

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

In re:

TEHUM CARE SERVICES, INC.<sup>1</sup>

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**SECOND 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 JULY 1, 2024 THROUGH JULY 31, 2024**

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

***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"):	July 1, 2024 through July 31, 2024
Total Fees Sought:	\$6,680.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$6,680.00

<sup>1</sup> 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:	7.8
Average hourly rate for professionals:	\$856.41
Total paraprofessional fees covered by this statement:	N/A
Total paraprofessional hours covered by this statement:	0
Average hourly rate for paraprofessionals:	N/A
Reimbursable expenses sought in this statement:	\$0.00
Payment Requested:	
80% Fees	\$5,344.00
100% Expenses	\$0.00
Total:	\$5,344.00

**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 [ECF No. 1646] (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 Second Monthly Fee Statement for the Payment of Compensation and Reimbursement of Expenses for the Period from July 1, 2024 through July 31, 2024 (the “Second Monthly Fee Statement”).

By the Second Monthly Fee Statement and pursuant to the Interim Compensation Order, MoloLamken seeks interim payment of (i) \$5,344.00 (80% of \$6,680.00) as compensation for professional services rendered to the Committee and (ii) \$0.00 for reimbursement of actual and necessary expenses, for a total of \$5,344.00 for the period July 1, 2024 through and including July 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Second Monthly Fee Statement to object to the requested fees and expenses.

## **II. Itemization of Services Rendered and Expenses Incurred**

In support of this Second 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 \$6,680.00 in fees during the Fee Period. Pursuant to this Second Monthly Fee Statement, MoloLamken seeks compensation in the amount of \$5,344.00 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 Second Monthly Fee Statement. Attorneys and paraprofessionals of MoloLamken expended a total of 7.8 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 Second Monthly Fee Statement. This Second Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$0.00.

**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 Second 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 \$5,344.00, consisting of (i) \$5,344.00, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by MoloLamken, and (ii) \$0.00, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: September 16, 2024  
Washington, D.C.

Respectfully submitted,

/s/ Jeffrey A. Lamken

Jeffrey A. Lamken (*pro hac vice*)  
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Lauren F. Dayton (*pro hac vice*)  
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Chicago, IL 60654  
(312) 450-6700  
ldayton@mololamken.com

**CERTIFICATE OF SERVICE**

I certify that on September 16, 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**

<b>Bill Date Range: July 1, 2024 through July 31, 2024</b>				
<b>Task Code</b>	<b>Description of Task Code</b>	<b>Employee Name</b>	<b>Billed Hours</b>	<b>Billed Amount</b>
B160	Fee/Employment Applications	Sara Tofighbakhsh	7.3	\$6,205.00
		Elizabeth Clarke	0.5	\$475.00
<b>Total</b>			<b>7.8</b>	<b>\$6,680.00</b>
<b>Total for Second Monthly Fee Application</b>			<b>7.8</b>	<b>\$6,680.00</b>

**EXHIBIT B**  
**Summary of Hours Expended and Fees Incurred by Professional**  
**July 1, 2024 through July 31, 2024**

Name of Professional	Title	Year Admitted	Hourly Billing Rate	Total Billed Hours	Total Compensation
N/A	N/A	N/A	N/A	N/A	N/A
<b>Partner and Counsel Total</b>				<b>N/A</b>	<b>N/A</b>

Name of Professional	Title	Year Admitted	Hourly Billing Rate	Total Billed Hours	Total Compensation
Tofighbakhsh, Sara	Associate	2022	\$850	7.3	\$6,205.00
Clarke, Elizabeth	Associate	2017	\$950	0.5	\$475.00
<b>Associate Total</b>				<b>7.8</b>	<b>\$6,680.00</b>

Name of Paraprofessional	Title	Year Admitted	Hourly Billing Rate	Total Billed Hours	Total Compensation
N/A	N/A	N/A	N/A	N/A	N/A
<b>Paraprofessional Total</b>				<b>N/A</b>	<b>N/A</b>

PROFESSIONALS	BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	\$0.00	0	\$0.00
Associates	\$856.41	7.8	\$6,680.00
Paralegals/Non-Legal Staff	\$0.00	0	\$0.00
Blended Attorney Rate	\$856.41	7.8	\$6,680.00
Blended Rate All Timekeepers	\$856.41	7.8	\$6,680.00



**EXHIBIT C**  
**Record of Expenses**  
**July 1, 2024 through July 31, 2024**

<b>Expenses Category</b>	<b>Total Expenses (\$)</b>
N/A	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

**EXHIBIT D**  
**Detailed Record of Time Entries**  
**July 1, 2024 through July 31, 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. 14894  
 September 11, 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 July 31, 2024**

1887-001: Tehum Appeal

**Professional Fees**

Date	Professional		Hours
7/2/2024	Tofighbakhsh	Review certificate of no-objection filed by co-counsel; emails with L. Dayton re: preparation of fee application in light of same.	0.10
7/22/2024	Tofighbakhsh	Emails with Y. Miller, J. Bloom, and L. Dayton re: preparing fee application.	0.10
7/26/2024	Tofighbakhsh	Draft fee application (3.3); circulate draft to Y. Miller (0.2).	3.50
7/27/2024	Tofighbakhsh	Revise fees and expenses calculations (1.4); circulate revised fee application to L. Dayton and J. Bloom (0.1).	1.50
7/29/2024	Clarke	Proofread fee application.	0.50
7/29/2024	Tofighbakhsh	Review and revise fee application to incorporate edits (1.5); confer with Y. Miller re: production of billing reports for same (0.2); circulate revised fee application to team (0.2).	1.90
7/31/2024	Tofighbakhsh	Emails with L. Dayton re: fee application (0.1); circulate draft of same to J. Lamken for review (0.1).	0.20
			Total Hours
			7.80
			Total Fees
			\$6,680.00

**Timekeeper Summary**

Elizabeth Clarke	0.50 hours at \$950.00/hr	\$475.00
Sara Tofighbakhsh	7.30 hours at \$850.00/hr	\$6,205.00

**Summary**

Fees	\$6,680.00
Expenses	\$0.00
Total Current Billing	\$6,680.00
Previous Balance Due	\$148,230.00
Payments Received	(\$70,202.63)
<b>Total Amount Due:</b>	<b>\$84,707.37</b>

MoloLamken LLP

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430 Park Avenue, New York, NY 10022  
 600 New Hampshire Avenue, N.W., Washington, D.C. 20037  
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Official Tort Claimants' Committee  
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 United States District Court  
 for the Southern District of Texas

**REMITTANCE PAGE**  
**For Services Through July 31, 2024**

1887-001: Tehum Appeal

Total Fees This Statement:	\$6,680.00
Total Expenses This Statement:	\$0.00
Total Current Billing:	\$6,680.00
Previous Balance Due:	\$148,230.00
Payments Received:	(\$70,202.63)
<b>Total Now Due:</b>	<b>\$84,707.37</b>

**Please include Matter No. 1887-001 and Invoice No. 14894 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 Capital One Bank  
 1680 Capital One Drive  
 McLean, VA 22102  
 Routing Number: 065-000-090  
 Account Number: 3316983478  
 International SWIFT: HIBKUS44

**EXHIBIT E**  
**Itemized Time Detail by Task Code**  
**July 1, 2024 through July 31, 2024**

**MoloLamken LLP****ML - Listing - July 2024**

<b>Date</b>	<b>Prof</b>	<b>Matter ID/Client Sort Matter Description Narrative</b>	<b>Activity Code</b>	<b>Component Task Code</b>	<b>Units</b>	<b>Price</b>	<b>Value</b>
07/02/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review certificate of no- objection filed by co-counsel; emails with L. Dayton re: preparation of fee application in light of same.		T B160	0.10	850.00	85.00
07/22/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with Y. Miller, J. Bloom, and L. Dayton re: preparing fee application.		T B160	0.10	850.00	85.00
07/26/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Draft fee application (3.3); circulate draft to Y. Miller (0.2).		T B160	3.50	850.00	2,975.00

# MoloLamken LLP

## ML - Listing - July 2024

07/27/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Revise fees and expenses calculations (1.4); circulate revised fee application to L. Dayton and J. Bloom (0.1).	T B160	1.50	850.00	1,275.00
07/29/2024	EKC	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Proofread fee application	T B160	0.50	950.00	475.00
07/29/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Review and revise fee application to incorporate edits (1.5); confer with Y. Miller re: production of billing reports for same (0.2); circulate revised fee application to team (0.2).	T B160	1.90	850.00	1,615.00
07/31/2024	ST	1887-001/ Official Committee of Tort Claimants (Tehum) Tehum Appeal Emails with L. Dayton re: fee application (0.1); circulate draft of same to J. Lamken for review (0.1).	T B160	0.20	850.00	170.00
<b>Grand Total:</b>				7.80		\$6,680.00