0.30	\$890.00/hr	\$267.00
08/15/2023	Matthew Dundon	Business Analysis	Initial review of Ankura supplemental accounting production	2.50	\$890.00/hr	\$2,225.00
08/15/2023	Lee Rooney	Business Analysis	Analysis of general ledger with comparison to Debtor-provided bank accounts	3.10	\$650.00/hr	\$2,015.00

08/16/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom meeting and multiple pulls	2.50	\$350.00/hr	\$875.00
08/16/2023	Heather Barlow	Business Analysis	Review document production for mediation Prepare valuation indication	2.10	\$790.00/hr	\$1,659.00
08/16/2023	Heather Barlow	Business Analysis	Continue Valuation work and assessment for mediation	2.60	\$790.00/hr	\$2,054.00
08/16/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Committee pre mediation session	1.20	\$790.00/hr	\$948.00
08/16/2023	Jordan Olsen	Plan and Disclosure Statement	Valuation data discussion with M. Dundon	0.30	\$350.00/hr	\$105.00
08/16/2023	Matthew Dundon	Plan and Disclosure Statement	Valuation data discussion with J. Olsen.	0.30	\$890.00/hr	\$267.00
08/16/2023	Lee Rooney	Business Analysis	Participated in the mediation prep call with N. Zluticky, M. Dundon, and others	0.90	\$650.00/hr	\$585.00
08/16/2023	Matthew Dundon	Business Analysis	Second mediation prep requirements review with H. Barlow and L. Rooney	0.30	\$890.00/hr	\$267.00
08/16/2023	Matthew Dundon	Business Analysis	Mediation prep session with counsel	0.40	\$890.00/hr	\$356.00
08/16/2023	Jordan Olsen	Business Analysis	Data room pull for all financials that we are in possession of	2.50	\$350.00/hr	\$875.00
08/16/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the mediation prep committee meeting with N. Zluticky, M. Dundon, and others.	1.10	\$650.00/hr	\$715.00
08/16/2023	Matthew Dundon	Business Analysis	Mediation preparation meeting with UCC members.	1.50	\$890.00/hr	\$1,335.00

08/16/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: valuation of YesCare	1.00	\$650.00/hr	\$650.00
08/16/2023	Lee Rooney	Business Analysis	Analysis of valuation of Corizon go-forward contracts	3.40	\$650.00/hr	\$2,210.00
08/16/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow re: revenue multiples for valuation exercise	0.30	\$650.00/hr	\$195.00
08/16/2023	Lee Rooney	Business Analysis	Review of Debtor-provided AP disbursement records	2.10	\$650.00/hr	\$1,365.00
08/17/2023	Jordan Olsen	Case Administration	Valuation Model	2.00	\$350.00/hr	\$700.00
08/17/2023	Lee Rooney	Business Analysis	Analysis of individual contract revenues, expenses, and resulting projections	3.10	\$650.00/hr	\$2,015.00
08/17/2023	Heather Barlow	Business Analysis	Continue mediation preparation	1.60	\$790.00/hr	\$1,264.00
08/17/2023	Heather Barlow	Business Analysis	Discussions with L Rooney and J Olsen re: valuation related issues	0.80	\$790.00/hr	\$632.00
08/17/2023	Heather Barlow	Business Analysis	Discussion with M Dundon re: mediation prep workflow	0.50	\$790.00/hr	\$395.00
08/17/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with N. Zluticky, M. Dundon, and others re: preliminary projections for YesCare	0.50	\$650.00/hr	\$325.00
08/17/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.50	\$350.00/hr	\$175.00
08/17/2023	Matthew Dundon	Plan and Disclosure Statement	Internal review of mediation memo support on valuation and other data points	0.70	\$890.00/hr	\$623.00

08/17/2023	Matthew Dundon	Plan and Disclosure Statement	Discussion with UCC counsel on valuation and other data points.	0.40	\$890.00/hr	\$356.00
08/17/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow, J. Olsen, and M. Dundon re: valuation analysis	1.60	\$650.00/hr	\$1,040.00
08/17/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom with lawyers	0.50	\$350.00/hr	\$175.00
08/18/2023	Jordan Olsen	Business Analysis	Claims Analysis and mini deck	6.50	\$350.00/hr	\$2,275.00
08/18/2023	Jordan Olsen	Business Analysis	Variance Report	2.00	\$350.00/hr	\$700.00
08/18/2023	Heather Barlow	Claims Analysis	Review first cut of claims and sort for UCC Call	2.80	\$790.00/hr	\$2,212.00
08/18/2023	Heather Barlow	Claims Analysis	Discussion with M Dundon re Claims	0.30	\$790.00/hr	\$237.00
08/18/2023	Heather Barlow	Business Analysis	Continue valuation in anticipation of mediation	3.10	\$790.00/hr	\$2,449.00
08/18/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Review mediation prep with teh UCC and prepare for mediation in Houston	1.50	\$790.00/hr	\$1,185.00
08/18/2023	Matthew Dundon	Business Analysis	Mediation preparation meeting with UCC members.	1.00	\$890.00/hr	\$890.00
08/18/2023	Matthew Dundon	Claims Analysis	Participation in initial review and discussion of claims file from KCC.	0.70	\$890.00/hr	\$623.00
08/18/2023	Matthew Dundon	Claims Analysis	Discussion with UCC member regarding competing class claims and motions for 7023 leave.	0.40	\$890.00/hr	\$356.00

08/18/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the pre-mediation call with N. Zluticky, D. Barton, and others regarding mediation strategy	1.30	\$650.00/hr	\$845.00
08/18/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Review of claims register and creation of committee materials	3.30	\$650.00/hr	\$2,145.00
08/18/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow and J. Olsen re: claims report and preliminary indication of value for newco	1.50	\$650.00/hr	\$975.00
08/18/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow and J. Olsen re: editing of committee materials and modeling	0.90	\$650.00/hr	\$585.00
08/18/2023	Lee Rooney	Business Analysis	Editing of financial valuation methodology	1.40	\$650.00/hr	\$910.00
08/20/2023	Heather Barlow	Plan and Disclosure Statement	Travel to mediation	3.50	\$790.00/hr	\$2,765.00
08/20/2023	Matthew Dundon	Plan and Disclosure Statement	Travel to mediation	3.50	\$890.00/hr	\$3,115.00
08/20/2023	Lee Rooney	Business Analysis	Review and work on valuation workstream	3.40	\$650.00/hr	\$2,210.00
08/20/2023	Heather Barlow	Business Analysis	Mediation preparation	4.50	\$790.00/hr	\$3,555.00
08/21/2023	Lee Rooney	Business Analysis	Valuation work session with H. Barlow	2.00	\$650.00/hr	\$1,300.00
08/21/2023	Matthew Dundon	Plan and Disclosure Statement	GL/AR discussion with L. Rooney and Z. Hemenway	0.50	\$890.00/hr	\$445.00
08/21/2023	Lee Rooney	Committee Member/Professional	Participated in the mediation process	5.20	\$650.00/hr	\$3,380.00

		Meetings & Communications				
08/21/2023	Matthew Dundon	Plan and Disclosure Statement	Mediation session 1	8.00	\$890.00/hr	\$7,120.00
08/21/2023	Jordan Olsen	Business Analysis	Variance report reconciliation of actuals	0.50	\$350.00/hr	\$175.00
08/21/2023	Heather Barlow	Plan and Disclosure Statement	Participate in mediation in Houston with R Perry, TH J Jones and others	8.00	\$790.00/hr	\$6,320.00
08/21/2023	Heather Barlow	Business Analysis	Valuation work with L Rooney (2.0) and research (1.1)	3.10	\$790.00/hr	\$2,449.00
08/22/2023	Jordan Olsen	Case Administration	Updated valuation and zoom meetings	3.20	\$350.00/hr	\$1,120.00
08/22/2023	Matthew Dundon	Plan and Disclosure Statement	Mediation session 2	6.00	\$890.00/hr	\$5,340.00
08/22/2023	Matthew Dundon	Plan and Disclosure Statement	Model revision discussions with colleagues and UCC counsel	2.00	\$890.00/hr	\$1,780.00
08/22/2023	Lee Rooney	Business Analysis	Editing of valuation model	3.60	\$650.00/hr	\$2,340.00
08/22/2023	Lee Rooney	Business Analysis	Telecon with M. Dundon and others re: valuation modeling	0.50	\$650.00/hr	\$325.00
08/22/2023	Heather Barlow	Plan and Disclosure Statement	Continued participation in mediation on behalf of the UCC	6.00	\$790.00/hr	\$4,740.00
08/22/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participation in the mediation process	2.70	\$650.00/hr	\$1,755.00
08/23/2023	Matthew Dundon	Plan and Disclosure Statement	Discussion of settlement proposal with UCC.	1.00	\$890.00/hr	\$890.00
08/23/2023	Heather Barlow	Plan and Disclosure Statement	Travel from mediation	3.50	\$790.00/hr	\$2,765.00
08/23/2023	Matthew Dundon	Plan and Disclosure Statement	Mediation session 3	4.00	\$890.00/hr	\$3,560.00
08/23/2023	Matthew Dundon	Plan and Disclosure Statement	Travel from mediation	3.50	\$890.00/hr	\$3,115.00

08/23/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the Committee meeting /mediation discussion	1.00	\$650.00/hr	\$650.00
08/23/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Final day mediation session participation	4.00	\$790.00/hr	\$3,160.00
08/26/2023	Matthew Dundon	Plan and Disclosure Statement	3/25 status hearing playback.	0.30	\$890.00/hr	\$267.00
08/27/2023	Jordan Olsen	Case Administration	review of weekly expenditure report	1.50	\$350.00/hr	\$525.00
08/28/2023	Matthew Dundon	Retention and Fee Applications	Preparation of August 2023 fee an expense estimate at Debtor request.	0.50	\$890.00/hr	\$445.00
08/28/2023	Matthew Dundon	Claims Analysis	Initial overview of Ankura claims analysis materials	0.80	\$890.00/hr	\$712.00
08/28/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in weekly meeting of Committee members and professionals.	0.70	\$890.00/hr	\$623.00
08/28/2023	Lee Rooney	Business Analysis	Internal discussion of weekly expenditure report	0.50	\$650.00/hr	\$325.00
08/28/2023	Jordan Olsen	Business Analysis	Internal discussion of weekly expenditure report	0.50	\$350.00/hr	\$175.00
08/28/2023	Heather Barlow	Business Analysis	Weekly variance analysis and update with J Olsen and L Rooney	0.50	\$790.00/hr	\$395.00
08/28/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate on weekly UCC meeting with D Barton and others	1.10	\$790.00/hr	\$869.00
Totals For UCC				193.00		\$136,224.00

Exhibit B

Expense Detail

Expenses AUGUST 1, 2023 Through AUGUST 31, 2023	Totals
Total	\$4,956.38

Expenses 8/20-8/23

Matthew Dundon

Heather Barlow

Airfare \$1,400.00 Cap at \$700 Chicago fare to Houston

Cars/taxi \$492.96

Food \$403.65

Parking \$164.00

Hotel \$2,495.77

Total Mediation Expenses \$4,956.38

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**Objection Deadline: OCTOBER 16, 2023 at 4:00 p.m.
(ET)**

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the SECOND Monthly Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period AUGUST 1, 2023 Through and Including AUGUST 31, 2023* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated SEPTEMBER 26, 2023

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re TEHUM CARE SERVICES., INC. ¹ <p style="text-align: center;">Debtor.</p>	§ § § § § § § § §	Chapter 11 Case No. 23-90086 (CML)
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**COVERSHEET TO THE THIRD MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	09/01/2023	09/30/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

¹ 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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$25,470.80
Total professional hours covered by this Application:	44.5
Average hourly rate for professionals:	\$572.38
Total expense reimbursements requested in this Application:	\$3,213.55
Total fees and expenses requested in this Application:	\$28,684.35 (After voluntary rate reduction of \$7,818.20)
Total fees and expenses awarded in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023 Disclosure Statement Hearing occurred October 17, 2023; continued with further disclosures requested	

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

In re:

TEHUM CARE SERVICES., INC.²

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Objection Deadline: November 15, 2023 at 4:00 p.m. (ET)

SUMMARY OF THIRD MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD SEPTEMBER 1, 2023 THROUGH AND INCLUDING SEPTEMBER 30, 2023

Name of Applicant: Dundon Advisers LLC

Authorized to provide professional services to: The Official Committee of Unsecured Creditors

Petition Date: February 13, 2023

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and reimbursement is sought: SEPTEMBER 1, 2023 through SEPTEMBER 30, 2023

Amount of compensation sought as actual, reasonable, and necessary: \$25,470.80 (80% = \$20,376.64)

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$3,213.55

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023- 07/31/2023	\$167,893.10	N/A	\$30,000.00	None
08/01/2023- 08/31/2023	\$100,700.41	4,956.38	\$0.00	None

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Professional	Title	Rate July 1, 2022 – June 30, 2023³	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	11.9	\$10,591.00
Heather Barlow	Managing Director	\$604.00	\$604.00	24.7	\$14,918.80
Lee Rooney	Director	\$420.00	\$420.00	1.4	\$910.00
Jordan Olsen	Associate	\$288.00	\$288.00	6.5	\$2,275.00
		Blended Hourly Rate	44.5 hrs	\$572.38	\$25,470.80
				80%	\$20,376.64
				20%	\$5,094.16
				100%	\$25,470.80

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total here shows a voluntary reduction of \$55,734.40 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023

Category	Hours Billed	Fees (excluding voluntary rate discount)
Business Analysis	10.6	\$6,158.00
Case Administration	2.8	\$2,114.00
Claims Administration	6.0	\$4,544.00
Committee Member/Professional Meetings & Communications	5.3	\$4,101.00
Plan and Disclosure Statement	8.6	\$7,524.00
Retention and Fee Applications	11.2	\$8,848.00
Total	44.5	\$33,286.00
Voluntary Reduction		-\$7,818.20
Amended Fees		\$25,470.80
Blended Hourly Rate	\$572.38	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtors.

Chapter 11

Case No. 23-10497 (CTG)

Objection Deadline: November 15, 2023 at 4:00 p.m.

**THIRD MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

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/](https://ecf.txsb.uscourts.gov) WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) (the “Local Bankruptcy Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of TEHUM CARE SERVICES. INC (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its

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.

THIRD monthly application (the “Application”) for allowance of compensation and reimbursement of expenses for the period of SEPTEMBER 1, 2023 through and including SEPTEMBER 30, 2023 (the “Compensation Period”). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of **\$25,470.80** less a twenty percent (20%) holdback in the amount of **\$5,094.16**, for an immediately payable fee request of **\$20,376.64**. Additionally, immediately due and payable reasonable expenses of **\$3,213.55** were recorded during the fee period. In support of this Application, Dundon respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the “Court”) has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

Background

3. On February 13, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the “U.S. Trustee”) appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke’s Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell. On March

9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

5. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

6. On April 14, 2023, (DCKT. #0357) the Court entered the Interim Compensation Order.

7. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24,2023* [Docket No. 0796] (the “Dundon Retention Order”).

Compensation Paid and Its Source

8. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application complies with

sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 2016-2, applicable law and the Interim Compensation Order.

11. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached hereto as **Exhibit B**.

Summary of Services Rendered

12. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

13. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

14. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

**COMPENSATION BY PROJECT CATEGORY
SEPTEMBER 1, 2023 – SEPTEMBER 30, 2023**

Category	Hours Billed	Fees
Business Analysis	10.6	\$6,158.00
Case Administration	2.8	\$2,114.00
Claims Administration	6.0	\$4,544.00
Committee Member/Professional Meetings & Communications	5.3	\$4,101.00
Plan and Disclosure Statement	8.6	\$7,524.00
Retention and Fee Applications	11.2	\$8,848.00
Total	44.5	\$33,286.00
Voluntary Reduction		-\$7,818.20
Amended Fees		\$25,470.80
Blended Hourly Rate	\$572.38	

15. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	10.6	\$6,158.00
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16. This category includes time spent on analysis of the Debtors and issues related therein.

17. This category includes time spent case administration of the Debtors and issues related therein.

Case Administration	2.8	\$2,114.00
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Claims administration	6.0	\$4,544.00
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18. This category includes time spent on analysis of the Debtors claims and issues related therein.

Committee Member/Professional Meetings & Communications	5.3	\$4,101.00
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19. This category includes all time spent with Committee members or professionals and communications therein.

Investigations	0.0	\$0.00
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20. This category includes all time spent with Investigations and communications therein.

Plan & Disclosure Statement	8.6	\$7,524.00
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21. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Retention and Fee Applications	11.2	\$8,848.00
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22. This category includes all time spent preparing the Dundon Retention Application and fee documents in these proceedings.

Valuation of Services

23. Dundon’s professionals expended a total of 44.5 hours in connection with this matter during the Compensation Period² as follows:

²blank

Professional	Title	Rate July 1, 2022 – June 30, 2023 ³	Rate July 1, 2022 – June 30, 2024 ⁴	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	11.9	\$10,591.00
Heather Barlow	Managing Director	\$604.00	\$604.00	24.7	\$14,918.80
Lee Rooney	Director	\$420.00	\$420.00	1.4	\$910.00
Jordan Olsen	Associate	\$288.00	\$288.00	6.5	\$2,275.00
			44.5	\$572.38	\$25,470.80
				80%	\$20,376.64
				20%	\$5,094.16
				100%	\$25,470.80

24. The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are Dundon's normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is **\$25,470.80**. Expenses of \$3,213.55 are set forth in **Exhibit B**.

Certification

25. A certification of Matthew J. Dundon is attached hereto as **Exhibit C** and made part of this Application.

No Prior Request

26. No prior request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based

³ As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2022 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

⁴ As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2023 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$55,734.40 during this period.

upon all relevant criteria, including the results achieved in the case - as a whole.

27. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Dundon is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Dundon has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

Notice

28. Notice of this Application will be provided to the Fee Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

*TEHUM CARE SERVICES INC., et al.*⁵

Debtors.

Chapter 11

Case No.

(Jointly Administered)

Hearing Date: *Only if Objections are Filed*

Objection Deadline: October 17, 2023 at 4:00 p.m. (ET)

NOTICE OF FEE APPLICATION

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on September 27, 2023, pursuant to the Interim Compensation Order.

Ha.Nguyen@usdoj.gov

Andrew.Jimenez@usdoj.gov

kristian.gluck@nortonrosefulbright.com

julie.harrison@nortonrosefulbright.com

nicholas.zluticky@stinson.com

Phillip.Ashfield@stinson.com

ed.caldie@stinson.com

jbrookner@grayreed.com

akaufman@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

Russell.perry@ankura.com

Tehum Care Services – Russell Perry, CRO

**OFFICE OF THE UNITED
STATES TRUSTEE for the
Southern District of Texas:**

Ha M. Nguyen, Esq.

Andrew Jimenez, Esq.

**NORTON ROSE FULBRIGHT as
Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.**

Julie Goodrich Harrison, Esq.

**STINSON LLP as Counsel to
the Committee
Nicholas Zluticky, Esq.**

Phillip Ashfield, Esq.

Edwin H. Caldie, Esq.

**Tehum Care Services, Inc.,
Debtor and Debtor in Possession
Jason S. Brookner**

Aaron M. Kaufman

Lydia R. Webb

Amber M. Carson

**/s/ Matthew J Dundon
Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930
Email: md@dundon.com**

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Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$25,470.80** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$20,376.64** to be currently paid upon no objection, and 100% of **\$3,213.55** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: October 26, 2023

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon

10 Bank Street, Suite 1100

White Plains, NY 10606

Telephone: (914) 341-1188

Email: md@dundon.com

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

Billing Detail Description of Fees, Hours and Descriptions by Category**Exhibit A**

Date	Professional	Activity	Description	Billable Time	Hourly Rate	Billable Amt
09/01/2023	Matthew Dundon	Case Administration	Discussion with H. Barlow and UCC counsel regarding go-forward budget estimates.	0.40	\$890.00/hr	\$356.00
09/05/2023	Heather Barlow	Business Analysis	Review forecast and inform Stinson re: same	0.40	\$790.00/hr	\$316.00
09/05/2023	Matthew Dundon	Case Administration	Participation in hearing on motion to appoint Chapter 11 Trustee	1.70	\$890.00/hr	\$1,513.00
09/11/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate in UCC meeting with D Barton, N Zluticky and others	0.90	\$790.00/hr	\$711.00
09/11/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic UCC meeting participation.	0.90	\$890.00/hr	\$801.00
09/15/2023	Heather Barlow	Retention and Fee Applications	Prepare August 2023 Fee Application	1.10	\$790.00/hr	\$869.00
09/18/2023	Jordan Olsen	Business Analysis	Weekly Variance Report	1.90	\$350.00/hr	\$665.00

09/18/2023	Jordan Olsen	Business Analysis	Reconciliation of actuals	1.00	\$350.00/hr	\$350.00
09/18/2023	Matthew Dundon	Business Analysis	Review and discussion of Wall Street Journal story and any implications for case.	1.00	\$890.00/hr	\$890.00
09/18/2023	Matthew Dundon	Business Analysis	Review of objection to approval of LSA settlement.	0.40	\$890.00/hr	\$356.00
09/18/2023	Heather Barlow	Business Analysis	Weekly variance report prep and review with L Rooney and J Plsen	0.60	\$790.00/hr	\$474.00
09/18/2023	Heather Barlow	Business Analysis	Describe financials and ERC credit impact to UCC Members D Barton, E Monzo and others. Discuss Plan of reorganization docs	1.00	\$790.00/hr	\$790.00
09/19/2023	Matthew Dundon	Business Analysis	Discussion with internal colleagues of objection to approval of LSA settlement.	0.20	\$890.00/hr	\$178.00
09/21/2023	Heather Barlow	Business Analysis	Dundon meeting mediation for insurance review	0.30	\$790.00/hr	\$237.00
09/23/2023	Jordan Olsen	Business Analysis	Variance Report	2.50	\$350.00/hr	\$875.00
09/23/2023	Heather Barlow	Business Analysis	Review Variance report. Discussion with J Olsen re same	0.30	\$790.00/hr	\$237.00
09/25/2023	Jordan Olsen	Case Administration	Variance Deck Updates	0.70	\$350.00/hr	\$245.00

09/25/2023	Matthew Dundon	Plan and Disclosure Statement	Review and discussion with UCC counsel and internal colleagues of UCC counsel claims sizing and recovery estimation summary spreadsheet.	1.20	\$890.00/hr	\$1,068.00
09/25/2023	Heather Barlow	Claims Analysis	Review proposed allocation with Zach and M Dundon	0.50	\$790.00/hr	\$395.00
09/25/2023	Heather Barlow	Business Analysis	Review analysis with J Olsen and L Rooney. Reach out to R Perry at Ankura for clarification.	1.00	\$790.00/hr	\$790.00
09/25/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCXC call re case status and workstream review	1.10	\$790.00/hr	\$869.00
09/25/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.40	\$350.00/hr	\$140.00
09/25/2023	Heather Barlow	Retention and Fee Applications	Prepare the Second Monthly Fee App for August 2023 for counsel	3.40	\$790.00/hr	\$2,686.00
09/26/2023	Heather Barlow	Retention and Fee Applications	Edit, Prepare First and Second Monthly Applications and Notice lists	2.90	\$790.00/hr	\$2,291.00
09/26/2023	Matthew Dundon	Plan and Disclosure Statement	Review and comment draft disclosure statement.	0.90	\$890.00/hr	\$801.00
09/27/2023	Heather Barlow	Retention and Fee Applications	Prepare interim fee application and notice to parties	3.80	\$790.00/hr	\$3,002.00

09/28/2023	Heather Barlow	Claims Analysis	Work to coordinate claims info and calls with PI claimants" counsel and Stinson, Dundon L Rooney etc	2.10	\$790.00/hr	\$1,659.00
09/28/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	UCC to discuss Plan of Reorg and Disclosure Statement	1.00	\$790.00/hr	\$790.00
09/28/2023	Lee Rooney	Claims Analysis	Review of creditor claims	0.80	\$650.00/hr	\$520.00
09/28/2023	Lee Rooney	Claims Analysis	Telecom with H. Barlow re: litigation claims	0.60	\$650.00/hr	\$390.00
09/28/2023	Matthew Dundon	Plan and Disclosure Statement	Status discussion with H. Barlow and counsel.	0.30	\$890.00/hr	\$267.00
09/28/2023	Matthew Dundon	Plan and Disclosure Statement	Status discussion with UCC members and counsel	1.00	\$890.00/hr	\$890.00
09/28/2023	Matthew Dundon	Plan and Disclosure Statement	Plan terms discussion with certain UCC members and UCC counsel	1.60	\$890.00/hr	\$1,424.00
09/28/2023	Heather Barlow	Claims Analysis	Allocation and Plan procedures call with counsel and certain members	2.00	\$790.00/hr	\$1,580.00
09/29/2023	Heather Barlow	Plan and Disclosure Statement	Call re plan language with counsel and ucc members	1.30	\$790.00/hr	\$1,027.00
09/29/2023	Matthew Dundon	Plan and Disclosure Statement	Continue status discussion with UCC members and counsel	1.30	\$890.00/hr	\$1,157.00

09/29/2023	Matthew Dundon	Plan and Disclosure Statement	Complete plan status discussion with UCC members and counsel	1.00	\$890.00/hr	\$890.00
09/29/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Plan discussion continued and Disclosure Statement	1.00	\$790.00/hr	\$790.00
				Totals For UCC	44.50	\$33,289.00

Grand Total		44.50	\$33,289.00	
	Amended Total		\$25,470.80	-\$7,818.20
	80%		\$20,376.64	Voluntary Reduced rates
	20%		\$5,094.16	
	100%		\$25,470.80	
	Blended Hourly Rate		\$572.38	

Exhibit B

Expense Detail

Expenses Related to Hearing 10/17/2023	Totals
Total	\$3,213.55

Expense Detail Houston Disclosure Statement Hearing 10/17/2023

Tehum Expenses
Hearing 10/17/2023
Matt Dundon
Heather Barlow

Airfare	\$1,550.00	Chicago to Houston Cap
Cars/taxi	\$622.03	
Food	218.3	
Hotel	<u>814.03</u>	
Total Hearing Expenses	\$3,213.55	

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**Objection Deadline: November 15, 2023 at 4:00 p.m.
(ET)**

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the THIRD Monthly Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period SEPTEMBER 1, 2023 Through and Including SEPTEMBER 30, 2023* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated OCTOBER 26, 2023

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**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.	§	
	§	

**COVERSHEET TO THE FOURTH MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	10/01/2023	10/31/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

¹ 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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$39,577.60
Total professional hours covered by this Application:	82.50
Average hourly rate for professionals:	\$479.73
Total expense reimbursements requested in this Application:	\$0.00
Total fees and expenses requested in this Application:	\$39,577.60 (After voluntary rate reduction of \$14,425.40)
Total fees and expenses awarded in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023. Remediation to occur November 27-28	

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

In re:

TEHUM CARE SERVICES., INC.²

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Objection Deadline: December 5, 2023 at 4:00 p.m. (ET)

SUMMARY OF FOURTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OCTOBER 1, 2023 THROUGH AND INCLUDING OCTOBER 31, 2023

Name of Applicant: Dundon Advisers LLC

Authorized to provide professional services to: The Official Committee of Unsecured Creditors

Petition Date: February 13, 2023

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and reimbursement is sought: OCTOBER 1, 2023 through OCTOBER 31, 2023

Amount of compensation sought as actual, reasonable, and necessary: \$39,577.60 (80% = \$31,662.08)

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$0.00

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023-07/31/2023	\$167,893.10	N/A	\$82,158.44	None
08/01/2023-08/31/2023	\$100,700.41	4,956.38	\$0.00	None
09/01/2023-09/30/2023	\$25,470.80	\$3,213.55	\$0.00	None

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Professional	Title	Rate July 1, 2022 – June 30, 2023³	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	21.8	\$14,824.00
Heather Barlow	Managing Director	\$604.00	\$604.00	11.4	6,885.6
Lee Rooney	Director	\$420.00	\$420.00	27.8	\$11,676.00
Jordan Olsen	Associate	\$288.00	\$288.00	21.5	6,192.00
		Blended Hourly Rate	\$479.73	82.5	\$39,577.60
				80%	31,662.08
				20%	7,7915.52
				100%	\$39,577.60

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total here shows a voluntary reduction of \$55,734.40 off our standard fees.

**COMPENSATION BY PROJECT CATEGORY
OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Category	Hours Billed	Fees (excluding voluntary rate discount)
Business Analysis	46.8	\$26,832.00
Post-Effective Date Planning	0.5	\$445.00
Committee Member/Professional Meetings & Communications	10.7	\$7,291.00
Plan and Disclosure Statement	17.5	\$15,575.00
Retention and Fee Applications	2.1	\$1,659.00
Total	82.5	\$54,003.00
Voluntary Reduction		-14,425.40
Amended Fees		\$39,577.60
Blended Hourly Rate	\$479.73	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtors.

Chapter 11

Case No. 23-10497 (CTG)

Objection Deadline: December 5, 2023 at 4:00 p.m.

**FOURTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

**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/](https://ecf.txsb.uscourts.gov)
WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED.
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) (the “Local Bankruptcy Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of TEHUM CARE SERVICES. INC (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its

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.

FOURTH MONTHLY application (the “Application”) for allowance of compensation and reimbursement of expenses for the period of OCTOBER 1, 2023 through and including OCTOBER 31, 2023 (the “Compensation Period”). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of **\$39,577.60** less a twenty percent (20%) holdback in the amount of **\$7,915.52**, for an immediately payable fee request of **\$31,662.08**. Additionally, immediately due and payable reasonable expenses of **\$0.00** were recorded during the fee period. In support of this Application, Dundon respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the “Court”) has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

Background

3. On February 13, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the “U.S. Trustee”) appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke’s Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell. On March

9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

5. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

6. On April 14, 2023, (DCKT. #0357) the Court entered the Interim Compensation Order.

7. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24,2023* [Docket No. 0796] (the “Dundon Retention Order”).

Compensation Paid and Its Source

8. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application complies with

sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 2016-2, applicable law and the Interim Compensation Order.

11. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached hereto as **Exhibit B**.

Summary of Services Rendered

12. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

13. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

14. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

**COMPENSATION BY PROJECT CATEGORY
OCTOBER 1, 2023 – OCTOBER 31, 2023**

Category	Hours Billed	Fees
Business Analysis	46.8	\$26,832.00
Post-Effective Date Planning	0.5	\$445.00
Committee Member/Professional Meetings & Communications	10.7	\$7,291.00
Plan and Disclosure Statement	17.5	\$15,575.00
Retention and Fee Applications	2.1	\$1,659.00
Total	82.5	\$54,003.00
Voluntary Reduction		-14,425.40
	Amended Fees	\$39,577.60
	Blended Hourly Rate	\$479.73

15. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	46.8	\$26,832.00
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16. This category includes time spent on analysis of the Debtors and issues related therein.

17. This category includes time spent post-effective date planning of the Debtors and issues related therein.

Post-effective date planning	0.5	\$445.00
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Claims administration		
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18. This category includes time spent on analysis of the Debtors claims and issues related therein.

Committee Member/Professional Meetings & Communications	10.7	\$7,291.00
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19. This category includes all time spent with Committee members or professionals and communications therein.

Investigations	0.0	\$0.00
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20. This category includes all time spent with Investigations and communications therein.

Plan & Disclosure Statement	17.5	\$15,575.00
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21. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Retention and Fee Applications	2.1	\$1,659.00
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22. This category includes all time spent preparing the Dundon Retention Application and fee documents in these proceedings.

Valuation of Services

23. Dundon’s professionals expended a total of 82.5 hours in connection with this matter during the Compensation Period² as follows:

²blank

Professional	Title	Rate July 1, 2022 – June 30, 2023 ³	Rate July 1, 2022 – June 30, 2024 ⁴	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	21.8	\$14,824.00
Heather Barlow	Managing Director	\$604.00	\$604.00	11.4	6,885.6
Lee Rooney	Director	\$420.00	\$420.00	27.8	\$11,676.00
Jordan Olsen	Associate	\$288.00	\$288.00	21.5	6,192.00
Total Hours				82.5	\$39,577.60
				80%	31,662.08
				20%	7,7915.52
				100%	\$39,577.60

24. The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are Dundon’s normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is **\$39,577.60**. Expenses of \$0.00 are set forth in **Exhibit B**.

Certification

25. A certification of Matthew J. Dundon is attached hereto as **Exhibit C** and made part of this Application.

No Prior Request

26. No prior request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2022 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

⁴ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$55,734.40 during this period.

upon all relevant criteria, including the results achieved in the case - as a whole.

27. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Dundon is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Dundon has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

Notice

28. Notice of this Application will be provided to the Fee Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

*TEHUM CARE SERVICES INC., et al.*⁵

Debtors.

Chapter 11

Case No.

(Jointly Administered)

Hearing Date: *Only if Objections are Filed*

Objection Deadline: December 5, 2023 at 4:00 p.m. (ET)

NOTICE OF FEE APPLICATION

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on November 15, 2023, pursuant to the Interim Compensation Order.

Ha.Nguyen@usdoj.gov

Andrew.Jimenez@usdoj.gov

kristian.gluck@nortonrosefulbright.com

julie.harrison@nortonrosefulbright.com

nicholas.zluticky@stinson.com

Phillip.Ashfield@stinson.com

ed.caldie@stinson.com

jbrookner@grayreed.com

akaufman@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

Russell.perry@ankura.com

Tehum Care Services – Russell Perry, CRO

**OFFICE OF THE UNITED
STATES TRUSTEE for the
Southern District of Texas:**

Ha M. Nguyen, Esq.

Andrew Jimenez, Esq.

**NORTON ROSE FULBRIGHT as
Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.**

Julie Goodrich Harrison, Esq.

⁵

**STINSON LLP as Counsel to
the Committee
Nicholas Zluticky, Esq.**

Phillip Ashfield, Esq.

Edwin H. Caldie, Esq.

**Tehum Care Services, Inc.,
Debtor and Debtor in Possession
Jason S. Brookner**

Aaron M. Kaufman

Lydia R. Webb

Amber M. Carson

**/s/ Matthew J Dundon
Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930
Email: md@dundon.com**

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Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$39,577.60** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$31,662.08** to be currently paid upon no objection, and 100% of **\$0.00** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: November 15, 2023

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon

10 Bank Street, Suite 1100

White Plains, NY 10606

Telephone: (914) 341-1188

Email: md@dundon.com

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

Billing Detail Description of Fees, Hours and Descriptions by Category**Exhibit A**

Date	Professional	Activity	Description	Billable Time	Hourly Rate	Billable Amt		
10/01/2023	Jordan Olsen	Case Administration	Variance Report	2.0	\$350.00/hr	\$700.00		
10/02/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow and J. Olsen re: variance analysis and Committee voting strategy.	0.5	\$650.00/hr	\$325.00		
10/02/2023	Matthew Dundon	Exit and Post-Effective Date Planning	Discussion with Stinson regarding non-tort trustee candidates and process.	0.2	\$890.00/hr	\$178.00		
10/02/2023	Matthew Dundon	Plan and Disclosure Statement	Discussions with Stinson and Dundon colleagues regarding UCC witness for 10/17 hearing.	0.4	\$890.00/hr	\$356.00		

10/02/2023	Matthew Dundon	Exit and Post-Effective Date Planning	Discussion with candidate for role of non-tort trustee.	0.3	\$890.00/hr	\$267.00		
10/08/2023	Jordan Olsen	Business Analysis	Variance Report	2.0	\$350.00/hr	\$700.00		
10/09/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of UCC and its professionals.	1.0	\$890.00/hr	\$890.00		
10/09/2023	Heather Barlow	Business Analysis	Variance review with J Olsen and L Rooney	0.4	\$790.00/hr	\$316.00		
10/09/2023	Heather Barlow	Business Analysis	Review workstreams with UCC and counsel. Financial update	0.8	\$790.00/hr	\$632.00		
10/09/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.3	\$350.00/hr	\$105.00		
10/12/2023	Matthew Dundon	Plan and Disclosure Statement	Hearing preparation.	0.5	\$890.00/hr	\$445.00		
10/12/2023	Matthew Dundon	Plan and Disclosure Statement	Hearing preparation.	0.5	\$890.00/hr	\$445.00		

10/12/2023	Matthew Dundon	Claims Analysis	Review and discussion of Stinson litigation claims build up and haircut model.	0.9	\$890.00/hr	\$801.00		
10/15/2023	Jordan Olsen	Case Administration	Variance Report	2.0	\$350.00/hr	\$700.00		
10/16/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow and M. Dundon re: upcoming hearing	0.4	\$650.00/hr	\$260.00		
10/16/2023	Lee Rooney	Business Analysis	Review of Debtor's variances	0.6	\$650.00/hr	\$390.00		
10/16/2023	Matthew Dundon	Plan and Disclosure Statement	Discussion of mediation and plan support materials with H. Barlow and L. Rooney	0.4	\$890.00/hr	\$356.00		
10/16/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of UCC and its professionals.	0.9	\$890.00/hr	\$801.00		
10/16/2023	Matthew Dundon	Plan and Disclosure Statement	Disclosure statement review.	1.0	\$890.00/hr	\$890.00		
10/16/2023	Matthew Dundon	Plan and Disclosure Statement	Non-working travel to hearing	4.0	\$890.00/hr	\$3,560.00		

10/16/2023	Heather Barlow	Business Analysis	Prepare for hearing with L Rooney, M Dundon and J Olsen. Analyze changes to DS	2.4	\$790.00/hr	\$1,896.00		
10/16/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting with D. Barton, H. Barlow, and others	0.9	\$650.00/hr	\$585.00		
10/16/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the pre-hearing call with A. Kaufman, R. Perry and others	1.1	\$650.00/hr	\$715.00		
10/16/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.2	\$350.00/hr	\$70.00		
10/17/2023	Matthew Dundon	Plan and Disclosure Statement	Non-working travel from hearing	4.0	\$890.00/hr	\$3,560.00		
10/17/2023	Matthew Dundon	Plan and Disclosure Statement	Testimony prep session with Stinson.	0.3	\$890.00/hr	\$267.00		
10/17/2023	Matthew Dundon	Plan and Disclosure Statement	Review of first amended Plan and	1.5	\$890.00/hr	\$1,335.00		

			first amended Disclosure Statement					
10/17/2023	Matthew Dundon	Plan and Disclosure Statement	Post-mortem discussions with Stinson after denial of approval disclosure statement.	0.4	\$890.00/hr	\$356.00		
10/17/2023	Matthew Dundon	Plan and Disclosure Statement	Hearing considering conditional approval of disclosure statement.	0.6	\$890.00/hr	\$534.00		
10/19/2023	Jordan Olsen	Business Analysis	Liquidation analysis	4.5	\$350.00/hr	\$1,575.00		
10/22/2023	Jordan Olsen	Business Analysis	Variance report	2.0	\$350.00/hr	\$700.00		
10/23/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the committee meeting with D. Barton, M. Dundon, and others	0.7	\$650.00/hr	\$455.00		
10/23/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Regular meeting of UCC and its professionals	0.6	\$890.00/hr	\$534.00		

10/23/2023	Matthew Dundon	Plan and Disclosure Statement	Review of draft proposed second amended disclosure statement.	0.8	\$890.00/hr	\$712.00		
10/23/2023	Heather Barlow	Business Analysis	UCC call Tehum with D Barton, M Dundon and others	1.0	\$790.00/hr	\$790.00		
10/23/2023	Heather Barlow	Business Analysis	Liquidation analysis review with J Olsen and L Rooney	0.8	\$790.00/hr	\$632.00		
10/23/2023	Heather Barlow	Business Analysis	Liquidation Analysis with L Rooney and J Olsen	1.2	\$790.00/hr	\$948.00		
10/23/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow and J. Olsen re: liquidation analysis	1.8	\$650.00/hr	\$1,170.00		
10/23/2023	Lee Rooney	Business Analysis	Review of liquidation analysis versions for testimony prep	4.9	\$650.00/hr	\$3,185.00		
10/23/2023	Lee Rooney	Business Analysis	Review of budget variances / budget	0.6	\$650.00/hr	\$390.00		
10/23/2023	Jordan Olsen	Business Analysis	Zoom Meeting	1.8	\$350.00/hr	\$630.00		

10/23/2023	Jordan Olsen	Business Analysis	Liquidation analysis	4.5	\$350.00/hr	\$1,575.00		
10/24/2023	Lee Rooney	Business Analysis	Telecom with Ankura re: liquidation Plan calculations	0.6	\$650.00/hr	\$390.00		
10/24/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow re: Plan issues	1.3	\$650.00/hr	\$845.00		
10/24/2023	Lee Rooney	Business Analysis	Review of Plan edits	2.9	\$650.00/hr	\$1,885.00		
10/24/2023	Lee Rooney	Business Analysis	Analysis of Plan calculations - LA	4.6	\$650.00/hr	\$2,990.00		
10/24/2023	Heather Barlow	Business Analysis	Call with R Perry, L Rooney and Ankura team re Liquidation analysis amendments	1.0	\$790.00/hr	\$790.00		
10/25/2023	Matthew Dundon	Plan and Disclosure Statement	Review of Plan waterfall	0.5	\$890.00/hr	\$445.00		
10/25/2023	Heather Barlow	Business Analysis	Liquidation analysis review with L Rooney	0.7	\$790.00/hr	\$553.00		
10/25/2023	Lee Rooney	Business Analysis	Liquidation analysis discussion	0.7	\$650.00/hr	\$455.00		

10/25/2023	Lee Rooney	Business Analysis	Editing of Plan liquidation analysis calculations	3.4	\$650.00/hr	\$2,210.00		
10/25/2023	Lee Rooney	Business Analysis	Telecom with N. Zluticky, M. Dundon, and others	1.0	\$650.00/hr	\$650.00		
10/25/2023	Heather Barlow	Business Analysis	LA Review Z Hemenway, M Dundon and others	1.0	\$790.00/hr	\$790.00		
10/25/2023	Heather Barlow	Retention and Fee Applications	Prepare Third Monthly Application for September 2023	1.3	\$790.00/hr	\$1,027.00		
10/26/2023	Heather Barlow	Retention and Fee Applications	Distribute application and finalize draft for the Third Monthly Application September 2023	0.8	\$790.00/hr	\$632.00		
10/27/2023	Matthew Dundon	Plan and Disclosure Statement	Revision of waterfall to clarify cash sources and expense incurrences.	1.8	\$890.00/hr	\$1,602.00		
10/28/2023	Matthew Dundon	Plan and Disclosure Statement	Review of revised disclosure statement;	0.8	\$890.00/hr	\$712.00		

			discussion of same with Stinson.					
10/29/2023	Jordan Olsen	Business Analysis	Variance Report	1.5	\$350.00/hr	\$525.00		
10/30/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow and J. Olsen re: Debtor financials	0.7	\$650.00/hr	\$455.00		
10/30/2023	Lee Rooney	Business Analysis	Review of variances	0.6	\$650.00/hr	\$390.00		
10/30/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting with N. Zluticky, D. Barton, and others	0.5	\$650.00/hr	\$325.00		
10/30/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.7	\$350.00/hr	\$245.00		
10/30/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC members and professionals	0.4	\$890.00/hr	\$356.00		After Voluntary Reduction
Grand Total			Total hours	82.5		\$54,003.00		\$39,577.60

					Voluntary Reduction	\$14,425.40	80%	\$31,662.08
							<u>20%</u>	<u>\$7,915.52</u>
							100%	\$39,577.60
							BHR	\$479.73

Exhibit B

Expense Detail

Expenses	Totals
Total	\$0.00

Expense Detail since the October Disclosure Statement Hearing

Tehum Expenses	\$0.00
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Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**Objection Deadline: December 5, 2023 at 4:00 p.m.
(ET)**

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the FOURTH MONTHLY Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period OCTOBER 1, 2023 Through and Including OCTOBER 31, 2023* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated NOVEMBER 15, 2023

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**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.	§	
	§	

**COVERSHEET TO THE FIFTH MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	11/01/2023	11/30/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$19,005.60
Total professional hours covered by this Application:	40.5
Average hourly rate for professionals:	\$469.27
Total expense reimbursements requested in this Application:	\$0.00
Total fees and expenses requested in this Application:	\$19,005.60 (After voluntary rate reduction of \$7,185.40)
Total fees and expenses awarded in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023. Remediation occurring 12/14/2023	

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

In re: Chapter 11
TEHUM CARE SERVICES., INC.² Case No. 23-90086 (CML)
Debtor. Objection Deadline: January 3, 2024 at 4:00 p.m. (ET)

**SUMMARY OF FIFTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
NOVEMBER 1, 2023 THROUGH AND INCLUDING NOVEMBER 30, 2023**

Name of Applicant: Dundon Advisers LLC Authorized to
provide professional services to: The Official Committee of Unsecured Creditors

P e t i t i o n D a t e : F e b r u a r y 1 3 , 2 0 2 3

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and
reimbursement is sought: NOVEMBER 1, 2023 through NOVEMBER 30,
2023

Amount of compensation sought as
actual, reasonable, and necessary: \$19,005.60 (80% = \$15,204.48)

Amount of expense reimbursement sought
as actual, reasonable, and necessary: \$0.00

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023-07/31/2023	\$167,893.10	N/A	\$82,158.44	None
08/01/2023-08/31/2023	\$100,700.41	4,956.38	\$0.00	None
09/01/2023-09/30/2023	\$25,470.80	\$3,213.55	\$0.00	None
10/01/2023-10/31/2023	\$39,577.60	\$0.00	\$0.00	None

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Professional	Title	Rate July 1, 2022 - June 30, 2023³	Rate July 1, 2023 - June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	5.3	\$3,604.00
Heather Barlow	Managing Director	\$604.00	\$604.00	10.1	\$6,100.40
Lee Rooney	Director	\$420.00	\$420.00	15.7	\$6,594.00
Jordan Olsen	Associate	\$288.00	\$288.00	9.4	\$2,707.20
		Blended Hourly Rate	\$469.27	40.5 80%	\$19,005.60 \$15,204.48

³ As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2023 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total here shows a voluntary reduction of \$55,734.40 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023

Category	Hours Billed	Fees (excluding voluntary rate discount)
Business Analysis	24.7	\$14,673.00
Case Administration	0.4	\$356.00
Committee Member/Professional Meetings & Communications	14.1	\$10,105.00
Plan and Disclosure Statement	0.3	\$267.00
Retention and Fee Applications	1.0	\$790.00
Total		\$26,191.00
Voluntary Reduction		-7,185.40
Amended Fees		\$19,000.60
Blended Hourly Rate	\$469.27	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11
TEHUM CARE SERVICES., INC.¹ Case No. 23-10497 (CTG)

Debtors.

Objection Deadline: January 3, 2024 at 4:00 p.m.

**FIFTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

**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/](https://ecf.txsb.uscourts.gov/)
WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED.
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) (the “Local Bankruptcy Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of TEHUM CARE SERVICES. INC (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its

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.

FIFTH MONTHLY application (the "Application") for allowance of compensation and reimbursement of expenses for the period of NOVEMBER 1, 2023 through and including NOVEMBER 30, 2023 (the "Compensation Period"). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of **\$19,005.60** less a twenty percent (20%) holdback in the amount of **\$3,801.12**, for an immediately payable fee request of **\$15,204.48**. Additionally, immediately due and payable reasonable expenses of **\$0.00** were recorded during the fee period. In support of this Application, Dundon respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

Background

3. On February 13, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the "U.S. Trustee") appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke's Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell. On March

9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

5. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

6. On April 14, 2023, (DCKT. #0357) the Court entered the Interim Compensation Order.

7. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24, 2023* [Docket No. 0796] (the “Dundon Retention Order”).

Compensation Paid and Its Source

8. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application complies with

sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 20162, applicable law and the Interim Compensation Order.

11. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached hereto as **Exhibit B.**

Summary of Services Rendered

12. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

13. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

14. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

**COMPENSATION BY PROJECT CATEGORY
NOVEMBER 1, 2023 – NOVEMBER 30, 2023**

Category	Hours Billed	Fees
Business Analysis	24.7	\$14,673.00
Case Administration	0.4	\$356.00
Committee Member/Professional Meetings & Communications	14.1	\$10,105.00
Plan and Disclosure Statement	0.3	\$267.00
Retention and Fee Applications	1.0	\$790.00
Total		\$26,191.00
Voluntary Reduction		-7,185.40
Amended Fees		\$19,000.60
Blended Hourly Rate	\$469.27	

15. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	24.7	\$14,673.00
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16. This category includes time spent on analysis of the Debtors and issues related therein.

17. This category includes time spent with case administration of the Debtors and issues related therein.

Case Administration	0.4	\$356.00
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18. This category includes time spent on analysis of the Debtors claims and issues related therein.

Committee Member/Professional Meetings & Communications	14.1	\$10,105.00
--	------	-------------

19. This category includes all time spent with Committee members or professionals and communications therein.

Investigations	0.0	\$0.00
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20. This category includes all time spent with Investigations and communications therein.

Plan & Disclosure Statement	0.3	\$267.00
--	-----	----------

21. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Retention and Fee Applications	1.0	\$790.00
---------------------------------------	-----	----------

22. This category includes all time spent preparing the Dundon Retention Application and fee documents in these proceedings.

Valuation of Services

23. Dundon’s professionals expended a total of 40.5 hours in connection with this matter during the Compensation Period² as follows:

²blank

Professional	Title	Rate July 1,	Rate July 1,	Hours	Amount
Matthew	Principal	\$680.00	\$680.00	5.3	\$3,604.00
Heather	Managing	\$604.00	\$604.00	10.1	\$6,100.40
Lee	Director	\$420.00	\$420.00	15.7	\$6,594.00
Jordan	Associate	\$288.00	\$288.00	9.4	\$2,707.20
				40.5	\$19,005.60
				BHR	\$469.27
<i>Reflects</i>	<i>Voluntary</i>	<i>Reduced</i>	<i>Rates</i>		

24. The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are Dundon’s normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is **\$19,005.60**. Expenses of \$0.00 are set forth in **Exhibit B**.

Certification

25. A certification of Matthew J. Dundon is attached hereto as **Exhibit C** and made part of this Application.

No Prior Request

26. No prior request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2022 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

⁴ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$55,734.40 during this period.

upon all relevant criteria, including the results achieved in the case - as a whole.

27. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Dundon is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Dundon has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

Notice

28. Notice of this Application will be provided to the Fee Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

*TEHUM CARE SERVICES INC., et al.*⁵

Debtors.

Chapter 11

Case No.

(Jointly Administered)

Hearing Date: *Only if Objections are Filed*

Objection Deadline: January 3, 2023 at 4:00 p.m. (ET)

NOTICE OF FEE APPLICATION

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on December 14, 2023, pursuant to the Interim Compensation Order.

Ha.Nguyen@usdoj.gov

Andrew.Jimenez@usdoj.gov

kristian.gluck@nortonrosefulbright.com

julie.harrison@nortonrosefulbright.com

nicholas.zluticky@stinson.com

Phillip.Ashfield@stinson.com

ed.caldie@stinson.com

jbrookner@grayreed.com

akaufman@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

Russell.perry@ankura.com

Tehum Care Services – Russell Perry, CRO

**OFFICE OF THE UNITED
STATES TRUSTEE for the
Southern District of Texas:**

Ha M. Nguyen, Esq.

Andrew Jimenez, Esq.

**NORTON ROSE FULBRIGHT as
Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.**

Julie Goodrich Harrison, Esq.

⁵

**STINSON LLP as Counsel to
the Committee
Nicholas Zluticky, Esq.**

Phillip Ashfield, Esq.

Edwin H. Caldie, Esq.

**Tehum Care Services, Inc.,
Debtor and Debtor in Possession
Jason S. Brookner**

Aaron M. Kaufman

Lydia R. Webb

Amber M. Carson

**/s/ Matthew J Dundon
Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930
[Email: md@dundon.com](mailto:md@dundon.com)**

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Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$19,005.60** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$15,204.48** to be currently paid upon no objection, and 100% of **\$0.00** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: December 14, 2023

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon
10 Bank Street, Suite 1100
White Plains, NY 10606
Telephone: (914) 341-1188
[Email: md@dundon.com](mailto:md@dundon.com)

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

**Billing Detail Description of Fees,
Hours and Descriptions by
Category**

Exhibit A

Dundon Advisers LLC - Time Entry

Date Start: 11/1/2023 | Date End: 11/30/2023 | Clients: Tehum Care Services

Date	Professional	Activity	Description	Total Time	Hourly Rate	Billable Amt
11/05/2023	Jordan Olsen	Business Analysis	Review and analysis of variance report	1.5	\$350.00/hr	\$525.00
11/06/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Follow up discussion with counsel to a UCC member regarding mediation revision.	0.2	\$890.00/hr	\$178.00
11/06/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting with D. Barton, N. Zluticky, and others	0.5	\$790.00/hr	\$395.00
11/06/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC professionals and members.	0.8	\$890.00/hr	\$712.00

11/06/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: case financials	0.9	\$650.00/hr	\$585.00
11/06/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting with D. Barton, N. Zluticky, and others	0.5	\$650.00/hr	\$325.00
11/06/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Attended UCC periodic meeting	0.5	\$350.00/hr	\$175.00
11/06/2023	Heather Barlow	Business Analysis	Variance analysis with J Olsen and L Rooney	0.5	\$790.00/hr	\$395.00
11/09/2023	Matthew Dundon	Case Administration	Memo to Stinson regarding considerations U.S. Trustee should evaluate in deciding whether a Tort Claims Committee should be formed.	0.4	\$890.00/hr	\$356.00
11/12/2023	Jordan Olsen	Business Analysis	Variance Report	2.0	\$350.00/hr	\$700.00
11/13/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.5	\$350.00/hr	\$175.00
11/13/2023	Lee Rooney	Business Analysis	Review of Debtor's financials	0.7	\$650.00/hr	\$455.00
11/13/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow and J. Olsen re: financial presentation	0.4	\$650.00/hr	\$260.00
11/13/2023	Heather Barlow	Business Analysis	Variance review with J Olsen and L Rooney	0.5	\$790.00/hr	\$395.00

11/14/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the hearing with N. Zluticky, Z. Hemenway, and others re: mediation, allocation process	0.7	\$650.00/hr	\$455.00
11/14/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Hearing re Sontchi as remediator	0.7	\$790.00/hr	\$553.00
11/15/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC professionals and members.	1.0	\$890.00/hr	\$890.00
11/15/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Follow up call with UCC post hearing to update on mediation plan	1.0	\$790.00/hr	\$790.00
11/15/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the committee meeting with N. Zluticky, D. Barton, and others	1.1	\$650.00/hr	\$715.00
11/15/2023	Heather Barlow	Retention and Fee Applications	Prepare October 2023 Fourth Fee Application	1.0	\$790.00/hr	\$790.00
11/17/2023	Lee Rooney	Business Analysis	Analysis workstream for liq. analysis versus plan	3.6	\$650.00/hr	\$2,340.00
11/19/2023	Jordan Olsen	Business Analysis	Variance Report	2.0	\$350.00/hr	\$700.00
11/19/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow re:mediation prep	1.0	\$650.00/hr	\$650.00

11/19/2023	Heather Barlow	Business Analysis	Mediation prep with L Rooney	1.0	\$790.00/hr	\$790.00
11/20/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC professionals and members.	0.9	\$890.00/hr	\$801.00
11/20/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.5	\$350.00/hr	\$175.00
11/20/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with J. Olsen and H. Barlow re: case financials	0.4	\$650.00/hr	\$260.00
11/20/2023	Lee Rooney	Business Analysis	Review of the variance analysis	0.7	\$650.00/hr	\$455.00
11/20/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting	0.9	\$650.00/hr	\$585.00
11/20/2023	Heather Barlow	Business Analysis	J Olsen and L Rooney variance analyses and mediation prep	0.4	\$790.00/hr	\$316.00
11/20/2023	Heather Barlow	Business Analysis	Weekly meeting with N Zluticky and M Dundon and others	0.9	\$790.00/hr	\$711.00
11/21/2023	Lee Rooney	Business Analysis	Review of YC valuation for preparation for mediation	2.8	\$650.00/hr	\$1,820.00
11/21/2023	Matthew Dundon	Plan and Disclosure Statement	Discussion of impact on Plan mediation of new Committee with Stinson	0.3	\$890.00/hr	\$267.00

11/21/2023	Heather Barlow	Business Analysis	Review valuation with L Rooney	2.3	\$790.00/hr	\$1,817.00
11/26/2023	Jordan Olsen	Business Analysis	Variance Report	2.0	\$350.00/hr	\$700.00
11/27/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Weekly UCC member and professional meeting	0.7	\$890.00/hr	\$623.00
11/27/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC professionals and members.	1.0	\$890.00/hr	\$890.00
11/27/2023	Lee Rooney	Business Analysis	Review of financial deck and variance report	0.7	\$650.00/hr	\$455.00
11/27/2023	Lee Rooney	Business Analysis	Telecom with J. Olsen and H. Barlow re: case strategy	0.6	\$650.00/hr	\$390.00
11/27/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.4	\$350.00/hr	\$140.00
11/27/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting	0.7	\$650.00/hr	\$455.00
11/27/2023	Heather Barlow	Business Analysis	Variance analysis with L Rooney and J Olsen	0.6	\$790.00/hr	\$474.00
11/27/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Participate in UCC Meeting with Counsel and D Barton and others	0.7	\$790.00/hr	\$553.00

I Meetings &
Communications

	Grand Total	40.5	\$26,191.00
			80% \$20,952.80
			20% \$5,238.20
			100% \$26,191.00
			BHR \$646.69

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

TEHUM CARE SERVICES., INC.¹

Case No. 23-90086 (CML)

Debtor.

**Objection Deadline: January 3, 2023 at 4:00 p.m.
(ET)**

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the FIFTH MONTHLY Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period NOVEMBER 1, 2023 Through and Including NOVEMBER 30, 2023* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated December 14, 2023

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re TEHUM CARE SERVICES., INC. ¹ <p style="text-align: center;">Debtor.</p>	§ § § § § § § §	Chapter 11 Case No. 23-90086 (CML)
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**COVERSHEET TO THE SIXTH MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM DECEMBER 1, 2023 THROUGH JANUARY 30, 2024**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	12/01/2023	01/30/2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$39,948.40
Total professional hours covered by this Application:	81.0
Average hourly rate for professionals:	\$493.19
Total expense reimbursements requested in this Application:	\$202.55
Total fees and expenses requested in this Application:	\$40,150.95 (After voluntary rate reduction of \$14,253.60)
Total fees and expenses awarded in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023. Remediation occurred 12/14/2023	

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

<hr style="border: 0.5px solid black; margin-bottom: 10px;"/> In re: TEHUM CARE SERVICES., INC. ² <p style="text-align: center;">Debtor.</p>	Chapter 11 Case No. 23-90086 (CML) Objection Deadline: February 21, 2024 at 4:00 p.m. (ET)
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SUMMARY OF SIXTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD DECEMBER 1, 2023 THROUGH AND INCLUDING JANUARY 30, 2024

Name of Applicant: Dundon Advisers LLC Authorized to provide professional services to: The Official Committee of Unsecured Creditors

P e t i t i o n D a t e : F e b r u a r y 1 3 , 2 0 2 3

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and reimbursement is sought: DECEMBER 1, 2023 through JANUARY 30, 2024

Amount of compensation sought as actual, reasonable, and necessary: \$39,948.40 (80% = \$31,958.72)

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$202.55

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023- 07/31/2023	\$167,893.10	\$0.00	\$82,158.44 Sept. 2023	None
08/01/2023- 08/31/2023	\$100,700.41	4,956.38	\$137,675.15 Dec. 2023	None
09/01/2023- 09/30/2023	\$25,470.80	\$3,213.55	\$0.00	None
10/01/2023- 10/31/2023	\$39,577.60	\$0.00	\$0.00	None
11/01/2023- 11/30/2023	\$19,005.60	\$0.00	\$0.00	None
12/01/2023- 01/31/2024	\$39,948.40	\$202.55	\$0.00	TBD – Due 02/21/2024
As of 02/01/2024	<i>\$392,595.91</i> <i>Total Fees to Date</i>	<i>\$8,372.48</i> <i>Total Expenses to Date</i>	<i>\$219,833.59</i> <i>Paid Fees and Expenses to Date (80% Fees and 100% Expenses through August 2023)</i>	

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD DECEMBER 1, 2023 THROUGH JANUARY 30, 2024**

Professional	Title	Rate July 1, 2022 - June 30, 2023³	Rate July 1, 2023 - June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	13.6	\$9,248.00
Heather Barlow	Managing Director	\$604.00	\$604.00	25.7	\$15,522.80
Lee Rooney	Director	\$420.00	\$420.00	24.0	\$10,080.00
Jordan Olsen	Associate	\$288.00	\$288.00	17.7	\$5,097.60
		Blended Hourly Rate	\$493.19	81.0 80%	\$39,948.40 \$31,958.72

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total here shows a voluntary reduction of \$14,253.60 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
DECEMBER 1, 2023 THROUGH JANUARY 30, 2024

Category	Hours Billed	Fees (excluding voluntary rate discount)
Business Analysis	40.0	\$23,750.00
Case Administration	2.9	\$1,731.00
Committee Member/Professional Meetings & Communications	20.3	\$13,679.00
Plan and Disclosure Statement/Mediation	17.5	\$14,775.00
Other Retention and Fee Applications	0.3	\$267.00
Total		\$54,202.00
Voluntary Reduction		-14,253.60
Amended Fees		\$39,948.40
Blended Hourly Rate	\$493.19	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11
TEHUM CARE SERVICES., INC.¹ Case No. 23-10497 (CTG)

Debtors.

Objection Deadline: February 21, 2024 at 4:00 p.m.

**SIXTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD DECEMBER 1, 2023 THROUGH JANUARY 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/](https://ecf.txsb.uscourts.gov/)
WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED.
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) (the “Local Bankruptcy Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of TEHUM CARE SERVICES. INC (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its

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.

SIXTH MONTHLY application (the "Application") for allowance of compensation and reimbursement of expenses for the period of DECEMBER 1, 2023 through and including JANUARY 30, 2024 (the "Compensation Period"). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of **\$39,948.40** less a twenty percent (20%) holdback in the amount of **\$7,989.68**, for an immediately payable fee request of **\$31,958.72**. Additionally, immediately due and payable reasonable expenses of **\$202.55** were recorded during the fee period. In support of this Application, Dundon respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

Background

3. On February 13, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the "U.S. Trustee") appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke's Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell. On March

9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

5. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

6. On April 14, 2023, (DCKT. #0357) the Court entered the Interim Compensation Order.

7. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24, 2023* [Docket No. 0796] (the “Dundon Retention Order”).

Compensation Paid and Its Source

8. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application complies with

sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 20162, applicable law and the Interim Compensation Order.

11. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached hereto as **Exhibit B.**

Summary of Services Rendered

12. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

13. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

14. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

**COMPENSATION BY PROJECT CATEGORY
DECEMBER 1, 2023 – JANUARY 30, 2024**

Category	Hours Billed	Fees
Business Analysis	40.0	\$23,750.00
Case Administration	2.9	\$1,731.00
Committee Member/Professional Meetings & Communications	20.3	\$13,679.00
Plan and Disclosure Statement/Mediation	17.5	\$14,775.00
Other Retention and Fee Applications	0.3	\$267.00
Total		\$54,202.00
Voluntary Reduction		-\$14,253.60
Amended Fees		\$39,948.40
Blended Hourly Rate	\$493.19	

15. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	40.0	\$23,750.00
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16. This category includes time spent on analysis of the Debtors and issues related therein.

17. This category includes time spent with case administration of the Debtors and issues related therein.

Case Administration	2.9	\$1,731.00
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18. This category includes time spent on analysis of the Debtors claims and issues related therein.

Committee Member/Professional Meetings & Communications	20.3	\$13,679.00
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19. This category includes all time spent with Committee members or professionals and communications therein.

Investigations	0.0	\$0.00
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20. This category includes all time spent with Investigations and communications therein.

Plan & Disclosure Statement /Mediation	17.5	\$14,775.00
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21. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Other Retention and Fee	0.3	\$267.00
--------------------------------	-----	----------

22. This category includes all time spent reviewing Province’s Retention Application and fee documents in these proceedings.

Valuation of Services

23. Dundon’s professionals expended a total of 81.0 hours in connection with this matter during the Compensation Period² as follows:

²blank

Professional	Title	Rate July 1,	Rate July 1,	Hours	Amount
Matthew	Principal	\$680.00	\$680.00	13.6	\$9,248.00
Heather	Managing	\$604.00	\$604.00	25.7	\$15,522.80
Lee	Director	\$420.00	\$420.00	24.0	\$10,080.00
Jordan	Associate	\$288.00	\$288.00	17.7	\$5,097.60
				80.0	\$39,948.40
				BHR	\$493.19
<i>Reflects</i>	<i>Voluntary</i>	<i>Reduced</i>	<i>Rates</i>		

24. The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are Dundon's normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is **\$39,948.40**. Expenses of **\$202.55** are set forth in **Exhibit B**.

Certification

25. A certification of Matthew J. Dundon is attached hereto as **Exhibit C** and made part of this Application.

No Prior Request

26. No prior request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based

³ As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2022 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

⁴ As disclosed in the Dundon Retention Application, Dundon's customary hourly rates were adjusted on July 1, 2023 pursuant to the firm's annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$55,734.40 during this period.

upon all relevant criteria, including the results achieved in the case - as a whole.

27. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Dundon is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Dundon has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

Notice

28. Notice of this Application will be provided to the Fee Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

*TEHUM CARE SERVICES INC., et al.*⁵

Debtors.

Chapter 11

Case No.

(Jointly Administered)

Hearing Date: *Only if Objections are Filed*
Objection Deadline: February 21, 2024 at 4:00 p.m.
(ET)

NOTICE OF FEE APPLICATION

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on February 1, 2024, pursuant to the Interim Compensation Order.

Ha.Nguyen@usdoj.gov

Andrew.Jimenez@usdoj.gov

kristian.gluck@nortonrosefulbright.com

julie.harrison@nortonrosefulbright.com

nicholas.zluticky@stinson.com

Phillip.Ashfield@stinson.com

ed.caldie@stinson.com

jbrookner@grayreed.com

akaufman@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

Russell.perry@ankura.com

Tehum Care Services – Russell Perry, CRO

**OFFICE OF THE UNITED
STATES TRUSTEE for the
Southern District of Texas:**

Ha M. Nguyen, Esq.

Andrew Jimenez, Esq.

**NORTON ROSE FULBRIGHT as
Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.**

Julie Goodrich Harrison, Esq.

**STINSON LLP as Counsel to
the Committee
Nicholas Zluticky, Esq.**

Phillip Ashfield, Esq.

Edwin H. Caldie, Esq.

**Tehum Care Services, Inc.,
Debtor and Debtor in Possession
Jason S. Brookner**

Aaron M. Kaufman

Lydia R. Webb

Amber M. Carson

**/s/ Matthew J Dundon
Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930
[Email: md@dundon.com](mailto:md@dundon.com)**

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Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$39,948.40** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$31,958.72** to be currently paid upon no objection, and 100% of **\$202.55** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: February 1, 2024

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon
10 Bank Street, Suite 1100
White Plains, NY 10606
Telephone: (914) 341-1188
[Email: md@dundon.com](mailto:md@dundon.com)

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

**Billing Detail Description of Fees,
Hours and Descriptions by
Category**

Exhibit A

Date	Professional	Activity	Description	Total Time	Hourly Rate	Billable Amt
12/02/2023	Jordan Olsen	Business Analysis	Variance Report	2.00	\$350.00/hr	\$700.00
12/04/2023	Lee Rooney	Business Analysis	Telecom with J. Olsen and H. Barlow re: case financials	0.50	\$650.00/hr	\$325.00
12/04/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the committee meeting with N. Zluticky, D. Barton, and others	0.80	\$650.00/hr	\$520.00
12/04/2023	Lee Rooney	Business Analysis	Review of case finances	0.40	\$650.00/hr	\$260.00
12/04/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.30	\$350.00/hr	\$105.00
12/04/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic UCC meeting	0.30	\$890.00/hr	\$267.00

12/04/2023	Heather Barlow	Business Analysis	Variance Analysis with L Rooney and J Olsen	0.50	\$790.00/hr	\$395.00
12/04/2023	Heather Barlow	Business Analysis	Attend UCC Meeting with L Rooney and N Zluticky and others	0.80	\$790.00/hr	\$632.00
12/10/2023	Lee Rooney	Business Analysis	Telecon with H. Barlow re: financial analysis in anticipation of mediation	1.90	\$650.00/hr	\$1,235.00
12/10/2023	Lee Rooney	Business Analysis	Review of financial analysis for mediation	1.50	\$650.00/hr	\$975.00
12/10/2023	Jordan Olsen	Business Analysis	Variance Report	2.00	\$350.00/hr	\$700.00
12/10/2023	Heather Barlow	Business Analysis	Prepare for mediation with L Rooney	1.80	\$790.00/hr	\$1,422.00
12/11/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the committee meeting	0.70	\$650.00/hr	\$455.00
12/11/2023	Lee Rooney	Business Analysis	Review of case finances	0.70	\$650.00/hr	\$455.00
12/11/2023	Lee Rooney	Business Analysis	Telecon with H. Barlow and J. Olsen re: DIP budget	0.40	\$650.00/hr	\$260.00
12/11/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.40	\$350.00/hr	\$140.00

12/11/2023	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in periodic meeting of UCC members and professionals.	0.80	\$890.00/hr	\$712.00
12/11/2023	Heather Barlow	Business Analysis	Variance report with J Olsen and L Rooney	0.50	\$790.00/hr	\$395.00
12/11/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Ucc call re mediation prep with N Zluticky and M Dundon and others	1.10	\$790.00/hr	\$869.00
12/12/2023	Lee Rooney	Business Analysis	Mediation prep with H. Barlow	2.40	\$650.00/hr	\$1,560.00
12/12/2023	Heather Barlow	Business Analysis	Prepare for mediation continued with L Rooney	2.30	\$790.00/hr	\$1,817.00
12/14/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the mediation process (by zoom) with N. Zluticky, J. Sontchi, and others	3.10	\$650.00/hr	\$2,015.00
12/14/2023	Heather Barlow	Plan and Disclosure Statement	Attend in person and zoom mediation with Judge Sontchi in NYC and mediation parties and prepare November fee application	8.00	\$790.00/hr	\$6,320.00
12/14/2023	Matthew Dundon	Case Administration	Discussion of 1Q24 budget with UCC counsel and H. Barlow	1.00	\$890.00/hr	\$890.00
12/14/2023	Matthew Dundon	Plan and Disclosure Statement	Participation in second Plan mediation	9.50	\$890.00/hr	\$8,455.00

12/17/2023	Jordan Olsen	Business Analysis	Variance Report	2.00	\$350.00/hr	\$700.00
12/18/2023	Heather Barlow	Business Analysis	Review Variance report with J Olsen and L Rooney	0.50	\$790.00/hr	\$395.00
12/18/2023	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC meeting with D Barton and N Zluticky	0.50	\$790.00/hr	\$395.00
12/18/2023	Heather Barlow	Case Administration	Attend case status update with Judge Lopez Z Hemingway and others	0.40	\$790.00/hr	\$316.00
12/18/2023	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.50	\$350.00/hr	\$175.00
12/18/2023	Lee Rooney	Business Analysis	Review of the Debtor financials	0.40	\$650.00/hr	\$260.00
12/18/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: case financials	0.50	\$650.00/hr	\$325.00
12/18/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with D. Barton, N. Zuticky, and others	0.40	\$650.00/hr	\$260.00
12/18/2023	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the status hearing with J. Jones, Zimmerman, and others.	0.30	\$650.00/hr	\$195.00

12/21/2023	Heather Barlow	Business Analysis	Discuss budget related items with M Dundon and estimate forward demands	0.30	\$790.00/hr	\$237.00
12/25/2023	Jordan Olsen	Business Analysis	Variance Report	1.50	\$350.00/hr	\$525.00
12/26/2023	Lee Rooney	Business Analysis	Review of variance analysis book	0.60	\$650.00/hr	\$390.00
12/26/2023	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: variance report	0.50	\$650.00/hr	\$325.00
12/27/2023	Heather Barlow	Business Analysis	Variance report with L Rooney and J Olsen	0.50	\$790.00/hr	\$395.00
01/01/2024	Jordan Olsen	Business Analysis	Variance report	2.00	\$350.00/hr	\$700.00
01/01/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC meeting with D Barton and Z Hemenway and others	0.50	\$790.00/hr	\$395.00
01/02/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.30	\$350.00/hr	\$105.00
01/02/2024	Lee Rooney	Business Analysis	Review of case financials	0.70	\$650.00/hr	\$455.00
01/02/2024	Heather Barlow	Business Analysis	Perform variance analysis with L Rooney and J Olsen	0.30	\$790.00/hr	\$237.00

01/04/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation on regular UCC member and professional call	0.30	\$890.00/hr	\$267.00
01/06/2024	Jordan Olsen	Business Analysis	Variance Report	1.50	\$350.00/hr	\$525.00
01/08/2024	Lee Rooney	Business Analysis	Review of variance deck from Ankura	0.70	\$650.00/hr	\$455.00
01/08/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecon with H. Barlow and J. Olsen re: variance	0.50	\$650.00/hr	\$325.00
01/08/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Metting	0.40	\$350.00/hr	\$140.00
01/08/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic meeting of UCC.	0.40	\$890.00/hr	\$356.00
01/08/2024	Heather Barlow	Business Analysis	Variance analysis with L Rooney and J Olsen	0.50	\$790.00/hr	\$395.00
01/08/2024	Heather Barlow	Business Analysis	Attend weekly UCC meeting with N Zluticky and M Dundon and others	0.50	\$790.00/hr	\$395.00
01/11/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Call with Heather	0.20	\$350.00/hr	\$70.00

01/15/2024	Jordan Olsen	Case Administration	Variance Report	1.50	\$350.00/hr	\$525.00
01/15/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Periodic UCC meeting participation.	0.50	\$890.00/hr	\$445.00
01/15/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC Meeting with D Barton, N Zluticky and others	0.20	\$790.00/hr	\$158.00
01/16/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Review of the motion to dismiss	0.80	\$650.00/hr	\$520.00
01/16/2024	Matthew Dundon	Business Analysis	Review of TCC motion to dismiss.	0.50	\$890.00/hr	\$445.00
01/16/2024	Matthew Dundon	Other Professionals' Retention and Fee Applications	Review of TCC motion to retain Province as financial adviser	0.30	\$890.00/hr	\$267.00
01/17/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecom with H. Barlow re: motion to dismiss / settlement	0.50	\$650.00/hr	\$325.00
01/17/2024	Heather Barlow	Business Analysis	Review Motion to dismiss, other filings and workstreams (2.1). Discussion with L Rooney. (0.5)	2.60	\$790.00/hr	\$2,054.00
01/21/2024	Jordan Olsen	Business Analysis	Variance Report	1.00	\$350.00/hr	\$350.00

01/22/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the UCC call with N. Zluticky, and others	1.00	\$650.00/hr	\$650.00
01/22/2024	Lee Rooney	Business Analysis	Review of budget performance with telecon with H. Barlow and J. Olsen	0.80	\$650.00/hr	\$520.00
01/22/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.10	\$350.00/hr	\$35.00
01/22/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC meeting D Barton N Zluticky and others	1.00	\$790.00/hr	\$790.00
01/22/2024	Heather Barlow	Business Analysis	Variance analysis with J Olsen	0.30	\$790.00/hr	\$237.00
01/28/2024	Jordan Olsen	Business Analysis	Variance report	1.50	\$350.00/hr	\$525.00
01/29/2024	Lee Rooney	Business Analysis	Review of new budget and financial performance	1.40	\$650.00/hr	\$910.00
01/29/2024	Lee Rooney	Business Analysis	Telecon with J. Olsen, H. Barlow, and M. Dundon re: Debtor finances	0.60	\$650.00/hr	\$390.00
01/29/2024	Heather Barlow	Business Analysis	Review with J Olsen, L Rooney and discussion with M Dundon re hearing support and new budget	0.60	\$790.00/hr	\$474.00

01/29/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting with D. Barton, N. Zluticky, and others	1.00	\$650.00/hr	\$650.00
01/29/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC call with D Barton E Monzo and others	1.00	\$790.00/hr	\$790.00
01/29/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.50	\$350.00/hr	\$175.00
01/31/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the hearing with J. Lopez, N. Zluticky, and others	0.90	\$650.00/hr	\$585.00
01/31/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend case status hearing online with TH J C Lopez, N Zluticky and others coordinate depo times with M Dundon and N Zluticky	1.00	\$790.00/hr	\$790.00
			Total	81.00		\$54,202.00
					80%	\$31,958.72
					20%	\$7,989.68
					100%	\$39,948.40
					BHR	\$493.19

Exhibit B

Car Service for documents on behalf
of counsel during mediation – Total
Expenses

\$202.55

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

TEHUM CARE SERVICES., INC.¹

Case No. 23-90086 (CML)

Debtor.

**Objection Deadline: February 21, 2024 at 4:00 p.m.
(ET)**

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the SIXTH MONTHLY Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period DECEMBER 1, 2023 Through and Including JANUARY 30, 2024* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated February 1, 2024

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re TEHUM CARE SERVICES., INC. ¹ <p style="text-align: center;">Debtor.</p>	§ § § § § § § §	Chapter 11 Case No. 23-90086 (CML)
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**COVERSHEET TO THE SEVENTH MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 2024**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	02/01/2024	02/29/2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$71,240.00
Total professional hours covered by this Application:	123.1
Average hourly rate for professionals:	\$578.72
Total expense reimbursements requested in this Application:	\$2,238.61
Total fees and expenses requested in this Application:	\$73,478.61 (After voluntary rate reduction of \$21,769.00)
Total fees and expenses awarded final in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023. Remediation occurred 12/14/2023	

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

<p>In re:</p> <p>TEHUM CARE SERVICES., INC.²</p> <p style="text-align: center;">Debtor.</p>	<p>Chapter 11</p> <p>Case No. 23-90086 (CML)</p> <p>Objection Deadline: April 1, 2024 at 4:00 p.m. (ET)</p>
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**SUMMARY OF SEVENTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC
AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FEBRUARY 1, 2024 THROUGH AND INCLUDING FEBRUARY 29, 2024**

Name of Applicant: Dundon Advisers LLC Authorized to provide professional services to: The Official Committee of Unsecured Creditors

P e t i t i o n D a t e : F e b r u a r y 1 3 , 2 0 2 3

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and reimbursement is sought: FEBRUARY 1, 2024 through FEBRUARY 29, 2024

Amount of compensation sought as actual, reasonable, and necessary: \$71,240.00 (80% = \$56,992.00)

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$2,238.61

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023- 07/31/2023	\$167,893.10	\$0.00	\$82,158.44 Sept. 2023	None
08/01/2023- 08/31/2023	\$100,700.41	4,956.38	\$137,675.15 Dec. 2023	None
09/01/2023- 09/30/2023	\$25,470.80	\$3,213.55	\$0.00	None
10/01/2023- 10/31/2023	\$39,577.60	\$0.00	\$0.00	None
11/01/2023- 11/30/2023	\$19,005.60	\$0.00	\$0.00	None

Period	Amount Requested	Expenses	Amount Paid	Objections
12/01/2023-01/31/2024	\$39,948.40	\$202.55	\$0.00	None
As of 02/01/2024	<i>\$392,595.91 Total Fees to Date</i>	<i>\$8,372.48 Total Expenses to Date</i>	<i>\$219,833.59 Paid Fees and Expenses to Date (80% Fees and 100% Expenses through August 2023)</i>	
				TBD 04/01/2024
02/01/2024-02/29/2024	\$71,240.00	\$2,238.61	\$0.00	

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 2024**

Professional	Title	Rate July 1, 2022 – June 30, 2023³	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	29.4	\$19,992.00
Heather Barlow	Managing Director	\$604.00	\$604.00	42.7	\$25,790.80
Lee Rooney*	Senior Director	\$420.00	\$420.00/ \$535.00	43.6	\$23,326.00
Jordan Olsen	Associate	\$288.00	\$288.00	7.4	\$2,131.20
<i>* Promoted 1/1/2024; new rate is a proportional reduction from his \$700 per hour</i>					
		Blended	\$578.72	123.1	\$71,240.00
		Hourly Rate		80%	\$56,992.00

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total \$71,240.00 here shows a voluntary reduction of \$21,769.00 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 2024

Category	Hours Billed	Fees (excluding voluntary rate discount)
Business Analysis	110.6	\$63,855.40
Committee Member/Professional Meetings & Communications	9.1	\$5,331.00
Retention and Fee Applications	3.4	\$2,053.60
Total Standard Rates		\$93,009.00
Voluntary Reduction		-14,253.60
Amended Fees		\$71,240.00
Blended Hourly Rate	\$578.72	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtors.

Chapter 11

Case No. 23-10497 (CTG)

Objection Deadline: April 1, 2024 at 4:00 p.m.

**SEVENTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 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/](https://ecf.txsb.uscourts.gov/)
WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED.
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) (the “Local Bankruptcy Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of TEHUM CARE SERVICES. INC (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its

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.

SEVENTH MONTHLY application (the "Application") for allowance of compensation and reimbursement of expenses for the period of FEBRUARY 1, 2024 through and including FEBRUARY 29, 2024 (the "Compensation Period"). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of **\$71,240.00** less a twenty percent (20%) holdback in the amount of **\$14,248.00**, for an immediately payable fee request of **\$56,992.00**. Additionally, immediately due and payable reasonable expenses of **\$2,238.61** were recorded during the fee period. In support of this Application, Dundon respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

Background

3. On February 13, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the "U.S. Trustee") appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke's Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell. On March

9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

5. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

6. On April 14, 2023, (DCKT. #0357) the Court entered the Interim Compensation Order.

7. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24, 2023* [Docket No. 0796] (the “Dundon Retention Order”).

Compensation Paid and Its Source

8. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application complies with

sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 20162, applicable law and the Interim Compensation Order.

11. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached hereto as **Exhibit B.**

Summary of Services Rendered

12. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

13. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

14. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

**COMPENSATION BY PROJECT CATEGORY
FEBRUARY 1, 2024 – FEBRUARY 29, 2024**

Category	Hours Billed	Fees
Business Analysis	110.6	\$63,855.40
Committee Member/Professional Meetings & Communications	9.1	\$5,331.00
Retention and Fee Applications	3.4	\$2,053.60
Total Standard Rates		\$93,009.00
Voluntary Reduction		-14,253.60
Amended Fees		\$71,240.00
Blended Hourly Rate	\$578.72	

15. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	110.6	\$63,855.40
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16. This category includes time spent on analysis of the Debtors and issues related therein.

17. This category includes time spent with case administration of the Debtors and issues related therein.

Case Administration		
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18. This category includes time spent on analysis of the Debtors claims and issues related therein.

Committee Member/Professional Meetings & Communications	9.1	\$5,331.00
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19. This category includes all time spent with Committee members or professionals and communications therein.

Investigations		
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20. This category includes all time spent with Investigations and communications therein.

Plan & Disclosure Statement /Mediation		
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21. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Retention and Fee	3.4	\$2,053.60
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22. This category includes all time spent preparing and reviewing Dundon’s Fee Applications and for Monthly and interim in these proceedings.

Valuation of Services

23. Dundon’s professionals expended a total of 123.1 hours in connection with this matter during the Compensation Period² as follows:

²blank

Professional	Title	Rate July 1,	Rate July 1,	Hours	Amount
Matthew	Principal	\$680.00	\$680.00	29.4	\$19,992.00
Heather	Managing	\$604.00	\$604.00	42.7	\$25,790.80
Lee	Director	\$420.00	\$420.00	43.6	\$23,326.00
Jordan	Associate	\$288.00	\$288.00	7.4	\$2,131.20
				123.1	\$71,240.00
				BHR	\$578.72
<i>Reflects</i>	<i>Voluntary</i>	<i>Reduced</i>	<i>Rates</i>		

24. The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are Dundon’s normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is **\$71,240.00**. Expenses of **\$2,238.61** are set forth in **Exhibit B**.

Certification

25. A certification of Matthew J. Dundon is attached hereto as **Exhibit C** and made part of this Application.

No Prior Request

26. No prior request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2022 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

⁴ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$55,734.40 during this period.

upon all relevant criteria, including the results achieved in the case - as a whole.

27. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Dundon is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Dundon has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

Notice

28. Notice of this Application will be provided to the Fee Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

*TEHUM CARE SERVICES INC., et al.*⁵

Debtors.

Chapter 11

Case No.

(Jointly Administered)

Hearing Date: *Only if Objections are Filed*

Objection Deadline: April 1, 2024 at 4:00 p.m. (ET)

NOTICE OF FEE APPLICATION

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on February 1, 2024, pursuant to the Interim Compensation Order.

Ha.Nguyen@usdoj.gov

Andrew.Jimenez@usdoj.gov

kristian.gluck@nortonrosefulbright.com

julie.harrison@nortonrosefulbright.com

nicholas.zluticky@stinson.com

Phillip.Ashfield@stinson.com

ed.caldie@stinson.com

jbrookner@grayreed.com

akaufman@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

Russell.perry@ankura.com

Tehum Care Services – Russell Perry, CRO

**OFFICE OF THE UNITED
STATES TRUSTEE for the
Southern District of Texas:**

Ha M. Nguyen, Esq.

Andrew Jimenez, Esq.

**NORTON ROSE FULBRIGHT as
Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.**

Julie Goodrich Harrison, Esq.

**STINSON LLP as Counsel to
the Committee
Nicholas Zluticky, Esq.**

Phillip Ashfield, Esq.

Edwin H. Caldie, Esq.

**Tehum Care Services, Inc.,
Debtor and Debtor in Possession
Jason S. Brookner**

Aaron M. Kaufman

Lydia R. Webb

Amber M. Carson

**/s/ Matthew J Dundon
Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930
[Email: md@dundon.com](mailto:md@dundon.com)**

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Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$71,240.00** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$56,992.00** to be currently paid upon no objection, and 100% of **\$2,238.61** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: March 10, 2024

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon
10 Bank Street, Suite 1100
White Plains, NY 10606
Telephone: (914) 341-1188
[Email: md@dundon.com](mailto:md@dundon.com)

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

**Billing Detail Description of Fees,
Hours and Descriptions by
Category**

Exhibit A

Date Start: 2/1/2024 | Date End: 2/29/2024 | Clients: Tehum Care Services

Date	Professional	Activity	Description	Billable Time	Voluntary reduced Hourly Rate	Billable Amt
02/01/2024	Heather Barlow	Retention and Fee Applications	Prepare December and January Fee Applications for counsel.	3.40	\$604.00	\$2,053.60
02/02/2024	Heather Barlow	Business Analysis	Prepare items for team for depo. Discussion with M Dundon and L Rooney Re same.	1.80	\$604.00	\$1,087.20
02/05/2024	Heather Barlow	Business Analysis	Variance analysis with L Rooney and J Olsen.	0.50	\$604.00	\$302.00
02/05/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Weekly UCC meeting and case update with N Zluticky and D Barton and others	0.80	\$604.00	\$483.20
02/12/2024	Heather Barlow	Business Analysis	Variance analysis with J Olsen and L Rooney	0.50	\$604.00	\$302.00

02/12/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend weekly UCC call with N Zluticky, D Barton and others	1.00	\$604.00	\$604.00
02/13/2024	Heather Barlow	Business Analysis	Depo prep with N Zluticky and L Rooney	0.50	\$604.00	\$302.00
02/15/2024	Heather Barlow	Business Analysis	Depo prep with Dundon team and Stinson team	2.30	\$604.00	\$1,389.20
02/15/2024	Heather Barlow	Business Analysis	Continued Depo prep with M Dundon and Z Hemenway and others	2.10	\$604.00	\$1,268.40
02/16/2024	Heather Barlow	Business Analysis	Attend part of depo prep for R Perry by BR with Z Hemenway - time less breaks	4.30	\$604.00	\$2,597.20
02/17/2024	Heather Barlow	Business Analysis	Hearing Prep for M Dundon with N Zluticky Z Hemenway and others	2.50	\$604.00	\$1,510.00
02/18/2024	Heather Barlow	Business Analysis	Review Variance Analysis. Discussion with J Olsen re same. Prepare scope for M Dundon prep session.	1.40	\$604.00	\$845.60
02/19/2024	Heather Barlow	Business Analysis	Hearing and depo prep with M Dundon,L Rooney	1.00	\$604.00	\$604.00

02/19/2024	Heather Barlow	Business Analysis	Hearing and depo prep with M Dundon, N Zluticky and others, less breaks	3.50	\$604.00	\$2,114.00
02/20/2024	Heather Barlow	Business Analysis	M Dundon deposition 9019 A Kauffmann and L Rooney and others	3.50	\$604.00	\$2,114.00
02/22/2024	Heather Barlow	Business Analysis	Participate on UCC Meeting with D Barton and others	0.50	\$604.00	\$302.00
02/23/2024	Heather Barlow	Business Analysis	Atkinson report review	0.50	\$604.00	\$302.00
02/24/2024	Heather Barlow	Business Analysis	L Rooney discuss re Tehum analysis	1.30	\$604.00	\$785.20
02/24/2024	Heather Barlow	Business Analysis	L Rooney and A Wickelgren re Tehum analysis	1.10	\$604.00	\$664.40
02/24/2024	Heather Barlow	Business Analysis	Follow up with M Dundon	0.30	\$604.00	\$181.20
02/24/2024	Heather Barlow	Business Analysis	Hearing prep with N Zluticky and M Dundon and others	1.00	\$604.00	\$604.00

02/25/2024	Heather Barlow	Business Analysis	Preparation for M Atkinson depo	1.20	\$604.00	\$724.80
02/26/2024	Heather Barlow	Business Analysis	Attend via zoom M Atkinson deposition 9-6:30pm with breaks	7.00	\$604.00	\$4,228.00
02/28/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Weekly UCC Meeting with N Zluticky, D Barton and others	0.70	\$604.00	\$422.80
02/04/2024	Jordan Olsen	Business Analysis	Variance report	1.50	\$288.00	\$432.00
02/05/2024	Jordan Olsen	Business Analysis	Zoom Meeting	0.30	\$288.00	\$86.40
02/11/2024	Jordan Olsen	Business Analysis	Variance Report	1.50	\$288.00	\$432.00
02/12/2024	Jordan Olsen	Business Analysis	Zoom Meeting	0.30	\$288.00	\$86.40
02/18/2024	Jordan Olsen	Business Analysis	Variance Report	1.50	\$288.00	\$432.00

02/19/2024	Jordan Olsen	Business Analysis	File pull from the data room fair value production by FTI	0.50	\$288.00	\$144.00
02/25/2024	Jordan Olsen	Business Analysis	Variance Report	1.50	\$288.00	\$432.00
02/26/2024	Jordan Olsen	Business Analysis	Zoom meeting	0.30	\$288.00	\$86.40
02/02/2024	Lee Rooney	Business Analysis	Review of analysis with H. Barlow	0.60	\$535.00	\$321.00
02/02/2024	Lee Rooney	Business Analysis	Depo preparation	1.80	\$535.00	\$963.00
02/05/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with N. Zluticky, D. Barton, and others	0.80	\$535.00	\$428.00
02/05/2024	Lee Rooney	Business Analysis	Review of case financials, fifth motion for financing	0.90	\$535.00	\$481.50
02/05/2024	Lee Rooney	Business Analysis	Telecom with H. Barlow and J. Olsen re: budgetary concerns	0.50	\$535.00	\$267.50

02/12/2024	Lee Rooney	Business Analysis	Review of case financials	0.70	\$535.00	\$374.50
02/12/2024	Lee Rooney	Business Analysis	Telecon with H. Barlow and J. Olsen re: budget variances	0.30	\$535.00	\$160.50
02/12/2024	Lee Rooney	Business Analysis	Participated in weekly committee meeting with N. Zluticky, D. Barton, and others	0.90	\$535.00	\$481.50
02/13/2024	Lee Rooney	Business Analysis	Attended the depo prep of D. Barton	0.70	\$535.00	\$374.50
02/15/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Depo prep with H. Barlow and Stinson	2.30	\$535.00	\$1,230.50
02/16/2024	Lee Rooney	Business Analysis	Attended the deposition of Russell Perry	4.70	\$535.00	\$2,514.50
02/17/2024	Lee Rooney	Business Analysis	Attended the depo prep of M. Dundon	2.50	\$535.00	\$1,337.50
02/19/2024	Lee Rooney	Business Analysis	Participated in the testimony/depo hearing prep	3.40	\$535.00	\$1,819.00

02/19/2024	Lee Rooney	Business Analysis	Testimony preparation with M. Dundon and H. Barlow	0.90	\$535.00	\$481.50
02/19/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting	0.70	\$535.00	\$374.50
02/20/2024	Lee Rooney	Business Analysis	Attended the deposition of M.J. Dundon	3.30	\$535.00	\$1,765.50
02/22/2024	Lee Rooney	Business Analysis	Participated in the weekly committee meeting with D. Barton, Z. Hemenway, and others	0.50	\$535.00	\$267.50
02/23/2024	Lee Rooney	Business Analysis	Review of Province Declaration	1.30	\$535.00	\$695.50
02/24/2024	Lee Rooney	Business Analysis	Telecon with H. Barlow re: depo prep	1.30	\$535.00	\$695.50
02/24/2024	Lee Rooney	Business Analysis	Preparation in anticipation of deposition and hearing	3.70	\$535.00	\$1,979.50
02/24/2024	Lee Rooney	Business Analysis	Telecon with H. Barlow re: Province declaration	1.10	\$535.00	\$588.50

02/25/2024	Lee Rooney	Business Analysis	Depo prep, document review	2.70	\$535.00	\$1,444.50
02/26/2024	Lee Rooney	Business Analysis	Attended the depo via zoom of M. Atkinson	6.40	\$535.00	\$3,424.00
02/27/2024	Lee Rooney	Business Analysis	Analysis of case financials	0.80	\$535.00	\$428.00
02/28/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Attended the weekly committee meeting with D. Barton, N. Zluticky, and others	0.80	\$535.00	\$428.00
02/02/2024	Matthew Dundon	Business Analysis	Initial review of deposition / testimony preparation materials.	1.50	\$680.00	\$1,020.00
02/05/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Weekly UCC meeting and case update with N Zluticky and D Barton and others	0.80	\$680.00	\$544.00
02/05/2024	Matthew Dundon	Business Analysis	Review of correspondence in relation to value / potential of ERC credits	0.30	\$680.00	\$204.00
02/12/2024	Matthew Dundon	Business Analysis	Participated in weekly committee meeting with N. Zluticky, D. Barton, and others	0.90	\$680.00	\$612.00

02/16/2024	Matthew Dundon	Business Analysis	Personal deposition preparation time (document review, etc.)	3.50	\$680.00	\$2,380.00
02/17/2024	Matthew Dundon	Business Analysis	Testimony and deposition preparation	2.50	\$680.00	\$1,700.00
02/19/2024	Matthew Dundon	Business Analysis	Internal testimony preparation with L. Rooney and H. Barlow	0.90	\$680.00	\$612.00
02/19/2024	Matthew Dundon	Business Analysis	Hearing and depo prep with N Zluticky and others, less breaks	3.50	\$680.00	\$2,380.00
02/19/2024	Matthew Dundon	Business Analysis	Personal deposition preparation time, continued	2.00	\$680.00	\$1,360.00
02/19/2024	Matthew Dundon	Business Analysis	Prep follow-up session with N. Zluticky	0.50	\$680.00	\$340.00
02/20/2024	Matthew Dundon	Business Analysis	Sat for TCC deposition.	3.50	\$680.00	\$2,380.00
02/22/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with D. Barton, Z. Hemenway, and others	0.50	\$680.00	\$340.00

02/24/2024	Matthew Dundon	Business Analysis	Review of Province Declaration	2.00	\$680.00	\$1,360.00
02/25/2024	Matthew Dundon	Business Analysis	Drafting of memo regarding Atkinson declaration treatment of claims analysis.	1.50	\$680.00	\$1,020.00
02/26/2024	Matthew Dundon	Business Analysis	My attendance at Mike Atkinson deposition.	4.50	\$680.00	\$3,060.00
02/28/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Weekly UCC Meeting with N Zluticky, D Barton and others	0.70	\$680.00	\$476.00
02/28/2024	Matthew Dundon	Business Analysis	Prep session with N. Zluticky	0.30	\$680.00	\$204.00

Grand Total				123.10		\$71,240.00
			Standard Dundon Rates	123.10		\$93,009.00
			Voluntary Reduction			\$21,769.00
					80%	\$56,992.00
					20%	\$14,248.00
					100%	\$71,240.00
					Blended	
					Hourly Rate	\$578.72

Exhibit B

M J Dundon Expenses 9019 Hearing

Vendor	Purchase Date	Use Date	Description	Amount	Note
United Airlines	1/31/2024	3/4/2024	EWR to IAH	\$125.00	Lesser of actual or to/ex Chicago economy
United Airlines	2/7/2024	3/6/2024	IAH to EWR	\$125.00	Lesser of actual or to/ex Chicago economy
C. Baldwin Hotel	2/7/2024	3/4/24 - 3/6/24	Two nights	\$745.01	Receipt
Uber	3/4/2024	3/4/2024	Home to Airport	\$83.98	Receipt - partial charge with inadvertent cancelation discount
Uber	3/4/2024	3/4/2024	Home to Airport	\$50.00	Cash - required because trip inadvertently canceled

Uber	3/4/2024	3/4/2024	Airport to Office	\$53.64	Receipt
Uber	3/4/2024	3/4/2024	Office to Hotel	\$25.88	Receipt
Uber	3/5/2024	3/5/2024	Hotel to Office	\$20.91	Receipt
Poke	3/5/2024	3/5/2024	Dinner	\$32.95	Receipt
Uber	3/6/2024	3/6/2024	Hotel to Airport	\$55.86	Receipt
Lyft	3/6/2024	3/6/2024	Airport to Office	\$88.78	Receipt
C. Baldwin Hotel	3/6/2024	3/4/24 - 3/6/24	Destination fee, 1 meal, tax	\$57.78	Receipt
United Airlines	3/10/2024	3/27/2024	EWR to IAH	\$243.00	Lesser of actual or to/ex Chicago economy
United Airlines	3/10/2024	3/28/2024	IAH to EWR	\$243.00	Lesser of actual or to/ex Chicago economy
IAH Marriott	3/10/2024	3/27/24 - 3/28/24	One night	\$287.82	Receipt
TOTAL				\$2,238.61	

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

TEHUM CARE SERVICES., INC.¹

Case No. 23-90086 (CML)

Debtor.

Objection Deadline: April 1, 2024 at 4:00 p.m. (ET)

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the SEVENTH MONTHLY Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period FEBRUARY 1, 2024 Through and Including FEBRUARY 29, 2024* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated March 10, 2024

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re TEHUM CARE SERVICES., INC. ¹ <p style="text-align: center;">Debtor.</p>	§ § § § § § § §	Chapter 11 Case No. 23-90086 (CML)
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**COVERSHEET TO THE EIGHTH MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM MARCH 1, 2024 THROUGH MARCH 31, 2024**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
FIRST MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	03/01/2024	03/31/2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$78,413.60
Total professional hours covered by this Application:	134.5
Average hourly rate for professionals:	\$583.00
Total expense reimbursements requested in this Application:	\$289.39
Total fees and expenses requested in this Application:	\$73,478.61 (After voluntary rate reduction of \$23,869.40)
Total fees and expenses awarded final in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023. Remediation occurred 12/14/2023	

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

<p>In re:</p> <p>TEHUM CARE SERVICES., INC.²</p> <p style="text-align: center;">Debtor.</p>	<p>Chapter 11</p> <p>Case No. 23-90086 (CML)</p> <p>Objection Deadline: April 22, 2024 at 4:00 p.m. (ET)</p>
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SUMMARY OF EIGHTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD MARCH 1, 2024 THROUGH AND INCLUDING MARCH 31, 2024

Name of Applicant: Dundon Advisers LLC Authorized to provide professional services to: The Official Committee of Unsecured Creditors

P e t i t i o n D a t e : F e b r u a r y 1 3 , 2 0 2 3

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and reimbursement is sought: MARCH 1, 2024 through MARCH 31, 2024

Amount of compensation sought as actual, reasonable, and necessary: \$78,413.60 (80% = \$62,730.880)

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$289.39

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023- 07/31/2023	\$167,893.10	\$0.00	\$82,158.44 Sept. 2023	None
08/01/2023- 08/31/2023	\$100,700.41	4,956.38	\$137,675.15 Dec. 2023	None
09/01/2023- 09/30/2023	\$25,470.80	\$3,213.55	\$0.00	None
10/01/2023- 10/31/2023	\$39,577.60	\$0.00	\$0.00	None
11/01/2023- 11/30/2023	\$19,005.60	\$0.00	\$0.00	None

Period	Amount Requested	Expenses	Amount Paid	Objections
12/01/2023-01/31/2024	\$39,948.40	\$202.55	\$0.00	None
As of 02/01/2024	<i>\$392,595.91 Total Fees to Date</i>	<i>\$8,372.48 Total Expenses to Date</i>	<i>\$219,833.59 Paid Fees and Expenses to Date (80% Fees and 100% Expenses through August 2023)</i>	
02/01/2024-02/29/2024	\$71,240.00	\$2,238.61	\$0.00	None
03/01/2024-03/31/2024	\$78,413.60	\$289.39	\$0.00	

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD MARCH 1, 2024 THROUGH MARCH 31, 2024**

Professional	Title	Rate July 1, 2022 – June 30, 2023³	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	\$46.4	\$31,552.00
Heather Barlow	Managing Director	\$604.00	\$604.00	38.3	\$23,133.20
Lee Rooney*	Senior Director	\$420.00	\$420.00/ \$535.00	38.0	\$20,330.00
Jordan Olsen	Associate	\$288.00	\$288.00	11.8	\$3,398.40
* Promoted 1/1/2024; new rate is a proportional reduction from his \$700 per hour				134.5	\$78,413.60
Blended Hourly Rate			\$583.00		

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total \$78,413.60 here shows a voluntary reduction of \$23,869.40 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
MARCH 1, 2024 THROUGH MARCH 31, 2024

Category	Hours Billed	Fees
Business Analysis	127.3	\$74,132.80
Committee Member/Professional Meetings & Communications	2.8	\$1,623.20
Retention and Fee Applications	4.4	\$2,657.60
Voluntarily Reduced Fees	134.5	\$78,413.60
Blended Hourly Rate		\$583.00

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEHUM CARE SERVICES., INC.¹

Debtors.

Chapter 11

Case No. 23-10497 (CTG)

Objection Deadline: April 22, 2024 at 4:00 p.m.

**EIGHTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD MARCH 1, 2024 THROUGH MARCH 31, 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/](https://ecf.txsb.uscourts.gov)
WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED.
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) (the “Local Bankruptcy Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of TEHUM CARE SERVICES. INC (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its

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.

EIGHTH MONTHLY application (the “Application”) for allowance of compensation and reimbursement of expenses for the period of MARCH 1, 2024 through and including MARCH 31, 2024 (the “Compensation Period”). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of **\$78,413.60** less a twenty percent (20%) holdback in the amount of **\$15,682.72**, for an immediately payable fee request of **\$62,730.88**. Additionally, immediately due and payable reasonable expenses of **\$289.39** were recorded during the fee period. In support of this Application, Dundon respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the “Court”) has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

Background

3. On February 13, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the “U.S. Trustee”) appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke’s Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell. On March

9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

5. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

6. On April 14, 2023, (DCKT. #0357) the Court entered the Interim Compensation Order.

7. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24, 2023* [Docket No. 0796] (the “Dundon Retention Order”).

Compensation Paid and Its Source

8. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application complies with

sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 20162, applicable law and the Interim Compensation Order.

11. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached hereto as **Exhibit B.**

Summary of Services Rendered

12. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

13. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

14. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

COMPENSATION BY PROJECT CATEGORY
MARCH 1, 2024 – MARCH 31, 2024

Category	Hours Billed	Fees
Business Analysis	127.3	\$74,132.80
Committee Member/Professional Meetings & Communications	2.8	\$1,623.20
Retention and Fee Applications	4.4	\$2,657.60
Voluntarily Reduced Fees	134.5	\$78,413.60
Blended Hourly Rate		\$583.00

15. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	127.3	\$74,132.80
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16. This category includes time spent on analysis of the Debtors and issues related therein.

17. This category includes time spent with case administration of the Debtors and issues related therein.

Case Administration		
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18. This category includes time spent on analysis of the Debtors claims and issues related therein.

Committee Member/Professional Meetings & Communications	2.8	\$1,623.20
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19. This category includes all time spent with Committee members or professionals and communications therein.

Investigations		
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20. This category includes all time spent with Investigations and communications therein.

Plan & Disclosure Statement /Mediation		
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21. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Retention and Fee	4.4	\$2,657.60
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22. This category includes all time spent preparing and reviewing Dundon’s Fee Applications and for Monthly and interim in these proceedings.

Valuation of Services

23. Dundon’s professionals expended a total of 134.5 hours in connection with this matter during the Compensation Period² as follows:

²blank

Professional	Title	Rate July 1,	Rate July 1,	Hours	Amount
Matthew	Principal	\$680.00	\$680.00	\$46.4	\$31,552.00
Heather	Managing	\$604.00	\$604.00	38.3	\$23,133.20
Lee	Director	\$420.00	\$420.00	38.0	\$20,330.00
Jordan	Associate	\$288.00	\$288.00	11.8	\$3,398.40
				BHR	\$583.00
<i>Reflects</i>	<i>Voluntary</i>	<i>Reduced</i>	<i>Rates</i>		

24. The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are Dundon’s normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is **\$78,413.60**. Expenses of **\$283.39** are set forth in **Exhibit B**.

Certification

25. A certification of Matthew J. Dundon is attached hereto as **Exhibit C** and made part of this Application.

No Prior Request

26. No prior request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2022 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

⁴ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$23,869.40 during this period.

upon all relevant criteria, including the results achieved in the case - as a whole.

27. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Dundon is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Dundon has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

Notice

28. Notice of this Application will be provided to the Fee Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

*TEHUM CARE SERVICES INC., et al.*⁵

Debtors.

Chapter 11

Case No.

(Jointly Administered)

Hearing Date: *Only if Objections are Filed*

Objection Deadline: April 22, 2024 at 4:00 p.m.

(ET)

NOTICE OF FEE APPLICATION

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on MARCH 1, 2024, pursuant to the Interim Compensation Order.

Ha.Nguyen@usdoj.gov

Andrew.Jimenez@usdoj.gov

kristian.gluck@nortonrosefulbright.com

julie.harrison@nortonrosefulbright.com

nicholas.zluticky@stinson.com

Phillip.Ashfield@stinson.com

ed.caldie@stinson.com

jbrookner@grayreed.com

akaufman@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

Russell.perry@ankura.com

Tehum Care Services – Russell Perry, CRO

**OFFICE OF THE UNITED
STATES TRUSTEE for the
Southern District of Texas:**

Ha M. Nguyen, Esq.

Andrew Jimenez, Esq.

**NORTON ROSE FULBRIGHT as
Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.**

Julie Goodrich Harrison, Esq.

**STINSON LLP as Counsel to
the Committee
Nicholas Zluticky, Esq.**

Phillip Ashfield, Esq.

Edwin H. Caldie, Esq.

**Tehum Care Services, Inc.,
Debtor and Debtor in Possession
Jason S. Brookner**

Aaron M. Kaufman

Lydia R. Webb

Amber M. Carson

**/s/ Matthew J Dundon
Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930
[Email: md@dundon.com](mailto:md@dundon.com)**

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Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$78,413.60** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$62,730.88** to be currently paid upon no objection, and 100% of **\$289.39** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: April 2, 2024

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon
10 Bank Street, Suite 1100
White Plains, NY 10606
Telephone: (914) 341-1188
[Email: md@dundon.com](mailto:md@dundon.com)

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

**Billing Detail Description of Fees,
Hours and Descriptions by
Category**

Exhibit A

Dundon Advisers LLC - Time Entry

Date Start: 3/1/2024 | Date End: 3/31/2024 | Clients: Tehum Care Services

Date	Professional	Activity	Description	Billable Time	Standard Hourly Rate	Billable Amt
03/01/2024	Heather Barlow	Business Analysis	9019 hearing with N Zluticky, Z Hemenway and others (excluding breaks)	5.10	604	\$3,080.40
03/02/2024	Heather Barlow	Business Analysis	Hearing prep with M Dundon N Zluticky and others	1.10	604	\$664.40
03/04/2024	Heather Barlow	Business Analysis	Variance report and case related issues with L Rooney and J Olsen re same	0.50	604	\$302.00
03/05/2024	Heather Barlow	Business Analysis	Tehum settlement hearing less breaks	5.30	604	\$3,201.20
03/10/2024	Heather Barlow	Business Analysis	Review workstream with L Rooney	1.10	604	\$664.40

03/10/2024	Heather Barlow	Retention and Fee Applications	Prepare February 2024 Fee App and circulate to Notice Parties	2.70	604	\$1,630.80
03/11/2024	Heather Barlow	Business Analysis	Variance analysis review with J Olsen and L Rooney	0.20	604	\$120.80
03/13/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Participation in regular meeting of UCC	0.60	604	\$362.40
03/18/2024	Heather Barlow	Business Analysis	Variance analysis with J Olsen	0.40	604	\$241.60
03/18/2024	Heather Barlow	Business Analysis	Weekly ucc workstream discussion	0.50	604	\$302.00
03/25/2024	Heather Barlow	Business Analysis	Variance analysis with J Olsen and L Rooney. Discussions with N Zluticky and M Dundon re same.	0.50	604	\$302.00
03/25/2024	Heather Barlow	Business Analysis	Attend hearing via zoom R Perry, I Lefkowitz and others excluding breaks	10.30	604	\$6,221.20
03/26/2024	Heather Barlow	Business Analysis	Depo prep session with counsel	3.10	604	\$1,872.40
03/27/2024	Heather Barlow	Business Analysis	Final Day of the 9019 hearing less breaks. 9:30am CT-9:36pm CT. Less Breaks	5.20	604	\$3,140.80
03/30/2024	Heather Barlow	Retention and Fee Applications	Prepare Eighth Monthly Fee Application	1.70	604	\$1,026.80

03/03/2024	Jordan Olsen	Business Analysis	Variance Report	1.50	288	\$432.00
03/04/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting	0.30	288	\$86.40
03/10/2024	Jordan Olsen	Business Analysis	Analysis of variance report	1.50	288	\$432.00
03/11/2024	Jordan Olsen	Business Analysis	Zoom Meeting review w/ H. Barlow and L. Rooney	0.20	288	\$57.60
03/17/2024	Jordan Olsen	Business Analysis	Analysis of variance report	1.50	288	\$432.00
03/18/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting review w/ H. Barlow and L. Rooney	0.30	288	\$86.40
03/24/2024	Jordan Olsen	Business Analysis	Analysis of variance report	1.50	288	\$432.00
03/25/2024	Jordan Olsen	Business Analysis	Zoom Meeting review w/ H. Barlow and L. Rooney	0.50	288	\$144.00
03/26/2024	Jordan Olsen	Business Analysis	Preparation for testimony with counsel and Dundon team	3.00	288	\$864.00
03/30/2024	Jordan Olsen	Business Analysis	Weekly variance report analysis and presentation update	1.50	288	\$432.00
03/01/2024	Lee Rooney	Business Analysis	Attended the settlement hearing	5.40	535	\$2,889.00

03/03/2024	Lee Rooney	Business Analysis	Hearing prep with H. Barlow	1.10	535	\$588.50
03/04/2024	Lee Rooney	Business Analysis	Review of the case financials	0.30	535	\$160.50
03/04/2024	Lee Rooney	Business Analysis	Participated in a financial call with H. Barlow and J. Olsen	0.40	535	\$214.00
03/05/2024	Lee Rooney	Business Analysis	Attended the settlement hearing on video conference	5.30	535	\$2,835.50
03/10/2024	Lee Rooney	Business Analysis	Review of workstreams, prep with H. Barlow	1.10	535	\$588.50
03/11/2024	Lee Rooney	Business Analysis	Telecon with H. Barlow and J. Olsen re: case financials	0.40	535	\$214.00
03/13/2024	Lee Rooney	Business Analysis	Participated in the weekly Committee meeting with D. Barton, E. Monzo, and others	0.60	535	\$321.00
03/25/2024	Lee Rooney	Business Analysis	Attended the continued hearing on the 9019 Settlement	9.30	535	\$4,975.50
03/25/2024	Lee Rooney	Business Analysis	Review of the case financials	0.30	535	\$160.50
03/25/2024	Lee Rooney	Business Analysis	Telecon with H. Barlow and J. Olsen re: case financials	0.50	535	\$267.50
03/26/2024	Lee Rooney	Business Analysis	Attended the hearing prep for M. Dundon with Z. Hemenway and N. Zluticky	3.20	535	\$1,712.00

03/27/2024	Lee Rooney	Business Analysis	Attended the Settlement hearing (less breaks)	10.10	535	\$5,403.50
03/02/2024	Matthew Dundon	Business Analysis	Compilation of hearing and producible deposition transcripts	1.50	680	\$1,020.00
03/02/2024	Matthew Dundon	Business Analysis	Trial opening review and testimony prep	0.50	680	\$340.00
03/03/2024	Matthew Dundon	Business Analysis	Non-working travel for hearing	3.00	680	\$2,040.00
03/04/2024	Matthew Dundon	Business Analysis	Review of outline of direct	0.00	680	\$0.00
03/04/2024	Matthew Dundon	Business Analysis	Review of outline of direct	0.50	680	\$340.00
03/04/2024	Matthew Dundon	Business Analysis	Hearing prep	9.00	680	\$6,120.00
03/05/2024	Matthew Dundon	Business Analysis	Hearing	5.70	680	\$3,876.00
03/06/2024	Matthew Dundon	Business Analysis	Non-working travel home from hearing	3.00	680	\$2,040.00
03/13/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in regular meeting of UCC	0.60	680	\$408.00
03/18/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participation in regular meeting of UCC	1.00	680	\$680.00

03/24/2024	Matthew Dundon	Business Analysis	Testimony preparation	1.10	680	\$748.00
03/26/2024	Matthew Dundon	Business Analysis	Testimony preparation	3.50	680	\$2,380.00
03/27/2024	Matthew Dundon	Business Analysis	Hearing attendance and testimony	11.00	680	\$7,480.00
03/27/2024	Matthew Dundon	Business Analysis	Non-working travel for hearing	3.00	680	\$2,040.00
03/28/2024	Matthew Dundon	Business Analysis	Non-working travel from hearing	3.00	680	\$2,040.00

Grand Total		134.50	
			\$78,413.60
	80%		\$62,730.88
	20%		\$15,682.72
	100%		\$78,413.60
	BHR		\$583.00

Exhibit B

Matt Dundon carefare expenses for 9019 Hearing Trip - \$289.39

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

TEHUM CARE SERVICES., INC.¹

Case No. 23-90086 (CML)

Debtor.

**Objection Deadline: April 22, 2024 at 4:00 p.m.
(ET)**

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the EIGHTH MONTHLY Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period MARCH 1, 2024 Through and Including MARCH 31, 2024* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated April 2, 2024

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re TEHUM CARE SERVICES., INC. ¹ <p style="text-align: center;">Debtor.</p>	§ § § § § § § §	Chapter 11 Case No. 23-90086 (CML)
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**COVERSHEET TO THE NINTH MONTHLY APPLICATION
OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM APRIL 1, 2024 THROUGH MAY 31, 2024**

Name of Applicant:	Dundon Advisers LLC	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 0796, July 14, 2023 - effective March 24, 2023	
MONTHLY APPLICATION		
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	04/01/2024	05/31/2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

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.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$44,178.70
Total professional hours covered by this Application:	80.3
Average hourly rate for professionals:	\$550.17
Total expense reimbursements requested in this Application:	\$151.92
Total fees and expenses requested in this Application:	\$44,330.62 (After voluntary rate reduction of \$13,239.30)
Total fees and expenses awarded final in all prior Applications:	\$0.00
Plan Status: TBD - Mediation occurred for August 21-23, 2023. Remediation occurred 12/14/2023 and again on May 6, 2024	

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

In re: Chapter 11
TEHUM CARE SERVICES., INC.² Case No. 23-90086 (CML)
Debtor. **Objection Deadline: June 25, 2024 at 4:00 p.m. (ET)**

**SUMMARY OF NINTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
APRIL 1, 2024 THROUGH AND INCLUDING MAY 31, 2024**

Name of Applicant: Dundon Advisers LLC Authorized to
provide professional services to: The Official Committee of Unsecured Creditors

P e t i t i o n D a t e : F e b r u a r y 1 3 , 2 0 2 3

Date of Retention: July 14, 2023 (Effective as of March 24, 2023)

Period for which compensation and
reimbursement is sought: APRIL 1, 2024 through MAY 31, 2024

Amount of compensation sought as
actual, reasonable, and necessary: \$44,178.70 (80% = \$35,342.96)

Amount of expense reimbursement sought
as actual, reasonable, and necessary: \$151.92

This is a(n): X monthly interim final application

² 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 OF PRIOR MONTHLY FEE APPLICATIONS

Period	Amount Requested	Expenses	Amount Paid	Objections
3/24/2023- 07/31/2023	\$167,893.10	\$0.00	\$82,158.44 Sept. 2023	None
08/01/2023- 08/31/2023	\$100,700.41	4,956.38	\$137,675.15 Dec. 2023	None
09/01/2023- 09/30/2023	\$25,470.80	\$3,213.55	\$0.00	None
10/01/2023- 10/31/2023	\$39,577.60	\$0.00	\$0.00	None
11/01/2023- 11/30/2023	\$19,005.60	\$0.00	\$0.00	None

Period	Amount Requested	Expenses	Amount Paid	Objections
12/01/2023-01/31/2024	\$39,948.40	\$202.55	\$0.00	None
As of 02/01/2024	<i>\$392,595.91 Total Fees to Date</i>	<i>\$8,372.48 Total Expenses to Date</i>	<i>\$219,833.59 Paid Fees and Expenses to Date (80% Fees and 100% Expenses through August 2023)</i>	
02/01/2024-02/29/2024	\$71,240.00	\$2,238.61	\$0.00	None
03/01/2024-03/31/2024	\$78,413.60	\$289.39	\$0.00	None
04/01/2024-05/31/2024	\$44,178.70	151.92	\$0.00	TBD

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
FOR THE PERIOD APRIL 1, 2024 THROUGH MAY 31, 2024**

Professional	Title	Rate July 1, 2022 – June 30, 2023³	Rate July 1, 2023 – June 30, 2024	Hours	Amount Earned
Matthew Dundon	Principal	\$680.00	\$680.00	22.7	\$15,436.00
Heather Barlow	Managing Director	\$604.00	\$604.00	21.5	\$12,986.00
Lee Rooney*	Senior Director	\$420.00	\$420.00/ \$535.00	21.1	\$11,288.50
Michael Garbe*	Senior Director		\$535.00	0.6	\$321.00
Jordan Olsen	Associate	\$288.00	\$288.00	14.4	\$4,147.20
<i>* Promoted 1/1/2024; new rate is a proportional reduction from his \$700 per hour</i>				80.3	\$44,178.70
Blended Hourly Rate			\$550.17		

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024, and each year thereafter. The Total \$44,178.70 here shows a voluntary reduction of \$13,239.30 off our standard fees.

COMPENSATION BY PROJECT CATEGORY
APRIL 1, 2024 THROUGH MAY 31, 2024

Category	Hours Billed	Fees
Business Analysis	32.8	\$15,042.30
Claims Analysis	4.8	\$2,709.50
Committee Member/Professional Meetings & Communications	18.7	\$10,927.70
Debtor Professional and Client Meeting	10.8	\$6,523.20
Plan and Disclosure Statement	13.2	\$8,976.00
Voluntarily Reduced Fees		-\$13,239.30
Blended Hourly Rate		\$550.17

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11
TEHUM CARE SERVICES., INC.¹ Case No. 23-10497 (CTG)
Debtors. Objection Deadline: June 25, 2024 at 4:00 p.m.

**NINTH MONTHLY APPLICATION OF DUNDON ADVISERS LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD APRIL 1, 2024 THROUGH MAY 31, 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/](https://ecf.txsb.uscourts.gov/)
WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED.
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

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”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) (the “Local Bankruptcy Rules”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “Interim Compensation Order”), Dundon Advisers LLC (“Dundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of TEHUM CARE SERVICES. INC (the “Debtor”) appointed in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), hereby submits its

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.

NINTH MONTHLY application (the "Application") for allowance of compensation and reimbursement of expenses for the period of APRIL 1, 2024 through and including MAY 31, 2024 (the "Compensation Period"). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed during the Compensation Period in the amount of **\$44,178.70** less a twenty percent (20%) holdback in the amount of **\$8,835.74**, for an immediately payable fee request of **\$35,342.96**. Additionally, immediately due and payable reasonable expenses of **\$151.92** were recorded during the fee period. In support of this Application, Dundon respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the Southern District of Texas (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

Background

3. On February 13, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

4. On March 2 and 6, 2023, the United States Trustee for Region 7 (the "U.S. Trustee") appointed the Committee pursuant to Bankruptcy Code section 1102 [Docket No. 0145]. The Committee currently comprises: (i) St. Luke's Health System, Ltd.; (ii) Capital Region Medical Center (iii) Maxim Healthcare Staffing Services, Inc.; (iv) Saint Alphonsus Health System, Inc.; (v) Truman Medical Center, Inc. d/b/a University Health; (vi) Rachell Garwood; and (vii) Latricia Revell. On March

9, 2023, the Committee selected Stinson LLP to serve as legal counsel to the Committee and on March 24, 2023, selected Dundon Advisers LLC to serve as its financial advisor.

5. On April 26, 2023, the Committee filed an application for entry of an order authorizing and approving the employment and retention of Dundon as financial advisor to the Committee [Docket No. 0450] (the “Dundon Retention Application”).

6. On April 14, 2023, (DCKT. #0357) the Court entered the Interim Compensation Order.

7. On July 14, 2023, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors of TEHUM CARE SERVICES, Inc., et al. to Retain and Employ Dundon Advisers LLC as Financial Advisor Effective as of March 24, 2023* [Docket No. 0796] (the “Dundon Retention Order”).

Compensation Paid and Its Source

8. All services for which compensation is requested by Dundon were performed for or on behalf of the Committee.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Dundon and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Compensation Period. To the best of Dundon’s knowledge, this Application complies with

sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 20162, applicable law and the Interim Compensation Order.

11. A summary of actual and necessary expenses and daily logs of expenses incurred by Dundon during the Compensation Period is attached hereto as **Exhibit B**.

Summary of Services Rendered

12. The Dundon professionals who have rendered professional services in these Chapter 11 Cases are as follows: Matthew Dundon, Heather Barlow, Lee Rooney, David Chen, Jordan Olsen, Michael Garbe and Christopher Podesfinski.

13. Dundon, by and through the above-named persons, has prepared and/or assisted in the preparation of retention applications and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with these Chapter 11 Cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

14. To provide a meaningful summary of Dundon’s services provided on behalf of the Committee, Dundon has established, in accordance with its internal billing procedures, certain subject project categories in connection with these Chapter 11 Cases. The following chart is a summary of the fees and hours billed for each project category during the Compensation Period:

COMPENSATION BY PROJECT CATEGORY
APRIL 1, 2024 – MAY 31, 2024

Category	Hours Billed	Fees
Business Analysis	32.8	\$15,042.30
Claims Analysis	4.8	\$2,709.50
Committee Member/Professional Meetings & Communications	18.7	\$10,927.70
Debtor Professional and Client Meeting	10.8	\$6,523.20
Plan and Disclosure Statement	13.2	\$8,976.00
Voluntarily Reduced Fees		-\$13,239.30
Blended Hourly Rate		\$550.17

15. The following is a summary, by matter category, of the professional services provided by Dundon during the Compensation Period. This summary is organized in accordance with Dundon’s internal system of project category codes.

Business Analysis	32.8	\$15,042.30
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16. This category includes time spent on analysis of the Debtors and issues related therein.

17. This category includes time spent with claims administration of the Debtors and issues related therein.

Claims Administration	4.8	\$2,709.50
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18. This category includes time spent with case administration of the Debtors and issues related therein.

Case Administration		
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19. This category includes time spent working with the UCC and its professionals with the Debtors claims and issues related therein.

Committee Member/Professional Meetings & Communications	18.7	\$10,927.70
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20. This category includes all time spent with Debtors professionals, Committee members or professionals and communications therein.

Debtor Professionals and client	10.8	\$6,523.20
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21. This category includes all time spent with mediation plan discussions and communications therein.

Plan & Disclosure Statement /Mediation	13.2	\$8,976.00
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22. This category includes all time spent analyzing the case mediation and plan process in these proceedings.

Retention and Fee	0.0	\$0.00
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23. This category includes all time spent preparing and reviewing Dundon’s Fee Applications and for Monthly and interim in these proceedings.

Valuation of Services

24. Dundon’s professionals expended a total of 80.3 hours in connection with this matter during the Compensation Period² as follows:

²blank

Professional	Title	Rate July 1,	Rate July 1,	Hours	Amount
Matthew Dundon	Principal	\$680.00	\$680.00	22.7	\$15,436.00
Heather Barlow	Managing	\$604.00	\$604.00	21.5	\$12,986.00
Lee Rooney	Senior Director	\$420.00	\$535.00	21.1	\$11,288.50
Michael Garbe	Senior Director	\$0.00	\$535.00	0.6	\$321.00
Jordan Olsen	Associate	\$288.00	\$288.00	14.4	\$4,147.20
				80.3	\$44,178.70
<i>Reflects</i>	<i>Voluntary</i>	<i>Reduced</i>	<i>Rates</i>		

25. The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are Dundon’s normal hourly rates for work of this character. The reasonable value of the services rendered by Dundon to the Committee during the Compensation Period is **\$44,178.70**. Expenses of **\$151.92** are set forth in **Exhibit B**.

Certification

26. A certification of Matthew J. Dundon is attached hereto as **Exhibit C** and made part of this Application.

No Prior Request

27. No prior request for relief sought in the Application has been made to this or any other court. This Application is made without prejudice to further or final applications based

³ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2022 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2023 and each year thereafter.

⁴ As disclosed in the Dundon Retention Application, Dundon’s customary hourly rates were adjusted on July 1, 2023 pursuant to the firm’s annual rate adjustment. They will again be adjusted on July 1, 2024 and each year thereafter. Dundon has agreed to keep our voluntary discount rates for this case and that amounts to estate savings of \$23,869.40 during this period.

upon all relevant criteria, including the results achieved in the case - as a whole.

28. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code,

it is respectfully submitted that the amount requested by Dundon is fair and

reasonable given

(a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services

other than in a case under this title. Moreover, Dundon has reviewed the requirements of

Local Rule 2016-2 and believes that this Application complies with that Rule.

Notice

29. Notice of this Application will be provided to the Fee Notice Parties, as defined

in the Interim Compensation Order, in accordance with such order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

*TEHUM CARE SERVICES INC., et al.*⁵

Debtors.

Chapter 11

Case No.

(Jointly Administered)

Hearing Date: *Only if Objections are Filed*
Objection Deadline: June 24, 2024 at 4:00 p.m. (ET)

NOTICE OF FEE APPLICATION

Certificate of Service

The undersigned affirms that I served the following Fee Notice Parties via e-mail on JUNE 5, 2024, pursuant to the Interim Compensation Order.

Ha.Nguyen@usdoj.gov

Andrew.Jimenez@usdoj.gov

kristian.gluck@nortonrosefulbright.com

julie.harrison@nortonrosefulbright.com

nicholas.zluticky@stinson.com

Phillip.Ashfield@stinson.com

ed.caldie@stinson.com

jbrookner@grayreed.com

akaufman@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

Russell.perry@ankura.com

Tehum Care Services – Russell Perry, CRO

**OFFICE OF THE UNITED
STATES TRUSTEE for the
Southern District of Texas:**

Ha M. Nguyen, Esq.

Andrew Jimenez, Esq.

**NORTON ROSE FULBRIGHT as
Counsel to M2 LoanCo, LLC
Kristian W. Gluck, Esq.**

Julie Goodrich Harrison, Esq.

**STINSON LLP as Counsel to
the Committee
Nicholas Zluticky, Esq.**

Phillip Ashfield, Esq.

Edwin H. Caldie, Esq.

**Tehum Care Services, Inc.,
Debtor and Debtor in Possession
Jason S. Brookner**

Aaron M. Kaufman

Lydia R. Webb

Amber M. Carson

**/s/ Matthew J Dundon
Dundon Advisers, LLC
Matthew J Dundon
Principal
10 Bank St., Suite 1100 White Plains, NY 10606
Telephone: (917) 838-1930
[Email: md@dundon.com](mailto:md@dundon.com)**

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Conclusion

WHEREFORE, Dundon respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to Dundon pursuant to the terms of the Interim Compensation Order, with respect to the sum of **\$44,178.70** as compensation for necessary professional services rendered and that such sum, 80% of which equals **\$35,342.96** to be currently paid upon no objection, and 100% of **\$151.92** in reasonable expenses be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: June 5, 2024

DUNDON ADVISERS LLC

/s/ Matthew J. Dundon

Matthew J. Dundon
10 Bank Street, Suite 1100
White Plains, NY 10606
Telephone: (914) 341-1188
[Email: md@dundon.com](mailto:md@dundon.com)

*Financial Advisor for the Official
Committee of Unsecured Creditors of TPC
Group Inc., et al.*

**Billing Detail Description of Fees,
Hours and Descriptions by
Category**

Exhibit A

Date	Professional	Activity	Description	Total Time	Hourly Rate	Billable Amt
04/01/2024	Heather Barlow	Business Analysis	Review variance report and discuss with L Rooney and J Olsen	0.5	\$604.00	\$302.00
04/01/2024	Heather Barlow	Business Analysis	Attend weekly UCC meeting with N Zluticky and Z Hemenway and others	1.0	\$604.00	\$604.00
04/01/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting.	1.0	\$535.00	\$535.00
04/01/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.0	\$680.00	\$680.00
04/07/2024	Jordan Olsen	Business Analysis	Weekly Variance Analysis	1.5	\$288.00	\$432.00

04/08/2024	Heather Barlow	Business Analysis	Variance analysis with L Rooney and J Olsen re same	0.5	\$604.00	\$302.00
04/08/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting with H. Barlow and L. Rooney	0.2	\$288.00	\$57.60
04/11/2024	Matthew Dundon	Plan and Disclosure Statement	Attendance at Court ruling on motions for dismissal and approval of settlement	0.8	\$680.00	\$544.00
04/11/2024	Matthew Dundon	Plan and Disclosure Statement	Discussions of ruling with UCC counsel and with H. Barlow	1.1	\$680.00	\$748.00
04/14/2024	Jordan Olsen	Business Analysis	Weekly variance report analysis and presentation update	1.5	\$288.00	\$432.00
04/15/2024	Heather Barlow	Business Analysis	Discussion with L Rooney re valuation relayed items for counsel	0.5	\$604.00	\$302.00
04/15/2024	Heather Barlow	Business Analysis	Attend UCC Meeting with N Zluticky and M Dundon and others	1.0	\$604.00	\$604.00
04/15/2024	Heather Barlow	Business Analysis	Discussion with N Zluticky re mediation workstream.	0.2	\$604.00	\$120.80

04/15/2024	Heather Barlow	Business Analysis	Review variance and correspond with counsel and M Dundon re same	0.1	\$604.00	\$60.40
04/15/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting review w/ L. Rooney	0.1	\$288.00	\$28.80
04/15/2024	Jordan Olsen	Business Analysis	Emails to R. Perry and updates to the variance report	0.5	\$288.00	\$144.00
04/15/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the committee meeting with D. Barton, N. Zluticky, and others	1.1	\$535.00	\$588.50
04/15/2024	Lee Rooney	Business Analysis	Telecon with J. Olsen re: budget variances	0.4	\$535.00	\$214.00
04/15/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.1	\$680.00	\$748.00
04/21/2024	Jordan Olsen	Business Analysis	Weekly Variance Analysis	1.5	\$288.00	\$432.00
04/22/2024	Heather Barlow	Business Analysis	Review variance report with L Rooney J Olsen	0.3	\$604.00	\$181.20

04/22/2024	Heather Barlow	Business Analysis	Discuss workstreams with M Dundon for mediation and TH C Lopez	0.3	\$604.00	\$181.20
04/22/2024	Heather Barlow	Claims Analysis	Attend weekly UCC meeting re claims and mediation process	1.0	\$604.00	\$604.00
04/22/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting with H. Barlow and L. Rooney	0.3	\$288.00	\$86.40
04/22/2024	Lee Rooney	Business Analysis	Analysis of variance report, case funding	1.2	\$535.00	\$642.00
04/22/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Telecon with H. Barlow and J. Olsen re: case financials	0.3	\$535.00	\$160.50
04/22/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with N. Zlucticky, D. Barton, and others	0.7	\$535.00	\$374.50
04/22/2024	Matthew Dundon	Business Analysis	Discussion of incremental discovery requests with H. Barlow	0.1	\$680.00	\$68.00
04/22/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.0	\$680.00	\$680.00

04/28/2024	Jordan Olsen	Business Analysis	Weekly Variance Analysis	1.5	\$288.00	\$432.00
04/29/2024	Heather Barlow	Business Analysis	Prepare weekly variance analysis with J Olsen, M Dundon and L Rooney - Review diligence request items	0.8	\$604.00	\$483.20
04/29/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend UCC Meeting re mediation and workstreams	1.0	\$604.00	\$604.00
04/29/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Zoom Meeting with H.Barlow and L.Rooney	0.5	\$288.00	\$144.00
04/29/2024	Lee Rooney	Business Analysis	Review of financial report with drafting of Committee report	1.2	\$535.00	\$642.00
04/29/2024	Lee Rooney	Business Analysis	Telecon with H. Barlow, M. Dundon, and others re: financials and next steps	0.5	\$535.00	\$267.50
04/29/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with D. Barton, N. Zluticky, and others	1.1	\$535.00	\$588.50
04/29/2024	Matthew Dundon	Business Analysis	Internal team update meeting	0.3	\$680.00	\$204.00

04/29/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.0	\$680.00	\$680.00
05/05/2024	Jordan Olsen	Business Analysis	Weekly Variance Report	1.5	\$288.00	\$432.00
05/06/2024	Heather Barlow	Debtor Professional and Client Meeting	attend mediation in nyc with TH J C Sontchi and others	10.8	\$604.00	\$6,523.20
05/06/2024	Lee Rooney	Business Analysis	Participated in the mediation with N. Zluticky, J. Sontchi, and others	3.1	\$535.00	\$1,658.50
05/06/2024	Matthew Dundon	Plan and Disclosure Statement	Mediation session in New York	10.5	\$680.00	\$7,140.00
05/10/2024	Matthew Dundon	Business Analysis	Preliminary review of updated Yes Care financials	0.5	\$680.00	\$340.00
05/10/2024	Michael Garbe	Business Analysis	Respond to email from Lee re: treatment and amortization of Goodwill, outline for private companies and consideration of possible impairment generally.	0.3	\$535.00	\$160.50
05/10/2024	Michael Garbe	Business Analysis	Further receive and respond to email for Lee re: treatment of Goodwill for private companies in the GAAP basis of accounting.	0.3	\$535.00	\$160.50

05/12/2024	Jordan Olsen	Business Analysis	Weekly Variance Analysis	1.5	\$288.00	\$432.00
05/13/2024	Heather Barlow	Business Analysis	Variance analysis with J Olsen and L Rooney.	0.5	\$604.00	\$302.00
05/13/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Attend ucc meeting with D Barton and M Dundon	1.0	\$604.00	\$604.00
05/13/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Meeting with H. Barlow and L.Rooney	0.5	\$288.00	\$144.00
05/13/2024	Lee Rooney	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with D. Barton, N. Zluticky, and others	0.9	\$535.00	\$481.50
05/13/2024	Lee Rooney	Business Analysis	Telecon with H. Barlow and J. Olsen re: financials	0.6	\$535.00	\$321.00
05/13/2024	Lee Rooney	Business Analysis	Review of 2023 unaudited financials	1.7	\$535.00	\$909.50
05/13/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	0.7	\$680.00	\$476.00

05/13/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Participated in the weekly committee meeting with D. Barton, N. Zluticky, and others	0.9	\$680.00	\$612.00
05/14/2024	Lee Rooney	Business Analysis	Review of YC financials with comparison to prior projections	3.4	\$535.00	\$1,819.00
05/15/2024	Lee Rooney	Business Analysis	Email exchange with M. Garbe re: unaudited YC financials	0.6	\$535.00	\$321.00
05/19/2024	Jordan Olsen	Business Analysis	Weekly Variance Report	1.5	\$288.00	\$432.00
05/19/2024	Matthew Dundon	Business Analysis	Discussion with M. Atkinson and UCC counsel regarding potential provision to TCC FA of UCC billing and collection summary.	0.4	\$680.00	\$272.00
05/20/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.0	\$604.00	\$604.00
05/20/2024	Jordan Olsen	Committee Member/Professional Meetings & Communications	Variance review with HB	0.3	\$288.00	\$86.40
05/20/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.0	\$680.00	\$680.00

05/23/2024	Lee Rooney	Claims Analysis	Review of updated Debtor claims analysis	2.8	\$535.00	\$1,498.00
05/23/2024	Lee Rooney	Claims Analysis	Telecon with N. Zluticky, M. Dundon, and others	0.5	\$535.00	\$267.50
05/23/2024	Matthew Dundon	Plan and Disclosure Statement	Discussion w. R. Bailey regarding tort treatment in potential new Plan structure.	0.5	\$680.00	\$340.00
05/23/2024	Matthew Dundon	Claims Analysis	Telecon with N. Zluticky, L. Rooney, and others	0.5	\$680.00	\$340.00
05/24/2024	Heather Barlow	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.0	\$604.00	\$604.00
05/24/2024	Matthew Dundon	Committee Member/Professional Meetings & Communications	Recurring UCC member and professionals meeting	1.0	\$680.00	\$680.00
05/24/2024	Matthew Dundon	Plan and Disclosure Statement	Discussion w. E. Monzo regarding tort treatment in potential new Plan structure.	0.3	\$680.00	\$204.00
05/26/2024	Jordan Olsen	Business Analysis	Weekly Variance Report	1.5	\$288.00	\$432.00

	80.3	\$44,178.70
		80% \$35,342.96
		20% \$8,835.74
		100% \$44,178.70
		BHR \$550.17

Exhibit B

Heather Barlow parking expenses for May 6, 2024 mediation in NYC - \$151.92

Exhibit C

Certification of Matthew J. Dundon

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

TEHUM CARE SERVICES., INC.¹

Case No. 23-90086 (CML)

Debtor.

Objection Deadline: June 25, 2024 at 4:00 p.m. (ET)

CERTIFICATION OF MATTHEW J. DUNDON

I, **Matthew J. Dundon**, declare under penalty of perjury as follows:

1. I am a Principal at Dundon Advisers LLC (“Dundon”), Financial Advisor to the Official Committee of Unsecured Creditors of. (the “Committee”) in the above-captioned chapter 11 cases.
2. I have read *the NINTH MONTHLY Application of Dundon Advisers LLC As Financial Advisor to The Official Committee of Unsecured Creditors TEHUM CARE SERVICES., INC. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for The Period APRIL 1, 2024 Through and Including MAY 31, 2024* (the “Application”).
3. I have reviewed Rule 2016-2 of the Local Bankruptcy Rules for the District of Delaware (the “Local Rules”) and submit that the Application substantially complies with such Local Rule.
4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted October 31, 2013 (the “UST Guidelines”).

¹ 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.

5. The fees and out-of-pocket expenses are billed in accordance with the billing practices described below, and except as otherwise indicated therein fall within the UST Guidelines. Except to the extent prohibited by the UST Guidelines, the fees and out-of-pocket expenses sought herein have been billed in accordance with practices customarily employed by Dundon and accepted by the Dundon's clients.
6. With respect to expenses and reimbursable services incurred for which reimbursement is sought, Dundon:
 1. Does not make a profit;
 2. Does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay; and
 3. Seeks reimbursement of services purchased from or contracted for with a third-party vendor only in the amount billed to Dundon by and paid or to be paid by Dundon to the vendor.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated June 5, 2024

/s/ Matthew J. Dundon

By: Matthew J. Dundon

Principal