

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

In re:

NEW WEI, INC., et al.

Debtor(s)

Case No. 15-02741-TOM7

Chapter 7

**TWELFTH APPLICATION OF DENTONS SIROTE PC, ATTORNEYS FOR
THE CHAPTER 7 TRUSTEE, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES**

PART I. COVER SHEET

1. Name of Applicant: Dentons Sirote PC
2. Date Application For Employment was filed: February 28, 2017 (Doc. 2916)
3. Date of Order Authorizing Employment: March 3, 2017 (Nunc Pro Tunc) (Doc. 2918)
4. Professional Services Provided to: Chapter 7 Trustee, Andre Toffel
5. Period for Which Compensation Sought: April 1, 2021 – September 30, 2021
6. Amount of Compensation Sought: \$40,360.00
7. Amount of Expenses Sought: \$36.27
8. This is an Interim Application.
9. Prior Applications Filed.

First Interim Fee Application

Date Filed:	June 21, 2017
Period Covered:	February 21 – May 21, 2017
Total Requested:	Fees of \$63,708.75 and expenses of \$0.00
Total Compensation Allowed:	\$63,708.75
Total Expenses Allowed:	\$0.00



Total Compensation and Expenses Paid: \$63,708.75

Second Interim Fee Application

Date Filed: October 9, 2017

Period Covered: June 1, 2017 – September 30, 2017

Total Requested: Fees of \$85,082.50 and expenses of \$0.00

Total Compensation Allowed: \$84,912.50

Total Expenses Allowed: \$0.00

Total Compensation and Expenses Paid: \$84,912.50

Third Interim Fee Application

Date Filed: February 20, 2018

Period Covered: October 1, 2017 – January 31, 2018

Total Requested: Fees of \$100,935.00 and expenses of \$0.00

Total Compensation Allowed: \$100,770.00

Total Expenses Allowed: \$0.00

Total Compensation and Expenses Paid: \$100,770.00

Fourth Interim Fee Application

Date Filed: June 18, 2018

Period Covered: February 1, 2018 – May 31, 2018

Total Requested: Fees of \$42,440 and expenses of \$0.00

Total Compensation Allowed: \$42,425.00

Total Expenses Allowed: \$0.00

Total Compensation and Expenses Paid: \$42,425.00

Fifth Interim Fee Application

Date Filed: October 9, 2018
Period Covered: June 1, 2018 – September 30, 2018
Total Requested: Fees of \$46,922.50 and expenses of \$0.00
Total Compensation Allowed: \$46,922.50
Total Expenses Allowed: \$0.00
Total Compensation and Expenses Paid: \$46,922.50

Sixth Interim Fee Application

Date Filed: February 19, 2019
Period Covered: October 1, 2018 – January 31, 2019
Total Requested: Fees of \$56,193.70 and expenses of \$0.00
Total Compensation Allowed: \$56,087.50
Total Expenses Allowed: \$0.00
Total Compensation and Expenses Paid: \$56,087.50

Seventh Interim Fee Application

Date Filed: July 16, 2019
Period Covered: February 1, 2019 – June 30, 2019
Total Requested: Fees of \$78,731.25 and expenses of \$0.00
Total Compensation Allowed: \$78,731.25
Total Expenses Allowed: \$0.00
Total Compensation and Expenses Paid: \$78,731.25

Eighth Interim Fee Application

Date Filed: November 4, 2019
Period Covered: July 1, 2019 – October 31, 2019
Total Requested: Fees of \$86,312.50 & expenses of \$2,841.89
Total Compensation Allowed: \$86,163.75
Total Expenses Allowed: \$2,841.89
Total Compensation and Expenses Paid: \$89,005.64

Ninth Interim Fee Application

Date Filed: April 14, 2020
Period Covered: November 1, 2019 – March 31, 2020
Total Requested: Fees of \$82,562.50 & expenses of \$1,783.62
Total Compensation Allowed: \$82,447.50
Total Expenses Allowed: \$1,783.62
Total Compensation and Expenses Paid: \$84,231.12

Tenth Interim Fee Application

Date Filed: October 8, 2020
Period Covered: April 1, 2020 – September 30, 2020
Total Requested: Fees of \$100,142.50 & expenses of \$162.52
Total Compensation Allowed: \$106,142.50
Total Expenses Allowed: \$162.52
Total Compensation and Expenses Paid: \$106,305.02

Eleventh Interim Fee Application

Date Filed: April 20, 2021

Period Covered:	October 1, 2020 – March 31, 2021
Total Requested:	Fees of \$132,760.00 & expenses of \$207.04
Total Compensation Allowed:	\$132,398.75
Total Expenses Allowed:	\$207.04
Total Compensation and Expenses Paid:	\$132,605.79

October 8, 2021
Date

/s/ Stephen B. Porterfield
Applicant
DENTONS SIROTE PC
Stephen B. Porterfield
Thomas B. Humphries
P.O. Box 55727
Birmingham, AL 35255-5727
(205) 930-5278

**PART II. ARGUMENTS AND LAW IN SUPPORT OF TWELFTH
FEE APPLICATION**

Stephen B. Porterfield and the law firm of Dentons Sirote PC, (collectively, “Applicant” or “Dentons”), attorneys for André M. Toffel (the “Trustee”), duly appointed interim Chapter 7 trustee of the bankruptcy estates of the Debtors associated with this jointly administered case, respectfully submit this Twelfth Application for Compensation and Reimbursement of Expenses (the “Twelfth Application”) pursuant to 11 U.S.C. §§ 330 and 331, and Rule 2016 of the Rules of Bankruptcy Procedure. In support of the Twelfth Application, Applicant states the following:

1. Pursuant to this Court’s order of March 3, 2017, Applicant is the attorney for the Chapter 7 Trustee of the Debtors’ jointly administered bankruptcy estates. *See* Doc. 2918.

2. Applicant filed its First Interim Fee Application on June 21, 2017, seeking compensation in the amount of \$63,708.75. By Order dated August 16, 2017, this Court approved Applicant’s First Interim Fee Application and granted final allowance of interim compensation in the amount of \$63,708.75 (Doc. 3117). Applicant filed a Second Interim Fee Application on October 9, 2017, seeking compensation in the amount of \$85,082.50. By Order dated November 1, 2017, this Court approved Applicant’s Second Interim Fee Application and granted final allowance of interim compensation in the amount of \$84,912.50 (Doc. 3161). Applicant filed a Third Interim Fee Application on February 20, 2018, seeking compensation in the amount of \$100,935.00. By Order dated April 3, 2018, this Court approved Applicant’s Third Interim Fee Application and granted final allowance of interim compensation in the amount of \$100,770.00 (Doc. 3267). Applicant filed a Fourth Interim Fee Application on June 18, 2018, seeking compensation in the amount of \$42,440.00. By Order dated August 7, 2018, this Court approved the Applicant's Fourth Interim Fee Application and granted final allowance of compensation in the amount of \$42,425.00 (Doc. 3306). Applicant filed a Fifth Interim Fee Application on October 9,

2018, seeking compensation in the amount of \$46,922.50. By Order dated November 15, 2018, this Court approved the Applicant's Fifth Interim Fee Application and granted final allowance of compensation in the amount of \$46,922.50 (Doc. 3351). Applicant filed a Sixth Interim Fee Application on February 19, 2019, seeking compensation in the amount of \$56,193.75 (Doc. 3398). By Order dated April 8, 2019, this Court approved the Applicant's Sixth Fee Application and granted final allowance of compensation in the amount of \$56,087.50 (Doc. 3418). Applicant filed a Seventh Interim Fee Application on July 16, 2019, seeking compensation in the amount of \$78,731.25 (Doc. 3478). By Order dated August 27, 2019, this Court approved the Applicant's Seventh Fee Application and granted final allowance of compensation in the amount of \$78,731.25 (Doc. 3501). Applicant filed an Eighth Interim Fee Application on November 4, 2019 seeking compensation in the amount of \$86,163.75 and expenses in the amount of \$2,841.89 (Doc. 3552). By Order dated December 16, 2019, this Court approved the Applicant's Eighth Fee Application and granted final allowance of compensation in the amount of \$86,163.75 and expenses in the amount of \$2,841.89 (Doc. 3581). Applicant filed a Ninth Interim Fee Application on April 14, 2020 seeking compensation in the amount of \$82,562.50 and expenses in the amount of \$1,783.62 (Doc. 3615). By Order dated May 18, 2020, this Court approved the Applicant's Ninth Fee Application and granted final allowance of compensation in the amount of \$82,447.50 and expenses in the amount of \$1,783.62 (Doc. 3629). Applicant filed a Tenth Interim Fee Application on October 8, 2020, seeking compensation in the amount of \$106,142.50 and expenses in the amount of \$162.52 (Doc. 3663). By Order dated November 30, 2020, this Court approved the Applicant's Tenth Fee Application and granted final allowance of compensation in the amount of \$106,142.50 and expenses in the amount of \$162.52 (Doc. 3703). Applicant filed an Eleventh Interim Fee Application on April 20, 2021, seeking compensation in the amount of \$132,760.00 and expenses in the amount of \$207.04 (Doc. 3739). By Order dated June 8, 2021, this Court

approved the Applicant's Eleventh Fee Application and granted final allowance of compensation in the amount of \$132,398.75 and expenses in the amount of \$207.04 (Doc. 3745). Applicant now seeks allowance and reimbursement of its fees and expenses incurred in the course of its legal work for the Trustee from April 1, 2021 through September 30, 2021. Such fees were incurred by Applicant solely as to its work for the Trustee and were not performed on behalf of any creditor or other person.

3. The professional services provided to the Trustee by Applicant have required the expenditure of substantial time and effort. In total, more than 98 recorded hours have been devoted to this case by attorneys of the law firm of Dentons Sirote PC. The attorneys and staff who performed the services covered by this Twelfth Application are as follows:

- a. Stephen B. Porterfield is a shareholder at Dentons Sirote PC, and has been licensed to practice in the State of Alabama for over 32 years.
- b. Thomas B. Humphries is a shareholder at Dentons Sirote PC, and has been licensed to practice in the State of Alabama for over 10 years.

4. It is Applicant's belief, based upon experience in Bankruptcy Courts for the Northern District of Alabama, that the rates charged by Applicant are reasonable and consistent with prevailing market rates in this community.

5. In addition, Applicant submits that the fees and expenses sought via this Twelfth Application satisfy the relevant legal standards for compensation of retained professionals. Section 330(a)(1) of the Bankruptcy Code authorizes this Court to award "reasonable compensation for actual, necessary services rendered by" professionals hired pursuant to 11 U.S.C. 327, and for "reimbursement [of] actual, necessary expenses" incurred by such professionals. *See Grant v. George Schumann Tire & Battery Co.*, 908 F.2d 874, 878 (11th Cir. 1990). Moreover, Section 331 of the Code allows retained professionals to seek interim compensation "not more than once every

120 days after an order for relief in a case under this title ... for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under section 330 of this title.” See 11 U.S.C. § 331.

6. The Twelfth Circuit in *Grant* explained that “[i]n determining attorney’s fees, a judge must 1) determine the nature and extent of the services rendered; 2) determine the value of those services; and 3) consider the factors laid out in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974) and explain how they affect the award.” As applied to this Twelfth Application, the twelve factors detailed in the *Johnson* case are as follows:

a. Time and labor required. — A detailed summary of the total time and effort expended on behalf of the Trustee in this case by Applicant is provided in Part III to this Application.

b. The novelty and difficulty of the questions presented by the case. — This case involves the bankruptcy estates of 23 different debtor entities with tens of thousands of creditors. In addition, as a converted case, the Trustee’s job is complicated by the fact that most of the Debtors’ assets were sold through the Chapter 11 case and limited funds remain available to satisfy many claims. Even so, the bulk of the issues which have arisen are familiar to the Trustee and his counsel.

c. Skill requisite to perform the legal services properly. — Most of the work performed so far required an attorney.

d. Preclusion of other employment by the attorney due to acceptance of a case. — Applicant was at times precluded from performing other work requirements regarding pending and potential cases due to the work required in this case.

e. Customary fee for similar work in the community. — This Twelfth Application is reasonable and reflects the customary charge by Applicant for similar work in this community.

f. Fee is fixed or contingent. — The fee in this instance is fixed and is based upon the hourly billing rates of the attorney involved. The appropriate billing rate is disclosed in Part III to this Application.

g. Time pressures imposed by the Debtor or circumstances. — Though not the equivalent of the work required during the early days of a large Chapter 11 case, the Trustee and his counsel have had to work quickly to become familiar with the case issues and to efficiently respond to those issues.

h. Amount involved and result obtained. — The allowance requested by Applicant is detailed more particularly in Part III of this application. The results obtained to date have been in the best interest of the Debtors' estates.

i. Experience, reputation and ability of the attorneys involved. — The attorneys performing the services detailed in this Application have many years of experience in this area.

j. The undesirability of this case. — There was nothing about this case that rendered it “undesirable” to Applicant.

k. Nature and length of the professional relationship with the client. — Applicant has represented the Trustee in several cases over the last few years. There is no adversarial relationship between Applicant and the Trustee, and Applicant has no connections with creditors or other parties-in-interest, except as previously disclosed to this Court.

1. Awards in similar cases. — Similar cases have resulted in an award that is similar to that requested by Applicant in this case. It is therefore submitted to this Court that the fees requested are reasonable.

7. In accordance, Applicant asserts that the relevant legal standards are satisfied as to this Twelfth Application and respectfully requests that this Court approve the same.

PART III. PROJECT SUMMARIES

A detailed chronological list of Applicant's work performed for the Trustee during the period of April 1, 2021 through September 30, 2021 is attached here as Exhibit A. In addition, a categorical description and summary of the work performed by Applicant for the Trustee during the same period, organized by Project, is below:

Project Number 1. Miscellaneous Work and Investigations for the Trustee and the Estates of the Debtors: This project number includes general or miscellaneous projects of a smaller nature. To date, Trustee's counsel has incurred time as to this project related to (1) miscellaneous communications with courtroom personnel as to hearings and other settings; (2) communications with KCC and review of KCC invoices; (3) investigation into unclaimed funds and potentially recoverable retiree drug subsidy payments and recovery of some funds; (4) review of invoices for records storage; (5) review status of claims; (6) review of various tax bills and (7) some follow-up work on the worker's compensation guaranty fund litigation. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	10.30	\$475	\$4,892.50
Thomas B. Humphries, Shareholder	.80	\$325	\$260.00
Candice Stanford, Paralegal	1.5	\$200	<u>\$300.00</u>
TOTAL			\$5,452.50

Project Number 2. Conferences and Communications with the Trustee. This project consists of time spent meeting with and communicating with the Trustee regarding case issues, case strategy, assets of the estate, and pending and potential litigation. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	6.7	\$475	\$3,182.50
Thomas B. Humphries, Shareholder	4.40	\$325	<u>\$1,430.00</u>
TOTAL			\$4,612.50

Project Number 3. Conferences and Communications with Warrior Met. This project consists of time spent meeting with counsel for Warrior Met regarding case issues, relevant deadlines, estate assets, implementation of the global settlement approved by the Court and the pursuit/investigation of additional assets. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	2.00	\$475	\$950.00
Thomas B. Humphries, Shareholder	.50	\$325	<u>\$162.50</u>
TOTAL			\$1,112.50

Project Number 4. Work and Communications Related to Employment. This project consists of time spent on employment issues, including review of Direct Fee fee applications, review of Trustee's fee applications, review of Direct Fee reports on fee applications, preparation of orders approving fee applications, review of Court orders approving fee applications, work related to Applicant's Eleventh and Twelfth Interim Fee Applications and preparation of employment contracts and applications for other professionals related to pursuit of assets. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	6.90	\$475	\$3,277.50
Thomas B. Humphries, Shareholder	.20	\$325	<u>\$65.00</u>
TOTAL			\$3,342.50

Project Number 5. Work and Communications Related to Pleadings. This project consists of all time spent reviewing pleadings filed in the bankruptcy cases, and preparation of pleadings filed on behalf of the Trustee in these cases. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	1.80	\$475	\$855.00
Thomas B. Humphries, Shareholder	3.20	\$325	<u>\$1,040.00</u>
TOTAL			\$1,895.00

Project Number 6. Preparation for and Attending Hearings. This project consists of time spent in review of notices of hearings, preparation for and attendance at various hearings before the Bankruptcy Court, specifically including hearings as to fee applications, status conferences and as to the Trustee's motions. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	1.20	\$475	\$570.00
Thomas B. Humphries, Shareholder	1.40	\$325	<u>\$455.00</u>
TOTAL			\$1,025.00

Project Number 7. Work and Communications related to the Coal Act Funds. This project consists of substantial time spent regarding the adversary proceeding against the Coal Act

Funds, communications with counsel for the Coal Act Funds and preparation for the trial of the Coal Act litigation. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	4.30	\$475	\$2,042.50
Thomas B. Humphries, Shareholder	4.20	\$325	<u>\$1,365.00</u>
TOTAL			\$3,407.50

Project Number 8. Work and Communications related to Cardem. This project consists of time spent on review and investigation into the liquidation of Cardem, communication with Cardem board members, and review of pleadings and strategy for litigation filed against Cardem. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	4.50	\$475	\$2,137.50
Thomas B. Humphries, Shareholder	.20	\$325	<u>\$65.00</u>
TOTAL			\$2,202.50

Project Number 9. Work and Communications Related to Service of Process and State Court Litigation. This project consists of time spent on review and analysis of multiple documents served upon debtor entities via CT Corporation and engaging in related investigations and communications regarding state court litigation, workers’ compensation cases, arbitrations, and garnishments served against the debtors and filing status reports to the Alabama Supreme Court. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	1.90	\$475	\$902.50
Thomas B. Humphries, Shareholder	5.50	\$325	\$1,787.50
Candice Stanford, Paralegal	1.5	\$200	<u>\$300.00</u>
TOTAL			\$2,990.00

Project Number 10. Railroad Litigation. This project consists of time spent on litigation against certain railroad companies regarding a fuel surcharge class action and multi-district litigation. Time expended included conferences with special counsel, conferences with Warrior Met employees and assisting special counsel in discovery responses. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	13.30	\$475	<u>\$6,317.50</u>
TOTAL			\$6,317.50

Project Number 11. Work and Communication Related to Creditors. This project consists of various time spent in communicating with and responding to various creditors of these estates, including time spent assisting creditors with releases of unfunded mortgages of Jim Walter Homes. The time expended by the Applicant is detailed as follows:

<u>Name</u>	<u>Total Time</u>	<u>Hourly Rate</u>	<u>Total</u>
Stephen B. Porterfield, Shareholder	4.60	\$475	\$2,185.00
Thomas B. Humphries, Shareholder	17.90	\$325	<u>\$5,817.50</u>
TOTAL			\$8,002.50

TOTALS AS TO ALL PROJECTS

Project No. 1	\$5,452.50
Project No. 2	\$4,612.50
Project No. 3	\$1,112.50
Project No. 4	\$3,342.50
Project No. 5	\$1,895.00
Project No. 6	\$1,025.00
Project No. 7	\$3,407.50
Project No. 8	\$2,202.50
Project No. 9	\$2,990.00
Project No. 10	\$6,317.50
Project No. 13	<u>\$8,002.50</u>
Project No. 14	
Total	\$40,360.00

Fees for Services Rendered

Date	Tkpr	Description	Hours
04/05/21	TBH	Emails with the trustee re a recent communication from an individual (C. McDonald) seeking a release as to certain unclaimed funds in North Carolina (0.5); telephone conference with McDonald re the release request (0.5); extensive research re Mid-State Homes to determine whether the New WEI estates have any connection to the unclaimed funds, including telephone conference with J. Bailey (Chapter 11 counsel for the debtors) (1.6).	2.60
04/05/21	SBP	Review of several emails regarding request from Charlotte MacDonald to assist in collecting from North Carolina Unclaimed Property Division	0.40
04/06/21	TBH	Emails with the trustee re proposed communications to C. McDonald re unclaimed funds related to non debtor Mid-State Homes.	0.50
04/06/21	TBH	Emails with J. Roberts, counsel for Warrior Met, re fee issues.	0.50
04/06/21	SBP	Exchange emails with Trustee with strategy for responding to MacDonald request for help in recovery funds from Mid-State Homes	0.30
04/06/21	SBP	Review of exchange of emails with counsel for Warrior Met regarding fees for Coal Act case	0.30
04/07/21	TBH	Review of emails from counsel for the 1992 Plan and counsel for Warrior Met in preparation for today's status hearing re the MSJ.	0.20
04/07/21	TBH	Analysis of hearing audio re April 7 hearing re the 1992 Plan's motion for summary judgment.	0.30
04/07/21	TBH	Drafting letter to Charlotte McDonald, an individual seeking a waiver from the trustee as to certain unclaimed funds held in North Carolina (0.7); emailing the trustee re the letter (0.3).	1.00
04/07/21	SBP	Review and categorize March time entries for fee application	0.40
04/07/21	SBP	Preparation for and attendance of hearing on Plaintiff motions for summary judgment	1.00
04/07/21	SBP	Conference with courtroom deputy regarding new telephone number for today's hearing	0.20
04/07/21	SBP	Exchange emails with Tom of GR Robbins regarding status of check for approved fees	0.30
04/07/21	SBP	Review and edit of letter to Charlotte MacDonald	0.20
04/08/21	TBH	Emails with the trustee Re: the letter to be sent to Charlotte McDonald as to certain unclaimed funds.	0.40
04/08/21	SBP	Email to Trustee regarding check due to GR Robbins and providing address for same	0.20
04/08/21	SBP	Receipt of email from Brown, counsel for GenRe, with claims information on first four claims	0.20
04/08/21	SBP	Email to GR Robbins regarding check for final fee application	0.20
04/08/21	SBP	Conference with Trustee regarding results of Coal Act oral argument yesterday and strategy for possible settlement	0.20
04/09/21	TBH	Review of order taking the 1992 Plan's motion for summary judgment under submission.	0.20
04/09/21	TBH	Telephone conference with C. McDonald (an individual seeking a waiver from the trustee as to certain unclaimed funds held in North Carolina) re the trustee lacking the authority to waive any rights as to Mid-State Homes and as to Jim Walter Homes (0.5); revising letter to C. McDonald and emailing the trustee re the draft letter and the call (0.7).	1.20
04/09/21	TBH	Review of service of process re a garnishment release request as to state court case asking the court to release New WEI from a garnishment and investigations re the same.	0.50
04/09/21	SBP	Review of courtroom deputy notes regarding summary judgment under submission.	0.20
04/09/21	SBP	Review of email from Thomas Humphries to trustee regarding conference with Charlotte MacDonald (.20); review of revised letter to MacDonald (.20).	0.40
04/12/21	TBH	Analysis of order denying the 1992 Plan's summary judgment motion and strategy re post-denial options available to the 1992 Plan.	0.50
04/12/21	TBH	Strategy re the contents of potential pleadings as to remnant assets and emails with the trustee re the same.	0.30
04/12/21	TBH	Emails with the trustee re a proposed letter to C. McDonald re certain unclaimed funds in North Carolina and finalizing letter for mailing.	0.50

Date	Tkpr	Description	Hours
04/12/21	SBP	Review and analysis of court's order denying Coal Act Funds' motion for summary judgment and setting status conference for May 3, 2021.	0.30
04/12/21	SBP	Review of email from trustee regarding possible future sale of remnant assets and claims.	0.20
04/12/21	SBP	Begin drafting 11th Fee Application and continued review of time entries for same.	1.80
04/13/21	TBH	Receipt and acknowledgment of service of garnishment related filing through CT Corp.	0.20
04/14/21	SBP	Review of exchange of emails between counsel for debtor and CVS regarding Silverscript refund (.30); email to CVS regarding same (.20).	0.50
04/15/21	SBP	Edits to 11th fee application	1.00
04/15/21	SBP	Exchange several emails with CVS Health regarding Silverscript refund due to estate and Trustee information	0.40
04/15/21	SBP	Report to Trustee regarding another Silverscript refund due to estate	0.20
04/15/21	SBP	Review of email from Brown of GenRe regarding status of document review (.2); exchange emails with Walding regarding same (.2)	0.40
04/16/21	SBP	Receipt of email from JAMS confirming closing of Beasley and Ditech arbitration	0.20
04/19/21	SBP	Final review and edit of 11th fee application for filing	0.50
04/20/21	SBP	Email to Brown of GenRe regarding status of file review for first four claims sent (.2); exchange of emails with Walding regarding same (.4)	0.60
04/20/21	SBP	Review of garnishment acknowledgement email from CT and review of release	0.20
04/20/21	SBP	Instructions for filing 11th fee application	0.20
04/20/21	SBP	Receipt of notice of hearing on 11th fee application	0.20
04/20/21	TBH	Review notice of hearing re Sirote's 11th fee application.	0.20
04/21/21	SBP	Two emails to Direct Fee with 11th fee application and Excel time file	0.30
04/21/21	SBP	Review of KCC invoice for February and transmittal to Trustee for payment	0.30
04/26/21	SBP	Exchange emails with Trustee's office regarding address for Direct Fee Review	0.30
04/26/21	SBP	Email to Oliver and Dryer of Direct Fee regarding correct address	0.20
04/26/21	SBP	Exchange emails with Trustee regarding new Silverscript proceeds received	0.30
04/27/21	SBP	Receipt and review of Direct Fee Review's initial report on 11th fee application (.2); review of relevant time entries noted (.2); email to Direct Fee with response (.2)	0.60
04/28/21	TBH	Receipt and analysis of service of process re Tidewater Finance Company v. Minnifield (Jefferson County, Alabama) re garnishment efforts and strategy re the need to respond to the same.	0.50
04/28/21	SBP	Exchange emails with Trustee regarding setting up meeting in May to discuss all assets and issues	0.30
04/28/21	SBP	Review of Direct Fee Review final draft of report on 11th fee application and email to Oliver regarding same	0.30
04/29/21	TBH	Analysis of Direct Fee report re Sirote's 11th fee application.	0.20
04/29/21	TBH	In depth review of service of process in Tidewater Finance v. Minnifield to confirm that it does not impact the bankruptcy estates.	0.20
04/29/21	TBH	Review of email from trustee re meeting to discuss outstanding case issues.	0.20
04/29/21	SBP	Conference with TBH regarding strategy for May 3rd status conference	0.20
05/03/21	TBH	Preparation for and attending status hearing re the Coal Act AP	1.00
05/03/21	TBH	Emails with the Trustee re a small invoice received from Silverscript.	0.30
05/03/21	TBH	Emails with counsel for Warrior Met re trial timing issues and as to today's status hearing in the Coal Act AP (0.5); emails with the trustee re the status hearing and an expected fall trial date (0.5).	1.00
05/03/21	SBP	Review of exchange of emails between TBH and Mike Hall regarding status conference set today on Coal Act litigation (.3); review of report from TBH regarding July status conference and fall trial (.2)	0.50

Date	Tkpr	Description	Hours
05/03/21	SBP	Review of exchange of emails with Trustee and TBH regarding Silverscript invoice (.3); review of invoice (.2)	0.50
05/05/21	TBH	Analysis of order resetting the Coal Act AP for a status hearing in July, 2021.	0.20
05/05/21	SBP	Receipt and review of court's order rescheduling status conference for July 12th in Coal Act litigation	0.20
05/05/21	SBP	Review of April storage invoice for Archive Corp in Florida	0.20
05/06/21	SBP	Review and categorize April time entries for fee application	0.40
05/07/21	SBP	Receipt and review of KCC invoice for March and transmittal to Trustee for payment	0.30
05/10/21	SBP	Receipt and review of 2021 estimated tax due notice from Delaware (.2); email to Denaburg with copy (.2)	0.40
05/13/21	SBP	Drafting report to Alabama Supreme Court in Gustafson case	0.20
05/14/21	SBP	Review of email from special counsel, Wallin, regarding production of documents, follow up questions from experts and list of people Defendants want to depose (.2); review of copies of documents produced (.2)	0.40
05/17/21	SBP	Email to Phil Monroe with email from special counsel, Wallin, regarding railroad litigation (.2); email to Wallin regarding same (.2)	0.40
05/19/21	SBP	Receipt and review of email from Wallin regarding responses and objections to discovery due by May 21 in railroads case	0.20
05/20/21	TBH	Receipt and analysis of garnishment service of process on New WEI 18 re state court case Synchrony Bank v. Kamiri and strategy re responding to the same.	0.50
05/20/21	SBP	Review and analysis of draft responses to Defendant requests for production in railroad litigation (.5); review of Defendants' joint requests for production (.3); email to special counsel, Wallin, regarding responses (.2); email to Monroe regarding need for special counsel to communicate with Warrior Met employees (.2)	1.20
05/20/21	SBP	Review of files and status of all cases and issues in preparation for meeting with Trustee on Tuesday	1.00
05/20/21	SBP	Review and analysis of second motion to dismiss, memorandum of law and exhibits filed by Cardem in D.C. litigation (1.0); email to Mike Hall regarding same (.2)	1.20
05/20/21	SBP	Review of email from special counsel, Wallin, regarding supplemental discovery responses and list of questions for Warrior Met (.2); review of draft of supplemental discovery responses (.2)	0.40
05/21/21	SBP	Exchange several emails with Phil Monroe regarding setting up call with Melissa of Warrior Met and special counsel, Wallin	0.30
05/21/21	SBP	Email to Phil Monroe with specific questions for Melissa of Warrior Met sent by special counsel, Wallin	0.20
05/21/21	SBP	Email to Trustee with supplemental discovery responses to be signed by Trustee	0.20
05/24/21	SBP	Exchange emails with Wallin regarding status of execution of supplemental discovery responses (.3); email to Wallin with executed document (.2)	0.50
05/24/21	SBP	Exchange emails with Trustee's office regarding supplement to discovery execution and original	0.30
05/24/21	SBP	Exchange emails with Wallin regarding setting up call with Melissa and other Warrior Met employees for next week	0.30
05/25/21	TBH	Telephone conference with the trustee re open issues and litigation involving the WEI estates.	0.60
05/25/21	TBH	Evaluate impact, if any, of the US Supreme Court's decision to deny certiorari as to the 5th Circuit decision in Westmoreland re bankruptcy rejection of Coal Act liabilities.	0.30
05/25/21	TBH	Review of email from E. Denaburg re the current value of the Cardem assets not considering professional fees.	0.20
05/25/21	SBP	Receipt and review of notice from CT regarding Delaware franchise tax report due (.2); email to accountant for estate (.2)	0.40
05/25/21	SBP	Meeting with Trustee and accountant for estate regarding all matters and assets	0.60

Date	Tkpr	Description	Hours
05/25/21	SBP	Email to Phil Monroe regarding RDS questions and inquiries regarding Medicare subsidy payments	0.20
05/25/21	SBP	Review status of unclaimed property submissions to State of Alabama	0.20
05/25/21	SBP	Exchange emails with accountant for estate regarding recent Supreme Court decision and potential impact on Coal Act litigation	0.30
05/25/21	SBP	Conference with accountant for estate regarding Cardem information needed for taxes (.2); review of 2020 management accounts statement sent by Bennett at Willis (.2)	0.40
05/25/21	CHS	Phone call with unclaimed funds clerk and determine status of the same.	0.40
05/26/21	SBP	Receipt of email from accountant for estate regarding balance in Cardem accounts	0.20
05/26/21	SBP	Review of update on Alabama Unclaimed Property report applications and two checks expected soon	0.20
06/01/21	TBH	Draft/revise answer to garnishment action against New WEI, 18 filed in the Circuit Court of Jefferson County, Alabama.	1.00
06/01/21	SBP	Review and analysis of Plaintiff's memo in opposition to motion to dismiss in Cardem litigation and initial review of voluminous exhibits to memo	1.00
06/01/21	SBP	Review of May invoice from Archive regarding records stored in Florida (.2); review remaining boxes in storage and analysis of need (.2); email to Marjorie Baker of Archive regarding same (.2)	0.60
06/01/21	SBP	Exchange emails with Trustee regarding destruction of remaining records stored in Florida	0.30
06/02/21	TBH	Review and response to email from courtroom deputy requesting a report from the trustee (0.3); strategy re the contents of the requested report and preparing draft the same (0.5).	0.80
06/02/21	SBP	Exchange emails with Trustee regarding destruction of more records	0.30
06/02/21	SBP	Receipt of email from court office with request for status report (.2); begin work on same (.2)	0.40
06/02/21	CHS	NEW WEI - Draft Garnishee's Answer for TBH to review and sign. (Cavalry v. Silar Kamiri)	0.40
06/03/21	CHS	Finalize and File garnishment response for TBH	0.50
06/03/21	TBH	Final review and execution of garnishee answer in state court matter on behalf of New WEI 18.	0.30
06/03/21	TBH	Receipt and initial analysis of service of process re a garnishment issued to Walter Energy in Crown Asset Management v. Martin and strategy re response.	0.20
06/03/21	TBH	Drafting trustee's status report to the court and engaging in related docket and pleading review (1.7); review correspondence from the trustee and M. Hall, counsel for Warrior Met, re the draft report (0.3).	2.00
06/03/21	SBP	Work on preparation of status report to court including edit of draft report	0.60
06/03/21	SBP	Exchange emails with special counsel Wallin regarding information still needed and scheduling call with Warrior Met employees (.3); email to Monroe regarding same (.2)	0.50
06/03/21	SBP	Two emails to Trustee with draft of status report to court (.3); exchange emails with Trustee regarding edits to report (.3)	0.60
06/03/21	SBP	Conference with Mike Hall regarding status of several issues in case and matters set for hearing next week	0.30
06/04/21	TBH	Revise trustee's case status report based on information received from the trustee and counsel for Warrior Met.	0.70
06/04/21	SBP	Review and categorize May time entries for fee application	0.30
06/04/21	SBP	Review and analysis of Warrior Met answers to questions sent by special counsel Wallin (.3); email to Wallin with same (.2)	0.50
06/04/21	SBP	Review and edit of final draft of status report to court	0.20
06/07/21	TBH	Emails with trustee's paralegal re the recently filed case status report.	0.20
06/07/21	TBH	Review hearing results re Sirote's most recent fee application.	0.20
06/07/21	SBP	Review of KCC invoice for April and transmittal to Trustee for payment	0.30
06/07/21	SBP	Preparation for and attendance of hearing on eleventh fee application	0.30

Date	Tkpr	Description	Hours
06/07/21	SBP	Drafting proposed order on eleventh fee application	0.20
06/07/21	SBP	Email to Mike Hall with Plaintiff's response to motion to dismiss in Cardem litigation	0.20
06/08/21	TBH	Review entered order granting Sirote's 11th fee application.	0.20
06/08/21	SBP	Edit of proposed order on eleventh fee application and instructions for submission to court	0.20
06/08/21	SBP	Review of recent bank statement for liquidating trust account	0.20
06/09/21	SBP	Receipt of court's order approving eleventh fee application	0.20
06/10/21	SBP	Exchange emails with Monroe regarding investigation into RDS drug subsidy issue	0.30
06/14/21	SBP	Conference with Walding regarding status of workers compensation documents and review and follow up with GenRe	0.20
06/21/21	SBP	Review of PACER regarding status of ruling by Court regarding Cardem District of Columbia litigation.	0.20
06/23/21	SBP	Review of correspondence from special counsel Wallin regarding defendant's intent to conduct depositions in railroad litigation.	0.20
06/24/21	SBP	Exchange emails with special counsel Wallin regarding discovery in railroad case and setting up call to discuss.	0.30
06/25/21	SBP	Review of email from Brown, counsel for GenRe, regarding status of review of documents produced.	0.20
06/29/21	SBP	Conference call with special counsel Wallin and Dell-Angelo regarding railroad case status and depositions (.50); Email to Monroe regarding same (.20).	0.70
07/06/21	SBP	Review of several notices sent by court related to subpoenas sent to Walter Energy.	0.30
07/06/21	SBP	Review of email from Denaburg regarding status of case with Warrior Met distributions (.20); Review and analysis of calculation of monies due Warrior Met and list of previous distributions (.30)	0.50
07/06/21	SBP	Review of trustee's liquid asset report as of June 30.	0.20
07/06/21	SBP	Conference with trustee regarding status of pending matters, strategy for dealing with Warrior Met and status of railroad case discovery.	0.30
07/06/21	SBP	Review and categorization of June time entries for fee application.	0.30
07/06/21	TBH	Initial analysis of service of process re a state court document subpoena issued to Jim Walter in PEABODY ENERGY, INC. vs. MELVIN MONTGOMERY, JR. and strategy re responding to the same.	0.50
07/08/21	CHS	Work on Garnishee's Answer - John Martin	0.40
07/12/21	SBP	Preparation for and attendance at status conference in Coal Act litigation.	0.50
07/12/21	SBP	Report to special counsel Wallin regarding status of deponent notice and setting up calls.	0.20
07/12/21	SBP	Email to trustee regarding potential dates for Coal Act trial.	0.20
07/13/21	SBP	Exchange several emails with Hall regarding trial setting in Coal Act case.	0.40
07/13/21	SBP	Exchange emails with trustee regarding November dates for trial.	0.30
07/13/21	SBP	Receipt and review of Court's trial Order in Coal Act litigation.	0.20
07/16/21	SBP	Receipt of email from Barnett at Willis requesting organizational chart for Cardem (.20); Email to Barnett with check of all Walker Energy entities (.20); Exchange emails with Barnett regarding status of entity ownership (.30).	0.70
07/19/21	SBP	Preparation of required report to Alabama Supreme Court in Gustafson case and instructions for filing and service of Gustafson report.	0.40
07/19/21	SBP	Receipt and review of KCC invoice for May and transmittal to trustee for payment.	0.30
07/22/21	SBP	Review of PACER regarding status of Cardem litigation in D.C.	0.20
07/26/21	SBP	Exchange emails with Hall regarding U.S. Census Survey regarding Walter Energy sent to Warrior Melt.	0.30
07/27/21	SBP	Review of information sent by Census Bureau regarding Walter Energy (.20); Registered and Completion of online census survey (.30).	0.50

Date	Tkpr	Description	Hours
07/27/21	SBP	Email to Monroe regarding information needed by railroad special counsel.	0.20
08/04/21	SBP	Exchange emails with Warrior Met counsel regarding potential unclaimed property due debtor (.20); Email to C. Stanford to pursue (.20); Review of status of claims (.20).	0.60
08/06/21	SBP	Review of July time entries and categorization for fee application.	0.40
08/09/21	SBP	Receipt and review of KCC invoice for June and transmittal to trustee for payment.	0.30
08/09/21	SBP	Review of email from creditor Frontal with request to release lien.	0.20
08/09/21	TBH	Communications with property owner in Florida re a former Jim Walter mortgage.	0.30
08/10/21	TBH	Emails with the law office of Glen Weber re his client's request that the trustee sign a mortgage release as to property owned by the client.	0.20
08/10/21	TBH	Telephone conference with counsel (Allston Macon) for a potential purchaser of land encumbered by a Jim Walter Homes mortgage as to issues related to releasing the mortgage (0.5); emails with counsel for Ditech Financial re the mortgage issue (0.2); review summary email from Allston Macon re the details of the mortgage (0.2).	0.90
08/10/21	SBP	Review of PACER regarding status of Cardem case in D.C.	0.20
08/10/21	SBP	Review of several emails regarding release of Jim Walter Homes mortgage in Port St. Lucie, Florida.	0.30
08/10/21	SBP	Review of exchange of several emails between counsel for creditors and counsel for Ditech regarding release of old Jim Walter Home mortgage in Virgin Islands.	0.40
08/11/21	SBP	Review of subpoenas served on Jim Walter Resources in worker's compensation case and strategy for response.	0.30
08/11/21	CHS	Emails with Thomas regarding Jim Walter/Peabody/Matthews subpoena response. Review docket for the same.	0.20
08/11/21	TBH	Analysis of document subpoena issued to Jim Walter Resources in the state court case of Peabody Energy Inc. v. Melvin Montgomery, Jr (0.3); review of state court docket to determine the status of the subpoena (0.2); emailing issuing counsel as to the subpoena (0.3).	0.80
08/11/21	TBH	Analysis of emails from C. Murphy, real estate agent seeking the proper party in interest to release an old Jim Walter Homes' mortgage encumbering a property she is trying to sell (0.4); emails with debtor's Chapter 11 counsel re finding a good contact at Ditech re the mortgage at issue (0.2); emailing James Short, Ditech employee, re the mortgage (0.2).	0.80
08/12/21	TBH	Analysis of email from C. Murphy, party seeking a release as to a Jim Walter Homes mortgage, to a representative of Shellpoint mortgage as to the release (0.3); analysis of proposed lien release and related communications (0.3).	0.60
08/12/21	SBP	Review of exchanges of emails with counsel for debtors regarding ability to release old Jim Walter mortgages (.30); Strategy for requesting assistance from Ditech or others (.3).	0.60
08/13/21	TBH	Analysis and strategy re court's trial scheduling order.	0.50
08/16/21	TBH	Communications with party seeking lien release from the trustee re a 2001 Jim Walter Homes mortgage and conducting factual analysis re issues related to the same.	2.20
08/16/21	TBH	Review of emails from Candace Gibbs, current Shellpoint Mortgage employee and former Jim Walter Homes employee, re a lien release as to a former Jim Walter Homes' mortgage; calling the law office of Allston Macon to provide the lien release contact information, closing the loop on a request from Macon sent last week as to that information.	0.50
08/16/21	CHS	Unclaimed Property - continue to work on obtaining the funds.	0.30
08/17/21	SBP	Review of several emails with requests for release of Jim Walter home mortgage (.60); Review of letters sent to trustee regarding same (.20); Review of schedules of debtor regarding same (.20); Strategy for what trustee can execute (.30); Review of proposed release language (.20); Email to trustee regarding same (.20).	1.70
08/17/21	TBH	Continued factual investigation and communications with parties seeking mortgage releases from the trustee as to an old Jim Walter Homes mortgage regarding property located in Port St. Lucie.	2.90
08/17/21	TBH	Drafting detailed email to the trustee re a recent mortgage release request as to a 2001 Jim	0.50

Date	Tkpr	Description	Hours
		Walter Homes mortgage and making recommendations as to the best course of action.	
08/17/21	TBH	Analysis of voicemail from Amanda Patterson, issuing counsel as to a subpoena sent to Jim Walter Resources in a state court matter, and strategy re responding to the same.	0.30
08/18/21	TBH	Emailing the trustee re the proposed release language as to the Port St. Lucie mortgage release request.	0.20
08/18/21	TBH	Emailing counsel for a party seeking a lien release as to an old Jim Walter Homes' mortgage as to a property in Port St. Lucie, Florida.	0.20
08/18/21	TBH	Drafting proposed mortgage release document as to an old Jim Walter Homes' mortgage for the trustee's review (1.0); meeting and communications with trustee re the mortgage release document (0.5); emails with the parties seeking the release as to the release (0.5).	2.00
08/18/21	SBP	Receipt of email from special counsel Wallin regarding status of identifying witness for deposition.	0.20
08/18/21	SBP	Review draft of release of old Jim Walker home mortgage.	0.20
08/19/21	SBP	Review of chart of status of several unclaimed property applications pending with State of Alabama.	0.20
08/19/21	SBP	Review of email from Hall regarding latest distribution from trustee to Warrior Met (.20); Review of detail of check sent by Denaburg (.20).	0.40
08/19/21	CHS	Prepare chart of unclaimed property status and claims.	0.80
08/19/21	TBH	Review mailing receipt re the executed mortgage release sent to the title company as to a former Jim Walter Homes mortgage on property in Port St. Lucie, Florida.	0.20
08/19/21	TBH	Emails with the trustee and the trustee's accountant (E. Denaburg) re recent funds sent to Warrior Met in line with the settlement (0.3); emailing M. Hall, counsel for Warrior Met, information re a recent disbursement to Warrior Met (0.2).	0.50
08/23/21	TBH	Review status of lien release request as to an old Jim Walter Homes mortgage encumbering property in Falkville, Alabama.	0.20
08/23/21	SBP	Email to special counsel Wallin regarding status of witnesses for deposition (.20); Email to Monroe regarding same (.20).	0.40
08/24/21	TBH	Analysis of email from C. Murphy requesting changes to the mortgage release executed by the trustee and strategy re revisions (0.5); responding to Murphy's email (0.2).	0.70
08/25/21	TBH	Emailing the trustee re re-executing a release as to an old Jim Walter Homes mortgage.	0.20
08/26/21	TBH	Review and respond to emails from party seeking a mortgage release from the trustee as to the an old Jim Walter Homes mortgage.	0.50
08/26/21	TBH	Communications with the trustee re a proposed release of an old Jim Walter Homes mortgage.	0.50
08/26/21	SBP	Receipt of call from Mike Hall regarding new dates for Coal Act trial (.20); Several emails to Hall regarding same (.30).	0.50
08/26/21	SBP	Conference with trustee regarding rescheduling of Coal Act trial.	0.20
08/27/21	SBP	Review of several emails regarding status of release of Jim Walter mortgage requested and status of same.	0.20
08/27/21	TBH	Emails with parties seeking a release from the trustee as to an old Jim Walter Homes mortgage (0.5); emailing the trustee re the communications (0.2).	0.70
08/31/21	TBH	Meeting with trustee to execute a mortgage release as to an old Jim Walter Homes mortgage.	0.30
08/31/21	TBH	Emailing executed release to requesting party as to an old Jim Walter Homes mortgage.	0.20
08/31/21	SBP	Receipt of email from Goodchild regarding February dates for Coal Act trial (.20); Review of Hall email regarding same (.20).	0.40
08/31/21	SBP	Meeting with trustee regarding release of mortgages.	0.20
09/01/21	SBP	Exchange emails with special counsel Rios and D'Angelo regarding railroad case discovery (.30); Email to Monroe regarding same (.20).	0.50
09/02/21	SBP	Call to Hall regarding assistance with railroad litigation.	0.20
09/02/21	SBP	Exchange emails with special counsel Rios regarding conference call to discuss discovery.	0.30

Date	Tkpr	Description	Hours
09/03/21	SBP	Exchange emails with Hall regarding railroad litigation.	0.30
09/03/21	SBP	Exchange emails with Monroe regarding railroad litigation and call on Tuesday.	0.30
09/06/21	SBP	Exchange emails with Monroe regarding railroad litigation discovery and call tomorrow.	0.30
09/07/21	SBP	Email to Monroe regarding conference call with railroad litigation special counsel (.20); Conference call with special counsel Rios and D'Angelo (.40).	0.60
09/08/21	SBP	Email to Monroe regarding expected deposition schedule.	0.20
09/08/21	SBP	Receipt and review of Court's Order rescheduling trial on Coal Act litigation.	0.20
09/10/21	SBP	Receipt of email from Monroe regarding scheduling calls with potential deponents (.20); Email to special counsel Rios and D'Angelo regarding same (.20).	0.40
09/13/21	SBP	Drafting report in Gustafson case due next week and instructions for filing and service.	0.30
09/14/21	SBP	Review and categorization of August time entries for fee application.	0.30
09/14/21	SBP	Review of email from special counsel Rios regarding times of calls with potential deponents in railroad litigation (.20); Email to Monroe with same (.20); Review of response from Monroe (.20).	0.60
09/14/21	SBP	Exchange emails with special counsel Rios regarding defendant's intention as to depositions and identify of additional witness (.30); Email to Monroe regarding same (.20).	0.50
09/15/21	SBP	Begin work on Twelfth Fee Application.	0.30
09/15/21	TBH	Analysis of amended trial scheduling order.	0.50
09/16/21	SBP	Review of KCC invoice for July and transmittal to trustee for payment.	0.30
09/21/21	SBP	Exchange emails with special counsel Dell-Angelo regarding status of 30(b)(6) depositions.	0.30
09/22/21	SBP	Review of District of Columbia court docket regarding status of Cardem litigation.	0.20
09/22/21	SBP	Conference with special counsel Dell'Angelo regarding status of railroad litigation discovery (.20); Exchange emails with special counsel Rios regarding some dates for conferences with witnesses (.30); Email to Monroe regarding same (.20).	0.70
09/23/21	SBP	Email to special counsel Dell'Angelo regarding status of 30(b)(6) interviews.	0.20
09/23/21	SBP	Exchange emails with trustee regarding setting up meeting with trustee and accountant.	0.20
09/27/21	SBP	Exchange emails with Dell'Angelo regarding 30(b)(6) depositions and contacting Warrior Met for assistance (.30); Review of Monroe email with Rodney Camp contact info (.20); Review of Monroe email regarding Mike Madden availability (.20).	0.90
09/28/21	SBP	Review of email from Monroe regarding setting up call with Mike Madden regarding potential deposition.	0.20
09/30/21	SBP	Review of email from special counsel Rios regarding call with Mike Madden regarding railroad litigation.	0.20
09/30/21	TBH	Telephone conference with Pam Parsons of the Connecticut Attorneys Title Insurance Company as to a lien release request related to a former Jim Walter Homes property in Texas.	0.50
Total:			\$40,360.00

LIST OF EXPENSES

POSTAGE		\$12.80
E-DISCOVERY		<u>\$23.47</u>
	TOTAL	\$36.27

Toffel, Andre M.
General Business
064331.00001

Expenses Incurred

<u>Description</u>	<u>Amount</u>
Postage	\$12.80
eDiscovery Services	23.47
Total	<u><u>\$36.27</u></u>

**TWELFTH REQUEST FOR AWARD OF INTERIM COMPENSATION AND
VERIFICATION OF SUPPORTING INFORMATION**

In accordance with the above, and pursuant to 11 U.S.C. §§ 330 and 331, Applicant respectfully requests that this Court approve this Twelfth Application and asks that an Order be entered awarding interim compensation and expenses to Applicant in the total amount of **\$40,396.27**. Applicant hereby certifies that the information detailed above and submitted in support of this was reviewed and analyzed prior to its submission and Applicant verifies that such information is true and correct to the best of his knowledge.

/s/ Stephen B. Porterfield _____
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Thomas B. Humphries
Counsel for Andre M. Toffel
Chapter 7 Trustee

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CERTIFICATE OF SERVICE

I hereby certify that on this the 8th day of October, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing all persons and entities that have filed a request for service of filings in this case pursuant to Bankruptcy Rule 2002.

Electronic notice, and via U.S. Mail where appropriate, will also be provided to the following:

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