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

In re:

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

Chapter 11

Case No. 23-90086 (CML)

Debtor.

# NOTICE OF GRAY REED'S THIRTEENTH MONTHLY FEE STATEMENT AS COUNSEL TO THE DEBTOR FOR THE PERIOD OF AUGUST 1, 2024 THROUGH AUGUST 31, 2024

PLEASE TAKE NOTICE that pursuant to the Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 1646] (as modified or amended, the "Interim Compensation Order"), Gray Reed, as counsel to the Debtor, served its thirteenth monthly fee statement upon the Fee Notice Parties (as defined in the Interim Compensation Order) via electronic mail on September 24, 2024 (the "<u>Thirteenth</u> <u>Monthly Fee Statement</u>"). A copy of the Thirteenth Monthly Fee Statement is attached hereto as **Exhibit A**.

Respectfully submitted this 24th day of September, 2024.

<sup>&</sup>lt;sup>1</sup> The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



### **GRAY REED**

By: /s/ Jason S. Brookner

Jason S. Brookner Texas Bar No. 24033684 1300 Post Oak Boulevard, Suite 2000 Houston, Texas 77056 Telephone: (713) 986-7127 Facsimile: (713) 986-5966 Email: jbrookner@grayreed.com

Counsel to the Debtor and Debtor in Possession

# **Certificate of Service**

I certify that on September 24, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner

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# <u>Exhibit A</u>

**Thirteenth Monthly Fee Statement** 

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JASON S. BROOKNER D: 469-320-6132 jbrookner@grayreed.com DALLAS | HOUSTON | WACO

September 24, 2024

# **FEE NOTICE PARTIES**

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

Ha M. Nguyen, Esq. Ha.Nguyen@usdoj.gov Andrew Jimenez, Esq. Andrew.Jimenez@usdoj.gov

#### **BROWN RUDNICK LLP as** Counsel to the Tort Claimants' Committee

Eric D. Goodman, Esq. BRTehumTeam@brownrudnick.com mz@berryriddell.com

NORTON ROSE FULBRIGHT as Counsel to M2 LoanCo, LLC

Kristian W. Gluck, Esq. kristian.gluck@nortonrosefulbright.com STINSON LLP as Counsel to the Committee

Nicholas Zluticky, Esq. nicholas.zluticky@stinson.com Zach Hemenway, Esq. zachary.hemenway@stinson.com

#### **BERRY RIDDELL LLP as** Counsel to the Tort Claimants' *Committee*

Michael W. Zimmerman, Esq.

Re: In re Tehum Care Services, Inc. - Case No. 23-90086 (CML)

In accordance with the Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 1646] (the "Fee Procedures Order"), enclosed is a summary fee statement (the "Thirteenth Monthly Fee Statement") and the corresponding invoices (the "August Invoices") showing the services rendered and expenses incurred during the period from August 1 - August 31, 2024 (the "Fee Period").

Pursuant to the Fee Procedures Order, and if no objection(s) are received within 14 days of receipt of Gray Reed's Thirteenth Monthly Fee Statement, the Debtor will be authorized to pay the following amounts: (a) \$38,558.80, which represents 80% of the total fees sought (\$48,198.50) for the reasonable and necessary legal services rendered to the Debtor during the Fee Period; and (b) \$2,603.65, which represents 100% of the actual and necessary expenses incurred during the Fee Period for a total compensation amount of \$41,162.45.

September 24, 2024 Page 2

If you have any questions or comments, please feel free to contact me at (469) 320-6132.

Sincerely, Jason S. Brookner

JSB/vs Enclosures

cc:

**DEBTOR:** c/o Tehum Care Services, Inc. Attn: Chief Restructuring Officer Russell Perry (<u>russell.perry@ankura.com</u>)

Counsel to the Debtor: GRAY REED Aaron M. Kaufman (<u>akaufman@grayreed.com</u>) Lydia R. Webb (<u>lwebb@grayreed.com</u>) Amber M. Carson (<u>acarson@grayreed.com</u>)

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

In re:

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

Chapter 11

Case No. 23-90086 (CML)

Debtor.

### GRAY REED'S THIRTEENTH MONTHLY FEE STATEMENT FOR THE PERIOD OF AUGUST 1, 2024 THROUGH AUGUST 31, 2024

### **Summary of Professionals Included in this Fee Statement**

Professionals	Position	Year First Licensed to Practice	Hourly Rate	Billed Hours	Total Compensation
Jason S. Brookner	Partner	1995	\$985.00	26.20	\$25,807.00
Aaron M. Kaufman	Partner	2007	\$820.00	1.90	\$1,558.00
Joshua D. Smeltzer	Partner	2004	\$950.00	0.30	\$285.00
Lydia R. Webb	Partner	2012	\$760.00	1.00	\$760.00
Amber M. Carson	Partner	2012	\$710.00	6.50	\$4,615.00
Skyler Y. Stuckey	Partner	2011	\$675.00	5.70	\$3,847.50
Micheal W. Bishop	Senior Counsel	1988	\$795.00	0.30	\$238.50
London R. England	Associate	2018	\$595.00	0.40	\$238.00
Blake Bryan	Associate	2024	\$390.00	8.60	\$3,354.00
	50.90	\$40,703.00			

Paraprofessionals	Position	Year First Licensed to Practice	Hourly Rate	Billed Hours	Total Compensation	
Veronica T. Salazar	Paralegal	N/A	\$370.00	18.40	\$6,808.00	
Nancy Ward	Paralegal	N/A	\$275.00	2.50	\$687.50	
	SUBTOTAL FOR Paraprofessionals 20.90 \$7,495.50					
			GRAND TOTAL:	71.80	\$48,198.50	

<sup>&</sup>lt;sup>1</sup> The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Matter No.	Matter Description	Billed Hours	Fees Requested	Expenses Requested	Total Compensation
3	Asset Disposition	0.40	\$284.00	\$0.00	\$284.00
8	Case Administration	1.10	\$509.00	\$0.00	\$509.00
13	Professional Employment and Fee Applications	12.90	\$4,867.50	\$0.00	\$4,867.50
15	Financing and Cash Collateral	3.00	\$2,401.50	\$0.00	\$2,401.50
16	Litigation	44.10	\$33,929.00	\$0.00	\$33,929.00
21	Relief from Stay and Adequate Protection	8.60	\$5,188.50	\$0.00	\$5,188.50
22	Reporting	1.70	\$1,019.00	\$0.00	\$1,019.00
25	Expenses	0.00	\$0.00	\$2,603.65	\$2,603.65
	TOTAL	71.80	\$48,198.50	\$2,603.65	\$50,802.15

# Summary of Compensation Requested by Project Category

# Summary of Expense Requested by Category

Service Description	Amount
Copies	\$12.20
Litigation Support Vendors	\$2,591.45
TOTAL	\$2,603.65

# August 2024 Invoices

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Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000003 Jason S. Brookner 800883 1 of 3

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

**RE: Asset Disposition** 

Bill-at-a-Glance - for services through August 31, 2024

Professional Services	\$284.00	Please remit payment to: Gray Reed ATTN: Accounts Receivable
Total this Invoice	\$284.00	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$668.50	Houston, TX 77056
Less Payments	(\$534.80)	Wire Instructions: Domestic Routing #: 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205
Total Now Due	\$417.70	International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

Credit Card Payment:

Pay your invoice online by using this internet address: https://www.grayreed.com/Online-Bill-Pay A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.

Reference: 026673.000003 Invoice # 800883

# Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 10 of 35

### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page: September 19, 2024 026673.000003 800883 2 of 3

#### Matter 000003 – Asset Disposition

Outstanding Invoices						
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
09/22/23	778405	0.00	0.00	0.00	\$133.70	\$133.70
	Total Outstanding	\$0.00	\$0.00	\$0.00	\$133.70	\$133.70

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# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

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Matter 000003 - Asset Disposition

#### **Professional Services – Detail**

Date	Tkpr	Description of Services	Hours	Amount
08/07/24	AMC	Emails with counsel re AIG collateral allocation.	0.40	\$284.00
		Total Professional Services	0.40	\$284.00

Professional Services - Timekeeper Summary						
Person	Amber M. Carson	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>		
AMC		0.40	\$710.00	\$284.00		

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Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000008 Jason S. Brookner 800884 1 of 3

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

**RE: Case Administration** 

Bill-at-a-Glance – for services through August 31, 2024

Professional Services	\$509.00	<b>Please remit payment to:</b> Gray Reed ATTN: Accounts Receivable
Total this Invoice	\$509.00	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$83,216.20	Houston, TX 77056
Total Now Due	\$83,725.20	<b>Wire Instructions:</b> Domestic Routing #: 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

**Credit Card Payment:** Pay your invoice online by using this internet address: <u>https://www.grayreed.com/Online-Bill-Pay</u> *A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.* 

Reference: 026673.000008 Invoice # 800884

### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page: September 19, 2024 026673.000008 800884 2 of 3

### Matter 000008 – Case Administration

Outstand	ling Invoices					
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
04/28/23	769164	0.00	0.00	0.00	\$7,895.30	\$7,895.30
04/28/23	769279	0.00	0.00	0.00	\$16,356.30	\$16,356.30
05/22/23	770813	0.00	0.00	0.00	\$8,428.40	\$8,428.40
06/29/23	773240	0.00	0.00	0.00	\$6,076.20	\$6,076.20
07/27/23	774886	0.00	0.00	0.00	\$4,991.50	\$4,991.50
08/30/23	776830	0.00	0.00	0.00	\$4,111.70	\$4,111.70
09/22/23	778407	0.00	0.00	0.00	\$1,561.30	\$1,561.30
10/25/23	780544	0.00	0.00	0.00	\$442.00	\$442.00
11/17/23	782611	0.00	0.00	0.00	\$5,794.50	\$5,794.50
12/15/23	784653	0.00	0.00	0.00	\$9,387.00	\$9,387.00
01/17/24	785989	0.00	0.00	0.00	\$10,051.00	\$10,051.00
02/26/24	788021	0.00	0.00	0.00	\$1,009.00	\$1,009.00
03/28/24	790149	0.00	0.00	0.00	\$2,177.00	\$2,177.00
04/23/24	791730	0.00	0.00	0.00	\$2,027.00	\$2,027.00
05/30/24	793933	0.00	0.00	0.00	\$879.00	\$879.00
06/20/24	795478	0.00	0.00	0.00	\$329.00	\$329.00
07/25/24	797384	0.00	\$568.00	0.00	0.00	\$568.00
08/27/24	799126	\$1,132.00	0.00	0.00	0.00	\$1,132.00
	Total Outstanding	\$1,132.00	\$568.00	\$0.00	\$81,516.20	\$83,216.20

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# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date:	September 19, 2024
Client.Matter:	026673.000008
Invoice:	800884
Page:	3 of 3

Matter 000008 – Case Administration

#### **Professional Services – Detail**

Date	Tkpr	Description of Services	Hours	Amount
08/19/24	VTS	Draft notice of status conference re settlement update (.2); correspond with J. Brookner re same (.1); finalize, file and serve same (.2); follow up with J. Brookner re service of same (.1); attend to service of same (.2).	0.80	\$296.00
08/21/24	AMC	Confer with J. Brookner re Business Centers communications and issues re same.	0.30	\$213.00
		Total Professional Services	1.10	\$509.00

Professional Services - Timekeeper Summary						
Person		Hours	Rate	Amount		
AMC	Amber M. Carson	0.30	\$710.00	\$213.00		
VTS	Veronica T. Salazar	0.80	\$370.00	\$296.00		

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Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000013 Jason S. Brookner 800885 1 of 4

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

**RE:** Professional Employment and Fee Applications

Bill-at-a-Glance – for services through August 31, 2024

Professional Services	\$4,867.50	Please remit payment to: Gray Reed ATTN <sup>:</sup> Accounts Receivable
Total this Invoice	\$4,867.50	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$58,607.90	Houston, TX 77056
Total Now Due	\$63,475.40	<b>Wire Instructions:</b> Domestic Routing #: 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205
		International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

**Credit Card Payment:** Pay your invoice online by using this internet address: <u>https://www.grayreed.com/Online-Bill-Pay</u> *A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.* 

Reference: 026673.000013 Invoice # 800885

### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page: September 19, 2024 026673.000013 800885 2 of 4

### Matter 000013 – Professional Employment and Fee Applications

Outstanding Invoices						
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
04/28/23	769165	0.00	0.00	0.00	\$519.60	\$519.60
04/28/23	769280	0.00	0.00	0.00	\$9,166.90	\$9,166.90
05/22/23	770815	0.00	0.00	0.00	\$3,129.50	\$3,129.50
06/29/23	773242	0.00	0.00	0.00	\$1,861.00	\$1,861.00
07/27/23	774889	0.00	0.00	0.00	\$2,467.50	\$2,467.50
08/30/23	776832	0.00	0.00	0.00	\$1,637.10	\$1,637.10
09/22/23	778410	0.00	0.00	0.00	\$798.50	\$798.50
10/25/23	780546	0.00	0.00	0.00	\$1,371.30	\$1,371.30
11/17/23	782614	0.00	0.00	0.00	\$6,073.00	\$6,073.00
12/15/23	784654	0.00	0.00	0.00	\$7,117.00	\$7,117.00
01/17/24	785991	0.00	0.00	0.00	\$2,477.00	\$2,477.00
02/26/24	788023	0.00	0.00	0.00	\$1,111.00	\$1,111.00
03/28/24	790151	0.00	0.00	0.00	\$2,297.00	\$2,297.00
04/23/24	791732	0.00	0.00	0.00	\$4,594.00	\$4,594.00
05/30/24	793934	0.00	0.00	0.00	\$5,642.50	\$5,642.50
06/20/24	795479	0.00	0.00	0.00	\$982.50	\$982.50
07/25/24	797385	0.00	\$1,372.00	0.00	0.00	\$1,372.00
08/27/24	799127	\$5,990.50	0.00	0.00	0.00	\$5,990.50
	Total Outstanding	\$5,990.50	\$1,372.00	\$0.00	\$51,245.40	\$58,607.90

# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date:	September 19, 2024
Client.Matter:	026673.000013
Invoice:	800885
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#### Matter 000013 – Professional Employment and Fee Applications

#### **Professional Services – Detail**

Date	Tkpr	Description of Services	Hours	Amount
08/05/24	VTS	Finalize Gray Reed's March 2024 fee statement (.2); correspond with J. Brookner and A. Kaufman re same (.1).	0.30	\$111.00
08/08/24	VTS	Work on finalizing March (.3), April (.3) and May (.3) 2024 monthly fee statements; finalize draft first interim fee application (.4); correspond with Gray Reed team re same (.1); draft notice of monthly fee statements covering the first interim fee period (1.8); follow up with Gray Reed team re same (.1); additional revisions to Eighth, Ninth and Tenth monthly fee statements pursuant to amended interim comp order (.5); finalize and serve same (.3).	4.10	\$1,517.00
08/09/24	AMK	Review and revise prebills for July time.	0.40	\$328.00
08/12/24	VTS	Follow up with Gray Reed team on status of draft notices of filing fee statements and first interim fee app (.1); finalize and file notice of Gray Reed's fee statements for the period from February 2023 through February 2024 (.3); follow ups with N. Ward, J. Brookner and A. Kaufman (together and separately) re same (.1); draft, finalize and file notices of fee statements covering the months of March, April and May 2024 (.5); prepare first interim fee application for filing (.2); correspond with J. Brookner re same and filed notices of fee statements (.1); finalize first interim fee application (.8); file same (.2); attend to service of same (.1).	2.40	\$888.00
08/12/24	NMW	Update Fee and Expense spreadsheet for June; prepare Eleventh Monthly Fee Statement.	0.90	\$247.50
08/13/24	VTS	Brief review of July 2024 fees and expenses in preparation of monthly fee statement (.2); correspond with S. Petrocelli and J. Brookner (separately) re fee statement cover letter template for March through May 2024 fees and expenses (.2); follow up with S. Petrocelli re notice of monthly fee statements (.1); review and revise Ankura's notice of fee statements and first interim fee application (.4); finalize, file and serve Ankura's notice of fee statements and first interim fee app (.5).	1.40	\$518.00
08/21/24	VTS	Review email correspondence from J. Brookner re fifth interim DIP order and new procedural requirements per same (.1); research same (.2); confer with S. Grant re same (.1).	0.40	\$148.00
08/26/24	VTS	Correspond with A. Tremillo re first interim expense allocations (.2); review and analysis of fifth interim DIP order and related memorandum (.5); correspond with A. Cordova re procedural requirements under same (.4).	1.10	\$407.00
08/29/24	VTS	Work on Gray Reed's eleventh monthly fee statement (.2); further review of fee memorandum re same (.3); brief discussion with A. Kaufman re same (.1).	0.60	\$222.00
08/30/24	VTS	Prepare email to Notice Parties pursuant to Fifth Interim DIP Order forwarding invoices to Gray Reed's First Interim Fee Application in LEDES format (1.0); finalize and forward same (.3).	1.30	\$481.00
		Total Professional Services	12.90	\$4,867.50

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# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page: September 19, 2024 026673.000013 800885 4 of 4

Professio	Professional Services - Timekeeper Summary				
Person		Hours	Rate	Amount	
AMK	Aaron M. Kaufman	0.40	\$820.00	\$328.00	
VTS	Veronica T. Salazar	11.60	\$370.00	\$4,292.00	
NMW	Nancy M. Ward	0.90	\$275.00	\$247.50	

CONFIDENTIAL

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Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000015 Jason S. Brookner 800886 1 of 3

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

RE: Financing and Cash Collateral

Bill-at-a-Glance – for services through August 31, 2024

Professional Services	\$2,401.50	Please remit payment to: Gray Reed ATTN: Accounts Receivable
Total this Invoice	\$2,401.50	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$49,049.50	Houston, TX 77056
Total Now Due	\$51,451.00	Wire Instructions: Domestic Routing #: 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

**Credit Card Payment:** Pay your invoice online by using this internet address: <u>https://www.grayreed.com/Online-Bill-Pay</u> *A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.* 

Reference: 026673.000015 Invoice # 800886

### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page:

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### Matter 000015 – Financing and Cash Collateral

Outstand	ding Invoices					
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
04/28/23	769166	0.00	0.00	0.00	\$2,002.30	\$2,002.30
04/28/23	769281	0.00	0.00	0.00	\$21,605.10	\$21,605.10
05/22/23	770816	0.00	0.00	0.00	\$7,157.40	\$7,157.40
06/29/23	773243	0.00	0.00	0.00	\$1,407.20	\$1,407.20
07/27/23	774890	0.00	0.00	0.00	\$663.50	\$663.50
09/22/23	778411	0.00	0.00	0.00	\$707.20	\$707.20
10/25/23	780547	0.00	0.00	0.00	\$817.80	\$817.80
11/17/23	782615	0.00	0.00	0.00	\$898.00	\$898.00
12/15/23	784655	0.00	0.00	0.00	\$760.00	\$760.00
01/17/24	785992	0.00	0.00	0.00	\$4,733.00	\$4,733.00
02/26/24	788024	0.00	0.00	0.00	\$2,198.00	\$2,198.00
03/28/24	790152	0.00	0.00	0.00	\$590.50	\$590.50
04/23/24	791734	0.00	0.00	0.00	\$671.50	\$671.50
08/27/24	799128	\$4,838.00	0.00	0.00	0.00	\$4,838.00
	Total Outstanding	\$4,838.00	\$0.00	\$0.00	\$44,211.50	\$49,049.50

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### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

 Bill Date:
 September 19, 2024

 Client.Matter:
 026673.000015

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 800886

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Matter 000015 – Financing and Cash Collateral

#### **Professional Services – Detail**

Date	Tkpr	Description of Services	Hours	Amount
08/09/24	JSB	Finalize CoC and 5th interim DIP Order and many calls and emails with C. Sontchi, N. Zluticky, M. Hayward and K. Gluck on same.	2.10	\$2,068.50
08/09/24	VTS	Prepare certificate of counsel re 5th interim DIP order for filing (.6); file (.2) and serve (.1) same.	0.90	\$333.00
		Total Professional Services	3.00	\$2,401.50

Professional Services - Timekeeper Summary						
Person		Hours	Rate	Amount		
JSB	Jason S. Brookner	2.10	\$985.00	\$2,068.50		
VTS	Veronica T. Salazar	0.90	\$370.00	\$333.00		

### Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 22 of 35



Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000016 Jason S. Brookner 800887 1 of 4

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

**RE:** Litigation

Bill-at-a-Glance – for services through August 31, 2024

Professional Services	\$33,929.00	Please remit payment to: Gray Reed ATTN: Accounts Receivable
Total this Invoice	\$33,929.00	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$1,557,314.50	Houston, TX 77056
Total Now Due	\$1,591,243.50	<b>Wire Instructions:</b> Domestic Routing <i>#</i> : 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

**Credit Card Payment:** Pay your invoice online by using this internet address: <u>https://www.grayreed.com/Online-Bill-Pay</u> *A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.* 

Reference: 026673.000016 Invoice # 800887

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#### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page: September 19, 2024 026673.000016 800887 2 of 4

#### Matter 000016 - Litigation

Outstanding Invoices						
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
04/28/23	769163	0.00	0.00	0.00	\$12,516.80	\$12,516.80
04/28/23	769282	0.00	0.00	0.00	\$13,938.70	\$13,938.70
05/22/23	770817	0.00	0.00	0.00	\$12,905.70	\$12,905.70
06/29/23	773244	0.00	0.00	0.00	\$26,649.30	\$26,649.30
07/27/23	774891	0.00	0.00	0.00	\$60,144.30	\$60,144.30
08/30/23	776833	0.00	0.00	0.00	\$44,732.20	\$44,732.20
09/22/23	778412	0.00	0.00	0.00	\$44,714.30	\$44,714.30
10/25/23	780548	0.00	0.00	0.00	\$27,860.20	\$27,860.20
11/17/23	782616	0.00	0.00	0.00	\$7,192.50	\$7,192.50
12/15/23	784656	0.00	0.00	0.00	\$125,325.50	\$125,325.50
01/17/24	785993	0.00	0.00	0.00	\$103,771.00	\$103,771.00
02/26/24	788025	0.00	0.00	0.00	\$166,229.00	\$166,229.00
03/28/24	790153	0.00	0.00	0.00	\$447,004.00	\$447,004.00
04/23/24	791735	0.00	0.00	0.00	\$277,570.00	\$277,570.00
05/30/24	793935	0.00	0.00	0.00	\$53,046.00	\$53,046.00
06/20/24	795480	0.00	0.00	0.00	\$99,746.50	\$99,746.50
07/25/24	797386	0.00	\$7,191.00	0.00	0.00	\$7,191.00
08/27/24	799129	\$26,777.50	0.00	0.00	0.00	\$26,777.50
	Total Outstanding	\$26,777.50	\$7,191.00	\$0.00	\$1,523,346.00	\$1,557,314.50

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# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

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#### Matter 000016 – Litigation

#### **Professional Services – Detail**

Date	Tkpr	Description of Services	Hours	Amount
08/05/24	JSB	DIP update call with TCC, UCC and settling parties.	0.60	\$591.00
08/06/24	JSB	Calls with N. Zluticky, I. Lefkowitz and C. Sontchi (separately) settlement, DIP and related AIG issues.	0.70	\$689.50
08/06/24	VTS	Review email correspondence from J. Brookner re certificate of no objection concerning proposed fifth interim DIP order (.1); draft same (.5).	0.60	\$222.00
08/07/24	JSB	Many calls with N. Zluticky, C. Sontchi, I. Lefkowitz, K. Gluck and R. Perry (separately) re settlement, DIP and related insurance issues (1.2); review documents and prior emails on same (.5); work on matters regarding same (.9).	2.60	\$2,561.00
08/08/24	JSB	Multiple calls and emails with N. Zluticky and I. Lefkowitz re settlement and related (1.2); internal call on same (.7); follow ups on same (1.1); group call with I. Lefkowitz, C. Sontchi, K. Gluck, N. Zluticky, M. Hayward and S. King on same (.7); follow ups with R. Perry and N. Zluticky on same (.8); further follow up with C. Sontchi on same (.5); follow ups with K. Gluck and M. Hayward on same (.6).	5.60	\$5,516.00
08/08/24	AMC	Call with CRO and counsel re AIG collateral allocation.	0.50	\$355.00
08/09/24	JSB	Many calls and emails with settling parties, C. Sontchi and committees, etc. re settlement, DIP, insurance and related (3.3); finalize insurance stipulation and emails with parties on same (.7).	4.00	\$3,940.00
08/11/24	JSB	Multiple calls and emails with R. Perry, A. Kaufman, N. Zluticky, and C. Sontchi re settlement.	1.10	\$1,083.50
08/12/24	JSB	Call with C. Sontchi on DIP status and related (.2); follow ups on same (.3); continued follow ups on same (.8).	1.30	\$1,280.50
08/13/24	JSB	Correspond with constituents re settlement and term sheet, etc.	0.60	\$591.00
08/13/24	AMC	Email to E. Day re bankruptcy status update.	0.10	\$71.00
08/14/24	JSB	Multiple communications with UCC counsel and C. Sontchi re settlement.	0.90	\$886.50
08/15/24	JSB	Many calls with I. Lefkowitz and C. Sontchi re: settlement and Term Sheet issues and work on matters re: same (1.2); correspond with UCC and TCC on same (.4); correspond with CRO on same (.3); review and revise amended TS and work with constituents on same (.5); calls with C. Gluck re: same (.5).	2.90	\$2,856.50
08/16/24	JSB	Finalize Term Sheet and side letter and correspond with TCC, UCC, M2 and mediator on same.	0.50	\$492.50
08/20/24	AMK	Send requested documents to R. Perry for analysis.	0.20	\$164.00
08/21/24	SYS	Initial review of subpoena to Tehum from D. Cook and review of docket on case; briefly confer with J. Brookner on same. (.7)	0.70	\$472.50
08/22/24	JSB	Work on prisoner subpoena/quash issues.	0.40	\$394.00
08/26/24	JSB	Prepare for today's status conference and work with N. Zuticky and Z. Hemenway on same (1.8); attend status conference and post-hearing	2.90	\$2,856.50

# Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 25 of 35

# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date:	September 19, 2024
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		follow ups (1.1).		
08/26/24	SYS	Correspondence to R. Perry and J. Brookner on subpoena and options to address same.	0.80	\$540.00
08/26/24	AMC	Call with J. Finger re potential Lexington settlement and use of insurance proceeds.	0.30	\$213.00
08/26/24	AMK	Attend status conference (virtually).	1.00	\$820.00
08/27/24	SYS	Review of correspondence from R. Perry and M. Russano on potential response to subpoena and analysis of same after conferring with J. Brookner (.4); responsive correspondence on approach to same. (.2).	0.60	\$405.00
08/28/24	SYS	Attention to correspondence from client on Motion to Quash and compiling materials for drafting of same. (.4)	0.40	\$270.00
08/29/24	SYS	Attention ton addressing issues raised by Local Rules, including need to confer with Cook prior to filing of Motion to Quash. (1.1)	1.10	\$742.50
08/29/24	AMC	Email to non-bankruptcy counsel re case status.	0.10	\$71.00
08/29/24	BB	Draft motion to quash third-party subpoena; draft brief in support; draft declaration of R. Perry; draft certificate of compliance; research and analyze local filing rules.	5.90	\$2,301.00
08/30/24	SYS	Finalization and filing of Motion to Quash. (2.1)	2.10	\$1,417.50
08/30/24	BB	Revise and prepare motion to quash for filing.	2.70	\$1,053.00
08/30/24	VTS	Correspond with J. Brookner re Western District of Michigan admissions (.2); work on motion to quash and related documents (1.9); finalize and file same (.8).	2.90	\$1,073.00
		Total Professional Services	44.10	\$33,929.00

Professio	Professional Services - Timekeeper Summary						
Person		Hours	Rate	Amount			
JSB	Jason S. Brookner	24.10	\$985.00	\$23,738.50			
AMK	Aaron M. Kaufman	1.20	\$820.00	\$984.00			
AMC	Amber M. Carson	1.00	\$710.00	\$710.00			
SYS	Skyler Y. Stuckey	5.70	\$675.00	\$3,847.50			
BB	Blake Bryan	8.60	\$390.00	\$3,354.00			
VTS	Veronica T. Salazar	3.50	\$370.00	\$1,295.00			

### Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 26 of 35



Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000021 Jason S. Brookner 800888 1 of 4

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

RE: Relief from Stay and Adequate Protection

Bill-at-a-Glance – for services through August 31, 2024

Professional Services	\$5,188.50	Please remit payment to: Gray Reed ATTN: Accounts Receivable
Total this Invoice	\$5,188.50	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$310,298.50	Houston, TX 77056
Total Now Due	\$315,487.00	<b>Wire Instructions:</b> Domestic Routing #: 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

**Credit Card Payment:** Pay your invoice online by using this internet address: <u>https://www.grayreed.com/Online-Bill-Pay</u> *A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.* 

Reference: 026673.000021 Invoice # 800888

### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page: September 19, 2024 026673.000021 800888 2 of 4

### Matter 000021 - Relief from Stay and Adequate Protection

Outstand	ding Invoices					
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
04/28/23	769168	0.00	0.00	0.00	\$20,475.60	\$20,475.60
04/28/23	769285	0.00	0.00	0.00	\$66,168.50	\$66,168.50
05/22/23	770820	0.00	0.00	0.00	\$54,676.10	\$54,676.10
06/29/23	773248	0.00	0.00	0.00	\$43,583.60	\$43,583.60
07/27/23	774894	0.00	0.00	0.00	\$9,733.00	\$9,733.00
08/30/23	776835	0.00	0.00	0.00	\$14,685.80	\$14,685.80
09/22/23	778416	0.00	0.00	0.00	\$7,491.80	\$7,491.80
10/25/23	780551	0.00	0.00	0.00	\$3,789.60	\$3,789.60
11/17/23	782618	0.00	0.00	0.00	\$26,835.50	\$26,835.50
12/15/23	784658	0.00	0.00	0.00	\$12,305.00	\$12,305.00
01/17/24	785996	0.00	0.00	0.00	\$4,062.50	\$4,062.50
02/26/24	788027	0.00	0.00	0.00	\$2,884.00	\$2,884.00
03/28/24	790156	0.00	0.00	0.00	\$1,376.00	\$1,376.00
04/23/24	791736	0.00	0.00	0.00	\$5,260.00	\$5,260.00
05/30/24	793937	0.00	0.00	0.00	\$9,025.50	\$9,025.50
06/20/24	795482	0.00	0.00	0.00	\$7,238.50	\$7,238.50
07/25/24	797387	0.00	\$14,236.00	0.00	0.00	\$14,236.00
08/27/24	799131	\$6,471.50	0.00	0.00	0.00	\$6,471.50
	Total Outstanding	\$6,471.50	\$14,236.00	\$0.00	\$289,591.00	\$310,298.50

#### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date:	September 19, 2024
Client.Matter:	026673.000021
Invoice:	800888
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#### Matter 000021 - Relief from Stay and Adequate Protection

#### **Professional Services – Detail**

Date	Tkpr	Description of Services	Hours	Amount
08/05/24	JDS	Review, evaluate and coordinate with Z. Meade on filing suggestion of bankruptcy in MD court.	0.30	\$285.00
08/05/24	LRE	Assist with filing suggestion of bankruptcy and follow-up regarding status of same.	0.20	\$119.00
08/06/24	NMW	Confer with Zoe Meade and Sherie Smith regarding Joshua Smeltzer Maryland bar number (.20); emails with Joshua Smeltzer regarding information needed to set up Maryland e-filing account and set up same (.80); review rules regarding e-filing in Maryland District Court for Allegany County (.40); finalize and file Suggestion of Bankruptcy and Notice of Automatic Stay in Hinton v. Corizon and forward to Hinton via regular and certified mail (.20).	1.60	\$440.00
08/08/24	MWB	Emails with the Gray Reed team re the 8/16 stay hearings.	0.10	\$79.50
08/10/24	LRE	Correspondence regarding status of automatic stay and suggestion of bankruptcy in pro se case.	0.20	\$119.00
08/13/24	AMC	Analyze potential evidence for Windhurst (.6) and Johnson (.8) lift stay hearings.	1.40	\$994.00
08/14/24	AMC	Review exhibits re Windhurst lift stay motion hearing (.2); confer with M. Bishop re same (.1)	0.30	\$213.00
08/14/24	MWB	Review the Windhurst E&W list for the stay hearing and email to A. Carson re issues.	0.20	\$159.00
08/14/24	VTS	Draft witness and exhibit list for August 16, 2024 lift stay hearings (.5); finalize and file same (.4).	0.90	\$333.00
08/15/24	AMC	Prepare for Windhurst lift stay hearing (1.3); prepare for Johnson lift stay hearing (.5).	1.80	\$1,278.00
08/16/24	AMC	Attend Johnson and Windhurst lift stay hearings (.4); emails to counsel for Branum re next week's lift stay hearing (.2); email to counsel for Arizona re same (.1).	0.70	\$497.00
08/16/24	AMK	Attend hearing on Windhurst motion for relief.	0.30	\$246.00
08/19/24	AMC	Review and revise Windhurst lift stay order and email to counsel for Windhurst re same (.3); email to Court re resetting Branum lift stay hearing (.1).	0.40	\$284.00
08/21/24	AMC	Email to S. Moreno re Vela status conference request.	0.10	\$71.00
08/28/24	AMC	Email to counsel for Gamez re lift stay stipulation.	0.10	\$71.00
		Total Professional Services	8.60	\$5,188.50

**Professional Services - Timekeeper Summary** 

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# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date:	September 19, 2024
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Person		Hours	Rate	Amount
JDS	Joshua D. Smeltzer	0.30	\$950.00	\$285.00
AMK	Aaron M. Kaufman	0.30	\$820.00	\$246.00
AMC	Amber M. Carson	4.80	\$710.00	\$3,408.00
MWB	Micheal W. Bishop	0.30	\$795.00	\$238.50
LRE	London R. England	0.40	\$595.00	\$238.00
VTS	Veronica T. Salazar	0.90	\$370.00	\$333.00
NMW	Nancy M. Ward	1.60	\$275.00	\$440.00

CONFIDENTIAL

### Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 30 of 35



Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000022 Jason S. Brookner 800889 1 of 3

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

**RE:** Reporting

Bill-at-a-Glance – for services through August 31, 2024

Professional Services	\$1,019.00	Please remit payment to: Gray Reed ATTN: Accounts Receivable
Total this Invoice	\$1,019.00	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$19,444.80	Houston, TX 77056
Total Now Due	\$20,463.80	Wire Instructions: Domestic Routing #: 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

**Credit Card Payment:** Pay your invoice online by using this internet address: <u>https://www.grayreed.com/Online-Bill-Pay</u> *A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.* 

Reference: 026673.000022 Invoice # 800889

# Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 31 of 35

### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page:

September 19, 2024 026673.000022 800889 2 of 3

### Matter 000022 - Reporting .

Outstand	ding Invoices					
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
04/28/23	769169	0.00	0.00	0.00	\$134.40	\$134.40
04/28/23	769258	0.00	0.00	0.00	\$1,727.90	\$1,727.90
05/22/23	770821	0.00	0.00	0.00	\$5,379.20	\$5,379.20
06/29/23	773249	0.00	0.00	0.00	\$2,894.50	\$2,894.50
07/27/23	774895	0.00	0.00	0.00	\$2,369.90	\$2,369.90
08/30/23	776836	0.00	0.00	0.00	\$2,292.00	\$2,292.00
09/22/23	778417	0.00	0.00	0.00	\$138.00	\$138.00
10/25/23	780552	0.00	0.00	0.00	\$81.90	\$81.90
11/17/23	782619	0.00	0.00	0.00	\$1,083.00	\$1,083.00
01/17/24	785997	0.00	0.00	0.00	\$438.00	\$438.00
02/26/24	788028	0.00	0.00	0.00	\$454.00	\$454.00
03/28/24	790157	0.00	0.00	0.00	\$491.00	\$491.00
04/23/24	791737	0.00	0.00	0.00	\$380.00	\$380.00
06/20/24	795483	0.00	0.00	0.00	\$751.00	\$751.00
07/25/24	797388	0.00	\$491.00	0.00	0.00	\$491.00
08/27/24	799132	\$339.00	0.00	0.00	0.00	\$339.00
	Total Outstanding	\$339.00	\$491.00	\$0.00	\$18,614.80	\$19,444.80

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### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

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Matter 000022 - Reporting

#### **Professional Services – Detail**

Date	Tkpr	Description of Services		Hours	Amount
08/01/24	LW	Review June MOR.		0.50	\$380.00
08/01/24	VTS	Finalize and file June 2024 MOR.		0.40	\$ 148.00
08/27/24	LW	Review July MOR.		0.50	\$380.00
08/27/24	VTS	Finalize and file July 2024 MOR.		0.30	\$111.00
					<u> </u>
			Total Professional Services	1.70	\$1,019.00

Professional Services - Timekeeper Summary				
Person		Hours	Rate	Amount
LW	Lydia Webb	1.00	\$760.00	\$760.00
VTS	Veronica T. Salazar	0.70	\$370.00	\$259.00

### Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 33 of 35



Bill Date: Client.Matter: Attorney: Invoice: Page: September 19, 2024 026673.000025 Jason S. Brookner 800890 1 of 3

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056 Federal Tax Identification Number: 81-4045088

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Attention: Isaac Lefkowitz

**RE: Expenses** 

Bill-at-a-Glance – for services through August 31, 2024

Expenses	\$2,603.65	<b>Please remit payment to:</b> Gray Reed ATTN: Accounts Receivable
Total this Invoice	\$2,603.65	1300 Post Oak Boulevard Suite 2000
Previous Balance	\$7,780.55	Houston, TX 77056
Total Now Due	\$10,384.20	<b>Wire Instructions:</b> Domestic Routing #: 114000093   Frost Bank 100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725 Beneficiary Name: Gray Reed Depository

**Credit Card Payment:** Pay your invoice online by using this internet address: <u>https://www.grayreed.com/Online-Bill-Pay</u> *A 3% surcharge will be added for credit card payments. No surcharge will be added for debit card payments.* 

Reference: 026673.000025 Invoice # 800890

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### ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date: Client.Matter: Invoice: Page: September 19, 2024 026673.000025 800890 2 of 3

#### Matter 000025 - Expenses

Outstanding Invoices						
Date	Invoice Number	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount
07/25/24	797417	0.00	\$2,597.65	0.00	0.00	\$2,597.65
08/27/24	799133	\$5,182.90	0.00	0.00	0.00	\$5,182.90
	Total Outstanding	\$5,182.90	\$2,597.65	\$0.00	\$0.00	\$7,780.55

# Case 23-90086 Document 1723 Filed in TXSB on 09/24/24 Page 35 of 35

# ||| Gray Reed

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. isaac@tehumcare.com

Bill Date:	September 19, 2024
Client.Matter:	026673.000025
Invoice:	800890
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#### Matter 000025 – Expenses

#### Expenses - Detail

Date	Description of Expenses	Amount
07/31/24	Litigation Expenses – VENDOR: Consilio LLC; INVOICE#: INV579382632; DATE: 7/31/2 Everlaw ECA Everlaw Hibernated	2024 - \$2,591.45
	Photocopies (61 @ \$0.20)	\$12.20
	Total Expenses	\$2,603.65