

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

In re:)	
)	Chapter 11
ZACHRY HOLDINGS, INC., <i>et al.</i> ¹)	
)	Case No. 24-90377 (MI)
Debtors.)	
)	(Jointly Administered)

**HICKS THOMAS LLP’S THIRD MONTHLY FEE STATEMENT FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Applicant:	Hicks Thomas LLP	
Applicant’s Role in Case:	Special litigation counsel to the Debtors	
Employment Order:	July 9, 2024 [Docket No. 440]	
	Beginning of Period	End of Period
Time period covered by this Statement:	August 1, 2024	August 31, 2024
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$94,970.00 (80% of \$118,712.50)	
Total reimbursable expenses requested in this Statement	\$405.00	
Total fees and expenses requested in this Statement (exclusive of 20% Holdback):	\$95,375.00	
Total fees and expenses requested in this Statement (inclusive of 20% Holdback):	\$119,117.50	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$118,587.50	
Total actual attorney hours covered by this Statement:	161.40	
Average hourly rate for attorneys:	\$734.74	
Summary of Paraprofessional Fees Requested		
Total paraprofessional fees requested in this Statement:	\$125.00	
Total actual paraprofessional hours covered by this Statement:	0.50	
Average hourly rate for paraprofessionals:	\$250.00	

¹ The last four digits of Zachry Holdings, Inc.’s tax identification number are 6814. A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.veritaglobal.net/ZHI. The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.



In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (“Compensation Procedures Order”) [Docket No. 342], each Application Recipient receiving notice of the Monthly Fee Statement will have until noon (prevailing Central Time) on the 14th day after the filing of the Monthly Fee Statement, i.e., September 23, 2024, to object to the requested fees and expenses. Upon the expiration of such period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Statement that are not objected to.

Hicks Thomas LLP (“Hicks Thomas”), special litigation counsel for the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases, hereby files this monthly fee statement (this “Monthly Fee Statement”) for the period from August 1, 2024 through August 31, 2024 (the “Fee Period”) requesting an aggregate amount of \$95,375.00 for the Fee Period representing (a) interim allowance and payment of compensation for professional services to the Debtors in the amount of \$94,970.00, representing 80% of the \$118,712.50 of fees earned by Hicks Thomas for professional services to the Debtors during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by Hicks Thomas during the Fee Period in connection with such services in the amount of \$405.00.

1. A summary of Hicks Thomas’s hours expended and fees earned during the Fee Period by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**. A summary of Hicks Thomas’s hours expended and fees earned during the Fee Period by matter and ABA task code² is attached here to as **Exhibit B**.³ A detailed statement of Hicks Thomas’s hours expended, fees earned, and expenses incurred during the Fee Period is attached hereto as **Exhibit**

² <https://www.americanbar.org/content/dam/aba/administrative/litigation/leadership-portal/utbms.pdf>

³ Hicks Thomas has separated its services into four matters: (i) In re: Zachry Bankruptcy: Contested Matters; (ii) Commonwealth Electric Company; (iii) SEC Investigation; and (iv) Project Goal Post. Within each of the four matters, and consistent with its usual practice, Hicks Thomas then used the ABA task codes to categorize the services provided. In addition to a separate summary ABA task code for each matter, Exhibit B also contains a summary by ABA task code aggregated across all four matters.

C. A summary of the expenses incurred for which Hicks Thomas seeks reimbursement is attached hereto as Exhibit D.

2. Hicks Thomas attorneys and paraprofessionals expended a total of 534.10 hours in connection with the chapter 11 cases during the Fee Period. All services rendered by Hick Thomas for which compensation is sought pursuant to this Monthly Fee Statement were rendered solely to or on behalf of the Debtors. No payments were received by Hicks Thomas from any other source for services rendered or to be rendered in connection with the chapter 11 cases.

3. Pursuant to the Compensation Procedures Order, any party objecting to this Monthly Fee Statement shall serve via email to Hicks Thomas and the Notice Parties (as defined in the Compensation Procedures Order) a written notice setting forth the precise nature and basis of the objection and the exact dollar amount at issue (the “Notice of Objection”) before noon (prevailing Central Time) on the 14th day after the filing of this Monthly Fee Statement, i.e., September 23, 2024.

4. Upon expiration of the objection deadline, the Debtors are authorized to pay Hicks Thomas an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement that are not subject to an objection. If a Notice of Objection is timely served pursuant to the Compensation Procedures Order, the objecting party and Hicks Thomas shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay Hicks Thomas an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If the parties are unable to reach an agreement, then resolution will be governed as set forth in the Compensation Procedures Order.

5. Although Hicks Thomas has made every effort to include all fees earned and expenses incurred during the Fee Period, some fees and expenses might not be included in this

Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Hicks Thomas reserves the right to make further statements to this Court for allowance of such fees and expenses not included herein, which further statement will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order.

Dated: September 9, 2024
Houston, Texas

Respectfully submitted,

HICKS THOMAS LLP

By: /s/ John B. Thomas
John B. Thomas, Attorney-in-Charge
Southern District Bar No. 10675
HICKS THOMAS, LLP
700 Louisiana, Suite 2300
Houston, Texas 77002
(713) 547-9100
(713) 547-9150 (Facsimile)

CERTIFICATE OF SERVICE

I certify that on September 9, 2024, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster

Charles R. Koster

Exhibit A

Summary of Total Fees and Hours by Attorneys and Paraprofessionals

Name	Title	Year Admitted	Areas of Expertise	Hours	Rate	Fees
John B. Thomas	Partner	1987	Commercial Litigation Practice	61.60	\$950	\$58,520.00
Stephen M. Loftin	Partner	1990	Commercial Litigation Practice	1.70	\$875	\$1,487.50
John J. Deis	Partner	2000	Commercial Litigation Practice	52.20	\$675	\$35,235.00
J. Stephen Barrick	Partner	1996	Commercial Litigation Practice	6.00	\$750	\$4,500.00
Eric A. Grant	Partner	1990	Commercial Litigation Practice	7.30	\$750	\$5,475.00
D. Ryan Cordell	Associate	2018	Commercial Litigation Practice	11.20	\$525	\$5,880.00
Sofia C. Burnett	Associate	2023	Commercial Litigation Practice	21.40	\$350	\$7,490.00
Jennifer R. Baker	Paralegal			0.50	\$250	\$125.00
Grand Total				161.90		\$118,712.50

Exhibit B**In re: Zachry Bankruptcy: Contested Matters****Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	6.30	\$ 5,297.50
L190	Other Case Assessment, Development & Administration	1.70	\$ 1,147.50
L210	Pleadings	0.40	\$ 270.00
L250	Other Written Motions and Submissions	11.10	\$ 7,492.50
E112	Court Fees		\$ 405.00
		Totals	
		<u>19.50</u>	<u>\$ 14,612.50</u>

**Commonwealth Electric Company
Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	2.70	\$ 2,225.00
L160	Settlement/Non-Binding ADR	2.10	\$ 1,957.50
L210	Pleadings	0.70	\$ 612.50
		<u>Totals</u>	
		5.50	\$ 4,795.00

**SEC Investigation
Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L140	Document/File Management	1.20	\$ 1,140.00
		Totals	
		<u>1.20</u>	<u>\$ 1,140.00</u>

**Project Goal Post
Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	7.30	\$ 6,935.00
L120	Analysis/Strategy	57.30	\$ 36,372.50
L130	Experts/Consultants	0.20	\$ 135.00
L160	Settlement/Non-Binding ADR	0.80	\$ 760.00
L190	Other Case Assessment, Development & Administration	2.90	\$ 2,755.00
L230	Court Mandated Conferences	0.70	\$ 472.50
L250	Other Written Motions and Submissions	1.70	\$ 1,147.50
L430	Written Motions and Submissions	1.20	\$ 1,140.00
L680	Presentation	14.20	\$ 13,490.00
		Totals	
		86.30	\$ 63,207.50

**In Re: FLNG Explosion Litigation
Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	1.50	\$ 1,205.00
L120	Analysis/Strategy	24.10	\$ 17,845.00
L140	Document/File Management	0.50	\$ 125.00
L190	Other Case Assessment, Development & Administration	4.60	\$ 3,717.50
L210	Pleadings	1.50	\$ 1,325.00
L240	Dispositive Motions	6.20	\$ 4,650.00
L250	Other Written Motions and Submissions	3.70	\$ 2,662.50
L310	Written Discovery	0.30	\$ 157.50
L430	Written Motions and Submissions	7.00	\$ 3,675.00
		Totals	
		<u>49.40</u>	<u>\$ 35,362.50</u>

EXHIBIT C

Detailed time

Hicks Thomas LLP
700 Louisiana, Suite 2300
Houston, TX 77002
(713) 547-9100
Tax I.D. 76-0536336

Mr. Jay Old
Zachry Group
P. O. Box 240130
San Antonio, TX 78224-0130

September 5, 2024
Invoice #79557
File Number: 002162-16164

SEC Investigation

TOTAL FEES	\$1,140.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<u>\$1,140.00</u>

Hicks Thomas LLP
 700 Louisiana, Suite 2300
 Houston, TX 77002
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Mr. Jay Old
 Zachry Group
 P. O. Box 240130
 San Antonio, TX 78224-0130

September 5, 2024
 Invoice #79557
 File Number: 002162-16164

SEC Investigation

PROFESSIONAL SERVICES

Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/27/2024	JBT	L140	A104	Attention to closing the matter in response to notification of the close of proceeding.	1.20	950/hr	\$1,140.00

TIMEKEEPER SUMMARY

Initials	Name	Hours	Rate	Amount
JBT	Thomas, John B	Partner	1.20	\$950.00
Total fees for this matter			<u>1.20 hrs</u>	<u>\$1,140.00</u>

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Tax I.D. 76-0536336

Mr. Jay Old
Zachry Group
P. O. Box 240130
San Antonio, TX 78224-0130

September 5, 2024

Invoice #79558

File Number: 002162-16187

Project Goal Post

TOTAL FEES	\$63,207.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<u>\$63,207.50</u>

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 700 Louisiana, Suite 2300
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 Tax I.D. 76-0536336

Mr. Jay Old
 Zachry Group
 P. O. Box 240130
 San Antonio, TX 78224-0130

September 5, 2024
 Invoice #79558
 File Number: 002162-16187

Project Goal Post

PROFESSIONAL SERVICES

Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/01/2024	JBT	L190	A101	Prepare for meeting with Zachry team.	1.20	950/hr	\$1,140.00
08/05/2024	JBT	L120	A106	Conference with Mr. Old to prepare for upcoming meetings in San Antonio.	1.00	950/hr	\$950.00
	JJD	L230	A109	Pretrial conference on Adversary Proceeding.	0.70	675/hr	\$472.50
08/06/2024	JBT	L190	A104	Review and work on finalizing fee application.	0.70	950/hr	\$665.00
	JBT	L160	A104	Review draft settlement agreement with GPX and related correspondence.	0.80	950/hr	\$760.00
	JBT	L680	A101	Review case materials and prepare for meetings with Zachry team.	1.20	950/hr	\$1,140.00
	JJD	L120	A103	Begin work analyzing key issues and evidence for after action report requested by Zachry in-house counsel.	1.60	675/hr	\$1,080.00
	JJD	L120	A106	Litigation team call with Zachry in-house counsel, Rick Hess and Susman Godfrey team and Charles Koster with White & Case team.	0.70	675/hr	\$472.50
	SCB	L120	A104	Create an outline for analysis of legal issues that may be relevant to other pending litigation for after action report requested by Zachry in-house counsel.	0.30	350/hr	\$105.00
	SCB	L120	A104	Review and summarize key evidence to add to after action analysis.	1.90	350/hr	\$665.00

Zachry Group
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Hicks Thomas LLP
 September 5, 2024
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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
	SCB	L120	A104	Review and summarize key correspondence to add to an analysis of legal issues that may be relevant to other pending litigation.	1.90	350/hr	\$665.00
	SCB	L120	A105	Meeting with partners J. Thomas and J. Deis to discuss assignment from in-house counsel at Zachry to draft an analysis of legal issues that may be relevant to other pending litigation.	0.30	350/hr	\$105.00
08/07/2024	JBT	L680	A101	Prepare slides for Zachry presentation.	1.00	950/hr	\$950.00
	JBT	L680	A111	Travel to San Antonio for Zachry presentation and meetings.	3.00	950/hr	\$2,850.00
	JJD	L120	A104	Review of key correspondence for use in after action analysis of GPX's contract issues.	1.40	675/hr	\$945.00
	SCB	L120	A104	Review the EPC Contract to analyze issues relevant to issues in future litigation.	2.80	350/hr	\$980.00
	SCB	L120	A104	Continue reviewing key evidence relevant to the main issues from the Project to include in an analysis regarding issues potentially relevant to Zachry's other litigation.	1.30	350/hr	\$455.00
08/08/2024	JBT	L680	A101	Prepare for presentation to Zachry team.	1.00	950/hr	\$950.00
	JBT	L680	A106	Attend meetings with Zachry and make presentation for those in attendance.	5.00	950/hr	\$4,750.00
	JBT	L120	A106	Meet with Zachry legal team.	1.50	950/hr	\$1,425.00
	JBT	L680	A111	Travel to Houston.	3.00	950/hr	\$2,850.00
	JJD	L120	A104	Analyze key GPX contractual provisions and underlying communications and documents for after action analysis.	4.20	675/hr	\$2,835.00
	SCB	L120	A105	Phone call with partner J. Deis to discuss assignment to draft memoranda related to after action analysis.	0.20	350/hr	\$70.00
08/09/2024	JBT	L120	A106	Conference with Mr. Old as a follow up to the meetings with Zachry personnel.	0.60	950/hr	\$570.00

Zachry Group
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Hicks Thomas LLP
 September 5, 2024
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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
	JBT	L120	A104	Review key contract provisions and prepare analysis requested by the client.	2.00	950/hr	\$1,900.00
	JJD	L120	A104	Analyze key GPX contract issues and evidence for after action report.	6.70	675/hr	\$4,522.50
	SCB	L120	A105	Draft e-mail to partner J. Deis summarizing the EPC Contract provisions relevant to after action analysis.	0.80	350/hr	\$280.00
	SCB	L120	A103	Draft a memo of the EPC Contract provisions related to change order claims as requested by in-house Zachry counsel for after action analysis.	1.90	350/hr	\$665.00
08/11/2024	JJD	L120	A103	Finalize memo on key GPX contractual provisions for after action analysis.	1.10	675/hr	\$742.50
	JJD	L120	A101	Confer with John Thomas on key GPX contractual provisions for after action analysis.	0.30	675/hr	\$202.50
	SCB	L120	A103	Revise memo regarding EPC Contract provisions for partner J. Thomas.	0.40	350/hr	\$140.00
08/12/2024	JJD	L120	A104	Review and comment on draft analysis of key GPX contractual issues being prepared by Sofia Burnett.	0.60	675/hr	\$405.00
	JJD	L130	A108	Confer with expert on resolution of GPX adversary proceeding.	0.20	675/hr	\$135.00
	JJD	L250	A106	Attend prehearing meeting with Jay Old, Jeffrey Lewis, Charles Koster and White & Case bankruptcy team.	0.80	675/hr	\$540.00
	JJD	L250	A109	Monitor hearing on approval of settlement of GPX adversary proceeding and related disputes.	0.90	675/hr	\$607.50
	SCB	L120	A103	Review and summarize key correspondence to send partner J. Thomas to assist in developing an analysis of issues on the Golden Pass Project.	0.80	350/hr	\$280.00
	SCB	L120	A105	Meeting with partner J. Deis to discuss project analyzing issues in the Golden Pass Project.	0.20	350/hr	\$70.00

Zachry Group
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Hicks Thomas LLP
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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/13/2024	JBT	L120	A104	Review and revise draft memorandum regarding evaluation project requested by the client.	1.30	950/hr	\$1,235.00
	JJD	L120	A104	Review and comment on GPX after action analysis of contract provisions from Sofia Burnett.	0.70	675/hr	\$472.50
	SCB	L120	A103	Revise legal memo on EPC Contract provisions for after action analysis as requested by partner J. Thomas.	0.40	350/hr	\$140.00
	SCB	L120	A105	Draft e-mail to partner J. Thomas regarding key evidence to assist in developing a memo regarding EPC Contract issues for after action analysis.	0.20	350/hr	\$70.00
08/15/2024	JBT	L120	A106	Conference with Mr. Old regarding pending negotiations with EPC counterparty.	0.80	950/hr	\$760.00
	JBT	L110	A104	Review materials received from Mr. Old regarding ongoing negotiations with EPC counterparty.	0.70	950/hr	\$665.00
	JBT	L110	A101	Draft outline for interviews with Zachry personnel in connection with special assignment from the legal department.	2.00	950/hr	\$1,900.00
	JBT	L190	A104	Review Hicks Thomas fee applications and provide information requested by the client.	1.00	950/hr	\$950.00
08/16/2024	JBT	L110	A101	Draft witness interview outline for special review project.	1.50	950/hr	\$1,425.00
	JBT	L110	A104	Review contract documents to prepare for possible dispute with counterparty.	1.60	950/hr	\$1,520.00
08/19/2024	JBT	L120	A103	Review and revise contract analysis supporting presentation to be made to client regarding contract issues.	2.00	950/hr	\$1,900.00
	JJD	L120	A103	Edit and revise outline of after action analysis.	1.20	675/hr	\$810.00
08/20/2024	JJD	L120	A103	Work on review and analysis of relevant evidence for drafting of GPX action report.	3.90	675/hr	\$2,632.50

Zachry Group
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Hicks Thomas LLP
 September 5, 2024
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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
	JJD	L120	A101	Confer with John Thomas and Sofia Burnett on GPX after action analysis.	0.30	675/hr	\$202.50
08/21/2024	JBT	L120	A106	Draft correspondence to client regarding strategy.	0.70	950/hr	\$665.00
08/23/2024	JBT	L120	A106	Conference with Mr. Old.	0.80	950/hr	\$760.00
	JBT	L430	A103	Work on report to client.	1.20	950/hr	\$1,140.00
	JJD	L120	A104	Study evidence for after action analysis memo.	1.90	675/hr	\$1,282.50
	SCB	L120	A103	Continue drafting and revising partner J. Deis' analysis of "Lessons Learned" during the Golden Pass Project to assist in advising Zachry on issues relevant to future potential litigation (1.7); review key evidence to locate any additional information to include in same (0.4).	2.10	350/hr	\$735.00
08/26/2024	JJD	L120	A103	Work on analysis of evidence and legal issues for after action analysis memo.	2.10	675/hr	\$1,417.50
	SCB	L120	A103	Continue reviewing the chart of events from the project to assist in drafting and revising a summary of after action analysis issues to present to the client.	2.00	350/hr	\$700.00
08/27/2024	JBT	L120	A106	Conference with client and legal team to discuss strategy.	0.60	950/hr	\$570.00
08/28/2024	JBT	L120	A104	Prepare for conference with restructuring counsel to discuss strategy.	1.00	950/hr	\$950.00
08/29/2024	JJD	L120	A103	Review and revise after action analysis memo.	0.50	675/hr	\$337.50
08/30/2024	JBT	L110	A104	Review draft analysis memorandum to prepare for meetings with Zachry.	1.50	950/hr	\$1,425.00
08/31/2024	JJD	L120	A101	Conferences with John Thomas on after action analysis and revisions to same.	0.30	675/hr	\$202.50

TIMEKEEPER SUMMARY

Initials	Name	Hours	Rate	Amount
JBT	Thomas, John B	38.70	\$950.00	\$36,765.00

Zachry Group
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JJD	Deis, John J	Partner	30.10	\$675.00	\$20,317.50
SCB	Burnett, Sofia C.	Associate	17.50	\$350.00	\$6,125.00
Total fees for this matter			<u>86.30 hrs</u>		<u>\$63,207.50</u>

Hicks Thomas LLP
700 Louisiana, Suite 2300
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Tax I.D. 76-0536336

Mr. Jay Old
Zachry Holdings
P.O. Box 240130
San Antonio, TX 78224-0130

September 5, 2024
Invoice #79559
File Number: 002162-16226

Commonwealth Electric Company

TOTAL FEES	\$4,795.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<u>\$4,795.00</u>

Hicks Thomas LLP
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 Tax I.D. 76-0536336

Mr. Jay Old
 Zachry Holdings
 P.O. Box 240130
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September 5, 2024
 Invoice #79559
 File Number: 002162-16226

Commonwealth Electric Company

PROFESSIONAL SERVICES

Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/05/2024	JBT	L160	A106	Conference with Mr. Old regarding case status.	0.80	950/hr	\$760.00
	JBT	L160	A104	Review evidence and develop strategy for the case.	0.80	950/hr	\$760.00
08/06/2024	JBT	L120	A101	Review background information to prepare for conference with client.	1.20	950/hr	\$1,140.00
	JBT	L120	A106	Conference with client to discuss case.	0.70	950/hr	\$665.00
	SML	L210	A106	Call with client to analyze potential adversary claim.	0.70	875/hr	\$612.50
08/09/2024	DRC	L120	A105	Correspondence with S. Loftin regarding evidence and Commonwealth's demand.	0.20	525/hr	\$105.00
08/12/2024	DRC	L120	A105	Correspondence with litigation team regarding key evidence and status of dispute with Commonwealth.	0.30	525/hr	\$157.50
	DRC	L120	A106	Meet with J. Lewis and S. Loftin to discuss status and action items in Commonwealth matter.	0.30	525/hr	\$157.50
	SML	L160	A107	Participate in conference with Commonwealth's counsel regarding possible settlement.	0.30	875/hr	\$262.50
	SML	L160	A103	Draft proposed settlement offer to circulate to client.	0.20	875/hr	\$175.00

TIMEKEEPER SUMMARY

Zachry Group
 Commonwealth Electric Company
 Invoice # 79559

Hicks Thomas LLP
 September 5, 2024
 Page: 3

<u>Initials</u>	<u>Name</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JBT	Thomas, John B	Partner	3.50	\$950.00	\$3,325.00
SML	Loftin, Stephen M	Partner	1.20	\$875.00	\$1,050.00
DC	Cordell, Jr., D. Ryan	Associate	0.80	\$525.00	\$420.00
Total fees for this matter			5.50 hrs		\$4,795.00

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Mr. Jay Old
Zachry Group
P. O. Box 240130
San Antonio, TX 78224-0130

September 5, 2024
Invoice #79560
File Number: 002162-16230

In Re: FLNG Explosion Litigation

TOTAL FEES	\$35,362.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$35,362.50

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September 5, 2024
 Invoice #79560
 File Number: 002162-16230

In Re: FLNG Explosion Litigation

PROFESSIONAL SERVICES

Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/02/2024	EAG	L120	A107	Online conference with all counsel regarding next steps.	0.50	750/hr	\$375.00
	EAG	L250	A103	Draft and oversee filing and service of Certificate of Service of Notice of Removal.	0.50	750/hr	\$375.00
	EAG	L250	A105	E-mail correspondence with J. Thomas and R. Cordell (HT) regarding court's order for conference and disclosure of interested parties and regarding other possible filings.	0.30	750/hr	\$225.00
	JJD	L110	A108	Conference with counsel for CB&I/McDermott Matt Rawlinson and for Chiyoda on case background.	0.50	675/hr	\$337.50
	SML	L190	A107	Participate in Joint Defense Call.	0.50	875/hr	\$437.50
08/05/2024	DRC	L120	A105	Draft correspondence enclosing memoranda on pending procedural issues.	0.20	525/hr	\$105.00
	EAG	L240	A105	E-mail correspondence with J. Thomas and R. Cordell (HT) regarding certificate-of-merit defense.	0.20	750/hr	\$150.00
	JBT	L120	A106	Conference with Zachry in-house counsel regarding procedural status of the matters.	0.60	950/hr	\$570.00
	JBT	L120	A106	Review materials requested by client and draft memorandum outlining status of the pending matters.	1.50	950/hr	\$1,425.00

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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/06/2024	DRC	L120	A103	Draft summary list of FLNG cases for J. Deis, including parties and subject matter of claims.	0.40	525/hr	\$210.00
	DRC	L120	A102	Research and revise memorandum regarding procedural issues for motion to dismiss.	0.70	525/hr	\$367.50
	DRC	L190	A103	Revise Zachry Litigation Report with FLNG case updates.	0.30	525/hr	\$157.50
	EAG	L210	A105	E-mail correspondence with J. Thomas (HT) and K. Green (Bonds Ellis) regarding pending complaints.	0.20	750/hr	\$150.00
	JBT	L190	A107	Conference with opposing counsel to discuss the pending matters.	1.00	950/hr	\$950.00
	JRB	L140	A103	Review and prepare updated litigation case status report to the client per attorney request	0.50	250/hr	\$125.00
08/08/2024	EAG	L250	A104	Review agreed motions for extension of time to respond to original petition and orders granting same.	0.20	750/hr	\$150.00
08/09/2024	EAG	L210	A107	E-mail correspondence with P. Catalano (Bush Ramirez) and K. Green (Bonds Ellis) regarding movement on agreed motion to transfer actions to Houston bankruptcy court.	0.30	750/hr	\$225.00
08/13/2024	EAG	L250	A103	Draft Certificate of Interested Parties for review and comment by J. Lewis (Zachry) and J. Thomas (HT).	0.90	750/hr	\$675.00
	EAG	L250	A103	Review Certificates of Interested Parties filed by CB&I LLC.	0.20	750/hr	\$150.00
08/14/2024	EAG	L250	A104	Review Rule 9027(e)(3) filings by Plaintiffs and Chiyoda and Chiyoda's Certificate of Interested Parties.	0.20	750/hr	\$150.00
08/15/2024	DRC	L250	A104	Review and proofread Zachry's Certificate of Interested Parties.	0.20	525/hr	\$105.00
	EAG	L250	A103	Finalize Certificate of Interested Parties after consultation with J. Lewis (Zachry) and R. Cordell (HT).	0.40	750/hr	\$300.00

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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/16/2024	EAG	L120	A107	Online conference with E. Rosenberg (W&C) and J. Thomas (HT) regarding procedural issues and next steps.	0.80	750/hr	\$600.00
	JBT	L120	A107	Strategy discussion with bankruptcy counsel at White & Case.	1.00	950/hr	\$950.00
	JBT	L110	A107	Communications with co-defendants counsel regarding procedural issues in pending matters.	0.70	950/hr	\$665.00
08/21/2024	JBT	L190	A107	Conference with opposing counsel.	0.70	950/hr	\$665.00
	JJD	L120	A101	Confer with J. Thomas on key FLNG contractual provisions and case strategy.	0.20	675/hr	\$135.00
08/22/2024	EAG	L120	A107	E-mail correspondence with C. Koster (W&C) and J. Thomas (HT) regarding procedural issues..	0.30	750/hr	\$225.00
	JBT	L120	A107	Communications with bankruptcy counsel regarding strategy.	0.80	950/hr	\$760.00
	JBT	L120	A106	Conference with client regarding strategy.	1.00	950/hr	\$950.00
	JBT	L120	A104	Review EPC contract and prepare correspondence to plaintiff's counsel.	1.80	950/hr	\$1,710.00
	JJD	L120	A104	Analyze key contractual requirements in FLNG agreements for case strategy development.	1.50	675/hr	\$1,012.50
08/26/2024	DRC	L430	A103	Draft Motion to Dismiss based on Chapter 150 of the Civil Practice and Remedies Code.	0.80	525/hr	\$420.00
	EAG	L190	A107	E-mail correspondence with J. Thomas and R. Cordell (HT) regarding approaching deadline for Rule 26(f) conference and strategy for moving action to bankruptcy court.	0.20	750/hr	\$150.00
	JBT	L120	A106	Conference with client to discuss strategy.	0.70	950/hr	\$665.00
	JBT	L120	A107	Conference with co-defendants counsel.	0.80	950/hr	\$760.00

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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/27/2024	DRC	L250	A103	Draft Rule 26(f) report for discussion with litigation team in advance of anticipated Rule 26 conference.	0.30	525/hr	\$157.50
	DRC	L120	A105	Meet with J. Thomas and E. Grant to discuss status of FLNG explosion cases.	0.20	525/hr	\$105.00
	DRC	L120	A107	Correspondence with case managers from all three FLNG cases regarding status of cases in light of bankruptcy stay, motions to transfer, and upcoming initial conferences.	0.30	525/hr	\$157.50
	DRC	L430	A103	Draft and revise Motion to Dismiss, applicable to both Galveston Division cases.	5.50	525/hr	\$2,887.50
	DRC	L310	A105	Meet with S. Barrick (HT) to discuss Motion to Dismiss and most effective presentation to the Court.	0.30	525/hr	\$157.50
	EAG	L190	A107	Telephone conference and e-mail correspondence with C. Koster (W&C) and J. Thomas (HT) regarding co-Defendants.	0.40	750/hr	\$300.00
	EAG	L190	A105	Online conference and e-mail correspondence with J. Thomas and R. Cordell (HT) regarding strategy.	0.40	750/hr	\$300.00
	JBT	L120	A104	Review issues pertaining to FLNG warranty litigation.	1.50	950/hr	\$1,425.00
	JJD	L120	A104	Work on analysis of FLNG contract issues.	1.60	675/hr	\$1,080.00
08/28/2024	DRC	L120	A107	Renewed attempts to contact case manager for Galveston Division Judge concerning initial conference and status of motion to transfer to bankruptcy court.	0.20	525/hr	\$105.00
	EAG	L190	A107	E-mail correspondence with J. Thomas and J. Deis (HT) regarding contract issues.	0.20	750/hr	\$150.00
	JBT	L120	A104	Review insurance coverage materials in preparation for meeting with client.	1.30	950/hr	\$1,235.00
	JJD	L120	A101	Confer with John Thomas on FLNG contract issues.	0.30	675/hr	\$202.50

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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
	JSB	L240	A103	Review plaintiffs' petition and certificate of merit (.5); Begin reviewing and revising motion to dismiss (1.0).	1.50	750/hr	\$1,125.00
08/29/2024	DRC	L190	A108	Written and phone correspondence with case manager for Southern District of Texas - Galveston Division regarding status of ruling on Motions to Transfer Venue and initial conference setting.	0.30	525/hr	\$157.50
	DRC	L430	A105	Correspondence with S. Barrick (HT) regarding motion to dismiss.	0.20	525/hr	\$105.00
	EAG	L190	A107	E-mail correspondence and online conference with E. Rosenberg, W. Guerrieri, and A. Swingle (W&C) and J. Thomas regarding litigation strategy.	0.60	750/hr	\$450.00
	EAG	L250	A107	Review Plaintiffs' motion to remand.	0.30	750/hr	\$225.00
	JJD	L120	A104	Review material in FLNG explosion case in preparation for call with White & Case.	0.30	675/hr	\$202.50
	JJD	L120	A107	Strategy conference with John Thomas and White & Case counsel Will Gurrieri and Erin Rosenberg.	0.60	675/hr	\$405.00
	JJD	L120	A101	Coordinate with John Thomas plan of action to assist White & Case on FLNG matter.	0.30	675/hr	\$202.50
	JJD	L120	A104	Review work product on evidence and legal analysis of FLNG claim regarding GE Generator.	0.20	675/hr	\$135.00
	JJD	L110	A104	Review pleadings and evidence on Alliance Global factual claims regarding FLNG explosion matter.	0.30	675/hr	\$202.50
08/30/2024	DRC	L430	A104	Analyze Plaintiffs' Response to Defendant CB&I's Motion to Dismiss in Allianz matter.	0.30	525/hr	\$157.50
	DRC	L430	A105	Meet with S. Barrick to discuss revisions to motion to dismiss.	0.20	525/hr	\$105.00
	EAG	L250	A107	E-mail correspondence with P. Catalano (Bush Ramirez) and K. Green (Bonds Ellis) regarding status of agreed motions to transfer actions to Houston bankruptcy court.	0.20	750/hr	\$150.00

Zachry Group
 In Re: FLNG Explosion Litigation
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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
	JBT	L210	A104	Review oppositions to motion to dismiss filed by the plaintiff insurers.	1.00	950/hr	\$950.00
	JJD	L120	A104	Review background facts and information on the FLNG explosion to assist in analyzing case strategy.	0.60	675/hr	\$405.00
	JSB	L240	A103	Continue revising motion to dismiss.	4.50	750/hr	\$3,375.00
	SCB	L120	A102	Review Plaintiff's Motion to Remand and conduct legal research on the issues discussed therein for the FLNG matter.	3.90	350/hr	\$1,365.00

TIMEKEEPER SUMMARY

Initials	Name		Hours	Rate	Amount
EAG	Grant, Eric A.	Partner	7.30	\$750.00	\$5,475.00
JBT	Thomas, John B	Partner	14.40	\$950.00	\$13,680.00
JJD	Deis, John J	Partner	6.40	\$675.00	\$4,320.00
JB	Barrick, J. Stephen	Partner	6.00	\$750.00	\$4,500.00
SML	Loftin, Stephen M	Partner	0.50	\$875.00	\$437.50
DC	Cordell, Jr., D. Ryan	Associate	10.40	\$525.00	\$5,460.00
SCB	Burnett, Sofia C.	Associate	3.90	\$350.00	\$1,365.00
JRB	Baker, Jennifer R	Paralegal	0.50	\$250.00	\$125.00
Total fees for this matter			<u>49.40 hrs</u>		<u>\$35,362.50</u>

Hicks Thomas LLP
700 Louisiana, Suite 2300
Houston, TX 77002
(713) 547-9100
Tax I.D. 76-0536336

Mr. Jay Old
Zachry Group
P. O. Box 240130
San Antonio, TX 78224-0130

September 5, 2024
Invoice #79561
File Number: 002162-16231

In re: Zachry Bankruptcy: Contested Matters

TOTAL FEES	\$14,207.50
TOTAL DISBURSEMENTS	\$405.00
TOTAL CHARGES FOR THIS BILL	<u>\$14,612.50</u>

Hicks Thomas LLP
 700 Louisiana, Suite 2300
 Houston, TX 77002
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September 5, 2024
 Invoice #79561
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In re: Zachry Bankruptcy: Contested Matters

PROFESSIONAL SERVICES

Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
08/01/2024	JJD	L250	A103	Work on preparation of Hicks Thomas fee application on all Zachry matters for July time.	1.90	675/hr	\$1,282.50
08/02/2024	JJD	L250	A103	Work on preparation of interim fee application for Hicks Thomas July time.	2.80	675/hr	\$1,890.00
08/05/2024	JJD	L250	A103	Work on finalizing interim monthly fee submissions of July time for court approval.	2.20	675/hr	\$1,485.00
	JJD	L250	A108	Confer with Stephen Ludovici of White & Case on Hicks Thomas interim monthly fee submission for July time.	0.30	675/hr	\$202.50
08/06/2024	JJD	L250	A103	Draft a supplemental declaration and supporting exhibit in support of Hicks Thomas fee applications.	1.10	675/hr	\$742.50
	JJD	L250	A103	Conferences with Stephen Ludovici (White & Case) on supplemental declaration and supporting exhibit in support of Hicks Thomas fee applications.	0.30	675/hr	\$202.50
	JJD	L250	A103	Work on revisions to the monthly fee statement submissions to incorporate comments by Stephen Ludovici.	1.10	675/hr	\$742.50
08/09/2024	JJD	L250	A103	Revise supplemental declaration and exhibit in support of Hicks Thomas fee application.	0.60	675/hr	\$405.00

Zachry Group

Hicks Thomas LLP

In re: Zachry Bankruptcy: Contested Matters

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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
	JJD	L250	A107	Confer with Stephen Barrick (Hicks Thomas) and Stephen Ludovici (White & Case) on supplemental declaration in support of Hicks Thomas fee application.	0.30	675/hr	\$202.50
	JJD	L250	A101	Confer with John Thomas on status of Hicks Thomas monthly fee applications and supplemental declaration and exhibit in support of same.	0.30	675/hr	\$202.50
08/12/2024	JJD	L120	A104	Analyze communications between and among key individuals on GPX contract dispute issues for after action analysis.	2.50	675/hr	\$1,687.50
	JJD	L250	A107	Confer with Stephen Ludovici at White & Case on supplemental declaration for Hicks Thomas retention.	0.20	675/hr	\$135.00
08/20/2024	JJD	L210	A104	Review motion to substitute counsel in Orion matter and coordinate follow up on pleadings and case status during the remainder of the bankruptcy process.	0.40	675/hr	\$270.00
08/28/2024	JJD	L190	A104	Analyze court's order and commentary by White & Case counsel regarding Interim Fee Applications.	0.40	675/hr	\$270.00
	JJD	L190	A107	Conferences with White & Case counsel and John Thomas on Interim Fee Applications.	0.40	675/hr	\$270.00
	JJD	L190	A101	Study Second Supplemental PPII list of Zachry creditors to coordinate update of Hicks Thomas disclosures.	0.70	675/hr	\$472.50
	JJD	L190	A101	Confer with White & Case counsel Stephen Ludovici on Second Supplemental PPI list.	0.20	675/hr	\$135.00
08/29/2024	JBT	L120	A102	Review information related to pending claims to prepare for conference with restructuring team.	1.30	950/hr	\$1,235.00
	JBT	L120	A107	Conference with restructuring team to discuss strategy.	0.60	950/hr	\$570.00
	JBT	L120	A106	Conference with Zachry legal to discuss strategy.	0.60	950/hr	\$570.00

Zachry Group

Hicks Thomas LLP

In re: Zachry Bankruptcy: Contested Matters

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Date	Initials	Task Code	Act Code	Description	Hours	Rate	Amount
	JBT	L120	A104	Work on assessment of claims to aid restructuring team in developing plan of reorganization.	1.30	950/hr	\$1,235.00

TIMEKEEPER SUMMARY

Initials	Name		Hours	Rate	Amount
JBT	Thomas, John B	Partner	3.80	\$950.00	\$3,610.00
JJD	Deis, John J	Partner	15.70	\$675.00	\$10,597.50
Total fees for this matter			19.50 hrs		\$14,207.50

DISBURSEMENTS

Date	Code	Description	Amount
08/01/2024	E112	American Express; Notice of Removal. - Court fees	\$405.00

DISBURSEMENT SUMMARY

Code	Description	Amount
E112	Court fees	\$405.00
Total Disbursements		\$405.00

Exhibit D

Summary Statement of Expenses

Category	Amount
Filing Fees	\$ 405.00
Grand Total	\$ 405.00

Attachments for Bill 79561

FW: Pay.gov Payment Confirmation: TEXAS SOUTHERN DISTRICT COURT

Jackie Marlowe <jmarlowe@hicks-thomas.com>

Wed 7/31/2024 2:11 PM

To: Racheal Reyes <rreyes@hicks-thomas.com>

■ 1 attachments (4 MB)

2024.07.31 [001] Notice of Removal - Exhibits.pdf;

Fee for 405.00 Notice of Removal (Zachry/CB&I) Below and attached.

-----Original Message-----

From: do_not_reply@psc.uscourts.gov <do_not_reply@psc.uscourts.gov>

Sent: Wednesday, July 31, 2024 2:03 PM

To: Jackie Marlowe <jmarlowe@hicks-thomas.com>

Subject: Pay.gov Payment Confirmation: TEXAS SOUTHERN DISTRICT COURT

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: Financial Services Group at 713-250-5875.

Account Number: 5197696

Court: TEXAS SOUTHERN DISTRICT COURT

Amount: \$405.00

Tracking Id: ATXSDC-31971116

Approval Code: 144734

Card Number: *****1018

Date/Time: 07/31/2024 03:03:26 ET

NOTE: This is an automated message. Please do not reply