

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

In re: TEHUM CARE SERVICES, INC., ¹ Debtor.	Chapter 11 Case No. 23-90086 (CML)
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**NINTH MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP FOR
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
 EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE
 OF TORT CLAIMANTS FOR THE PERIOD FROM
AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Brown Rudnick LLP
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 22, 2023 [ECF No. 1294]
Time Period Covered:	August 1, 2024 – August 31, 2024
Total Fees Sought:	\$206,777.50
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$198,027.50
Total professional hours covered by this statement:	136.10
Average hourly rate for professionals:	\$1,455.01

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 paraprofessional fees covered by this statement:	\$8,750.00
Total paraprofessional hours covered by this statement:	17.50
Average hourly rate for paraprofessionals:	\$500.00
Reimbursable expenses sought in this statement:	\$3,861.74
Payment requested:	
80% Fees	\$165,422.00
100% Expenses	\$3,861.74
Total:	\$169,283.74

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Tort Claimants as of November 22, 2023 [ECF No. 1294], the law firm of Brown Rudnick LLP (“Brown Rudnick”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Ninth Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from August 1, 2024 to August 31, 2024 (the “Ninth Monthly Fee Statement”). By the Ninth Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$165,422.00 (80% of \$206,777.50) as compensation for professional services rendered to the Committee and (ii) \$3,861.74 for reimbursement of actual and necessary expenses, for a total of \$169,283.74 for the

period August 1, 2024 through and including August 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Ninth Monthly Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Ninth Monthly Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Brown Rudnick partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Brown Rudnick established in accordance with its internal billing procedures. As reflected in Exhibit A, Brown Rudnick incurred \$206,777.50 in fees during the Fee Period. Pursuant to this Ninth Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$3,861.74 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Brown Rudnick attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Ninth Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 153.60 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Ninth Monthly Fee Statement. This Ninth Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$3,861.74.

Exhibit D consists of Brown Rudnick’s detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Brown Rudnick has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Ninth Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Brown Rudnick reserves the right to seek payment of such fees and expenses not

included herein. Subsequent monthly fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Brown Rudnick respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$169,283.74, consisting of (i) \$165,422.00, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$3,861.74, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: September 12, 2024
New York, NY

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Eric R. Goodman

David J. Molton (*pro hac vice*)

Eric R. Goodman (*pro hac vice*)

Gerard T. Cicero (*pro hac vice*)

Seven Times Square

New York, NY 10036

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

Email: dmolton@brownrudnick.com

egoodman@brownrudnick.com

gcicero@brownrudnick.com

CERTIFICATE OF SERVICE

I certify that on September 12, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Eric R. Goodman

Eric R. Goodman

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

FEE APPLICATION DATA

9/9/2024

CLIENT: 040178

1

Bill Date range: 9/6/2024 to 9/6/2024

MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
CASE ADMINISTRATION/DISBURSEMENTS	BURNS, THOMAS	4.80	\$2,400.00
		4.80	\$2,400.00
MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	MOXLEY, D. CAMERON	1.20	\$1,500.00
	GOODMAN, ERIC R.	2.30	\$3,680.00
		3.50	\$5,180.00
FEE/EMPLOYMENT APPLICATIONS	GOODMAN, ERIC R.	0.30	\$480.00
	BURNS, THOMAS	12.00	\$6,000.00
		12.30	\$6,480.00
CONTESTED MATTERS/LITIGATION (GENERAL)	CICERO, GERARD T.	0.40	\$600.00
	MOXLEY, D. CAMERON	0.20	\$250.00
	GOODMAN, ERIC R.	4.80	\$7,680.00
		5.40	\$8,530.00
NON-WORKING TRAVEL @ 50%	GOODMAN, ERIC R.	4.20	\$3,360.00
		4.20	\$3,360.00
PLAN AND DISCLOSURE STATEMENT	KELLY, BARBARA J.	5.00	\$9,000.00
	CICERO, GERARD T.	20.30	\$30,450.00
	GOODMAN, ERIC R.	64.20	\$102,720.00
	MOTTER, JANE W.	0.50	\$387.50
	KASNETZ, ALEXANDER F.	4.50	\$4,275.00
	SHACHMUROVE, AMIR	17.00	\$16,150.00
		111.50	\$162,982.50

FEE APPLICATION DATA

9/9/2024

CLIENT: 040178

1

Bill Date range: 9/6/2024 to 9/6/2024

MEDIATION/SETTLEMENT	CICERO, GERARD T.	1.80	\$2,700.00
	GOODMAN, ERIC R.	1.70	\$2,720.00
		3.50	\$5,420.00
COURT ATTENDANCE	MOXLEY, D. CAMERON	0.70	\$875.00
	GOODMAN, ERIC R.	3.10	\$4,960.00
	BURNS, THOMAS	0.70	\$350.00
		4.50	\$6,185.00
FINANCING ISSUES	GOODMAN, ERIC R.	3.90	\$6,240.00
		3.90	\$6,240.00
		153.60	\$206,777.50

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

SUMMARY OF TIME & COMPENSATION

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Barabara J. Kelly	Counsel; Admitted to New York Bar in 1982; Tax	\$1,800	5.00	\$9,000.00
Eric R. Goodman	Partner; Admitted to Ohio Bar in 2003; Admitted to New York Bar in 2018; Admitted to Illinois Bar in 2020; Admitted to District Court of Columbia Bar in 2021; Admitted to Massachusetts Bar in 2021; Dispute Resolution & Restructuring	\$1,600	84.50	\$131,840.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	22.50	\$33,750.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	2.10	\$2,625.00
Alexander F. Kasnetz	Associate; Admitted to Illinois Bar in 2018; Dispute Resolution & Restructuring	\$950	4.50	\$4,275.00
Amir Shachmurove	Associate; Admitted to New York Bar 2014; Admitted to District Court of Columbia Bar in 2018; Bankruptcy & Corporate Restructuring	\$950	17.00	\$16,150.00

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Jane W. Motter	Associate; Admitted to Massachusetts Bar in 2021; Corporate & Capital Markets	\$775	.50	\$387.50
TOTAL			136.10	\$198,027.50
PROFESSIONAL BLENDED RATE		\$1,455.01		

COMPENSATION BY PARAPROFESSIONAL				
Name of Professional Person	Position	Hourly Billing Rate	Total Hours	Total Compensation
Thomas Burns	Paralegal	\$500	17.50	\$8,750.00
TOTAL			17.50	\$8,750.00
PARAPROFESSIONAL BLENDED RATE		\$500		

EXHIBIT C

Record of Expenses

BILLED DISBURSEMENTS

Client: TEHUM CARE SERVICES, INC., OFFICIAL TORT (040178)

1

Amounts shown in USD

BILL DATE	COST DESC	BILLED AMT
9/6/2024	Document Production	0.00
	Hotel	2,711.88
	Meals	398.02
	Mileage	72.36
	Parking and Tolls	84.00
	Taxi	595.48
		3,861.74
		3,861.74

EXHIBIT D

Detailed Record of Time Entries



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

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

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	2,400.00	3,861.74	6,261.74
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	5,180.00	0.00	5,180.00
040178.0008	FEE/EMPLOYMENT APPLICATIONS	6,480.00	0.00	6,480.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	8,530.00	0.00	8,530.00
040178.0011	NON-WORKING TRAVEL @ 50%	3,360.00	0.00	3,360.00
040178.0014	PLAN AND DISCLOSURE STATEMENT	162,982.50	0.00	162,982.50
040178.0015	MEDIATION/SETTLEMENT	5,420.00	0.00	5,420.00
040178.0016	COURT ATTENDANCE	6,185.00	0.00	6,185.00
040178.0018	FINANCING ISSUES	6,240.00	0.00	6,240.00
	Total	206,777.50	3,861.74	210,639.24

Total Current Fees	\$206,777.50
20% Holdback Amount	(41,355.50)
80% CURRENT BALANCE DUE	\$165,422.00
Total Current Costs	\$3,861.74
Total Invoice	\$169,283.74



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	2,400.00	3,861.74	6,261.74
	Total	2,400.00	3,861.74	6,261.74

Total Current Fees	\$2,400.00
Total Current Costs	\$3,861.74
Total Invoice	\$6,261.74



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

Invoice 6983091
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RE: CASE ADMINISTRATION/DISBURSEMENTS

TIME DETAIL

Date	Professional	Description	Hours	Value
08/05/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); CONFER WITH E. HOSANG REGARDING J. MEYERS' NOTICE OF APPEARANCE (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.3)	0.80	400.00
08/06/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES (.3); CONFER FURTHER WITH E. HOSANG REGARDING J. MEYERS APPEARANCE IN MATTER (.2); RESEARCH SAME (.4)	0.90	450.00
08/07/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.3)	0.60	300.00
08/09/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
08/12/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.3); PHONE/EMAIL WITH CHAMBERS REGARDING PROPOSED ORDER FOR FIRST INTERIM FEE APPLICATION (.3)	0.70	350.00
08/13/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES	0.30	150.00
08/15/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES (.3); REVIEW AND ANALYZE DOCKET (.1); CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.60	300.00
08/19/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2); ANALYSIS OF PERTINENT DATES AND DEADLINES (.3)	0.60	300.00
Total Hours and Fees			4.80	2,400.00

TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	4.80 hours at	500.00	2,400.00
Total Fees			2,400.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

Invoice 6983091
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COST SUMMARY

Description	Value
PARKING AND TOLLS	84.00
MEALS	398.02
MILEAGE	72.36
TAXI	595.48
HOTEL	2,711.88
Total Costs	3,861.74



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH
COMMITTEE/CREDITORS

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	5,180.00	0.00	5,180.00
	Total	5,180.00	0.00	5,180.00

Total Current Fees	\$5,180.00
Total Current Costs	\$0.00
Total Invoice	\$5,180.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

Invoice 6983091
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RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

TIME DETAIL

Date	Professional	Description	Hours	Value
08/06/24	MOXLEY	PARTICIPATE IN COMMITTEE STRATEGY CALL	0.20	250.00
08/13/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING CASE STATUS	0.70	1,120.00
08/20/24	GOODMAN	ATTEND MEETING WITH THE TCC (VIA ZOOM) REGARDING CASE STATUS	0.50	800.00
08/27/24	GOODMAN	ATTEND MEETING WITH THE TCC REGARDING CASE STATUS	1.10	1,760.00
08/27/24	MOXLEY	PARTICIPATE IN COMMITTEE MEETING REGARDING CASE STATUS (.8); CONFER WITH E. GOODMAN RE DRAFT PLAN ISSUES (.2)	1.00	1,250.00
Total Hours and Fees			3.50	5,180.00

TIME SUMMARY

Professional	Hours	Rate	Value
D. C. MOXLEY	1.20 hours at	1,250.00	1,500.00
ERIC R. GOODMAN	2.30 hours at	1,600.00	3,680.00
Total Fees			5,180.00



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0008	FEE/EMPLOYMENT APPLICATIONS	6,480.00	0.00	6,480.00
Total		6,480.00	0.00	6,480.00

Total Current Fees	\$6,480.00
Total Current Costs	\$0.00
Total Invoice	\$6,480.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

Invoice 6983091
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RE: FEE/EMPLOYMENT APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
08/01/24	BURNS	WORK ON EIGHTH MONTHLY FEE APPLICATION	0.60	300.00
08/05/24	GOODMAN	REVIEW AND EDIT SECOND INTERIM FEE APPLICATION	0.30	480.00
08/05/24	BURNS	CONFER WITH G. CICERO AND E. GOODMAN REGARDING BR'S SECOND INTERIM FEE APPLICATION (.3); WORK ON SECOND INTERIM FEE APPLICATION (.5); CONFER WITH M. ZIMMERMAN REGARDING THE SECOND INTERIM FEE APPLICATION (.2)	1.00	500.00
08/06/24	BURNS	CONFER WITH G. CICERO REGARDING FIRST INTERIM FEE APPLCAITION (.2); RETRIEIVE AND CIRCULATE SUPPORTING INFORMATION FOR FIRST INTERIM FEE APPLICATION (.5); CONFER WITH G. CICERO REGARDING NINTH MONTHLY FEE STATEMENT (.2); CONFER FURTHER WITH M. ZIMMERMAN REGARDING EIGHTH MONTHLY FEE STATEMENT (.2)	1.10	550.00
08/07/24	BURNS	CONFER WITH G. CICERO REGARDING EIGHTH INTERIM FEE APPLICATION (.3); CONFER WITH E. GOODMAN REGARDING SECOND INTERIM FEE APPLICATION (.3); PREPARE SECOND FEE APPLICATION FOR FILING (.5); FILE SAME (.3)	1.40	700.00
08/08/24	BURNS	WORK ON EIGHTH FEE STATEMENT (.8); CONFER WITH G. CICERO REGARDING FIRST AND SECOND INTERIM FEE APPLICATIONS (.4)	1.20	600.00
08/09/24	BURNS	CONFER WITH G. CICERO REGARDING EXCHANGING BACKUP FOR FIRST AND SECOND INTERIM APPLICATIONS	0.40	200.00
08/13/24	BURNS	CONFER WITH A. SHACHMUROVE REGARDING EIGHTH MONTHLY FEE STATEMENT (.4); WORK ON EIGHTH MONTHLY FEE STATEMENT (.9)	1.30	650.00
08/15/24	BURNS	CONFER WITH G. CICERO REGARDING EIGHTH MONTHLY FEE STATEMENT (.2); CONFER WITH G. CICERO REGARDING THE BACKUP RELATED TO THE FIRST AND SECOND INTERIM FEE APPLICATIONS (.3); EMAIL BACK UP RELATED TO FIRST AND SECOND INTERIM FEE APPLICATION TO COUNSEL FOR DIP LENDER (.2)	0.70	350.00
08/16/24	BURNS	CONFER WITH E. GOODMAN REGARDING THE EIGHT MONTHLY FEE STATEMENT	0.30	150.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

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Date	Professional	Description	Hours	Value
08/19/24	BURNS	CONFER WITH M. ZIMMERMAN REGARDING THE EIOGHTH MONTHLY FEE STATEMENT	0.20	100.00
08/20/24	BURNS	CONFER WITH M. ZIMMERMAN REGARDING THE EIGHTH MONTHLY FEE STATEMENT (.2); CONFER WITH E. GOODMAN REGARDING THE EIGHTH MONTHLY FEE STATEMENT (.2); PREPARE EIGHTH MONTHLY FEE STATEMENT FOR FILING (.4); FILE SAME (.3); EFFECTUATE THE EIGHTH MONTHLY FEE STATEMENT SERVICE ON THE NOTICE PARTIES (.4)	1.50	750.00
08/21/24	BURNS	SERVE BACKUP FOR THE EIGHT MONTHLY FEE STATEMENT ON NOTICE PARTIES	0.30	150.00
08/27/24	BURNS	WORK ON NINTH MONTHLY FEE STATEMENT	0.80	400.00
08/28/24	BURNS	FURTHER WORK ON NINTH MONTHLY FEE STATEMENT	0.50	250.00
08/29/24	BURNS	WORK ON NINTH MONTHLY FEE STATEMENT	0.70	350.00
Total Hours and Fees			12.30	6,480.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	0.30 hours at	1,600.00	480.00
THOMAS BURNS	12.00 hours at	500.00	6,000.00
Total Fees			6,480.00



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	8,530.00	0.00	8,530.00
	Total	8,530.00	0.00	8,530.00

Total Current Fees	\$8,530.00
Total Current Costs	\$0.00
Total Invoice	\$8,530.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024Invoice 6983091
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RE: CONTESTED MATTERS/LITIGATION (GENERAL)

TIME DETAIL

Date	Professional	Description	Hours	Value
07/17/24	CICERO	DRAFT AND REVISE INTERIM FEE ORDER	0.40	600.00
08/01/24	GOODMAN	DRAFT AND EDIT RESPONSE TO HARRINGTON MOTION	3.40	5,440.00
08/01/24	MOXLEY	REVIEW DRAFT OPPOSITION TO CLAIMANT'S MOTION TO DISMISS	0.20	250.00
08/05/24	GOODMAN	EDIT AND REVISE OBJECTION TO HARRINGTON MOTION	0.50	800.00
08/13/24	GOODMAN	EDIT AND REVISE OBJECTION TO MOTION TO DISMISS	0.50	800.00
08/18/24	GOODMAN	DRAFT AND EDIT SCRIPT FOR HEARING ON CASE STATUS	0.40	640.00
Total Hours and Fees			5.40	8,530.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	0.40 hours at	1,500.00	600.00
D. C. MOXLEY	0.20 hours at	1,250.00	250.00
ERIC R. GOODMAN	4.80 hours at	1,600.00	7,680.00
Total Fees			8,530.00



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: NON-WORKING TRAVEL @ 50%

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0011	NON-WORKING TRAVEL @ 50%	3,360.00	0.00	3,360.00
	Total	3,360.00	0.00	3,360.00

Total Current Fees	\$3,360.00
Total Current Costs	\$0.00
Total Invoice	\$3,360.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

Invoice 6983091
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RE: NON-WORKING TRAVEL @ 50%

TIME DETAIL

Date	Professional	Description	Hours	Value
08/25/24	GOODMAN	TRAVEL TO HOUSTON, TEXAS FOR STATUS CONFERENCE BEFORE JUDGE LOPEZ	4.20	3,360.00
Total Hours and Fees			4.20	3,360.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	4.20 hours at	800.00	3,360.00
Total Fees			3,360.00



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: PLAN AND DISCLOSURE STATEMENT

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0014	PLAN AND DISCLOSURE STATEMENT	162,982.50	0.00	162,982.50
Total		162,982.50	0.00	162,982.50

Total Current Fees	\$162,982.50
Total Current Costs	\$0.00
Total Invoice	\$162,982.50



RE: PLAN AND DISCLOSURE STATEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
08/01/24	CICERO	DRAFT AND REVISE PLAN	5.10	7,650.00
08/01/24	KASNETZ	DRAFT PLAN	3.20	3,040.00
08/01/24	SHACHMUROVE	REVIEW EDITS/REVISIONS TO PLAN BY COLLEAGUE, A. KASNETZ	0.60	570.00
08/01/24	SHACHMUROVE	REVISE AND REDRAFT SUBSTANTIAL SEGMENTS OF PROPOSED PLAN TO COHERE BEGINNING EDITS/REVISIONS MADE BY A. KASNETZ AND ADJUST FOR THEMATIC/STRUCTURAL CHANGES LIMNED BY G. CICERO ON PRECEDING DAYS	3.90	3,705.00
08/01/24	SHACHMUROVE	REVIEW ALL CHANGES TO PLAN, REVISE TO RECTIFY GAPS, AND FLAG ANY REMAINING ISSUES	1.30	1,235.00
08/01/24	SHACHMUROVE	CONFER OVER PLAN WITH COLLEAGUES, A. KASNETZ AND G. CICERO	1.10	1,045.00
08/02/24	SHACHMUROVE	REVISE PLAN BEFORE SENDING OFF TO G. CICERO AND A. KASNETZ FOR REVIEW	0.80	760.00
08/02/24	SHACHMUROVE	CONFER WITH G. CICERO AND A. KASNETZ AS TO PLAN DRAFTS AND REVISIONS MADE BY A. SHACHMUROVE IN EARLY AM AND LATE PRIOR NIGHT AND G. CICERO IN MORNING	0.40	380.00
08/02/24	SHACHMUROVE	CONFER WITH G. CICERO AND A. KASNETZ AS TO PLAN DRAFTS AND REVISIONS MADE BY A. KASNETZ, SELF, AND G. CICERO THROUGHOUT AFTERNOON AND EARLY EVENING	1.20	1,140.00
08/02/24	CICERO	DRAFT AND REVISE PLAN	5.10	7,650.00
08/05/24	KASNETZ	WORK ON PLAN (.2); REVIEW QSF (.2)	0.40	380.00
08/06/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING TRUST DISTRIBUTION PROCEDURES (.7); TELEPHONE CALL WITH STATE COURT COUNSEL REGARDING TRUST DISTRIBUTION PROCEDURES (2.5)	3.20	5,120.00
08/07/24	KASNETZ	WORK ON REVISED PLAN	0.40	380.00
08/07/24	CICERO	DRAFT AND REVISE PLAN (2.5); CALLS WITH A. SHACHMUROVE RE: SAME (1.0)	3.50	5,250.00
08/07/24	CICERO	REVIEW DRAFT TRUST AGREEMENT (.8); REVIEW DRAFT TRUST DISTRIBUTION PROCEDURES (.9)	1.70	2,550.00
08/08/24	CICERO	DRAFT AND REVISE PLAN	3.00	4,500.00
08/09/24	KASNETZ	ANALYZE FURTHER REVISED PLAN DRAFT	0.50	475.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

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Date	Professional	Description	Hours	Value
08/12/24	GOODMAN	REVIEW DRAFT CHAPTER 11 PLAN (.3); TELEPHONE CALL WITH MR. CICERO REGARDING DRAFT CHAPTER 11 PLAN (1.0); EDIT AND REVISE TRUST DISTRIBUTION PROCEDURES (2.7); DRAFT EMAIL TO STATE COURT COUNSEL REGARDING REVISED TRUST DISTRIBUTION PROCEDURES (.2); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS (.3); REVIEW AND RESPOND TO EMAIL FROM MR. HILKERT REGARDING INSURANCE ISSUES (.4)	4.90	7,840.00
08/13/24	GOODMAN	EDIT AND REVISE TRUST DISTRIBUTION PROCEDURES	1.50	2,400.00
08/15/24	GOODMAN	REVIEW AND ANALYZE STRUCTURE OF UCC/DEBTOR PLAN (3.2); DRAFT AND EDIT JOINT TCC/UCC PLAN (5.6)	8.80	14,080.00
08/16/24	GOODMAN	DRAFT AND EDIT CHAPTER 11 PLAN (10.3); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING PLAN ISSUES (.5)	10.80	17,280.00
08/17/24	GOODMAN	DRAFT AND EDIT CHAPTER 11 PLAN	3.50	5,600.00
08/18/24	GOODMAN	DRAFT AND EDIT CHAPTER 11 PLAN	4.60	7,360.00
08/19/24	GOODMAN	EDIT AND REVISE CHAPTER 11 PLAN (1.9); EDIT AND REVIEW TRUST DISTRIBUTION PROCEDURES TO CONFORM TO CHAPTER 11 PLAN (1.0); TELEPHONE CALL WITH INSURANCE COUNSEL REGARDING PLAN AND TDPS (.6); TELEPHONE CALL WITH COUNSEL FOR THE UCC REGARDING PLAN TIME LINE (.2)	3.70	5,920.00
08/19/24	SHACHMUROVE	REVIEW AND ANNOTATE LATEST PLAN REDLINE	1.20	1,140.00
08/19/24	SHACHMUROVE	CONFER WITH COLLEAGUES AND OTHER PARTIES' COUNSEL REGARDING PLAN REDLINE AND UPDATED TRUST DISTRIBUTION PROCEDURES	0.20	190.00
08/20/24	GOODMAN	EDIT AND REVISE CHAPTER 11 PLAN (.5); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CHAPTER 11 PLAN ISSUES (.5)	1.00	1,600.00
08/21/24	GOODMAN	DRAFT AND EDIT PRESENTATION FOR THE BANKRUPTCY COURT ON THE PLAN SETTLEMENT	2.00	3,200.00
08/22/24	CICERO	REVISE TDP RE: INDIRECT CLAIM TREATMENT	1.30	1,950.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
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Date	Professional	Description	Hours	Value
08/22/24	GOODMAN	EDIT AND REVISE CHAPTER 11 PLAN (2.3); EDIT AND REVISE TRUST DISTRIBUTION PROCEDURES (1.4); BEGIN DRAFTING MOTION TO APPROVE SOLICITATION PROCEDURES (1.6); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CHAPTER 11 PLAN (.4); TELEPHONE CALL WITH COUNSEL FOR PUBLIC INTEREST GROUPS REGARDING CHAPTER 11 PLAN (.7)	6.40	10,240.00
08/23/24	GOODMAN	TELEPHONE CALL WITH COUNSEL FOR THE STATE OF ARIZONA REGARDING CHAPTER 11 PLAN (.7); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CHAPTER 11 PLAN (.1); TELEPHONE CALL WITH MR. SCHACHMUROVE AND MR. CICERO REGARDING SOLICITATION PROCEDURES (.6)	1.40	2,240.00
08/23/24	CICERO	PARTICIPATE IN SOLICITATION PROCEDURES DRAFTING	0.60	900.00
08/24/24	GOODMAN	EDIT AND REVISE TRUST DISTRIBUTION PROCEDURES (.3); EDIT AND REVISE CHAPTER 11 PLAN (.1); DRAFT EMAIL TO MS.. KELLY REGARDING TRUST AGREEMENT (.1)	0.50	800.00
08/27/24	GOODMAN	EDIT AND REVISE CHAPTER 11 PLAN (2.1); EDIT AND REVISE TRUST DISTRIBUTION PROCEDURES (1.0); DRAFT SUMMARY OF PLAN CHANGES FOR UCC COUNSEL (1.0); TELEPHONE CALL WITH COUNSEL FOR INSURER REGARDING PLAN ISSUES (.3)	4.40	7,040.00
08/28/24	GOODMAN	EDIT AND REVISE CHAPTER 11 PLAN (.5); TELEPHONE CALL WITH COUNSEL FOR GOVERNMENTAL CLAIMANT REGARDING CHAPTER 11 PLAN (.4)	0.90	1,440.00
08/28/24	KELLY	WORK ON DETAILED REVISIONS TO TRUST AGREEMENT CONSISTENT WITH LATEST DRAFTS OF TDP AND PLAN (4.8); CORRESPOND W ERIC GOODMAN ON CERTAIN OPEN ITEMS FOR TRUST AGREEMENT (.2)	5.00	9,000.00
08/29/24	GOODMAN	EDIT AND REVISE CHAPTER 11 PLAN (.7); EDIT AND REVISE TRUST DISTRIBUTION PROCEDURES (.3)	1.00	1,600.00
08/29/24	MOTTER	REVIEW/REVISE TRUST AGREEMENT	0.30	232.50
08/30/24	GOODMAN	DRAFT AND EDIT MOTION TO APPROVE SOLICITATIONS PROCEDURES (3.0); REVIEW AND EDIT TRUST AGREEMENT (1.5); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CHAPTER 11 PLAN AND TRUST AGREEMENT (.8); TELEPHONE CALL WITH COUNSEL FOR INSURER REGARDING CHAPTER 11 PLAN (.3)	5.60	8,960.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024

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Date	Professional	Description	Hours	Value
08/30/24	MOTTER	REVIEW/COMMENT ON DRAFT TRUST AGREEMENT	0.20	155.00
08/30/24	SHACHMUROVE	REVISE SUBSTANCE OF COMBINED DISCLOSURE STATEMENT APPROVAL AND SOLICITATION PROCEDURES MOTION (V1) BASED ON EMAIL/COMMENTS AND ANOTHER CASE DRAFT FROM E. GOODMAN	3.20	3,040.00
08/30/24	SHACHMUROVE	DRAFT FOUR EXHIBITS (CONFIRMATION HEARING NOTICE, DISCLOSURE HEARING NOTICE, COVER LETTER, AND CONTRACT/LEASE NOTICE) TO BE INCLUDED IN COMBINED DISCLOSURE STATEMENT APPROVAL AND SOLICITATION PROCEDURES MOTION (V1)	1.30	1,235.00
08/30/24	SHACHMUROVE	OUTLINE FORMS OF BALLOTS FOR FOUR CLAIMANT/INTEREST GROUPS: CONVENIENCE, GENERAL UNSECURED, PI/WD, AND INDIRECT CLAIMS	0.80	760.00
08/30/24	SHACHMUROVE	FURTHER REVIEW/ANNOTATE SOLICITATION MOTIONS, INCLUDES ATTACHED EXHIBITS (NOTICES, BALLOT, COVER LETTERS, ETC.), BY KIRKLAND AND LATHAM, INCLUDING THE PACKAGE SUBMITTED BY LATHAM IN ROBERTSHAW	1.00	950.00
Total Hours and Fees			111.50	162,982.50

TIME SUMMARY

Professional	Hours	Rate	Value
BARBARA J. KELLY	5.00 hours at	1,800.00	9,000.00
GERARD T. CICERO	20.30 hours at	1,500.00	30,450.00
ERIC R. GOODMAN	64.20 hours at	1,600.00	102,720.00
JANE W. MOTTER	0.50 hours at	775.00	387.50
ALEXANDER F. KASNETZ	4.50 hours at	950.00	4,275.00
AMIR SHACHMUROVE	17.00 hours at	950.00	16,150.00
Total Fees			162,982.50



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: MEDIATION/SETTLEMENT

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0015	MEDIATION/SETTLEMENT	5,420.00	0.00	5,420.00
Total		5,420.00	0.00	5,420.00

Total Current Fees	\$5,420.00
Total Current Costs	\$0.00
Total Invoice	\$5,420.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
September 6, 2024Invoice 6983091
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RE: MEDIATION/SETTLEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
07/17/24	CICERO	DRAFT AND REVISE DIP RELATED ORDERS FROM MEDIATION (1.3); ATTENTION TO MEDIATION FINALIZATION (.3); CALL WITH E. GOODMAN RE: SAME (.2)	1.80	2,700.00
08/01/24	GOODMAN	TELEPHONE CALL WITH THE UST REGARDING SETTLEMENT STATUS (.9); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING SETTLEMENT STATUS AND RELATED MATTERS (.5)	1.40	2,240.00
08/15/24	GOODMAN	REVIEW AND EDIT FINAL SETTLEMENT TERM SHEET (.2); COMMUNICATIONS WITH COUNSEL FOR THE DEBTOR AND THE UCC REGARDING TERM SHEET (.1)	0.30	480.00
Total Hours and Fees			3.50	5,420.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	1.80 hours at	1,500.00	2,700.00
ERIC R. GOODMAN	1.70 hours at	1,600.00	2,720.00
Total Fees			5,420.00



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: COURT ATTENDANCE

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0016	COURT ATTENDANCE	6,185.00	0.00	6,185.00
	Total	6,185.00	0.00	6,185.00

Total Current Fees	\$6,185.00
Total Current Costs	\$0.00
Total Invoice	\$6,185.00

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

TIME DETAIL

Date	Professional	Description	Hours	Value
08/16/24	GOODMAN	ATTEND HEARING ON MOTIONS FOR RELIEF FROM STAY	0.80	1,280.00
08/26/24	GOODMAN	PLAN AND PREPARE FOR HEARING BEFORE JUDGE LOPEZ (1.3); ATTEND HEARING BEFORE JUDGE LOPEZ REGARDING CASE STATUS (.8); POST-HEARING CONFERENCE CALL WITH MR. ZIMMERMAN (.2)	2.30	3,680.00
08/26/24	BURNS	CONFER WITH G. CICERO REGARDING APPEARANCES AT 8/26 STATUS CONFERENCE (.3); EFFECTUATED APPEARANCES FOR 8/26 HEARING FOR M. ZIMMERMAN, E. GOODMAN AND C. MOXLEY (.4)	0.70	350.00
08/26/24	MOXLEY	ATTEND COURT CONFERENCE REGARDING CASE AND SETTLEMENT STATUS REMOTELY	0.70	875.00
Total Hours and Fees			4.50	6,185.00

TIME SUMMARY

Professional	Hours	Rate	Value
D. C. MOXLEY	0.70 hours at	1,250.00	875.00
ERIC R. GOODMAN	3.10 hours at	1,600.00	4,960.00
THOMAS BURNS	0.70 hours at	500.00	350.00
Total Fees			6,185.00



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

Invoice 6983091
Date Sep 6, 2024
Client 040178

RE: FINANCING ISSUES

INVOICE

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

Matter No.	Matter Name	Fees	Costs	Total
040178.0018	FINANCING ISSUES	6,240.00	0.00	6,240.00
	Total	6,240.00	0.00	6,240.00

Total Current Fees	\$6,240.00
Total Current Costs	\$0.00
Total Invoice	\$6,240.00

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

TIME DETAIL

Date	Professional	Description	Hours	Value
08/04/24	GOODMAN	REVIEW REVISED DIP (.1); COMMUNICATIONS WITH CASE PARTIES REGARDING REVISED DIP ORDER (.2)	0.30	480.00
08/05/24	GOODMAN	EDIT AND REVISE DIP ORDER (1.0); CONFERENCE CALL WITH COUNSEL FOR THE DIP LENDER, THE UCC, AND THE DEBTOR REGARDING REVISED DIP ORDER (.4)	1.40	2,240.00
08/06/24	GOODMAN	EDIT AND FINALIZE DIP ORDER AND REVIEW FINAL EXHIBITS THERETO	1.00	1,600.00
08/08/24	GOODMAN	CONFERENCE CALL WITH THE MEDIATOR REGARDING THE DIP ORDER AND RELATED MATTERS	0.70	1,120.00
08/09/24	GOODMAN	REVIEW PROPOSED INSURANCE STIPULATION (.2); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING INSURANCE ISSUE AND DIP ORDER (.1); TELEPHONE CALL WITH MR. CICERO REGARDING INSURANCE ISSUE AND DIP ORDER (.1); TELEPHONE CALL WITH COUNSEL FOR THE UCC REGARDING INSURANCE ISSUE AND DIP ORDER (.1)	0.50	800.00
Total Hours and Fees			3.90	6,240.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	3.90 hours at	1,600.00	6,240.00
Total Fees			6,240.00

INCLUDES ONLY TIME AND COSTS TO DATE
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

brownrudnick

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

Invoice 6983091
Date Sep 6, 2024
Client 040178

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

Remittance **remit**

Balance Due: \$169,283.74

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

Remittance Address

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

Wire Instructions

JP Morgan Chase
270 Park Avenue
New York, NY 10017
ABA Number: 021000021
SWIFT Code: CHASUS33

For Credit To

Brown Rudnick LLP Deposit Account
Account Number: 760367067