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

In re:	)	Chapter 11
	)	
SHANNON WIND, LLC,	)	Case No. 26-90124 (ARP)
	)	
Debtor.	)	

THIRD MONTHLY FEE STATEMENT OF BRADLEY ARANT BOULT CUMMINGS LLP, AS COUNSEL FOR SHANNON WIND, LLC, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM APRIL 1, 2026 THROUGH APRIL 30, 2026

Name of Applicant:	Bradley Arant Boult Cummings LLP, as counsel for the Shannon Wind, LLC
Date of Retention Order:	March 17, 2026 [Docket No. 104]
Period for which Fees and Expenses are Incurred:	April 1, 2026 through April 30, 2026
Total Fees Incurred in this Statement:	$306,682.93
Total Fees Requested (80%) in this Statement:	$245,346.34
Total Expenses Requested in this Statement:	$11.25
Total Fees and Expenses Requested in this Statement (inclusive of 20% holdback):	$245,357.59

1. Pursuant to sections 327, 330, and 331 of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "**Bankruptcy Local Rules**"), and the Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "**Interim Compensation Order**") [Docket

No. 104], Bradley Arant Boult Cummings, LLP ("**Bradley**"), as counsel for Shannon Wind, LLC, files this Third Monthly Fee Statement (the "**Monthly Fee Statement**") for the period from April 1, 2026 through April 30, 2026 (the "**Fee Period**").

2. Bradley requests compensation for reasonable and necessary legal services rendered in the amount of $306,682.93 (the "**Fees**") and for reimbursement of out-of-pocket expenses in the amount of $11.25 (the "**Expenses**") for the Fee Period. Pursuant to the Interim Compensation Procedures Order, Bradley requests payment of eighty percent (80%) of its Fees ($245,346.34) and one hundred percent (100%) of its Expenses ($11.25) incurred during the Fee Period for a total requested amount of $245,357.59.

3. A summary of the time expended, and fees requested by Bradley's professionals by matter name and number is attached hereto as Exhibit 1. A summary of Bradley's out-of-pocket expenses for the Fee Period is attached hereto as Exhibit 2. A summary of time expended by Bradley's attorneys and professional support staff for the Fee Period is attached hereto as Exhibit 3. Bradley's invoices for the Fee Period are attached hereto as Exhibit 4.

4. Pursuant to the Interim Compensation Procedures Order, notice of this Monthly Fee Statement will be served by electronic transmission upon (i) the Debtor, Shannon Wind LLC, c/o Accordion Partners, LLC, John Shepherd (John.Shepherd@accordion.com); (ii) the U.S. Trustee for the Southern District of Texas; 515 Rusk St., Suite 3516, Houston, Texas 77002 (Attn: C. Ross Travis, C.Ross.Travis@usdoj.gov); and (iii) counsel to the Prepetition Secured Parties, Willkie Farr & Gallagher LLP, 600 Travis Street, Houston, TX 77002 (Attn: Jennifer Hardy, jhardy2@willkie.com) (each entity listed above a "Notice Party," and collectively, the "Notice Parties").

5. Parties in interest shall have until 4:00 p.m. (prevailing Central Time) fourteen (14) days after filing of the Monthly Fee Statement and service upon the Notice Parties to object to the requested fees and expenses via written notice setting forth the precise nature and basis of the objection and the amount at issue (the "Objection"). Upon expiration of such fourteen (14)-day period, the Debtor is authorized and directed to pay Bradley an amount equal to 80% of the Fees and 100% of the Expenses requested herein. If an Objection is timely served upon Bradley and the other Notice Parties, the objecting party and Bradley shall attempt to resolve the Objection on a consensual basis. Bradley submits that in light of the relief requested, no other or further notice need be provided.

6. Although every effort has been made to include all fees 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. Bradley reserves the right to seek payment of such fees and expenses in a subsequent monthly fee statement.

WHEREFORE, Bradley respectfully requests payment and reimbursement in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought for Fees in the amount of $245,346.34 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of $11.25 for the total amount of $245,357.59.

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Dated: June 9, 2026

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP
Jarrod B. Martin (TX Bar No. 24070221)
Michael K. Riordan (TX Bar No. 24070502)
600 Travis Street, Suite 5600
Houston, Texas 77060
Telephone: (713) 576- 0300
Facsimile: (713) 547-0301
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-and-

James Bailey (TX Bar No. 24108289)
1819 Fifth Avenue N.
Birmingham, AL 35203
Telephone: (205) 521-8000
Facsimile: (205) 488-6913
Email: jbailey@bradley.com

-and-

/s/ Alexandra E. Dugan
Alexandra E. Dugan (admitted *pro hac vice*)
1221 Broadway, Suite 2400
Nashville, TN 37203
Telephone: (615) 252-4638
Facsimile: (615) 252-4705
Email: adugan@bradley.com

Counsel to Shannon Wind, LLC

CERTIFICATE OF SERVICE

I certify that on June 9, 2026, a true and correct copy of the foregoing document was served via electronic mail on the Notice Parties pursuant to the Interim Compensation Order.

/s/ Alexandra E. Dugan
Alexandra E. Dugan

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY MATTER

Matter No.	Matter Name	Total Hours	Total Fees Requested
BD11	Employment and Fee Applications	16.10	$10,354.55
BD13	Financing and Cash Collateral	4.70	$2,920.05
BD14	Litigation	2.10	$1,476.00
BD15	Meetings and Communications with Creditors	0.20	$162.00
BD17	Plan and Disclosure Statement	83.60	$65,079.90
BD19	Relief from Stay and Adequate Protection	0.50	$490.00
BD2	Asset Disposition	252.30	$191,607.78
BD20	Reporting	4.80	$3,657.15
BD21	Tax	8.10	$7,062.30
BD3	Assumption and Rejection of Leases and Contracts	8.10	$4,722.30
BD5	Budgeting (Case)	1.20	$864.00
BD6	Business Operations	6.40	$5,351.80
BD7	Case Administration	2.10	$1,634.00
BD8	Claims Administration and Objections	14.70	$11,301.10
	TOTALS:	**404.9**	**$306,682.93**

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expense Category	**Amount**
FILING FEES 04-03-2026- TX2604800158403-Notice of Bar Dates MDL-Shelly Smith	$4.25
FED DOCKET SERV-PACER	$7.00
Total:	**$11.25**

EXHIBIT 3

SUMMARY OF TIME EXPENDED BY ATTORNEYS AND PROFESSIONAL SUPPORT STAFF

Professional	Title	Hourly Rate	Total Hours	Total Fees
Asiya Khan	Associate	621.00	9.60	$5,961.60
Charlie Evans	Associate	499.50	11.60	$5,794.20
Rodrigo Martinez Cabello	Associate	589.50	66.50	$39,201.78
Raneen Abdelghani	Associate	576.00	0.40	$230.40
Taylor Davis	Associate	499.50	6.20	$3,096.90
Amy Moss	Partner	877.50	34.80	$30,537.00
Alex Dugan	Partner	720.00	38.20	$27,504.00
Austin L. McMullen	Partner	972.00	0.30	$291.60
Allen Sullivan	Partner	783.00	26.20	$20,514.60
David Sheinbein	Partner	796.50	91.50	$72,879.75
Erin Malone-Smolla	Partner	666.00	12.20	$8,125.20
Jarrod Martin	Partner	980.00	20.90	$20,482.00
James Bailey	Partner	810.00	66.40	$53,784.00
Michael S. Denniston	Partner	931.50	6.90	$6,427.35
Mark Miller	Partner	895.50	6.10	$5,462.55
Michael Riordan	Senior Attorney	900.00	7.10	$6,390.00
TOTALS:			**404.90**	**$306,682.93**

EXHIBIT 4

BRADLEY INVOICES

Bradley

Bradley Arant Boult Cummings LLP

Shannon Wind, LLC
1920 McKinney Ave, Suite 950
Dallas, TX 75201

Invoice Date:	June 08, 2026
Invoice Num.:	1965640
Client Number:	308892

Client: Shannon Wind, LLC

For professional services rendered through April 30, 2026

Fees	306,682.93
Costs	11.25
Total Amount Due	**$306,694.18**

Client Name: Shannon Wind, LLC
Client Number: 308892

Invoice Date: June 08, 2026
Invoice Num.: 1965640

Time Detail

Date	Initials	Description	Hours	Rate	Amount
BD11 - Employment and Fee Applications					
04/01/26	AD	Emails with J. Shepherd and P. O'Malley re Bradley monthly fee statement (.3); revisions to Bradley monthly fee statement (.2)	0.50	720.00	360.00
04/01/26	CHEV	Continue strategy for ensuring compliance with UST guidelines on fee applications for March submission	0.70	499.50	349.65
04/01/26	EMSM	Email J.Shepherd regarding filed version of Accordion fee statement	0.30	666.00	199.80
04/01/26	EMSM	Revise Bradley monthly fee statement based on revised invoice	0.40	666.00	266.40
04/01/26	EMSM	Revise Bradley invoices in anticipation of filing monthly fee statement	0.60	666.00	399.60
04/01/26	EMSM	Revise fee application template for Accordion	1.20	666.00	799.20
04/03/26	AD	Review and finalize Bradley monthly fee statement for filing	0.20	720.00	144.00
04/03/26	EMSM	Finalize Bradley's first monthly fee statement and documents in support	0.40	666.00	266.40
04/06/26	CHEV	Begin initial review of March time entries for forthcoming interim fee application	1.40	499.50	699.30
04/07/26	CHEV	Continue initial review of March time entries	0.50	499.50	249.75
04/08/26	AD	Emails with J. Shepherd regarding OCP payment	0.10	720.00	72.00
04/09/26	CHEV	Continue compliance review of March time entries	0.20	499.50	99.90
04/13/26	JAMA	Review Nomura fee statement.	0.10	980.00	98.00
04/13/26	EMSM	Revise Bradley invoices in preparation for filing next Bradley monthly fee statement	0.30	666.00	199.80
04/13/26	EMSM	Email C.Jensen regarding Nomura expense entries for fee application	0.20	666.00	133.20
04/15/26	EMSM	Revise Accordion's second monthly fee statement	1.30	666.00	865.80
04/16/26	AD	Review and finalize Accordion fee statement for filing	0.10	720.00	72.00
04/16/26	CHEV	Continue to outline strategy regarding time entry compliance	0.10	499.50	49.95
04/16/26	EMSM	Make final edits to Accordion monthly fee statement	0.40	666.00	266.40
04/16/26	EMSM	Email P.O'Malley regarding filed Accordion monthly fee statement	0.10	666.00	66.60

Client Name: Shannon Wind, LLC
Client Number: 308892

Invoice Date: June 08, 2026
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Date	Initials	Description	Hours	Rate	Amount
04/17/26	EMSM	Continue to revise Bradley invoices in preparation for filing second monthly fee statement	2.10	666.00	1,398.60
04/21/26	AD	Review conflicts information (.1); emails with P. O'Malley regarding fee statement (.1)	0.20	720.00	144.00
04/22/26	AD	Review and revise Bradley fee statement and invoices	0.30	720.00	216.00
04/22/26	CHEV	Finalize analysis of March time entries	0.80	499.50	399.60
04/22/26	EMSM	Revise Nomura monthly fee statement	0.40	666.00	266.40
04/23/26	CHEV	Communicate with Bradley team regarding narrative consistency for fee applications	0.40	499.50	199.80
04/23/26	EMSM	Continue to revise Bradley invoices in preparation for finalizing second monthly fee statement	0.90	666.00	599.40
04/24/26	AD	Final review of second monthly fee statement (.3); email to J. Shepherd and P. O'Malley re same (.1)	0.40	720.00	288.00
04/24/26	EMSM	Make final edits to Nomura's monthly fee statement and supporting documents	0.30	666.00	199.80
04/24/26	EMSM	Make final edits to Bradley's second monthly fee statement	0.20	666.00	133.20
04/25/26	JAMA	Review monthly fee statement.	0.30	980.00	294.00
04/27/26	ALM	Analyze conflict reports and determine additional information to be included in amended declaration for employment disclosure	0.30	972.00	291.60
04/27/26	EMSM	Email Nomura regarding monthly fee statement	0.10	666.00	66.60
04/28/26	EMSM	Email K.Kumar regarding Nomura fee application	0.10	666.00	66.60
04/28/26	EMSM	Email J.Shepherd regarding Bradley monthly fee statement	0.20	666.00	133.20
Subtotal for BD11 - Employment and Fee Applications			**16.10**		**$10,354.55**
BD13 - Financing and Cash Collateral					
04/09/26	AD	Draft stipulation regarding 345 extension	0.30	720.00	216.00
04/10/26	MKRI	Analyze section 345(b) issues (0.5); emails with R. Travis regarding same (0.1).	0.60	900.00	540.00
04/11/26	AD	Develop strategy regarding motion to extend time for 345 compliance	0.30	720.00	216.00
04/13/26	CHEV	Begin initial draft of motion to extend compliance with section 345(b) of the	1.50	499.50	749.25

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Date	Initials	Description	Hours	Rate	Amount
		Bankruptcy Code			
04/13/26	CHEV	Begin initial draft of proposed order granting 345(b) extension motion	0.40	499.50	199.80
04/14/26	CHEV	Continue initial draft of proposed order on 345(b) motion	1.00	499.50	499.50
04/15/26	JB	Conference with Bradley Team and Accordion Team regarding compliance with section 345	0.20	810.00	162.00
04/15/26	ACMO	Conference with P. O'Malley, S. Merksamer and Bradley team to decide on bank account services and movement of same.	0.20	877.50	175.50
04/17/26	JB	Email counsel for CEI regarding updated budget	0.10	810.00	81.00
04/20/26	JB	Conference with R.Travis and J.Martin regarding request to extend deadline to comply with section 345	0.10	810.00	81.00
Subtotal for BD13 - Financing and Cash Collateral			**4.70**		**$2,920.05**
BD14 - Litigation					
04/01/26	ATKH	Analyze open issues regarding MDL Litigation (0.1); edits to draft Notice (0.2)	0.30	621.00	186.30
04/02/26	ATKH	Further edits to MDL Bar Date Notice.	0.30	621.00	186.30
04/03/26	ATKH	Finalize Bar Date Notice for MDL Litigation.	0.40	621.00	248.40
04/26/26	JB	Revise motion and order extending removal deadline	0.50	810.00	405.00
04/26/26	JB	Email Accordion Team regarding motion and order extending removal deadline	0.10	810.00	81.00
04/27/26	JB	Email with Verita regarding service of motion to extend deadline to remove causes of action	0.10	810.00	81.00
04/27/26	AD	Review and finalize motion to extend removal deadline (.3); emails with Stretto on same (.1)	0.40	720.00	288.00
Subtotal for BD14 - Litigation			**2.10**		**$1,476.00**
BD15 - Meetings and Communications with Creditors					
04/16/26	JB	Email with Verita regarding strategy for response to inquiries on procedures for claim filing	0.20	810.00	162.00
Subtotal for BD15 - Meetings and Communications with Creditors			**0.20**		**$162.00**
BD17 - Plan and Disclosure Statement					

Client Name: Shannon Wind, LLC
Client Number: 308892

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Date	Initials	Description	Hours	Rate	Amount
04/01/26	JB	Revise motion to approve solicitation procedures	1.50	810.00	1,215.00
04/01/26	JB	Conference with J.Shepherd regarding draft plan	0.30	810.00	243.00
04/01/26	JB	Conference with Bradley Team and Accordion Team regarding draft plan and related status	0.30	810.00	243.00
04/01/26	JB	Conference with Bradley Team regarding edits to draft plan and related strategy	0.50	810.00	405.00
04/01/26	JB	Revise combined plan and disclosure statement	1.50	810.00	1,215.00
04/01/26	AD	Review and revise motion, proposed order to conditionally approve disclosure statement (2.6); emails with Verita regarding review of motion and proposed order (.2); begin drafting confirmation hearling notice (.4)	3.20	720.00	2,304.00
04/01/26	AD	Draft exhibits relating to motion and proposed order to conditionally approve disclosure statement	2.10	720.00	1,512.00
04/01/26	AD	Develop strategy and evaluate issues regarding plan development and drafting with Bradley team	0.50	720.00	360.00
04/01/26	TCDA	Revise and cite check motion for conditional approval of disclosure statement	0.80	499.50	399.60
04/01/26	DBSH	Confer with Bradley team about Combined Disclosure Statement and Plan.	0.50	796.50	398.25
04/01/26	DBSH	Review/revise Securities Laws Notices, statement of facts, and Risk Factors sections of Combined Disclosure Statement and Plan.	1.10	796.50	876.15
04/01/26	DBSH	Meet with Accordian and Bradley team to discuss Combined Disclosure Statement and Plan.	0.30	796.50	238.95
04/01/26	JAMA	Participate in strategy call with Bradley team regarding plan confirmation.	0.50	980.00	490.00
04/01/26	JAMA	Continue to review and provide comment on Shannon plan.	1.00	980.00	980.00
04/01/26	JAMA	Participate in Bradley/Accordion call regarding Shannon plan.	0.30	980.00	294.00
04/01/26	JAMA	Phone call with J. Bailey regarding Shannon plan.	0.10	980.00	98.00
04/01/26	JAMA	Phone call with CRO regarding plan and related revisions.	0.30	980.00	294.00
04/01/26	ACMO	Conference with P. O'Malley, Accordion	0.30	877.50	263.25

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Date	Initials	Description	Hours	Rate	Amount
		team, Bradley team and J. Shepherd regarding revisions to Plan			
04/02/26	JB	Review and revise ballots and plan solicitation notices	3.80	810.00	3,078.00
04/02/26	JB	Conference with A.Dugan and Verita Team regarding plan solicitation matters	0.50	810.00	405.00
04/02/26	JB	Conference with A.Dugan, A.Gorman, and S.Ewing regarding plan solicitation strategy matters	0.50	810.00	405.00
04/02/26	JB	Review and revise draft conditional disclosure statement and solicitation order	1.00	810.00	810.00
04/02/26	AD	Continue drafting confirmation hearing notice, cure notice, ballot and notice of non-voting rights	2.30	720.00	1,656.00
04/02/26	AD	Continue revisions to motion for conditional approval of DS and proposed order (.9); call with Verita and J. Bailey regarding upcoming filing (.5)	1.40	720.00	1,008.00
04/02/26	AD	Continue developing strategy and outlining solicitation procedures	0.70	720.00	504.00
04/02/26	CHEV	Research local rules for requirements for solicitation package	1.30	499.50	649.35
04/02/26	JAMA	Correspondence with J. Hardy regarding plan filing timeline.	0.10	980.00	98.00
04/02/26	JAMA	Conference with Bradley team regarding plan filing timeline and correspondence with counsel for US Trustee regarding draft plan.	0.20	980.00	196.00
04/02/26	JAMA	Review and consider revisions to liquidation analysis.	0.50	980.00	490.00
04/03/26	JB	Research regarding plan provisions	0.30	810.00	243.00
04/03/26	JB	Revise bankruptcy plan	0.80	810.00	648.00
04/03/26	JB	Conference with J.Shepherd, J.Jones, A.Dugan and J.Martin regarding bankruptcy plan	1.00	810.00	810.00
04/03/26	AD	Continued revisions to plan, motion to conditionally approve and related documents	2.70	720.00	1,944.00
04/04/26	AD	Continue revising exhibits and ancillary documents for filing motion for conditional approval	1.00	720.00	720.00
04/05/26	JB	Conference with Bradley team regarding plan and solicitation strategy matters	0.20	810.00	162.00
04/05/26	AD	Confer with Bradley team regarding liquidation analysis	0.20	720.00	144.00

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Date	Initials	Description	Hours	Rate	Amount
04/05/26	AD	Continue revising notice of cure for plan assumed contracts list	0.60	720.00	432.00
04/05/26	JAMA	Participate in status call with Bradley team regarding revisions to plan and disclosure statement.	0.20	980.00	196.00
04/05/26	MKRI	Call with Bradley team to discuss strategy and next steps in connection with plan and disclosure statement	0.20	900.00	180.00
04/05/26	ACMO	Conference with Bradley Team regarding revisions to Plan and open issues	0.20	877.50	175.50
04/06/26	JB	Email J.Shepherd and Accordion Team regarding further proposed revisions to plan	0.20	810.00	162.00
04/06/26	JB	Initial review of creditor comments to draft plan	0.30	810.00	243.00
04/06/26	AD	Continue revising motion, proposed order and ancillary documents for motion for conditional approval of disclosure statement (1.3); review feedback from J. Hardy regarding draft plan (.4)	1.70	720.00	1,224.00
04/06/26	JAMA	Continue to review and revise Shannon plan.	0.50	980.00	490.00
04/07/26	JB	Email Accordion Team and J.Jones regarding further revisions to draft plan and disclosure statement	0.10	810.00	81.00
04/07/26	JB	Revise draft combined plan and disclosure statement	1.80	810.00	1,458.00
04/07/26	JB	Conference with J.Shepherd, J.Jones and Bradley Team regarding further edits to draft combined plan and disclosure statement	0.50	810.00	405.00
04/07/26	JB	Email counsel for CEI regarding further revisions to draft plan and disclosure statement	0.20	810.00	162.00
04/07/26	AD	Continue revising motion, proposed order and ancillary documents for motion for conditional approval of disclosure statement (1.3); review feedback from J. Hardy regarding draft plan (.4)	1.70	720.00	1,224.00
04/07/26	JAMA	Participate in Shannon Wind plan strategy call with Bradley team.	0.70	980.00	686.00
04/07/26	JAMA	Prepare for Shannon Wind plan strategy call.	0.20	980.00	196.00
04/07/26	ACMO	Address securities law questions and provide comments to Plan.	0.20	877.50	175.50
04/08/26	JB	Conference with Accordion Team and Bradley Team regarding plan revisions	0.20	810.00	162.00

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Date	Initials	Description	Hours	Rate	Amount
		and status			
04/08/26	AD	Begin drafting declaration for Shepherd re motion for conditional approval	0.40	720.00	288.00
04/08/26	AD	Analyze and outline strategy relating to various discussions with stakeholders regarding plan terms (.4); emails with Verita regarding draft motion for conditional approval (.2); emails with court clerk re hearing (.1)	0.70	720.00	504.00
04/08/26	AD	Emails with J. Shepherd and Accordion team regarding hearing on conditional approval of disclosure statement	0.10	720.00	72.00
04/08/26	AD	Confer with Bradley team regarding open items to file motion to conditionally approve disclosure statement	0.50	720.00	360.00
04/08/26	DBSH	Make additional revisions to securities laws language in Combined Disclosure Statement and Plan and discuss same with Bradley team.	1.00	796.50	796.50
04/08/26	DBSH	Meet with Bradley Team to discuss draft Combined Disclosure Statement and Plan and liquidation analysis in effort to finalize.	0.50	796.50	398.25
04/08/26	DBSH	Confer with Bradley Team and Accordion about draft Combined Disclosure Statement and Plan.	0.20	796.50	159.30
04/08/26	JAMA	Participate in Bradley planning call regarding Shannon Plan.	0.50	980.00	490.00
04/08/26	MKRI	Call with Bradley teams to discuss strategy and next steps for plan and disclosure statement issues	0.50	900.00	450.00
04/08/26	ACMO	Teams conference with J. Martin, A. Dugan, M. Riordan and J. Bailey regarding open issues regarding Plan	0.50	877.50	438.75
04/08/26	ACMO	Review and draft comments to Plan.	0.30	877.50	263.25
04/09/26	JB	Research regarding revisions to certain plan provisions	0.80	810.00	648.00
04/09/26	JB	Implement further revisions to plan	1.00	810.00	810.00
04/09/26	JB	Emails with counsel for CEI regarding plan revisions	0.30	810.00	243.00
04/09/26	JB	Conference with J.Shepherd regarding draft liquidation analysis	0.50	810.00	405.00
04/09/26	JB	Research regarding standards for liquidation analysis	0.40	810.00	324.00
04/09/26	AD	Revise cure notice (.3); continue developing strategy regarding open items	1.60	720.00	1,152.00

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Date	Initials	Description	Hours	Rate	Amount
		to prepare for filing motion for conditional approval and related documents (1.3)			
04/09/26	JAMA	Emails regarding revisions to Shannon plan and conference regarding same	0.30	980.00	294.00
04/10/26	JB	Finalize plan and solicitation materials for filing and service	4.20	810.00	3,402.00
04/10/26	AD	Continue revising plan/disclosure statement, motion and proposed order (1.5); continue developing strategy regarding open items to prepare for filing motion for conditional approval and related documents (.3)	1.80	720.00	1,296.00
04/10/26	AD	Continue final review and coordination for filing motion to conditionally approve (.3); emails to J. Shepherd and P. O'Malley re service costs (.1); emails to Verita re service of motion (.1)	0.50	720.00	360.00
04/10/26	JAMA	Final review of chapter 11 plan and disclosure statement.	0.30	980.00	294.00
04/10/26	MKRI	Analyze draft plan, including release, exculpation, injunction, and gatekeeper provisions (1.3); emails with J. Bailey regarding injunction provision (0.1)	1.40	900.00	1,260.00
04/14/26	JB	Review and revise draft declaration in support of bidding procedures	0.40	810.00	324.00
04/14/26	JB	Review J.Shepherd edits to declaration in support of disclosure statement	0.10	810.00	81.00
04/14/26	JB	Revise draft liquidation analysis	0.80	810.00	648.00
04/14/26	JB	Conference with J.Shepherd regarding preparation for hearing on disclosure statement	0.10	810.00	81.00
04/14/26	JB	Review draft notice regarding remote testimony for disclosure statement hearing	0.10	810.00	81.00
04/14/26	JB	Revise witness and exhibit list for hearing on conditional approval of disclosure statement	0.20	810.00	162.00
04/15/26	AD	Review edits from J. Shepherd re declaration in support of conditional approval of DS	0.20	720.00	144.00
04/16/26	JB	Conference with Bradley Team regarding review of stalking horse bid and related strategy	0.40	810.00	324.00
04/16/26	JB	Conference with Bradley Team regarding plan status and strategy matters	0.10	810.00	81.00
04/16/26	JAMA	Participate in planning call to discuss chapter 11 plan.	0.20	980.00	196.00

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04/16/26	JAMA	Review redline of Shannon plan.	0.50	980.00	490.00
04/16/26	RIAB	Review and analyze Redline for Plan and Disclosure statement (.3); email to R. Travis exchanging documents (.1).	0.40	576.00	230.40
04/17/26	JB	Review emails from Accordion regarding potential recoveries based on bids	0.10	810.00	81.00
04/17/26	AD	Emails with J. Shepherd re declaration for upcoming hearing (.2); confer with Bradley team regarding filings for upcoming hearing (.1)	0.30	720.00	216.00
04/18/26	JB	Conference with Bradley Team regarding preparation for disclosure statement conditional approval hearing	0.20	810.00	162.00
04/18/26	AD	Confer with Bradley team regarding upcoming hearing on conditional approval of disclosure statement and preparation for same	0.20	720.00	144.00
04/18/26	JAMA	Participate in Bradley work in process call to discuss preparation for conditional approval hearing.	0.20	980.00	196.00
04/18/26	MKRI	Call with Bradley team to discuss strategy and next steps in connection with proposed plan and disclosure statement	0.20	900.00	180.00
04/18/26	ACMO	Conference with Bradley Team to prepare for conditional approval hearing	0.20	877.50	175.50
04/20/26	JB	Conference with R.Travis and J.Martin regarding draft plan	0.30	810.00	243.00
04/20/26	AD	Confer with Bradley team re status of filings for upcoming hearing on conditional approval of disclosure statement	0.40	720.00	288.00
04/20/26	JAMA	Conference regarding Shannon plan issues and revisions to same.	0.40	980.00	392.00
04/20/26	JAMA	Phone call with J. Bailey and UST regarding plan and solicitation.	0.30	980.00	294.00
04/20/26	ATKH	Prepare agenda for 4/22/2026 hearing.	1.00	621.00	621.00
04/21/26	JB	Conference with P.O'Malley regarding draft liquidation analysis	1.00	810.00	810.00
04/21/26	ATKH	Edits to Agenda for Hearing on Motion for Conditional Approval (0.2); edits to Witness and Exhibit List (0.3).	0.50	621.00	310.50
04/22/26	JB	Prepare for hearing on conditional approval of disclosure statement and solicitation procedures	0.70	810.00	567.00
04/22/26	JB	Attend hearing on conditional approval of	0.20	810.00	162.00

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		disclosure statement and solicitation procedures			
04/22/26	AD	Develop strategy regarding conditional approval hearing	0.50	720.00	360.00
04/22/26	AD	Attend hearing on conditional approval of disclosure statement	0.20	720.00	144.00
04/22/26	AD	Confer with Bradley team regarding upcoming hearing on motion for conditional approval	0.20	720.00	144.00
04/22/26	DBSH	Attend hearing to conditionally approve disclosure statement.	0.20	796.50	159.30
04/22/26	JAMA	Attend disclosure statement hearing.	0.30	980.00	294.00
04/22/26	MKRI	Remotely attend hearing on conditional approval of disclosure statement	0.20	900.00	180.00
04/22/26	ACMO	Attend bankruptcy court on conditional approval of disclosure statement.	0.20	877.50	175.50
04/22/26	ACMO	Conference with Bradley team regarding Plan filing and conditional approval next steps	0.30	877.50	263.25
04/23/26	JB	Research regarding amendments to plan	0.50	810.00	405.00
04/23/26	JB	Revise voting spreadsheet for solicitation purposes	0.80	810.00	648.00
04/23/26	JB	Email with Verita regarding solicitation matters	0.30	810.00	243.00
04/24/26	JB	Revise plan	0.80	810.00	648.00
04/24/26	JB	Emails with Verita regarding plan solicitation	0.30	810.00	243.00
04/25/26	JB	Conference with Bradley Team regarding plan status and strategy matters	0.30	810.00	243.00
04/25/26	DBSH	Review follow up to plan confirmation hearing, supplements to assignment and assumption of contracts notice, and miscellaneous filings	0.30	796.50	238.95
04/25/26	JAMA	Participate in touchpoint call with Bradley team regarding plan.	0.30	980.00	294.00
04/25/26	MKRI	Call with Bradley team to discuss strategy and next steps in connection with proposed plan	0.30	900.00	270.00
04/25/26	ACMO	Conference with Bradley team to address comments to Plan	0.30	877.50	263.25
04/27/26	JB	Finalize documents for solicitation of plan	1.50	810.00	1,215.00
04/27/26	JB	Emails with Verita regarding plan solicitation matters	0.30	810.00	243.00
04/27/26	CHEV	Begin initial draft of exclusivity motion	0.40	499.50	199.80
04/27/26	CHEV	Begin initial review of background	0.30	499.50	149.85

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		materials to begin drafting exclusivity motion			
04/29/26	JB	Conference with Bradley Team regarding plan status and strategy matters	0.20	810.00	162.00
04/29/26	AD	Confer with Bradley team regarding potential stalking horse designation	0.20	720.00	144.00
04/29/26	AD	Emails with Verita team regarding solicitation mailings	0.10	720.00	72.00
04/29/26	CHEV	Continue initial drafts of motion for exclusivity and related proposed order	2.60	499.50	1,298.70
04/29/26	DBSH	Discussion with Bradley team about various tasks related to Plan	0.20	796.50	159.30
04/29/26	JAMA	Participate in work in process call regarding Shannon plan confirmation.	0.20	980.00	196.00
04/29/26	MKRI	Call with Bradley team to discuss strategy and next steps in connection with plan and disclosure statement	0.20	900.00	180.00
Subtotal for BD17 - Plan and Disclosure Statement			**83.60**		**$65,079.90**
BD19 - Relief from Stay and Adequate Protection					
04/13/26	JAMA	Conference regarding Winter Storm Uri lift stay issues.	0.50	980.00	490.00
Subtotal for BD19 - Relief from Stay and Adequate Protection			**0.50**		**$490.00**
BD2 - Asset Disposition					
04/01/26	JB	Conference with Bradley Team and Accordion Team regarding asset sale status	0.20	810.00	162.00
04/01/26	DBSH	Brief discussion with J.Shepherd regarding sale structure.	0.10	796.50	79.65
04/01/26	DBSH	Weekly touch point call with Accordion and Bradley team to discuss progress on sale transaction.	0.20	796.50	159.30
04/01/26	JAMA	Participate in Accordion/Bradley call regarding sale of Shannon project.	0.20	980.00	196.00
04/01/26	ACMO	Conference with P. O'Malley, Accordion team, Bradley team and J. Shepherd regarding due diligence process and related issues	0.20	877.50	175.50
04/02/26	JB	Emails with Accordion and Nomura team regarding strategy for response to certain diligence inquiries	0.10	810.00	81.00
04/02/26	DBSH	Discuss diligence requests from prospective bidder with Accordion and	0.50	796.50	398.25

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Date	Initials	Description	Hours	Rate	Amount
		Nomura			
04/02/26	DBSH	Consider assigned contract question from bidder (0.2); email response to Nomura regarding same (0.2)	0.40	796.50	318.60
04/02/26	JAMA	Review and respond to diligence emails with counsel for Ardian.	0.20	980.00	196.00
04/03/26	PRMA	Review assigning and assumption necessity of transition services agreement (0.5); prepare summary about the same (0.4)	0.90	589.50	530.55
04/06/26	JB	Draft response to bidder diligence inquiries regarding proposed sale	0.20	810.00	162.00
04/06/26	PRMA	Work on responses to due diligence questions in data room	4.20	589.50	2,475.90
04/06/26	PRMA	Prepare initial summary responses regarding due diligence inquiries	3.00	589.50	1,768.50
04/06/26	DBSH	Discuss with Nomura legal due diligence questions submitted by bidders.	0.30	796.50	238.95
04/06/26	DBSH	Begin review of legal due diligence questions presented by bidders	0.20	796.50	159.30
04/06/26	DBSH	Continue to analyze legal due diligence questions submitted by bidders.	0.10	796.50	79.65
04/07/26	JB	Conference with Accordion Team, Citi Team, Nomura Team, and Bradley Team regarding status of bidding	0.80	810.00	648.00
04/07/26	PRMA	Provide responses to due diligence questions in data room (1.0); work on responses to additional questions in the data room (1.2)	2.20	589.50	1,296.90
04/07/26	DBSH	Participate in weekly touch point call with Citibank, CEI, Nomura, Accordion, Willkie, and Bradley team to discuss open transaction issues	1.00	796.50	796.50
04/07/26	ACMO	Conference with J. Shepherd, Citibank counsel and representatives, Nomura representatives, Accordion team and Bradley team regarding addressing stalking horse and due diligence issues	0.80	877.50	702.00
04/08/26	JB	Conference with Bradley Team and Accordion Team regarding sale status and related strategy	0.20	810.00	162.00
04/08/26	DBSH	Confer with Bradley Team and Accordion about sale process, due diligence requests, and stalking horse bidder candidates.	0.20	796.50	159.30
04/08/26	ACMO	Teams conference with J. Shepherd, S. Merksamer, J. Martin, A. Dugan, and J.	0.20	877.50	175.50

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Date	Initials	Description	Hours	Rate	Amount
		Bailey regarding upcoming stalking horse bid deadline open sale issues			
04/09/26	PRMA	Review and analyze due diligence question in the data room	0.60	589.50	353.70
04/10/26	JB	Conference with P.O'Malley regarding stalking horse bid requirements	0.20	810.00	162.00
04/10/26	JB	Email Nomura team regarding stalking horse bid requirements	0.10	810.00	81.00
04/10/26	PRMA	Work on responses to due diligence requests (2.8); call with P. O'Malley and D. Sheinbein to discuss the same (1.0)	3.80	589.50	2,240.10
04/10/26	DBSH	Confer with Nomura about deposit by stalking horse candidate.	0.40	796.50	318.60
04/10/26	DBSH	Confer with Bradley and Accordion teams about impact of GE MCU team work in transaction	0.30	796.50	238.95
04/10/26	DBSH	Analyze legal due diligence questions and conduct strategy regarding response to same	1.00	796.50	796.50
04/10/26	JAMA	Review and respond to emails with Bradley team regarding buyer feedback.	0.20	980.00	196.00
04/10/26	JAMA	Strategy call with A. Moss regarding vendor issues and liquidated damages	0.30	980.00	294.00
04/10/26	JAMA	Analyze correspondence from investment banker regarding status of various bidders	0.20	980.00	196.00
04/10/26	ACMO	Address questions surrounding vendor liquidated damages application and strategize for same	0.60	877.50	526.50
04/12/26	JB	Review emails from Nomura and Accordion regarding status of offers	0.10	810.00	81.00
04/12/26	JB	Review responses to diligence requests and revise same	0.20	810.00	162.00
04/12/26	JB	Conference with Bradley team regarding status of offers and sale strategy	0.30	810.00	243.00
04/12/26	AD	Confer with Bradley team regarding stalking horse bid discussions and upcoming deadline	0.30	720.00	216.00
04/12/26	DBSH	Meet with Bradley team to discuss updates on potential stalking horse bids.	0.30	796.50	238.95
04/12/26	JAMA	Participate in update call with Bradley team to discuss status of sale and stalking horse bids.	0.20	980.00	196.00
04/12/26	MKRI	Call with Bradley team regarding potential stalking horse bids	0.30	900.00	270.00
04/12/26	ACMO	Conference with Bradley Team regarding	0.30	877.50	263.25

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Date	Initials	Description	Hours	Rate	Amount
		potential stalking horse bids and planning for review of same			
04/13/26	JB	Review additional diligence requests from potential bidder	0.10	810.00	81.00
04/14/26	AD	Analyze issues and strategy regarding form template regarding stalking horse designation and proposed order	0.40	720.00	288.00
04/14/26	DBSH	Continue to outline responses to due diligence question from bidder (0.6); send responses regarding same (0.3)	0.90	796.50	716.85
04/14/26	DBSH	Confer with CAMS, Accordion, and Bradley Team about responses to open due diligence issues	1.00	796.50	796.50
04/14/26	ATKH	Outline issues regarding bid procedures and stalking horse protections (0.3); legal research regarding stalking horse and related protections (2.8)	3.10	621.00	1,925.10
04/15/26	MSD	Review regulations and analyze issues regarding application of Size of Person and Size of Transaction tests	0.30	931.50	279.45
04/15/26	MSD	Review open issues regarding Hart-Scott-Rodino	0.10	931.50	93.15
04/15/26	JB	Conduct initial review of stalking horse offer	0.30	810.00	243.00
04/15/26	JB	Conference with counsel for potential bidder regarding diligence matters	0.20	810.00	162.00
04/15/26	JB	Conference with Accordion Team and Bradley Team regarding stalking horse bid status and next steps	0.20	810.00	162.00
04/15/26	PRMA	Continue to work on responses to diligence requests	3.00	589.50	1,768.50
04/15/26	PRMA	Review and analyze Midway ISD Agreement and schedules to operating agreement of Shannon Wind Holdings (1.0); update disclosure schedules (0.7); work on Notice to Supplement of Assignment and Assumption (1.0)	2.70	589.50	1,591.65
04/15/26	PRMA	Call with Gibson Dunn to discuss assign ability of contracts and bid process (0.2); prepare summary about the same (0.2)	0.40	589.50	235.80
04/15/26	DBSH	Coordinate, prepare for, and participate in legal due diligence meeting with stalking horse bid candidate.	0.70	796.50	557.55
04/15/26	DBSH	Confer with J. Shepherd about transaction updates	0.20	796.50	159.30
04/15/26	DBSH	Revise Assigned Contracts schedule	0.10	796.50	79.65

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Date	Initials	Description	Hours	Rate	Amount
04/15/26	DBSH	Prepare list of issues raised by Asset Purchase Agreement.	1.00	796.50	796.50
04/15/26	DBSH	Analyze issues regarding whether particular filings relating to sale are appropriate	0.50	796.50	398.25
04/15/26	DBSH	Review and analyze bidder's revisions to Asset Purchase Agreement.	3.00	796.50	2,389.50
04/15/26	DBSH	Confer with Nomura and Bradley team about purchase price calculation proposed by bidder.	0.50	796.50	398.25
04/15/26	DBSH	Meet with Bradley and Accordion teams to discuss stalking horse bid and next steps.	0.20	796.50	159.30
04/15/26	JAMA	Phone call with Accordion and Bradley team regarding open sale issues.	0.40	980.00	392.00
04/15/26	JAMA	Initial review of potential bidder's bid materials	1.00	980.00	980.00
04/15/26	JAMA	Phone calls with J. Hardy and J. Sheppard regarding stalking horse bid	0.20	980.00	196.00
04/15/26	JAMA	Correspondence with CRO regarding stalking horse bid.	0.10	980.00	98.00
04/15/26	JAMA	Prepare or and participate in diligence call with counsel for potential bidder.	0.50	980.00	490.00
04/15/26	JAMA	Correspondence with Bradley team regarding diligence requests	0.10	980.00	98.00
04/15/26	ACMO	Conference with P. O'Malley, S. Merksamer and Bradley team analyzing legal services payment claims	0.20	877.50	175.50
04/15/26	ACMO	Review and prepare comments to stalking horse bid and revised asset purchase agreement.	2.00	877.50	1,755.00
04/15/26	ACMO	Research and analyze HSR filing requirements with respect to stalking horse bid.	0.50	877.50	438.75
04/15/26	ATKH	Conduct further research related to Stalking Horse	0.30	621.00	186.30
04/16/26	MSD	Research on recent FTC position on treatment of debt paid off at closing as consideration	2.00	931.50	1,863.00
04/16/26	MSD	Continue strategy regarding Hart-Scott-Rodino issues	0.50	931.50	465.75
04/16/26	MSD	Continue to analyze Hart-Scott-Rodino issues	0.40	931.50	372.60
04/16/26	MSD	Review Bid Letter and Asset Purchase Agreement	1.20	931.50	1,117.80
04/16/26	JB	Conference with Bradley, Nomura, and	1.00	810.00	810.00

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		Citi Teams regarding status of stalking horse bids			
04/16/26	AD	Conference with Bradley team regarding stalking bid proposal	0.40	720.00	288.00
04/16/26	PRMA	Call with Accordion team to discuss bid procedures (1.0); call with D. Sheinbein to discuss TSA and Disclosure Schedules (0.3); work on correspondence about the same (0.3)	1.60	589.50	943.20
04/16/26	DBSH	Meet with Bradley team to review/analyze stalking horse bid proposal.	0.40	796.50	318.60
04/16/26	DBSH	Meet with Bradley and Accordion teams to discuss stalking horse bid.	0.70	796.50	557.55
04/16/26	DBSH	Meet with Citi, Nomura, Bradley, and Accordion teams to discuss APA and related matters	1.00	796.50	796.50
04/16/26	DBSH	Analyze HSR provisions in APA and possible need for premerger notification filing	0.50	796.50	398.25
04/16/26	DBSH	Analyze form/terms of transition services agreement to be prepared in connection with stalking horse transaction	0.50	796.50	398.25
04/16/26	DBSH	Analyze revisions to bankruptcy provisions in APA	0.50	796.50	398.25
04/16/26	DBSH	Confer with Accordion about receipt of deposit from Stalking Horse Bidder.	0.10	796.50	79.65
04/16/26	JAMA	Strategize regarding stalking horse bid and revisions to same.	0.50	980.00	490.00
04/16/26	JAMA	Participate in touchpoint call to discuss stalking horse bid.	0.80	980.00	784.00
04/16/26	ACMO	Review and comment on stalking horse asset purchase agreement and related issues list.	1.50	877.50	1,316.25
04/16/26	ACMO	Research applicability of HSR Act filing to stalking horse bid.	2.00	877.50	1,755.00
04/16/26	ACMO	Conference with Bradley team and J. Shepherd regarding stalking horse bid and revised asset purchase agreement	0.90	877.50	789.75
04/16/26	ACMO	Conference with Bradley team, J. Shepherd, Accordion team, Citibank team and counsel, and Nomura team regarding bids and revised asset purchase agreement	1.00	877.50	877.50
04/16/26	ACMO	Teams conference with Bradley Team regarding open issues on stalking horse bid	0.40	877.50	351.00
04/17/26	MSD	Analyze issues regarding Section 363	0.20	931.50	186.30

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		sales and assets of debtor			
04/17/26	MSD	Analyze open issues regarding assets of debtor	0.10	931.50	93.15
04/17/26	MSD	Review proposed edits to purchase agreement	0.50	931.50	465.75
04/17/26	MSD	Review Schedule of Assets and Liabilities of debtor	0.30	931.50	279.45
04/17/26	MSD	Outline determination of Size of Person for non-manufacturing entity and failure to satisfy jurisdictional thresholds for Hart-Scott-Rodino filing	0.30	931.50	279.45
04/17/26	MSD	Continue to review edits to purchase agreement	0.10	931.50	93.15
04/17/26	JB	Review stalking horse bid and advise on bankruptcy provisions	1.20	810.00	972.00
04/17/26	JB	Conferences with Bradley Team and Accordion Team regarding review of bid and proposed revisions	2.00	810.00	1,620.00
04/17/26	PRMA	Work on Transition Services Agreement	2.00	589.50	1,179.00
04/17/26	PRMA	Calls with Accordion team to discuss issues list	1.80	589.50	1,061.10
04/17/26	PRMA	Review and analyze documents uploaded by CAMS	2.70	589.50	1,591.65
04/17/26	PRMA	Update Disclosure Schedules and Supplemental Notice	2.50	589.50	1,473.75
04/17/26	DBSH	Make further revisions to issues list	0.80	796.50	637.20
04/17/26	DBSH	Meet with Accordion and CAMS team to discuss potential transaction issues	0.80	796.50	637.20
04/17/26	DBSH	Coordinate meeting to discuss APA issues (0.2); further modify and review items regarding issues list (0.7)	0.90	796.50	716.85
04/17/26	DBSH	Continue to analyze bankruptcy provisions in purchase agreement	0.70	796.50	557.55
04/17/26	DBSH	Continue to review tax matters provisions in purchase agreement	0.70	796.50	557.55
04/17/26	DBSH	Continue HSR analysis	0.70	796.50	557.55
04/17/26	DBSH	Confer with CRO and Bradley team about APA issues.	1.00	796.50	796.50
04/17/26	DBSH	Additional discussions with CRO and Bradley team about APA issues.	1.00	796.50	796.50
04/17/26	JAMA	Conference regarding stalking horse APA.	0.50	980.00	490.00
04/17/26	ACMO	Analyze and determine applicability of HSR Act filing to stalking horse bid.	0.40	877.50	351.00
04/17/26	ACMO	Conference with J. Shepherd, P.	1.00	877.50	877.50

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Date	Initials	Description	Hours	Rate	Amount
		O'Malley and Bradley team addressing open issues in stalking horse bid and asset purchase agreement			
04/17/26	ACMO	Research applicability of ITAR and CFIUS filings to stalking horse bid terms.	0.40	877.50	351.00
04/17/26	ACMO	Analyze and prepare open issues list regarding stalking horse bid and asset purchase agreement.	2.10	877.50	1,842.75
04/17/26	ACMO	Conference with J. Shepherd, P. O'Malley and Bradley team regarding open issues in stalking horse bid and asset purchase agreement and response strategy	0.90	877.50	789.75
04/18/26	PRMA	Work on transition services agreement	1.70	589.50	1,002.15
04/18/26	DBSH	Continue reviewing and making changes to APA.	1.00	796.50	796.50
04/18/26	DBSH	Continue reviewing and making revisions to APA.	0.60	796.50	477.90
04/18/26	DBSH	Coordinate call with Gibson Dunn and Bradley teams to discuss APA (0.3); continue to analyze issues list (0.7)	1.00	796.50	796.50
04/18/26	ACMO	Revise list of open issues on stalking horse bid and asset purchase agreement.	0.50	877.50	438.75
04/19/26	PRMA	Work on Transition Services Agreement	1.50	589.50	884.25
04/19/26	JAMA	Review issues list and correspondence with counsel for CEI regarding same.	0.20	980.00	196.00
04/19/26	ACMO	Provide comments to stalking horse purchase agreement, including cure cost issues	1.20	877.50	1,053.00
04/20/26	JB	Conference with Bradley Team and counsel for bidder regarding edits to asset purchase agreement	1.00	810.00	810.00
04/20/26	JB	Implement additional revisions to draft asset purchase agreement	1.00	810.00	810.00
04/20/26	AD	Develop strategy regarding stalking bid designation notice and related documents (.3); begin drafting same (.2)	0.50	720.00	360.00
04/20/26	PRMA	Call with Bradley team and Gibson Dunn to discuss issues list to the asset purchase agreement	0.50	589.50	294.75
04/20/26	PRMA	Review and analyze surface lease agreement and easement agreement (0.7); work on correspondence about the same (0.3)	1.00	589.50	589.50
04/20/26	ASUL	Review purchase agreement and FIUS-related provisions (2.0); review Purchaser	3.10	783.00	2,427.30

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		and potential structure (1.1)			
04/20/26	ASUL	Compile list of questions for Seller and Purchaser	1.00	783.00	783.00
04/20/26	DBSH	Review and revise transition services agreement.	2.00	796.50	1,593.00
04/20/26	DBSH	Review CFIUS and ITAR filing requirements	0.40	796.50	318.60
04/20/26	DBSH	Confer with Bradley team about cure costs and conditions to closing.	0.20	796.50	159.30
04/20/26	DBSH	Continue to revise APA.	1.00	796.50	796.50
04/20/26	DBSH	Confer with J.Shepherd about calls with counsel to stalking horse bidder and counsel to vendor.	0.70	796.50	557.55
04/20/26	JAMA	Participate in call with purchaser regarding stalking horse APA.	1.00	980.00	980.00
04/20/26	ACMO	Conference with Bradley team and stalking horse bidder counsel regarding open issues in proposed stalking horse purchase agreement	1.00	877.50	877.50
04/20/26	ACMO	Prepare and provide comments relating to Transition Services Agreement.	0.20	877.50	175.50
04/20/26	ACMO	Review and prepare comments to stalking horse purchase agreement.	1.00	877.50	877.50
04/20/26	ACMO	Provide comments to purchase agreement	0.50	877.50	438.75
04/21/26	JB	Conference with Nomura Team, CEI Team, Accordion Team, and Bradley Team regarding status of sale and asset purchase agreement negotiations	1.00	810.00	810.00
04/21/26	ASUL	Continue reviewing purchase agreement and CFIUS-related provisions (.8); edits to list of questions for Seller and Purchaser (1.1); draft new CFIUS covenant and related Purchaser reps (1.1)	3.00	783.00	2,349.00
04/21/26	ASUL	Conduct substantive review and analysis of critical infrastructure and bulk-power system review	3.20	783.00	2,505.60
04/21/26	DBSH	Continue revising draft APA.	1.00	796.50	796.50
04/21/26	DBSH	Finalize draft APA, TSA, and updated issues list for Bradley and Accordion team review	0.40	796.50	318.60
04/21/26	DBSH	Meet with Willkie lawyer to discuss APA issues and comments to APA.	1.00	796.50	796.50
04/21/26	DBSH	Participate in weekly touch point call with CEI, Accordion, Nomura, Bradley, and	1.00	796.50	796.50

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		Willkie teams.			
04/21/26	DBSH	Update draft APA issues list.	0.90	796.50	716.85
04/21/26	DBSH	Continue drafting APA.	2.00	796.50	1,593.00
04/21/26	JAMA	Participate in Shannon touchpoint call with Accordion and CEI.	0.50	980.00	490.00
04/21/26	ACMO	Conference with Bradley team and Citibank counsel on comments to stalking horse proposal issues list	0.50	877.50	438.75
04/21/26	ACMO	Provide comments to stalking horse proposal issues list	0.30	877.50	263.25
04/22/26	JB	Revise draft asset purchase agreement	0.30	810.00	243.00
04/22/26	PRMA	Work on disclosure schedules	0.40	589.50	235.80
04/22/26	ASUL	Continue substantive review of purchase agreement and CFIUS-related provisions (1.0); further edits to list of questions for Seller and Purchaser (1.0); draft new CFIUS covenant and related Purchaser reps (1.0)	3.00	783.00	2,349.00
04/22/26	ASUL	Draft a list of questions for our client directed at the critical infrastructure and bulk-power system determination as that relates to CFIUS (1.5); further review of open matters related to the question list (1.0)	2.50	783.00	1,957.50
04/22/26	DBSH	Confer with regulatory counsel about CFIUS and ITAR considerations.	0.40	796.50	318.60
04/22/26	DBSH	Finalize and circulate copies of APA, draft TSA, and APA issues list for review	0.80	796.50	637.20
04/22/26	DBSH	Discuss APA with J. Shepherd and his comments to revised document	0.50	796.50	398.25
04/22/26	DBSH	Review/consider J. Shepherd comments and questions to revised APA (0.4); make revisions to document based on same (0.6)	1.00	796.50	796.50
04/22/26	DBSH	Revise APA bankruptcy proceeding provisions	0.60	796.50	477.90
04/22/26	DBSH	Review J. Shepherd comments/questions to draft TSA and revise based on same	0.70	796.50	557.55
04/22/26	DBSH	Begin finalizing revised draft of disclosure schedules and list of assigned contracts	0.10	796.50	79.65
04/22/26	DBSH	Emails regarding transition services agreement	0.10	796.50	79.65
04/22/26	DBSH	Provide current drafts of documents to Accordion and Willkie teams.	0.20	796.50	159.30
04/22/26	DBSH	Continue drafting and making revisions to APA.	0.40	796.50	318.60

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04/22/26	ACMO	Conference with D. Sheinbein to provide and discuss comments to stalking horse purchase agreement.	1.00	877.50	877.50
04/23/26	PRMA	Review and analyze agreements and arrangements shared by CAMS (1.3); work on disclosure schedules and supplement notice of assumption and assignment (1.7)	3.00	589.50	1,768.50
04/23/26	PRMA	Continue to analyze agreements and arrangements shared by CAMS (0.6); continue to revise disclosure schedules and supplement notice of assumption and assignment (1.4)	2.00	589.50	1,179.00
04/23/26	ASUL	Research Purchaser ownership (.6); draft rep for Purchaser (1.0)	1.60	783.00	1,252.80
04/23/26	ASUL	Drafting new CFIUS covenant and related Purchaser reps (1.4); draft a list of questions for our client based on same (.3)	1.70	783.00	1,331.10
04/23/26	DBSH	Analyze CFIUS-related issues	0.90	796.50	716.85
04/23/26	DBSH	Provide status update to J. Shepherd regarding APA discussions with stalking horse bidder's legal counsel.	0.30	796.50	238.95
04/23/26	JAMA	Work on asset purchase agreement issues (0.3); conference regarding same (0.2)	0.50	980.00	490.00
04/23/26	ACMO	Provide comments to stalking horse asset purchase agreement and assist with related negotiations.	0.80	877.50	702.00
04/24/26	JB	Revise notice regarding supplemental contracts for assignment	0.40	810.00	324.00
04/24/26	JB	Conference with Bradley Team and Accordion Team regarding asset sale strategy matters	0.30	810.00	243.00
04/24/26	JB	Review certain contracts for addition to supplemental assignment notice	0.20	810.00	162.00
04/24/26	PRMA	Work on supplemental notice	1.00	589.50	589.50
04/24/26	PRMA	Call with Bradley team to discuss asset purchase transaction	0.50	589.50	294.75
04/24/26	ASUL	Emails with Bradley Team and Accordion Team (1.0); reviewing redline of purchase agreement (2.1)	3.10	783.00	2,427.30
04/24/26	DBSH	Email exchange with stalking horse bidder counsel about various open transaction issues	0.20	796.50	159.30
04/24/26	DBSH	Review revised disclosure schedules and diligence matters	0.40	796.50	318.60

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04/24/26	DBSH	Review/revise disclosure schedules.	0.30	796.50	238.95
04/24/26	DBSH	Confer with stalking horse bidder about Form W-9 for regarded over of debtor.	0.20	796.50	159.30
04/24/26	DBSH	Confer with CRO about transfer of REC tracking account	0.40	796.50	318.60
04/24/26	DBSH	Meet with Bradley corporate and bankruptcy teams to discuss assets sale.	0.30	796.50	238.95
04/24/26	DBSH	Meeting with Accordion and Bradley teams to discuss sale process and open items	0.70	796.50	557.55
04/24/26	DBSH	Confer with A. Sullivan and Accordion about CFIUS questions (0.3); modify APA to include representation about same from purchaser (0.2)	0.50	796.50	398.25
04/24/26	JAMA	Phone call with A. Moss regarding APA revisions.	0.20	980.00	196.00
04/24/26	ACMO	Review CFIUS analysis re: stalking horse bid	0.10	877.50	87.75
04/24/26	ACMO	Conference with Bradley team, J. Shepherd and S. Merksamer regarding plan for negotiations regarding APA	0.30	877.50	263.25
04/24/26	ACMO	Coordinate with J. Bailey on stalking horse designation motion	0.10	877.50	87.75
04/24/26	ACMO	Address open issues on stalking horse asset purchase agreement	0.50	877.50	438.75
04/25/26	JB	Conference with Bradley Team regarding sale negotiations	0.30	810.00	243.00
04/25/26	JB	Email Nomura regarding assigned contract notice	0.10	810.00	81.00
04/25/26	JB	Initial review of bidder's edits to asset purchase agreement and diligence requests	0.30	810.00	243.00
04/25/26	JB	Conference with J.Shepherd, D.Sheinbein and A.Moss regarding revisions to asset purchase agreement and transition services agreement	3.30	810.00	2,673.00
04/25/26	PRMA	Call with Bradley team and J. Shepherd to discuss Buyer's revisions to asset purchase agreement	2.00	589.50	1,179.00
04/25/26	DBSH	Review/analyze stalking horse bidder's comments to APA.	1.00	796.50	796.50
04/25/26	DBSH	Make further revisions to APA and TSA (0.8); prepare cover transmittal (0.2)	1.00	796.50	796.50
04/25/26	DBSH	Review issues related to asset sale	0.30	796.50	238.95
04/25/26	DBSH	Continue to review/analyze stalking horse bidder's comments to APA.	0.70	796.50	557.55

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04/25/26	DBSH	Prepare cover transmittals and other transaction updates	0.40	796.50	318.60
04/25/26	DBSH	Review/analyze stalking horse bidder's comments to TSA.	0.60	796.50	477.90
04/25/26	DBSH	Confer with A. Moss about transaction documents and process.	0.30	796.50	238.95
04/25/26	DBSH	Confer with bankruptcy counsel and CRO about APA and TSA revisions.	1.00	796.50	796.50
04/25/26	DBSH	Additional discussions with bankruptcy counsel and CRO about APA and TSA revisions.	1.20	796.50	955.80
04/25/26	JAMA	Participate in Bradley touchpoint call regarding APA and sale.	0.30	980.00	294.00
04/25/26	MKRI	Call with Bradley team to discuss strategy and next steps in connection with proposed sale	0.20	900.00	180.00
04/25/26	ACMO	Conference with Bradley team and J. Shepherd to address comments to Stalking Horse Asset Purchase Agreement	2.00	877.50	1,755.00
04/25/26	ACMO	Conference with Bradley team to address comments and revisions to Stalking Horse Asset Purchase Agreement	0.30	877.50	263.25
04/26/26	JB	Draft filings in support of designation of stalking horse bidder	2.50	810.00	2,025.00
04/26/26	JB	Email Accordion Team regarding draft filings to designate stalking horse bidder	0.10	810.00	81.00
04/26/26	AD	Review and revise stalking horse supplement, proposed order and declaration in support	0.60	720.00	432.00
04/26/26	DBSH	Confer with Accordion about additional diligence questions posed by stalking horse bidder.	0.30	796.50	238.95
04/26/26	ACMO	Address outstanding issues and strategy related to stalking horse asset purchase agreement	0.30	877.50	263.25
04/27/26	JB	Email with Accordion Team regarding stalking horse designation drafts	0.10	810.00	81.00
04/27/26	JB	Emails with D.Sheinbein and others regarding further revisions to asset purchase agreement	0.30	810.00	243.00
04/27/26	JB	Email Nomura regarding supplements to data room	0.10	810.00	81.00
04/27/26	JB	Review emails with bidder regarding diligence matters	0.30	810.00	243.00
04/27/26	JB	Email counsel for prepetition secured	0.10	810.00	81.00

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Date	Initials	Description	Hours	Rate	Amount
		parties regarding draft stalking horse supplement			
04/27/26	JB	Revise stalking horse designation filings	0.50	810.00	405.00
04/27/26	PRMA	Work on due diligence requests regarding CFIUS	2.00	589.50	1,179.00
04/27/26	PRMA	Review and analyze written consent appointing and authorizing Chief Restructuring Officer and Hedge Energy Agreement (0.8); work on summary of same (1.2)	2.00	589.50	1,179.00
04/27/26	ASUL	Review purchase agreement and draft compliance provisions (1.0); review CFIUS regulations applicable to transaction (.9); review NERC-related statutes and regulations as they apply to CFIUS determinations (.8)	2.70	783.00	2,114.10
04/27/26	DBSH	Continue to negotiate and revise transaction documents with stalking horse bidder.	1.00	796.50	796.50
04/27/26	DBSH	Continue to negotiate and revise transaction documents with stalking horse bidder.	2.00	796.50	1,593.00
04/27/26	DBSH	Work with Accordion and CAMS teams to prepare responses to stalking horse bidder's due diligence requests.	1.00	796.50	796.50
04/27/26	DBSH	Draft and send email to counsel for stalking horse bidder summarizing responses to due diligence requests.	0.60	796.50	477.90
04/27/26	DBSH	Review transaction status, APA, and related items to finalize in advance of signing	1.00	796.50	796.50
04/27/26	DBSH	Discuss language changes to Stalking Horse APA with opposing counsel	0.80	796.50	637.20
04/27/26	DBSH	Meet with Accordion team to discuss stalking horse APA (0.2); related discussions regarding case administration deadlines and impact on APA (0.3)	0.50	796.50	398.25
04/27/26	DBSH	Meet with Willkie Farr to discuss changes to stalking horse APA	0.80	796.50	637.20
04/27/26	DBSH	Confer with specialist counsel regarding whether a CFIUS issues	0.60	796.50	477.90
04/27/26	DBSH	Prepare and provide CRO with summary of pending transaction items discussed with stalking horse counsel.	0.90	796.50	716.85
04/27/26	ACMO	Conference with D. Sheinbein and Citibank counsel regarding comments to	0.20	877.50	175.50

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		stalking horse purchase agreement			
04/27/26	ACMO	Address open issues on stalking horse purchase agreement.	0.60	877.50	526.50
04/27/26	ACMO	Conference with J. Shepherd and D. Sheinbein regarding comments to stalking horse purchase agreement	0.50	877.50	438.75
04/27/26	ACMO	Conference with D. Sheinbein regarding comments to stalking horse purchase agreement	0.50	877.50	438.75
04/28/26	JB	Advise on revisions to asset purchase agreement	1.50	810.00	1,215.00
04/28/26	JB	Conference with Bradley Team, Nomura, and Citi Team regarding sale status	0.80	810.00	648.00
04/28/26	JB	Conferences with counsel for bidder regarding draft asset purchase agreement	0.70	810.00	567.00
04/28/26	PRMA	Review and analyze disclosure schedules (1.4); update disclosure schedules (0.6)	2.00	589.50	1,179.00
04/28/26	PRMA	Work on written consent approving asset purchase agreement and sale of assets	3.00	589.50	1,768.50
04/28/26	ASUL	Reviewing responses from Buyer (0.3); emails with Bradley Team (0.3); call with David Sheinbein regarding CFIUS matters (0.7)	1.30	783.00	1,017.90
04/28/26	DBSH	Continue to revise and negotiate transaction documents with stalking horse bidder.	1.00	796.50	796.50
04/28/26	DBSH	Continue to negotiate and revise transaction documents with stalking horse bidder.	1.00	796.50	796.50
04/28/26	DBSH	Review and provide comments to stalking horse designation and discuss sale/auction process with stalking horse bidder.	1.00	796.50	796.50
04/28/26	DBSH	Attend meeting with Citibank, Accordion, Nomura, Willkie, and Bradley teams to discuss transaction status.	1.00	796.50	796.50
04/28/26	DBSH	Make revisions to transaction documents.	1.00	796.50	796.50
04/28/26	DBSH	Discuss Form W-2 requirement with CRO and Bradley team.	0.60	796.50	477.90
04/28/26	DBSH	Continue to negotiate and revise transaction documents with stalking horse bidder.	1.00	796.50	796.50
04/28/26	DBSH	Additional communications with special counsel regarding CFIUS reps and covenant in stalking horse APA.	0.30	796.50	238.95

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04/28/26	DBSH	Continue to update counsel to senior secured creditors on progress related to stalking horse APA	0.20	796.50	159.30
04/28/26	DBSH	Confer with stalking horse counsel about status of comments to exhibits to APA and related matters.	0.30	796.50	238.95
04/28/26	DBSH	Discuss APA authorizations with CRO.	0.50	796.50	398.25
04/28/26	JAMA	Conference with Bradley team regarding open sale issues.	0.50	980.00	490.00
04/28/26	JAMA	Meeting with CRO to discuss asset sale issues.	0.40	980.00	392.00
04/28/26	JAMA	Conference with Bradley team regarding sale closing gating issues	0.30	980.00	294.00
04/28/26	ACMO	Assist with and provide comments to stalking horse purchase agreement and prepare for execution.	2.50	877.50	2,193.75
04/29/26	JB	Conference with Bradley Team and Accordion Team regarding sale status and strategy matters	0.30	810.00	243.00
04/29/26	JB	Revise stalking horse designation notice	0.30	810.00	243.00
04/29/26	JB	Emails with D.Sheinbein regarding final revisions to stalking horse agreement	0.30	810.00	243.00
04/29/26	JB	Emails with counsel for stalking horse and CEI regarding stalking horse designation	0.20	810.00	162.00
04/29/26	PRMA	Correspond with Chief Restructuring Officer, Willkie Farr, and Gibson Dunn regarding transaction documentation and closing matters (.6) ; review and finalize compiled signature pages and fully executed Asset Purchase Agreement and ancillary transaction documents (.9)	1.50	589.50	884.25
04/29/26	PRMA	Prepare execution version of written consent authorizing the Asset Purchase Agreement and related transactions; prepare and coordinate closing checklist and execution process for transaction documents	2.50	589.50	1,473.78
04/29/26	PRMA	Prepare and review final execution and signature versions of the Asset Purchase Agreement, Bill of Sale, Assignment and Assumption Agreements, and related disclosure schedules	3.50	589.50	2,063.25
04/29/26	DBSH	Report to senior secured creditors counsel regarding APA revisions and related transaction matters	1.00	796.50	796.50
04/29/26	DBSH	Negotiate excluded assets section of	1.00	796.50	796.50

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		APA (0.6); make changes to relevant provisions in document (0.4)			
04/29/26	DBSH	Negotiation with stalking horse counsel over breakup fees, reps and warranties, and termination provisions in APA.	1.00	796.50	796.50
04/29/26	DBSH	Continue to make various changes to transaction documents	1.00	796.50	796.50
04/29/26	DBSH	Continue to work on finalizing transaction documents	1.00	796.50	796.50
04/29/26	DBSH	Modify Assignment and Assumption of Interconnection Agreement (0.7); discuss revisions with stalking horse counsel (0.3)	1.00	796.50	796.50
04/29/26	DBSH	Deliver executed documents to Accordion and Citi teams.	0.50	796.50	398.25
04/29/26	DBSH	Analyze open issues regarding tax certifications to be delivered at closing (0.5); follow up discussion regarding same with stalking horse bidder's counsel (0.3)	0.80	796.50	637.20
04/29/26	DBSH	Exchange execution documents and obtain senior secured creditor and manager approval of transaction	1.00	796.50	796.50
04/29/26	DBSH	Attend/participate in weekly touch point call with Accordion and Bradley team to discuss transaction status.	0.70	796.50	557.55
04/29/26	JAMA	Conference regarding sale closing issues.	0.20	980.00	196.00
04/29/26	JAMA	Review and respond to emails regarding sale closing issues and stalking horse APA.	0.20	980.00	196.00
04/29/26	ACMO	Advise and comment on open issues on stalking horse purchase agreement.	0.50	877.50	438.75
04/29/26	ACMO	Conference with Bradley team, J. Shepherd and P. O'Malley to address finalizing stalking horse purchase agreement	0.30	877.50	263.25
04/30/26	JB	Conference with D.Sheinbein regarding strategy for stalking horse asset purchase agreement matters	0.50	810.00	405.00
04/30/26	JB	Emails with stalking horse counsel and others regarding filing of stalking horse designation	0.20	810.00	162.00
04/30/26	JB	Finalize stalking horse designation	0.60	810.00	486.00
04/30/26	PRMA	Continue to work on schedule supplement	3.00	589.50	1,768.50

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Date	Initials	Description	Hours	Rate	Amount
04/30/26	PRMA	Continue to review and analyze material contracts	2.00	589.50	1,179.00
04/30/26	DBSH	Confer about Schedule 3.3 to APA and schedule supplement.	1.00	796.50	796.50
04/30/26	DBSH	Additional discussions about Schedule 3.3 to APA and schedule supplement.	1.00	796.50	796.50
04/30/26	DBSH	Analyze bankruptcy issues in sale/auction process (0.5); analyze reports from investment banker on possible alternative bidders (0.5)	1.00	796.50	796.50
04/30/26	JAMA	Phone call with J. Bailey regarding stalking horse designation.	0.20	980.00	196.00
Subtotal for BD2 - Asset Disposition			**252.30**		**$191,607.78**
BD20 - Reporting					
04/07/26	JB	Email Accordion Team regarding draft monthly operating report	0.20	810.00	162.00
04/07/26	JB	Review draft monthly operating report	0.30	810.00	243.00
04/08/26	JB	Emails with S.Merksamer and J.Shepherd regarding finalized MOR	0.20	810.00	162.00
04/08/26	AD	Emails with S. Merksmayer (Accordion) re MOR (.1); review and finalize MOR for filing (.2)	0.30	720.00	216.00
04/09/26	AD	Emails with J. Shepherd re Feb MOR (.1); finalize Feb MOR for filing (.2)	0.30	720.00	216.00
04/15/26	DBSH	Meet with Bradley and Accordion teams to discuss movement of bank accounts.	0.20	796.50	159.30
04/16/26	MSD	Draft and finalize request for informal opinion regarding treatment of debt paid off at closing as consideration	0.90	931.50	838.35
04/30/26	JB	Draft OCP payment reporting notice	0.40	810.00	324.00
04/30/26	JB	Emails with Accordion regarding OCP reporting matters	0.10	810.00	81.00
04/30/26	JB	FInalize monthly operating report	0.40	810.00	324.00
04/30/26	ATKH	Review and revise March Monthly Operating Report (1.4); coordinate service with Verita team (0.1).	1.50	621.00	931.50
Subtotal for BD20 - Reporting			**4.80**		**$3,657.15**
BD21 - Tax					
04/03/26	JB	Research regarding tax matters to respond to inquiry	0.30	810.00	243.00
04/03/26	DBSH	Review transfer tax question from bidder (0.5); send follow up reply to Nomura (0.2)	0.70	796.50	557.55

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04/16/26	DBSH	Analyze revisions to tax provisions in APA	0.50	796.50	398.25
04/17/26	MWM	Prepare revisions to tax provisions of Asset Purchase Agreement (1.2); analyze tax issues in connection with sale of assets in bankruptcy proceeding (2.1)	3.60	895.50	3,223.80
04/22/26	JB	Emails with Accordion Team regarding filed tax claims	0.20	810.00	162.00
04/25/26	DBSH	Meet with tax counsel about stalking horse changes to tax provisions and compromise language.	0.30	796.50	238.95
04/28/26	MWM	Work on tax reporting and filing matters in connection with closing of asset sale.	1.00	895.50	895.50
04/29/26	MWM	Prepare revisions to tax provisions of transaction documents.	1.20	895.50	1,074.60
04/30/26	MWM	Prepare revisions to tax provisions of transaction documents.	0.30	895.50	268.65
Subtotal for BD21 - Tax			**8.10**		**$7,062.30**
BD3 - Assumption and Rejection of Leases and Contracts					
04/14/26	AD	Draft supplemental notice of assumption and assignment (.3); emails with P. O'Malley re same (.1)	0.40	720.00	288.00
04/15/26	AD	Review emails re additional contract for supplemental assumption and assignment notice	0.20	720.00	144.00
04/15/26	AD	Review and analyze budget	0.10	720.00	72.00
04/17/26	AD	Review and revise notice of supplemental assumption and assignment (.3); emails with P. O'Malley regarding same (.1)	0.40	720.00	288.00
04/18/26	JB	Email with Accordion Team and Bradley Team regarding strategy for assignment of additional contracts	0.30	810.00	243.00
04/20/26	TCDA	Draft motion for extension of deadline to assume or reject under section 365(d)(4)	2.20	499.50	1,098.90
04/23/26	JB	Emails with Accordion Team regarding designation of contracts for assignment	0.10	810.00	81.00
04/24/26	JB	Email with Verita regarding service of supplemental cure notice	0.10	810.00	81.00
04/26/26	JB	Revise motion to extend deadline to assume or reject leases	0.30	810.00	243.00
04/26/26	JB	Email Accordion Team regarding motion to extend deadline to assume or reject leases	0.10	810.00	81.00
04/26/26	AD	Review and revise motion regarding	0.70	720.00	504.00

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Date	Initials	Description	Hours	Rate	Amount
		deadline to extend 365(d)(4) deadine			
04/29/26	TCDA	Analyze case law on contract assumption defense in Texas bankruptcy court	2.70	499.50	1,348.65
04/30/26	TCDA	Draft analysis on contract assumption defense in Texas bankruptcy caselaw	0.50	499.50	249.75
Subtotal for BD3 - Assumption and Rejection of Leases and Contracts			**8.10**		**$4,722.30**
BD5 - Budgeting (Case)					
04/13/26	AD	Analyze and update case budgeting	0.30	720.00	216.00
04/14/26	AD	Emails with P. O'Malley re case budgeting	0.30	720.00	216.00
04/21/26	AD	Develop strategy regarding budgeting	0.20	720.00	144.00
04/27/26	AD	Review and analyze updated information regarding case budget	0.40	720.00	288.00
Subtotal for BD5 - Budgeting (Case)			**1.20**		**$864.00**
BD6 - Business Operations					
04/09/26	JB	Emails with R.Travis regarding compliance with depository institution requirements	0.10	810.00	81.00
04/09/26	MKRI	Analyze issues regarding vendor invoices and potential netting of amounts owed (0.2); analyze related issues (0.7)	0.90	900.00	810.00
04/10/26	DBSH	Confer with A. Moss and P. O'Malley regarding vendor payments and offsets	0.60	796.50	477.90
04/12/26	AD	Confer with Bradley team regarding discussions regarding vendor negotiations	0.30	720.00	216.00
04/12/26	DBSH	Meet with Bradley team to discuss vendor negotiations	0.30	796.50	238.95
04/12/26	JAMA	Participate in update call with Bradley team to discuss vendor negotiations.	0.30	980.00	294.00
04/12/26	MKRI	Call with Bradley team relating to vendor negotiations	0.30	900.00	270.00
04/12/26	ACMO	Teams conference with Bradley Team regarding negotiations with vendors	0.30	877.50	263.25
04/13/26	JB	Conference with Bradley Team and Accordion Team regarding strategy for winddown matters including staffing	0.20	810.00	162.00
04/13/26	DBSH	Meet with vendor's legal counsel and M.Riordan to discuss vendor's requested stipulation	1.00	796.50	796.50
04/13/26	DBSH	Confer with J.Shepherd and M.Riordan to discuss vendor's requested stipulation.	0.50	796.50	398.25

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Date	Initials	Description	Hours	Rate	Amount
04/13/26	JAMA	Review and respond to emails with Accordion regarding insurance coverage.	0.20	980.00	196.00
04/13/26	MKRI	Call with D. Sheinbein and S. Matthews regarding GEV invoices	0.20	900.00	180.00
04/20/26	DBSH	Continue to analyze GE stipulation request	0.30	796.50	238.95
04/23/26	JB	Emails with Accordion Team regarding insurance matters	0.10	810.00	81.00
04/28/26	JB	Revise motion to extend deadline for deposit account compliance and proposed order	0.70	810.00	567.00
04/28/26	JB	Email with J.Shepherd regarding motion to extend deadline for deposit account compliance	0.10	810.00	81.00
Subtotal for BD6 - Business Operations			**6.40**		**$5,351.80**
BD7 - Case Administration					
04/07/26	JAMA	Prepare for weekly touchpoint call.	0.30	980.00	294.00
04/16/26	JB	Review creditor counsel notice of appearance on docket	0.10	810.00	81.00
04/20/26	JAMA	Correspondence with Accordion regarding Bradley/Accordion touchpoint call.	0.10	980.00	98.00
04/22/26	JB	Conference with J.Shepherd regarding preparation for disclosure statement hearing	0.10	810.00	81.00
04/25/26	AD	Develop strategy regarding case trajectory and upcoming deadlines	0.70	720.00	504.00
04/26/26	AD	Review and revise motion to extend removal deadline	0.80	720.00	576.00
Subtotal for BD7 - Case Administration			**2.10**		**$1,634.00**
BD8 - Claims Administration and Objections					
04/01/26	ATKH	Analyze claims register (0.5); coordinate with Verita team on same (0.3).	0.80	621.00	496.80
04/05/26	AD	Develop strategy regarding claims review and analysis (.5); draft amended bar date order (.3); emails to Verita re certificate of service for bar date order (.2)	1.00	720.00	720.00
04/06/26	AD	Emails with Verita regarding COS on bar date notices	0.20	720.00	144.00
04/13/26	JAMA	Review and respond to emails regarding Winter Storm Uri claims.	0.20	980.00	196.00
04/13/26	MKRI	Analyze issues relating to a debtor asserting set off rights under Bankruptcy	1.30	900.00	1,170.00

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Date	Initials	Description	Hours	Rate	Amount
		Code section 558.			
04/14/26	ACMO	Analyze and provide comments to GE's request for stipulation regarding liquidated damages under current contract.	0.10	877.50	87.75
04/15/26	JB	Conference with Bradley Team and Accordion Team regarding review of creditor claim amounts	0.10	810.00	81.00
04/15/26	DBSH	Meet with Bradley and Accordion teams to discuss senior creditor legal fee payments.	0.10	796.50	79.65
04/15/26	ACMO	Conference with P. O'Malley, S. Merksamer and Bradley team regarding strategy for payment of senior secured creditor claims.	0.10	877.50	87.75
04/16/26	AD	Review and analyze potential claim analysis	0.30	720.00	216.00
04/16/26	JAMA	Correspondence with counsel for Clay County regarding status of sale.	0.10	980.00	98.00
04/18/26	JB	Conference with Bradley Team regarding strategy for certain filed claims	0.30	810.00	243.00
04/18/26	JB	Email with Accordion regarding filed claims	0.10	810.00	81.00
04/18/26	JB	Review newly filed claims	0.20	810.00	162.00
04/18/26	AD	Confer with Bradley team regarding review of claims on file and analysis of same	0.30	720.00	216.00
04/18/26	JAMA	Participate in Bradley work in process call to discuss claims reconciliation and review.	0.30	980.00	294.00
04/18/26	MKRI	Call with Bradley team to discuss strategy and next steps in connection with claim review	0.30	900.00	270.00
04/18/26	ACMO	Conference with Bradley Team to address outstanding claims.	0.30	877.50	263.25
04/19/26	JB	Email with Accordion regarding strategy for potential claim objection	0.10	810.00	81.00
04/19/26	JB	Review invoices in support of filed claim and develop strategy for objection	0.30	810.00	243.00
04/19/26	JB	Email with J.Shepherd regarding review of filed proofs of claim	0.20	810.00	162.00
04/20/26	JB	Email with Verita regarding filed claims spreadsheets	0.10	810.00	81.00
04/20/26	DBSH	Meet with critical vendor and bankruptcy counsel to discuss proof of claim and potential cure notice objection.	1.00	796.50	796.50

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Date	Initials	Description	Hours	Rate	Amount
04/23/26	JB	Research in support of objections to certain claims	1.50	810.00	1,215.00
04/23/26	JB	Email with Accordion Team regarding strategy for certain claim objections	0.10	810.00	81.00
04/23/26	ATKH	Call with J. Bailey re claim objections (0.2); research related to same (1.2).	1.40	621.00	869.40
04/24/26	JB	Conference with Bradley Team and Accordion Team regarding strategy for claims objections	0.20	810.00	162.00
04/24/26	DBSH	Review objections to third party claims	0.20	796.50	159.30
04/24/26	ACMO	Conference with Bradley team, J. Shepherd and S. Merksamer regarding creditor claims	0.20	877.50	175.50
04/27/26	JAMA	Correspondence with counsel for Clay County regarding tax claim and sale status.	0.20	980.00	196.00
04/28/26	JB	Email with counsel for Winter Storm Uri claimants	0.10	810.00	81.00
04/28/26	EMSM	Begin review of possible conflicts in preparation for drafting objections to certain claims	1.30	666.00	865.80
04/29/26	JAMA	Participate in work in process call regarding Uri claims and related reconciliation.	0.30	980.00	294.00
04/30/26	EMSM	Address possible conflicts in preparation for drafting objections to certain claims	1.40	666.00	932.40
Subtotal for BD8 - Claims Administration and Objections			**14.70**		**$11,301.10**
Total			**404.90**		**$306,682.93**

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Timekeeper Summary

Name	Initials	Timekeeper Title	Hours	Rate	Amount
Asiya Khan	ATKH	Associate	9.60	621.00	5,961.60
Charlie Evans	CHEV	Associate	11.60	499.50	5,794.20
Rodrigo Martinez Cabello	PRMA	Associate	66.50	589.50	39,201.78
Raneen Abdelghani	RIAB	Associate	0.40	576.00	230.40
Taylor Davis	TCDA	Associate	6.20	499.50	3,096.90
Amy Moss	ACMO	Partner	34.80	877.50	30,537.00
Alex Dugan	AD	Partner	38.20	720.00	27,504.00
Austin L. McMullen	ALM	Partner	0.30	972.00	291.60
Allen Sullivan	ASUL	Partner	26.20	783.00	20,514.60
David Sheinbein	DBSH	Partner	91.50	796.50	72,879.75
Erin Malone-Smolla	EMSM	Partner	12.20	666.00	8,125.20
Jarrod Martin	JAMA	Partner	20.90	980.00	20,482.00
James Bailey	JB	Partner	66.40	810.00	53,784.00
Michael S. Denniston	MSD	Partner	6.90	931.50	6,427.35
Mark Miller	MWM	Partner	6.10	895.50	5,462.55
Michael Riordan	MKRI	Senior Attorney	7.10	900.00	6,390.00
Total			**404.90**		**$306,682.93**

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Task Summary

Task Code	Description	Hours	Amount
BD11	Employment and Fee Applications	16.10	10,354.55
BD13	Financing and Cash Collateral	4.70	2,920.05
BD14	Litigation	2.10	1,476.00
BD15	Meetings and Communications with Creditors	0.20	162.00
BD17	Plan and Disclosure Statement	83.60	65,079.90
BD19	Relief from Stay and Adequate Protection	0.50	490.00
BD2	Asset Disposition	252.30	191,607.78
BD20	Reporting	4.80	3,657.15
BD21	Tax	8.10	7,062.30
BD3	Assumption and Rejection of Leases and Contracts	8.10	4,722.30
BD5	Budgeting (Case)	1.20	864.00
BD6	Business Operations	6.40	5,351.80
BD7	Case Administration	2.10	1,634.00
BD8	Claims Administration and Objections	14.70	11,301.10
Total		**404.90**	**$306,682.93**

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Cost Detail

Date	Narrative	Units	Rate	Amount
04/03/26	FILING FEES 04-03-2026-TX2604800158403-Notice of Bar Dates MDL-Shelly Smith	1.00	4.25	4.25
04/16/26	FED DOCKET SERV-PACER	1.00	7.00	7.00
Total				**$11.25**

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Cost Summary

Description	Amount
FED DOCKET SERV-PACER	7.00
FILING FEES	4.25
Total	**$11.25**