

**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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**SUMMARY COVER SHEET TO FIRST INTERIM FEE APPLICATION OF
MOLOLAMKEN LLP FOR COMPENSATION FOR SERVICES RENDERED
AND FOR REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL APPELLATE
COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR THE
PERIOD FROM APRIL 15, 2024 THROUGH JUNE 30, 2024**

Name of Professional:	MoloLamken LLP	
Authorized to Provide Professional Services to:	The Official Committee of Tort Claimants, as Special Appellate Counsel	
Date Order of Employment Signed	July 18, 2024, <i>nunc pro tunc</i> to April 15, 2024 [ECF No. 1620]	
Interim Application (x) Final Application ()	First Interim Fee Application	
Time Period Covered by this Application for which interim compensation has not previously been awarded:	April 15, 2024 through June 30, 2024	
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case?	Yes.	
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed?	Yes.	
Do expense reimbursements represent actual and necessary expenses incurred?	Yes.	
Amount of retainer received in case:	N/A	
Total professional fees covered by this statement:	\$145,477.50	
Total professional hours covered by this statement:	138.9	

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



Average hourly rate for professionals:	\$1,047.35
Total paraprofessional fees covered by this statement:	\$2,052.50
Total paraprofessional hours covered by this statement:	6.2
Average hourly rate for paraprofessionals:	\$331.05
Total fees requested in this Application:	\$147,530.00
Total expense reimbursements requests in this Application:	\$700.00
Total fees and expenses requested in this Application:	\$148,230.00
Total fees and expenses requested in all prior Applications:	N/A
Plan Status: No current Plan to be prosecuted on file.	
Primary Benefits: Throughout the Application Period, as Special Appellate Counsel to the TCC, MoloLamken advised co-counsel to the TCC regarding all aspects of the TCC's appeal of the Court's decisions on the TCC's motion to dismiss the case (Dkts. 1260, 1404). MoloLamken's role included assisting in formulating strategy, conducting legal research, and developing legal arguments, in each case relating to that appeal.	

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)

**FIRST INTERIM FEE APPLICATION OF MOLOLAMKEN LLP FOR
COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT
OF EXPENSES INCURRED AS SPECIAL APPELLATE COUNSEL TO THE
OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR THE PERIOD
FROM APRIL 15, 2024 THROUGH JUNE 30, 2024**

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

MoloLamken LLP (“**MoloLamken**”), Special Appellate Counsel to the Official Committee of Tort Claimants (the “**Committee**”), hereby submits its *First Interim Fee Application of MoloLamken LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Special Appellate Counsel to the Official Committee of Tort Claimants for the Period from April 15, 2024 through June 30, 2024* (the “**Application**”) for interim allowance of compensation for professional and paraprofessional services provided in the amount of \$147,530.00 and reimbursement of actual and necessary expenses in the amount of \$700.00 that MoloLamken

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

incurred for the period from April 15, 2024 through June 30, 2024 (the “**Application Period**”). In support of this Application, MoloLamken attaches the following exhibit:

EXHIBIT	DESCRIPTION
A	First Monthly Fee Statement of MoloLamken LLP, Special Appellate Counsel to the Official Committee of Tort Claimants, for the Payment of Compensation for Services Rendered and for Reimbursement of Expenses for the Period from April 15, 2024 through June 30, 2024 [Docket No. 1652]

NOTICE

Pursuant to the Amended Agreed Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 1646] (the “**Interim Compensation Order**”), notice of this Fee Application will be provided to the Application Recipients (as defined in the Interim Compensation Order).

Dated: September 13, 2024
Washington, D.C.

Respectfully submitted,

/s/ Jeffrey A. Lamken
Jeffrey A. Lamken (*pro hac vice*)
MOLOLAMKEN LLP
The Watergate, Suite 500
600 New Hampshire Avenue, N.W.
Washington, D.C. 20037
(202) 556-2000
jlamken@mololamken.com

Lauren F. Dayton (*pro hac vice*)
MOLOLAMKEN LLP
300 N. LaSalle Street, Suite 5350
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(312) 450-6700
ldayton@mololamken.com

CERTIFICATE OF SERVICE

I certify that on September 13, 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/ Jeffrey A. Lamken
Jeffrey A. Lamken

EXHIBIT A

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)

FIRST MONTHLY FEE STATEMENT OF MOLOLAMKEN LLP, SPECIAL APPELLATE COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS, FOR THE PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM APRIL 15, 2024 THROUGH JUNE 30, 2024

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

General Information

Name of Professional:	MoloLamken LLP
Authorized to Provide Professional Services to:	The Official Committee of Tort Claimants, as Special Appellate Counsel
Date of Retention:	July 18, 2024, <i>nunc pro tunc</i> to April 15, 2024 [ECF No. 1620]
Period for Which Compensation and Reimbursement Is Sought (the "Fee Period"):	April 15, 2024 through June 30, 2024
Total Fees Sought:	\$147,530.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$145,477.50

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

Total professional hours covered by this statement:	138.9
Average hourly rate for professionals:	\$1,047.35
Total paraprofessional fees covered by this statement:	\$2,052.50
Total paraprofessional hours covered by this statement:	6.2
Average hourly rate for paraprofessionals:	\$331.05
Reimbursable expenses sought in this statement:	\$700.00
Payment Requested:	
80% Fees	\$118,024.00
100% Expenses	\$700.00
Total:	\$118,724.00

I. Summary of Professional Compensation 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”), 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 Amended Agreed 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 MoloLamken LLP as Special Appellate Counsel for the TCC of Tort Claimants *Nunc Pro Tunc* as to April 15, 2024 [ECF No. 1620], the law firm of MoloLamken LLP (“MoloLamken”), as Special Appellate Counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this First Monthly Fee Statement for the Payment of Compensation and Reimbursement of Expenses for the Period from April 15, 2024 through June 30, 2024 (the “First Monthly Fee Statement”).

By the First Monthly Fee Statement and pursuant to the Interim Compensation Order, MoloLamken seeks interim payment of (i) \$118,024.00 (80% of \$147,530.00) as compensation for professional services rendered to the Committee and (ii) \$700.00 for reimbursement of actual and necessary expenses, for a total of \$118,724.00 for the period April 15, 2024 through and including June 30, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this First Monthly Fee Statement to object to the requested fees and expenses.

II. Itemization of Services Rendered and Expenses Incurred

In support of this First 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 MoloLamken partners, counsel, associates, consultants, and paraprofessionals during the Fee Period with respect to each of the task code categories MoloLamken established in accordance with its internal billing procedures. As reflected in Exhibit A, MoloLamken incurred \$147,530.00 in fees during the Fee Period. Pursuant to this First Monthly Fee Statement, MoloLamken seeks compensation in the amount of \$118,024.00 or 80% of such fees.

Exhibit B is a schedule providing certain information regarding the MoloLamken attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this First Monthly Fee Statement. Attorneys and paraprofessionals of MoloLamken expended a total of 145.1 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 First Monthly Fee Statement. This First Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$700.00.

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

Exhibit E consists of MoloLamken's detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee, arranged by task code.

III. Representations

Although MoloLamken 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 First Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. MoloLamken 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, MoloLamken respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$118,724.00, consisting of (i) \$118,024.00, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by MoloLamken, and (ii) \$700.00, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: August 12, 2024
Washington, D.C.

Respectfully submitted,

/s/ Jeffrey A. Lamken
Jeffrey A. Lamken (*pro hac vice*)
MOLOLAMKEN LLP
The Watergate, Suite 500
600 New Hampshire Avenue, N.W.
Washington, D.C. 20037
(202) 556-2000
jlamken@mololamken.com

Lauren F. Dayton (*pro hac vice*)
MOLOLAMKEN LLP
300 N. LaSalle Street, Suite 5350
Chicago, IL 60654
(312) 450-6700
ldayton@mololamken.com

CERTIFICATE OF SERVICE

I certify that on August 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/ Jeffrey A. Lamken
Jeffrey A. Lamken

EXHIBIT A
Summary of Hours Expended and Fees Incurred by Task Code

Bill Date Range: April 15, 2024 to June 30, 2024				
Task Code	Description of Task Code	Employee Name	Billed Hours	Billed Amount
L120	Analysis/Strategy	Jeffrey A. Lamken	2.60	\$5,135.00
		Lauren F. Dayton	2.20	\$2,200.00
		Justin Ellis	1.90	\$2,565.00
		Josh Bloom	1.00	\$1,000.00
		Sara Tofighbakhsh	1.20	\$1,020.00
Total			8.90	\$11,920.00
L140	Document/File Management	Sara Tofighbakhsh	5.10	\$4,335.00
		Charlie Christoffersen	2.30	\$747.50
		Alice Litvak	1.90	\$617.50
		Anna Starobinets	1.50	\$487.50
		Veronica Velasco	0.50	\$200.00
Total			11.30	\$6,387.50

Bill Date Range: April 15, 2024 to June 30, 2024				
Task Code	Description of Task Code	Employee Name	Billed Hours	Billed Amount
L250	Other Written Motions and Submissions	Jeffrey A. Lamken	9.60	\$18,960.00
		Lauren F. Dayton	13.30	\$13,300.00
		Justin Ellis	0.30	\$405.00
		Sara Tofighbakhsh	1.20	\$1,020.00
Total			24.40	\$33,685.00
L500	Appeal	Jeffrey A. Lamken	0.30	\$592.50
		Lauren F. Dayton	19.30	\$19,300.00
		Justin Ellis	8.40	\$11,340.00
		Josh Bloom	3.90	\$3,900.00
		Sara Tofighbakhsh	48.40	\$41,140.00
Total			80.30	\$76,272.50
B110	Case Administration	Jeffrey A. Lamken	1.20	\$2,370.00
		Lauren F. Dayton	2.40	\$2,400.00

Bill Date Range: April 15, 2024 to June 30, 2024				
Task Code	Description of Task Code	Employee Name	Billed Hours	Billed Amount
		Justin Ellis	0.20	\$270.00
		Josh Bloom	1.30	\$1,300.00
		Sara Tofighbakhsh	7.00	\$5,950.00
		Kayvon Ghayoumi	0.40	\$340.00
		Thomas Schubert	0.30	\$255.00
Total			12.80	\$12,885.00
B160	Fee/Employment Applications	Josh Bloom	0.60	\$600.00
		Sara Tofighbakhsh	6.80	\$5,780.00
Total			7.40	\$6,380.00
Total for First Monthly Fee Application			145.10	\$147,530.00

EXHIBIT B
Summary of Hours Expended and Fees Incurred by Professional
April 15, 2024 through June 30, 2024

Name of Professional	Title	Year Admitted	Hourly Billing Rate	Total Billed Hours	Total Compensation
Lamken, Jeffrey	Partner	1991	\$1,975	13.7	\$27,057.50
Dayton, Lauren	Partner	2017	\$1,000	37.2	\$37,200.00
Ellis, Justin	Partner	2011	\$1,350	10.8	\$14,580.00
Bloom, Josh	Counsel	2014	\$1,000	6.8	\$6,800.00
Partner and Counsel Total				68.5	\$85,637.50

Name of Professional	Title	Year Admitted	Hourly Billing Rate	Total Billed Hours	Total Compensation
Tofighbakhsh, Sara	Associate	2022	\$850	69.7	\$59,245.00
Schubert, Thomas	Associate	2021	\$850	0.3	\$255.00
Ghayoumi, Kayvon	Associate	2019	\$850	0.4	\$340.00
Associate Total				70.4	\$59,840.00

Name of Paraprofessional	Title	Year Admitted	Hourly Billing Rate	Total Billed Hours	Total Compensation
Christoffersen, Charlie	Legal Assistant	N/A	\$325	2.3	\$747.50
Litvak, Alice	Legal Assistant	N/A	\$325	1.9	\$617.50
Starobinets, Anna	Legal Assistant	N/A	\$325	1.5	\$487.50
Velasco, Veronica	Legal Assistant	N/A	\$400	0.5	\$200.00
Paraprofessional Total				6.2	\$2,052.50

PROFESSIONALS	BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	\$1,250.18	68.5	\$85,637.50
Associates	\$850.00	70.4	\$59,840.00
Paralegals/Non-Legal Staff	\$330.97	6.2	\$2,052.50
Blended Attorney Rate	\$1,047.35	138.9	\$145,477.50
Blended Rate All Timekeepers	\$1,016.75	145.1	\$147,530.00

EXHIBIT C
Record of Expenses
April 15, 2024 through June 30, 2024

Expenses Category	Total Expenses (\$)
Court Filing Fees	\$700.00
TOTAL	\$700.00

EXHIBIT D
Detailed Record of Time Entries
April 15, 2024 through June 30, 2024



430 Park Avenue, New York, NY 10022
 600 New Hampshire Avenue, N.W., Washington, D.C. 20037
 300 North LaSalle, Chicago, IL 60654

Invoice No. 14599
 June 20, 2024

Official Tort Claimants' Committee
 In re: Tehum Care Services, Inc.
 No. 23-90086 (CML)
 United States District Court
 for the Southern District of Texas

INVOICE
For Services Through April 30, 2024

1887-001: Tehum Appeal

Professional Fees

Date	Professional		Hours
4/17/2024	Lamken	Review motion for leave to appeal.	1.70
4/17/2024	Dayton	Review relevant Fifth Circuit and Bankruptcy Rules regarding appeal.	0.50
4/17/2024	Dayton	Review motion for leave to appeal.	2.00
4/19/2024	Lamken	Review draft motion for leave to appeal.	2.80
4/19/2024	Lamken	Email to L. Dayton re: revisions to motion for leave to appeal and strategic issues.	0.10
4/19/2024	Lamken	Revise draft motion for leave to appeal.	2.80
4/19/2024	Lamken	Email to L. Dayton re: revisions to motion for leave to appeal and strategic issues.	0.10
4/19/2024	Ellis	Emails with L. Dayton re: strategy for motion for leave to appeal brief.	0.20
4/19/2024	Ellis	Research with L. Dayton re: strategy for motion for leave to appeal brief.	0.30
4/19/2024	Dayton	Edit motion for leave to appeal.	6.20
4/19/2024	Dayton	Email to team re: caselaw research for appeal.	0.20
4/19/2024	Tofighbakhsh	Review and analyze draft motion for leave to appeal; review background of bankruptcy court case; emails with L. Dayton to team re: same.	1.90
4/20/2024	Dayton	Review and revise motion for leave to appeal.	2.60
4/21/2024	Ellis	Emails with L. Dayton re: leave to appeal brief.	0.10
4/21/2024	Ellis	Research with L. Dayton re: leave to appeal brief.	0.20
4/21/2024	Dayton	Review bankruptcy appellate rules re: motion for leave to appeal.	0.40
4/21/2024	Dayton	Edit motion for leave to appeal.	0.50
4/21/2024	Dayton	Emails to E. Goodman re: motion for leave to appeal.	0.30
4/21/2024	Dayton	Phone conference with E. Goodman re: leave to appeal.	0.20
4/21/2024	Dayton	Incorporate edits into most recent draft of motion for leave to appeal.	0.60
4/22/2024	Lamken	Edit motion for leave to appeal.	2.10
4/22/2024	Lamken	Emails re: strategy and questions presented.	0.20

MoloLamken LLP

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4/22/2024	Dayton	Review J. Lamken edits to motion for leave to appeal.	0.20	
4/22/2024	Tofighbakhsh	Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court for J. Lamken; conduct research re: same.	0.40	
4/23/2024	Dayton	Emails with S. Tofighbakhsh re: pro hac vice applications for S.D. Texas bankruptcy court.	0.20	
4/23/2024	Tofighbakhsh	Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court for J. Lamken; prepare application forms for same; confer with L. Dayton about appeal timeline and preliminary research topics.	2.10	
4/25/2024	Tofighbakhsh	Review involved parties list for potential conflicts; confirm no conflicts.	0.10	
4/28/2024	Dayton	Email to C. Christoffersen re: case management.	0.10	
4/29/2024	Tofighbakhsh	Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court.	0.10	
4/30/2024	Tofighbakhsh	Conduct legal research on case background and Texas Two-Step cases in other circuits and academic writing.	2.40	
			Total Hours	31.60
			Total Fees	\$40,385.00

Timekeeper Summary

Lauren Dayton	14.00 hours at \$1,000.00/hr	\$14,000.00
Justin Ellis	0.80 hours at \$1,350.00/hr	\$1,080.00
Jeffrey Lamken	9.80 hours at \$1,975.00/hr	\$19,355.00
Sara Tofighbakhsh	7.00 hours at \$850.00/hr	\$5,950.00

Summary

Fees	\$40,385.00
Expenses	\$0.00
Total Current Billing	\$40,385.00
Previous Balance Due	\$0.00
Payments Received	\$0.00
Total Amount Due:	\$40,385.00



430 Park Avenue, New York, NY 10022
600 New Hampshire Avenue, N.W., Washington, D.C. 20037
300 North LaSalle, Chicago, IL 60654

Invoice No. 14599
June 20, 2024

Official Tort Claimants' Committee
In re: Tehum Care Services, Inc.
No. 23-90086 (CML)
United States District Court
for the Southern District of Texas

REMITTANCE PAGE
For Services Through April 30, 2024

1887-001: Tehum Appeal

Total Fees This Statement:	\$40,385.00
Total Expenses This Statement:	\$0.00
Total Current Billing:	\$40,385.00
Previous Balance Due:	\$0.00
Total Now Due:	\$40,385.00

Please include Matter No. 1887-001 and Invoice No. 14599 in the description when making a payment.

Domestic Wire Transfer:

International Wire Transfer:

Account Name: MoloLamken LLP
Bank info Signature Bank
9450 W. Bryn Mawr Avenue
Suite 300
Rosemont, IL 60018
Routing Number: 071-026-628
Account Number: 7000015810

Account Name: MoloLamken LLP
Bank info Wells Fargo Bank
420 Montgomery
San Francisco, CA 94104
Routing Number: 121-000-248
Account Number: 5231560185
International SWIFT: WFBIUS6S



430 Park Avenue, New York, NY 10022
 600 New Hampshire Avenue, N.W., Washington, D.C. 20037
 300 North LaSalle, Chicago, IL 60654

Invoice No. 14627
 June 25, 2024

Official Tort Claimants' Committee
 In re: Tehum Care Services, Inc.
 No. 23-90086 (CML)
 United States District Court
 for the Southern District of Texas

INVOICE
For Services Through May 31, 2024

1887-001: Tehum Appeal

Professional Fees

Date	Professional		Hours
5/1/2024	Lamken	Emails re: pro hac applications and assignment of appeal.	0.10
5/1/2024	Dayton	Email re: assigned of appeal.	0.10
5/1/2024	Tofighbakhsh	Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court.	0.40
5/1/2024	Tofighbakhsh	Emails with J. Lamken regarding pro hac vice applications for S.D. Texas bankruptcy court.	0.30
5/1/2024	Tofighbakhsh	File application for J. Lamken in S.D. Texas bankruptcy case.	0.20
5/1/2024	Tofighbakhsh	Prepare Pacer link and applications for L. Dayton.	0.10
5/2/2024	Tofighbakhsh	Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court for J. Lamken.	0.40
5/2/2024	Tofighbakhsh	File application for S.D. Texas bankruptcy court.	0.40
5/3/2024	Bloom	Draft retention application [N.C. -6.70].	0.00
5/3/2024	Dayton	Emails with J. Lamken, J. Bloom, and Brown Rudnick re: engagement letter and disclosure conflicts check [N.C. -0.10].	0.00
5/3/2024	Tofighbakhsh	Conduct background research on filings in S.D. Texas bankruptcy motion for leave to appeal by Tort Claimants' Committee, Texas Two-Step arguments in LTL Management opinion.	2.00
5/3/2024	Tofighbakhsh	Review and analyze briefing in second LTL appeal, and review memoranda on developments up to 2023 on other Texas Two-Step cases around the country.	1.00
5/3/2024	Tofighbakhsh	Conduct legal research on Texas Two-Step issues.	0.90
5/5/2024	Dayton	Review bankruptcy retention application [N.C. -1.10].	0.00
5/6/2024	Dayton	Email to E. Goodman re: statement of issues and designation of the record.	0.10
5/6/2024	Tofighbakhsh	Conduct legal research on other Texas Two-Step cases and Fifth Circuit caselaw on non-consensual non-debtor releases and confer with J. Bloom re: same.	5.60
5/7/2024	Bloom	Legal research regarding procedure.	0.60
5/7/2024	Bloom	Review and revise retention application [N.C. -1.10].	0.00

MoloLamken LLP

Page: 2

5/7/2024	Dayton	Coordinate re: question from Brown Rudnick re: reply for motion for leave to appeal.	0.20
5/7/2024	Tofighbakhsh	Conduct legal research on Fifth Circuit caselaw on nonconsensual non-debt releases and timeline for opposition briefs to motion for leave to appeal; Conduct legal research on Fifth Circuit caselaw on non-consensual non-debt releases.	1.80
5/8/2024	Dayton	Phone conference with L. Walker re: case update.	0.10
5/8/2024	Dayton	Emails with Brown Rudnick re: appeal.	0.10
5/8/2024	Dayton	Emails with team re: research and case management re: appeal.	0.10
5/8/2024	Dayton	Phone conference with S. Tofighbakhsh re: research.	0.60
5/8/2024	Tofighbakhsh	Conduct legal research on Fifth Circuit caselaw on nonconsensual non-debtor releases and bad faith Chapter 11 filings.	1.60
5/8/2024	Tofighbakhsh	Review and analyze opposition brief to motion for leave to appeal.	1.00
5/8/2024	Tofighbakhsh	Confer with J. Bloom and L. Dayton re: legal research on Fifth Circuit caselaw on non-consensual non-debt releases and bad faith Chapter 11 filings.	1.20
5/8/2024	Tofighbakhsh	Circulate findings to team re: legal research on timelines and page limits for appeal briefing in district court and Fifth Circuit.	1.60
5/9/2024	Tofighbakhsh	Draft pro hac vice applications for appeal in S.D. Texas for whole team.	0.80
5/9/2024	Tofighbakhsh	Conduct research re: rules of appearing in S.D. Texas.	0.30
5/9/2024	Tofighbakhsh	Implement proofing edits to pro hac vice applications and attempt to file.	0.30
5/9/2024	Tofighbakhsh	Emails with team re: ECF failing to list client as a party.	0.30
5/9/2024	Schubert	Proofread PHV forms for S. Tofighbakhsh.	0.20
5/9/2024	Schubert	Assist with filing of PHV forms for S. Tofighbakhsh.	0.10
5/10/2024	Christoffersen	Organize docket materials for J. Lamken, L. Dayton, and S. Tofighbakhsh.	0.30
5/10/2024	Ghayoumi	Assist with filing pro hac vice motions.	0.40
5/10/2024	Tofighbakhsh	Confer with co-counsel re: ECF failing to list client as a party in appeal in S.D. Texas.	0.70
5/10/2024	Tofighbakhsh	Contact clerk of court and correct issue.	0.30
5/10/2024	Tofighbakhsh	File pro hac vice applications for team.	0.40
5/12/2024	Tofighbakhsh	Conduct legal research on Fifth Circuit caselaw on bad faith in for-cause dismissals of bankruptcy filings.	3.10
5/14/2024	Lamken	Call with L. Dayton re: appeal strategy and timing.	0.20
5/14/2024	Bloom	Finalize retention application.	1.30
5/14/2024	Ellis	Internal communication re: motion for leave to appeal and appellate brief.	0.30
5/14/2024	Dayton	Phone conference with J. Lamken re: appeal strategy.	0.20
5/14/2024	Dayton	Phone conference with S. Tofighbakhsh re: appeal timing.	0.10
5/14/2024	Dayton	Follow-up for J. Lamken re: timing and appeal procedure.	1.30
5/14/2024	Dayton	Review opposition to motion for leave to appeal.	0.50
5/14/2024	Tofighbakhsh	Conduct legal research on Fifth Circuit caselaw on bad faith in for-cause dismissals of bankruptcy filings.	1.20
5/15/2024	Litvak	Assemble Tehum materials for J. Ellis, S. Tofighbakhsh, and J. Bloom.	1.70
5/15/2024	Bloom	Legal research regarding potential appellate issues.	2.30

5/15/2024	Tofighbakhsh	Conduct legal research on nonconsensual non-debtor releases, bad faith requirements, other Texas Two-Step cases, and constitutional takings theories.	2.30
5/15/2024	Tofighbakhsh	Emails with L. Dayton, A Litvak, A. Starobinets, and C. Christoffersen re: compiling key documents and binders for J. Ellis, L. Dayton, J. Bloom, and J. Lamken.	1.10
5/15/2024	Tofighbakhsh	Confer with L. Dayton and J. Bloom re: key documents.	1.20
5/15/2024	Tofighbakhsh	Summarize research and compile key cases and circulate to team.	1.20
5/16/2024	Litvak	Coordinate Tehum materials for L. Dayton.	0.20
5/16/2024	Starobinets	Compile and organize documents for L. Dayton.	1.00
5/16/2024	Christoffersen	Prepare materials for J. Lamken.	1.60
5/16/2024	Dayton	Coordinate with S. Tofighbakhsh re: research materials for appeal.	0.20
5/16/2024	Tofighbakhsh	Review and analyze analogous bad faith arguments in briefings of LTL Management cases.	0.60
5/16/2024	Tofighbakhsh	Compile summaries of key background materials and research findings on key Fifth Circuit caselaw.	0.30
5/16/2024	Tofighbakhsh	Conduct legal research on requirements for direct appeals to the court of appeals and timelines for briefing and other procedural requirements in the district court and Fifth Circuit.	1.20
5/16/2024	Tofighbakhsh	Confer with L. Dayton and circulate summary of findings re: appeal timelines and procedural requirements.	1.20
5/16/2024	Tofighbakhsh	Emails with L. Dayton re: key background materials and research findings on key Fifth Circuit caselaw.	1.50
5/16/2024	Tofighbakhsh	Emails with L. Dayton re: of key background materials and research findings on key Fifth Circuit caselaw.	0.30
5/17/2024	Starobinets	Compile and organize documents for L. Dayton.	0.50
5/17/2024	Christoffersen	Prepare materials for J. Lamken.	0.40
5/17/2024	Bloom	Legal research regarding appellate procedure.	1.00
5/17/2024	Dayton	Review materials in preparation for appeal.	3.70
5/17/2024	Dayton	Phone conference with and email to M. McCafferty re: timing of Rule 8009(f) motion.	0.20
5/17/2024	Tofighbakhsh	Review and analyze analogous bad faith arguments in briefings of LTL Management cases.	0.20
5/17/2024	Tofighbakhsh	Emails with C. Christoffersen re: review materials prepared for J. Lamken.	0.20
5/17/2024	Tofighbakhsh	Review emails with L. Dayton and J. Bloom re: Rule 8009(f) motions.	0.20
5/17/2024	Tofighbakhsh	Respond to J. Lamken re: review materials and draft outline of appeal brief.	0.20
5/18/2024	Ellis	Review motion to compel briefing, ruling on same, and motion for leave to appeal re: same.	2.50
5/18/2024	Ellis	Emails with team re: arguments for opening appellate brief.	0.90
5/18/2024	Dayton	Review materials in preparation for appeal.	4.70
5/18/2024	Tofighbakhsh	Emails with J. Ellis and L. Dayton re: takings issue and outline of appeal argument.	0.90
5/18/2024	Tofighbakhsh	Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw.	0.90
5/19/2024	Lamken	Review outline of arguments on appeal; emails with L. Dayton re: same.	0.80
5/19/2024	Ellis	Review bankruptcy court briefing and cited cases.	2.00

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5/19/2024	Ellis	Emails with team re: arguments for opening appellate brief.	0.90
5/19/2024	Dayton	Review materials and draft outline of appeal brief.	5.60
5/19/2024	Dayton	Respond to J. Lamken emails re: review materials and draft outline of appeal brief.	1.00
5/19/2024	Dayton	Respond to J. Ellis emails re: review materials and appeal brief.	0.20
5/19/2024	Tofighbakhsh	Emails with J. Ellis and L. Dayton re: takings, due process, bad faith, unusual circumstances, and outline of appeal arguments; conduct research and compile summaries in support of same.	2.20
5/19/2024	Tofighbakhsh	Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw; review LTL briefing in support of same.	4.70
5/19/2024	Tofighbakhsh	Review LTL briefing in support of Tehum appeal.	1.70
5/20/2024	Lamken	Call with L. Dayton re: appeal strategy.	0.60
5/20/2024	Ellis	Research and emails with team re: appellate strategy.	0.90
5/20/2024	Dayton	Phone conference with J. Lamken re: appeal strategy.	0.60
5/20/2024	Dayton	Review materials in preparation for appeal.	1.40
5/20/2024	Tofighbakhsh	Emails with L. Dayton and J. Ellis re: argument outline for appeal.	0.60
5/20/2024	Tofighbakhsh	Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw.	0.20
5/20/2024	Tofighbakhsh	Review LTL briefing in preparation for appeal.	1.10
5/21/2024	Lamken	Call with full TCC team re: appeal status and strategy.	1.00
5/21/2024	Bloom	Call with E. Goodman, J. Lamken, J. Ellis, L. Dayton, and S. Tofighbakhsh re case status.	1.00
5/21/2024	Ellis	Discuss appeal with team.	2.10
5/21/2024	Dayton	Phone conference with E. Goodman re: appeal strategy.	0.20
5/21/2024	Dayton	Email to J. Lamken re: appeal strategy.	0.10
5/21/2024	Dayton	Team strategy meeting with E. Goodman, J. Lamken, J. Ellis, J. Bloom and S. Tofighbakhsh re: appellate strategy.	1.00
5/21/2024	Tofighbakhsh	Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw.	1.70
5/21/2024	Tofighbakhsh	Emails with L. Dayton and J. Ellis re: argument outline for appeal.	0.20
5/21/2024	Tofighbakhsh	Participate in meeting with co-counsel and appellate team re: appeal strategy and case updates.	1.20
5/21/2024	Tofighbakhsh	Review LTL briefing and academic articles on constitutional issues in support of same.	1.70
5/28/2024	Velasco	Compile interim compensation orders.	0.50
5/29/2024	Dayton	Follow-up re: timing of district court appeal.	0.10
5/29/2024	Tofighbakhsh	Emails with L. Dayton re: status of timeline to file appellate brief.	0.20
Total Hours			102.70
Total Fees			\$96,205.00

Timekeeper Summary

Josh Bloom	6.20 hours at \$1,000.00/hr	\$6,200.00
Charlie Christoffersen	2.30 hours at \$325.00/hr	\$747.50

MoloLamken LLP

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Lauren Dayton	22.40 hours at \$1,000.00/hr	\$22,400.00
Justin Ellis	9.60 hours at \$1,350.00/hr	\$12,960.00
Kayvon Ghayoumi	0.40 hours at \$850.00/hr	\$340.00
Jeffrey Lamken	2.70 hours at \$1,975.00/hr	\$5,332.50
Alice Litvak	1.90 hours at \$325.00/hr	\$617.50
Thomas Schubert	0.30 hours at \$850.00/hr	\$255.00
Anna Starobinets	1.50 hours at \$325.00/hr	\$487.50
Sara Tofighbakhsh	54.90 hours at \$850.00/hr	\$46,665.00
Veronica Velasco	0.50 hours at \$400.00/hr	\$200.00

Expenses

Date	Category	Description	Amount
5/10/2024	Filing Fees	Pro Hac Vice filing fee for J. Ellis TX Southern District Court.	\$100.00
5/10/2024	Filing Fees	Pro Hac Vice filing fee for J. Lamken TX Southern District Court.	\$100.00
5/10/2024	Filing Fees	Pro Hac Vice filing fee for J. Bloom TX Southern District Court.	\$100.00
5/10/2024	Filing Fees	Pro Hac Vice filing fee for J. Lamken TX Southern Bankruptcy Court	\$100.00
5/10/2024	Filing Fees	Pro Hac Vice filing fee for S. Tofighbakhsh TX Southern District Court.	\$100.00
5/28/2024	Court Fees	L. Dayton - Court Fee on 5/3 re: PHV Bankr TX	\$100.00
5/28/2024	Court Fees	L. Dayton - Court Fee on 5/10 re: PHV SD Texas	\$100.00
		Total Costs	\$700.00

Summary

Fees	\$96,205.00
Expenses	\$700.00
Total Current Billing	\$96,905.00
Previous Balance Due	\$40,385.00
Payments Received	\$0.00
Total Amount Due:	\$137,290.00



430 Park Avenue, New York, NY 10022
600 New Hampshire Avenue, N.W., Washington, D.C. 20037
300 North LaSalle, Chicago, IL 60654

Invoice No. 14627
June 25, 2024

Official Tort Claimants' Committee
In re: Tehum Care Services, Inc.
No. 23-90086 (CML)
United States District Court
for the Southern District of Texas

REMITTANCE PAGE
For Services Through May 31, 2024

1887-001: Tehum Appeal

Total Fees This Statement:	\$96,205.00
Total Expenses This Statement:	\$700.00
Total Current Billing:	\$96,905.00
Previous Balance Due:	\$40,385.00
Total Now Due:	\$137,290.00

Please include Matter No. 1887-001 and Invoice No. 14627 in the description when making a payment.

Domestic Wire Transfer:

International Wire Transfer:

Account Name: MoloLamken LLP
Bank info Signature Bank
9450 W. Bryn Mawr Avenue
Suite 300
Rosemont, IL 60018
Routing Number: 071-026-628
Account Number: 7000015810

Account Name: MoloLamken LLP
Bank info Wells Fargo Bank
420 Montgomery
San Francisco, CA 94104
Routing Number: 121-000-248
Account Number: 5231560185
International SWIFT: WFBIUS6S



430 Park Avenue, New York, NY 10022
 600 New Hampshire Avenue, N.W., Washington, D.C. 20037
 300 North LaSalle, Chicago, IL 60654

Invoice No. 14734
 July 29, 2024

Official Tort Claimants' Committee
 In re: Tehum Care Services, Inc.
 No. 23-90086 (CML)
 United States District Court
 for the Southern District of Texas

INVOICE
For Services Through June 30, 2024

1887-001: Tehum Appeal

Professional Fees

Date	Professional		Hours
6/10/2024	Lamken	Conference with L. Dayton re: case and appeal status; emails regarding same.	1.00
6/10/2024	Ellis	Discuss appellate record issues with L. Dayton.	0.20
6/10/2024	Dayton	Contact clerk's office to confirm status of appeal (0.1); draft email to co-counsel re same (0.2).	0.30
6/11/2024	Tofighbakhsh	Review Texas-Two Step cases in preparation for appeal; review emails with trial counsel re: appeal status.	1.00
6/14/2024	Bloom	Emails with S. Tofighbakhsh re: preparing fee application.	0.60
6/14/2024	Tofighbakhsh	Identify and enter task codes for team time entries in preparation for drafting fee application; confer with J. Bloom re: same; circulate task code entries to Y. Miller.	1.50
6/17/2024	Tofighbakhsh	Draft fee application and identify task codes for billing and preparation of same; confer with J. Bloom and Y. Miller re: same.	3.20
6/18/2024	Tofighbakhsh	Emails with Y. Miller re: billing codes for fee application.	0.20
6/19/2024	Tofighbakhsh	Confer with J. Bloom re: draft confirmation of no objection in support of fee application; proof same and circulate to co-counsel; review emails from same re: extension of objection timeline; review and analyze billing summary in support of fee application; emails to Y. Miller re: revisions to same.	1.30
6/20/2024	Tofighbakhsh	Review billing summary and invoices in support of fee application; emails with Y. Miller re: same.	0.40
6/21/2024	Lamken	Emails on denial of motion for leave.	0.20
6/21/2024	Dayton	Review decision denying motion for leave to appeal (0.3).	0.30
6/21/2024	Tofighbakhsh	Review and analyze denial of motion for leave to appeal from motion to dismiss and email from L. Dayton re: same.	0.10
6/22/2024	Dayton	Review Fifth Circuit caselaw on appeal of denial of motion for leave to appeal.	0.20
6/24/2024	Tofighbakhsh	Confer with J. Bloom re: status of fee application; emails with L. Dayton re: same.	0.10
6/26/2024	Ellis	Discuss fee application with S. Tofighbakhsh.	0.20

Total Hours	10.80
Total Fees	\$10,940.00

Timekeeper Summary

Josh Bloom	0.60 hours at \$1,000.00/hr	\$600.00
Lauren Dayton	0.80 hours at \$1,000.00/hr	\$800.00
Justin Ellis	0.40 hours at \$1,350.00/hr	\$540.00
Jeffrey Lamken	1.20 hours at \$1,975.00/hr	\$2,370.00
Sara Tofighbakhsh	7.80 hours at \$850.00/hr	\$6,630.00

Summary

Fees	\$10,940.00
Expenses	\$0.00
Total Current Billing	<u>\$10,940.00</u>
Previous Balance Due	\$137,290.00
Payments Received	\$0.00
Total Amount Due:	<u>\$148,230.00</u>



430 Park Avenue, New York, NY 10022
600 New Hampshire Avenue, N.W., Washington, D.C. 20037
300 North LaSalle, Chicago, IL 60654

Invoice No. 14734
July 29, 2024

Official Tort Claimants' Committee
In re: Tehum Care Services, Inc.
No. 23-90086 (CML)
United States District Court
for the Southern District of Texas

REMITTANCE PAGE
For Services Through June 30, 2024

1887-001: Tehum Appeal

Total Fees This Statement:	\$10,940.00
Total Expenses This Statement:	\$0.00
Total Current Billing:	\$10,940.00
Previous Balance Due:	\$137,290.00
Total Now Due:	\$148,230.00

Please include Matter No. 1887-001 and Invoice No. 14734 in the description when making a payment.

Domestic Wire Transfer:

International Wire Transfer:

Account Name: MoloLamken LLP
Bank info Signature Bank
9450 W. Bryn Mawr Avenue
Suite 300
Rosemont, IL 60018
Routing Number: 071-026-628
Account Number: 7000015810

Account Name: MoloLamken LLP
Bank info Wells Fargo Bank
420 Montgomery
San Francisco, CA 94104
Routing Number: 121-000-248
Account Number: 5231560185
International SWIFT: WFBIUS6S

EXHIBIT E
Itemized Time Detail by Task Code
April 15, 2024 through June 30, 2024

MoloLamken LLP

ML - Listing - April 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/17/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review relevant Fifth Circuit and Bankruptcy Rules regarding appeal.		T L500	0.50	1,000.00	500.00
04/17/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review motion for leave to appeal.		T L250	2.00	1,000.00	2,000.00
04/17/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review motion for leave to appeal		T L250	1.70	1,975.00	3,357.50
04/19/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Edit motion for leave to appeal.		T L250	6.20	1,000.00	6,200.00

MoloLamken LLP

ML - Listing - April 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/19/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and analyze draft motion for leave to appeal; review background of bankruptcy court case; emails with L. Dayton to team re: same.		T L500	1.90	850.00	1,615.00
04/19/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton re: strategy for motion for leave to appeal brief.		T L120	0.20	1,350.00	270.00
04/19/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Email to team re: caselaw research for appeal.		T L120	0.20	1,000.00	200.00
04/19/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Research with L. Dayton re: strategy for motion for leave to appeal brief.		T L120	0.30	1,350.00	405.00

MoloLamken LLP

ML - Listing - April 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/19/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review draft motion for leave to appeal		T L250	2.80	1,975.00	5,530.00
04/19/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Email to L. Dayton re: revisions to motion for leave to appeal and strategic issues		T L250	0.10	1,975.00	197.50
04/19/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Revise draft motion for leave to appeal.		T L250	2.80	1,975.00	5,530.00
04/19/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Email to L. Dayton re: revisions to motion for leave to appeal and strategic issues.		T L250	0.10	1,975.00	197.50
04/20/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and revise motion for leave to appeal.		T L250	2.60	1,000.00	2,600.00

MoloLamken LLP

ML - Listing - April 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review bankruptcy appellate rules re: motion for leave to appeal.		T L500	0.40	1,000.00	400.00
04/21/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton re: leave to appeal brief.		T L250	0.10	1,350.00	135.00
04/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Edit motion for leave to appeal.		T L250	0.50	1,000.00	500.00
04/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails to E. Goodman re: motion for leave to appeal.		T L250	0.30	1,000.00	300.00
04/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with E. Goodman re: leave to appeal.		T L120	0.20	1,000.00	200.00

MoloLamken LLP

ML - Listing - April 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Incorporate edits into most recent draft of motion for leave to appeal.		T L250	0.60	1,000.00	600.00
04/21/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Research with L. Dayton re: leave to appeal brief.		T L250	0.20	1,350.00	270.00
04/22/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review J. Lamken edits to motion for leave to appeal.		T L250	0.20	1,000.00	200.00
04/22/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court for J. Lamken; conduct research re: same.		T B110	0.40	850.00	340.00

MoloLamken LLP

ML - Listing - April 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/22/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Edit motion for leave to appeal		T L250	2.10	1,975.00	4,147.50
04/22/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails re: strategy and questions presented		T L120	0.20	1,975.00	395.00
04/23/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with S. Tofighbakhsh re: pro hac vice applications for S.D. Texas bankruptcy court.		T B110	0.20	1,000.00	200.00
04/23/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court for J. Lamken; prepare application forms for same; confer with L. Dayton about appeal timeline and preliminary research topics.		T B110	2.10	850.00	1,785.00

MoloLamken LLP

ML - Listing - April 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/25/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review involved parties list for potential conflicts; confirm no conflicts.		T B110	0.10	850.00	85.00
04/28/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Email to C. Christoffersen re: case management.		T B110	0.10	1,000.00	100.00
04/29/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court.		T B110	0.10	850.00	85.00
04/30/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on case background and Texas Two-Step cases in other circuits and academic writing.		T L500	2.40	850.00	2,040.00
				Grand Total:	31.60		<u>\$40,385.00</u>

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/01/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Email re: assigned of appeal.		T B110	0.10	1,000.00	100.00
05/01/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court.		T B110	0.40	850.00	340.00
05/01/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with J. Lamken regarding pro hac vice applications for S.D. Texas bankruptcy court.		T B110	0.30	850.00	255.00
05/01/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal File application for J. Lamken in S.D. Texas bankruptcy case.		T B110	0.20	850.00	170.00

MoloLamken LLP

ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/01/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Prepare Pacer link and applications for L. Dayton.		T B110	0.10	850.00	85.00
05/01/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails re: pro hac applications and assignment of appeal.		T L500	0.10	1,975.00	197.50
05/02/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton regarding pro hac vice applications for S.D. Texas bankruptcy court for J. Lamken.		T B110	0.40	850.00	340.00
05/02/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal File application for S.D. Texas bankruptcy court.		T B110	0.40	850.00	340.00

MoloLamken LLP

ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/03/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with J. Lamken, J. Bloom, and Brown Rudnick re: engagement letter and disclosure conflicts check [N.C. -0.10]		T B110	0.00	1,000.00	0.00
05/03/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct background research on filings in S.D. Texas bankruptcy motion for leave to appeal by Tort Claimants' Committee, Texas Two-Step arguments in LTL Management opinion.		T L500	2.00	850.00	1,700.00
05/03/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Draft retention application [N.C. -6.70]		T B160	0.00	1,000.00	0.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/03/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and analyze briefing in second LTL appeal, and review memoranda on developments up to 2023 on other Texas Two-Step cases around the country.		T L500	1.00	850.00	850.00
05/03/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on Texas Two-Step issues.		T L500	0.90	850.00	765.00
05/05/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review bankruptcy retention application [N.C. -1.10]		T B160	0.00	1,000.00	0.00
05/06/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Email to E. Goodman re: statement of issues and designation of the record.		T L500	0.10	1,000.00	100.00

MoloLamken LLP

ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/06/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on other Texas Two-Step cases and Fifth Circuit caselaw on non-consensual non-debtor releases and confer with J. Bloom re: same.		T L500	5.60	850.00	4,760.00
05/07/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Coordinate re: question from Brown Rudnick re: reply for motion for leave to appeal.		T L250	0.20	1,000.00	200.00
05/07/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on Fifth Circuit caselaw on nonconsensual non-debt releases and timeline for opposition briefs to motion for leave to appeal; Conduct legal research on Fifth Circuit caselaw on non-consensual non-debt releases.		T L500	1.80	850.00	1,530.00

MoloLamken LLP

ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/07/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Legal research regarding procedure.		T L500	0.60	1,000.00	600.00
05/07/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and revise retention application [N.C. -1.10]		T B160	0.00	1,000.00	0.00
05/08/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with L. Walker re: case update.		T B110	0.10	1,000.00	100.00
05/08/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on Fifth Circuit caselaw on nonconsensual non-debtor releases and bad faith Chapter 11 filings.		T L500	1.60	850.00	1,360.00

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ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/08/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and analyze opposition brief to motion for leave to appeal.		T L250	1.00	850.00	850.00
05/08/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with Brown Rudnick re: appeal.		T L500	0.10	1,000.00	100.00
05/08/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with team re: research and case management re: appeal.		T B110	0.10	1,000.00	100.00
05/08/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with S. Tofighbakhsh re: research.		T L500	0.60	1,000.00	600.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/08/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Confer with J. Bloom and L. Dayton re: legal research on Fifth Circuit caselaw on non-consensual non-debt releases and bad faith Chapter 11 filings.		T L500	1.20	850.00	1,020.00
05/08/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Circulate findings to team re: legal research on timelines and page limits for appeal briefing in district court and Fifth Circuit.		T L500	1.60	850.00	1,360.00
05/09/2024	TPS	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Proofread PHV forms for S. Tofighbakhsh.		T B110	0.20	850.00	170.00
05/09/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Draft pro hac vice applications for appeal in S.D. Texas for whole team.		T L500	0.80	850.00	680.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/09/2024	TPS	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Assist with filing of PHV forms for S. Tofighbakhsh.		T B110	0.10	850.00	85.00
05/09/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct research re: rules of appearing in S.D. Texas.		T B110	0.30	850.00	255.00
05/09/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Implement proofing edits to pro hac vice applications and attempt to file.		T B110	0.30	850.00	255.00
05/09/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with team re: ECF failing to list client as a party.		T B110	0.30	850.00	255.00
05/10/2024	KG	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Assist with filing pro hac vice motions.		T B110	0.40	850.00	340.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/10/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Confer with co-counsel re: ECF failing to list client as a party in appeal in S.D. Texas.		T B110	0.70	850.00	595.00
05/10/2024		1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Sara Tofighbakhsh		Filing Fee E123	1.00	100.00	100.00
05/10/2024		1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Sara Tofighbakhsh		Filing Fee E123	1.00	100.00	100.00
05/10/2024		1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Sara Tofighbakhsh		Filing Fee E123	1.00	100.00	100.00
05/10/2024		1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Sara Tofighbakhsh		Filing Fee E123	1.00	100.00	100.00
05/10/2024		1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Sara Tofighbakhsh		Filing Fee E123	1.00	100.00	100.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/10/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Contact clerk of court and correct issue.		T B110	0.30	850.00	255.00
05/10/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal File pro hac vice applications for team.		T B110	0.40	850.00	340.00
05/10/2024	CC	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Organize docket materials for J. Lamken, L. Dayton, and S. Tofighbakhsh.		T L140	0.30	325.00	97.50
05/12/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on Fifth Circuit caselaw on bad faith in for-cause dismissals of bankruptcy filings.		T L500	3.10	850.00	2,635.00
05/14/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with J. Lamken re: appeal strategy.		T L120	0.20	1,000.00	200.00

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ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/14/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Internal communication re: motion for leave to appeal and appellate brief.		T L120	0.30	1,350.00	405.00
05/14/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on Fifth Circuit caselaw on bad faith in for-cause dismissals of bankruptcy filings.		T L500	1.20	850.00	1,020.00
05/14/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with S. Tofighbakhsh re: appeal timing.		T B110	0.10	1,000.00	100.00
05/14/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Follow-up for J. Lamken re: timing and appeal procedure.		T B110	1.30	1,000.00	1,300.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/14/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review opposition to motion for leave to appeal.		T L250	0.50	1,000.00	500.00
05/14/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Finalize retention application		T B110	1.30	1,000.00	1,300.00
05/14/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Call with L. Dayton re: appeal strategy and timing.		T L500	0.20	1,975.00	395.00
05/15/2024	AL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Assemble Tehum materials for J. Ellis, S. Tofighbakhsh, and J. Bloom.		T L140	1.70	325.00	552.50

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ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/15/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on nonconsensual non-debtor releases, bad faith requirements, other Texas Two-Step cases, and constitutional takings theories.		T L140	2.30	850.00	1,955.00
05/15/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton, A Litvak, A. Starobinets, and C. Christoffersen re: compiling key documents and binders for J. Ellis, L. Dayton, J. Bloom, and J. Lamken.		T L500	1.10	850.00	935.00
05/15/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Confer with L. Dayton and J. Bloom re: key documents.		T L140	1.20	850.00	1,020.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/15/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Summarize research and compile key cases and circulate to team.		T L140	1.20	850.00	1,020.00
05/15/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Legal research regarding potential appellate issues		T L500	2.30	1,000.00	2,300.00
05/16/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Coordinate with S. Tofighbakhsh re: research materials for appeal.		T L500	0.20	1,000.00	200.00
05/16/2024	AL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Coordinate Tehum materials for L. Dayton.		T L140	0.20	325.00	65.00
05/16/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and analyze analogous bad faith arguments in briefings of LTL Management cases.		T L500	0.60	850.00	510.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/16/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Compile summaries of key background materials and research findings on key Fifth Circuit caselaw.		T L500	0.30	850.00	255.00
05/16/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conduct legal research on requirements for direct appeals to the court of appeals and timelines for briefing and other procedural requirements in the district court and Fifth Circuit.		T L500	1.20	850.00	1,020.00
05/16/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Confer with L. Dayton and circulate summary of findings re: appeal timelines and procedural requirements.		T L500	1.20	850.00	1,020.00

MoloLamken LLP

ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/16/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton re: key background materials and research findings on key Fifth Circuit caselaw.		T L500	1.50	850.00	1,275.00
05/16/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton re: of key background materials and research findings on key Fifth Circuit caselaw.		T L500	0.30	850.00	255.00
05/16/2024	CC	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Prepare materials for J. Lamken.		T L140	1.60	325.00	520.00
05/16/2024	AS	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Compile and organize documents for L. Dayton.		T L140	1.00	325.00	325.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/17/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review materials in preparation for appeal.		T L500	3.70	1,000.00	3,700.00
05/17/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and analyze analogous bad faith arguments in briefings of LTL Management cases.		T L500	0.20	850.00	170.00
05/17/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with C. Christoffersen re: review materials prepared for J. Lamken.		T L140	0.20	850.00	170.00
05/17/2024	CC	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Prepare materials for J. Lamken.		T L140	0.40	325.00	130.00
05/17/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Legal research regarding appellate procedure		T L500	1.00	1,000.00	1,000.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/17/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with and email to M. McCafferty re: timing of Rule 8009(f) motion.		T L250	0.20	1,000.00	200.00
05/17/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review emails with L. Dayton and J. Bloom re: Rule 8009(f) motions.		T L250	0.20	850.00	170.00
05/17/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Respond to J. Lamken re: review materials and draft outline of appeal brief.		T L140	0.20	850.00	170.00
05/17/2024	AS	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Compile and organize documents for L. Dayton.		T L140	0.50	325.00	162.50
05/18/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review materials in preparation for appeal.		T L500	4.70	1,000.00	4,700.00

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Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/18/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review motion to compel briefing, ruling on same, and motion for leave to appeal re: same.		T L500	2.50	1,350.00	3,375.00
05/18/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with J. Ellis and L. Dayton re: takings issue and outline of appeal argument.		T L500	0.90	850.00	765.00
05/18/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw.		T L500	0.90	850.00	765.00
05/18/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with team re: arguments for opening appellate brief.		T L500	0.90	1,350.00	1,215.00

MoloLamken LLP

ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/19/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review materials and draft outline of appeal brief.		T L500	5.60	1,000.00	5,900.00
05/19/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review bankruptcy court briefing and cited cases.		T L500	2.00	1,350.00	2,700.00
05/19/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with J. Ellis and L. Dayton re: takings, due process, bad faith, unusual circumstances, and outline of appeal arguments; conduct research and compile summaries in support of same.		T L500	2.20	850.00	1,870.00
05/19/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw; review LTL briefing in support of same.		T L500	4.70	850.00	3,995.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/19/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with team re: arguments for opening appellate brief.		T L500	0.90	1,350.00	1,215.00
05/19/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review LTL briefing in support of Tehum appeal.		T L500	1.70	850.00	1,445.00
05/19/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Respond to J. Lamken emails re: review materials and draft outline of appeal brief.		T L500	1.00	1,000.00	1,000.00
05/19/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Respond to J. Ellis emails re: review materials and appeal brief.		T L500	0.20	1,000.00	200.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/19/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review outline of arguments on appeal; emails with L. Dayton re: same.		T L120	0.80	1,975.00	1,580.00
05/20/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton and J. Ellis re: argument outline for appeal.		T L500	0.60	850.00	510.00
05/20/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with J. Lamken re: appeal strategy.		T L500	0.60	1,000.00	600.00
05/20/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw.		T L500	0.20	850.00	170.00

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ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/20/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Research and emails with team re: appellate strategy		T L120	0.90	1,350.00	1,215.00
05/20/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review materials in preparation for appeal.		T L500	1.40	1,000.00	700.00
05/20/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review LTL briefing in preparation for appeal.		T L500	1.10	850.00	935.00
05/20/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Call with L. Dayton re: appeal strategy.		T L120	0.60	1,975.00	1,185.00
05/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Phone conference with E. Goodman re: appeal strategy.		T L500	0.20	1,000.00	200.00

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ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/21/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Discuss appeal with team.		T L500	2.10	1,350.00	2,835.00
05/21/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review key background materials from bankruptcy court record and research findings on key Fifth Circuit caselaw.		T L500	1.70	850.00	1,445.00
05/21/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton and J. Ellis re: argument outline for appeal.		T L500	0.20	850.00	170.00
05/21/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Participate in meeting with co-counsel and appellate team re: appeal strategy and case updates.		T L120	1.20	850.00	1,020.00

MoloLamken LLP**ML - Listing - May 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/21/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Call with E. Goodman, J. Lamken, J. Ellis, L. Dayton, and S. Tofighbakhsh re case status		T L120	1.00	1,000.00	1,000.00
05/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Email to J. Lamken re: appeal strategy.		T L120	0.10	1,000.00	100.00
05/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Team strategy meeting with E. Goodman, J. Lamken, J. Ellis, J. Bloom and S. Tofighbakhsh re: appellate strategy.		T L120	1.00	1,000.00	1,000.00
05/21/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review LTL briefing and academic articles on constitutional issues in support of same.		T L500	1.70	850.00	1,445.00

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ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/21/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Call with full TCC team re: appeal status and strategy.		T L120	1.00	1,975.00	1,975.00
05/28/2024		1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Lauren F. Dayton		Court Fees E123	1.00	100.00	100.00
05/28/2024		1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Lauren F. Dayton		Court Fees E123	1.00	100.00	100.00
05/28/2024	VV	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Compile interim compensation orders.		T L140	0.50	400.00	200.00
05/29/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Follow-up re: timing of district court appeal.		T B110	0.10	1,000.00	100.00

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ML - Listing - May 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/29/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton re: status of timeline to file appellate brief.		T B110	0.20	850.00	170.00
Grand Total:					109.70		\$105,845.00

MoloLamken LLP**ML - Listing - June 2024**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
06/10/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Contact clerk's office to confirm status of appeal (0.1); draft email to co- counsel re same (0.2).		T B110	0.30	1,000.00	300.00
06/10/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Discuss appellate record issues with L. Dayton		T L120	0.20	1,350.00	270.00
06/10/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Conference with L. Dayton re: case and appeal status; emails regarding same.		T B160	1.00	1,975.00	1,975.00
06/11/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review Texas-Two Step cases in preparation for appeal; review emails with trial counsel re: appeal status.		T L500	1.00	850.00	850.00

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ML - Listing - June 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
06/14/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Identify and enter task codes for team time entries in preparation for drafting fee application; confer with J. Bloom re: same; circulate task code entries to Y. Miller.		T B160	1.50	850.00	1,275.00
06/14/2024	JB	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with S. Tofighbakhsh re: preparing fee application		T B160	0.60	1,000.00	600.00
06/17/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Draft fee application and identify task codes for billing and preparation of same; confer with J. Bloom and Y. Miller re: same.		T B160	3.20	850.00	2,720.00
06/18/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with Y. Miller re: billing codes for fee application.		T B160	0.20	850.00	170.00

MoloLamken LLP

ML - Listing - June 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
06/19/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Confer with J. Bloom re: draft confirmation of no objection in support of fee application; proof same and circulate to co-counsel; review emails from same re: extension of objection timeline; review and analyze billing summary in support of fee application; emails to Y. Miller re: revisions to same.		T B160	1.30	850.00	1,105.00
06/20/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review billing summary and invoices in support of fee application; emails with Y. Miller re: same.		T B160	0.40	850.00	340.00
06/21/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review decision denying motion for leave to appeal (0.3).		T L120	0.30	1,000.00	300.00

MoloLamken LLP

ML - Listing - June 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
06/21/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and analyze denial of motion for leave to appeal from motion to dismiss and email from L. Dayton re: same.		T B110	0.10	850.00	85.00
06/21/2024	JAL	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails on denial of motion for leave		T L120	0.20	1,975.00	395.00
06/22/2024	LFD	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review Fifth Circuit caselaw on appeal of denial of motion for leave to appeal.		T L120	0.20	1,000.00	200.00
06/24/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Confer with J. Bloom re: status of fee application; emails with L. Dayton re: same.		T B160	0.10	850.00	85.00

MoloLamken LLP

ML - Listing - June 2024

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
06/26/2024	JME	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Discuss fee application with S. Tofighbakhsh		T B110	0.20	1,350.00	270.00
				Grand Total:	10.80		<u>\$10,940.00</u>

**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)

Re: Docket No. _____

**ORDER GRANTING FIRST INTERIM FEE APPLICATION OF
MOLOLAMKEN LLP FOR COMPENSATION FOR SERVICES RENDERED AND
FOR REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL APPELLATE
COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR THE
PERIOD FROM APRIL 15, 2024 THROUGH JUNE 30, 2024**

The Court has considered the *First Interim Fee Application of MoloLamken LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Special Appellate Counsel to the Official Committee of Tort Claimants for the Period from April 15, 2024 through June 30, 2024* (the “**Application**”) filed by MoloLamken LLP (the “**Applicant**”). The Court hereby orders that:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$148,230.00 for the period set forth in the Application.
2. The Debtor is authorized to disburse any unpaid amounts allowed by Paragraph 1 of this Order.
3. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon entry.

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

4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

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

Signed: _____, 2024

Christopher López
United States Bankruptcy Judge