Docket #0993 Date Filed: 09/29/2026

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:	)	Chapter 11
Vanderbilt Minerals, LLC, [1]	)	Case No. 26-60110 (WAK)
Debtor.	)	

FOURTH MONTHLY FEE STATEMENT OF KATTEN MUCHIN ROSENMAN LLP AS COUNSEL TO THE DEBTOR AT THE SOLE DIRECTION OF THE INDEPENDENT MANAGER AND SOLE MEMBER OF THE INDEPENDENT SPECIAL COMMITTEE OF THE DEBTOR, FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JULY 1, 2026 THROUGH AND INCLUDING JULY 31, 2026

Name of Applicant:	**Katten Muchin Rosenman LLP**
Authorized to provide professional services to:	Vanderbilt Minerals, LLC, at the sole direction of Ben Pickering in his capacity as Independent Manager and Sole Member of the Independent Special Committee
Date of bankruptcy filing:	February 16, 2026
Date of retention order:	April 14, 2026
Period for which compensation and reimbursement are sought:	July 1, 2026 through and including July 31, 2026
Amount of compensation sought as actual, reasonable, and necessary:	$139,967.60 (80% of $174,959.50)
Amount of expense reimbursement sought as actual, reasonable, and necessary:	$3,272.45
Type of fee statement or application:	Monthly Fee Statement
Prior Applications	First Monthly Fee Statement [Docket No. 671] Second Monthly Fee Statement [Docket No. 772] Third Monthly Fee Statement [Docket No. 837]

[1] The Debtor is Vanderbilt Minerals, LLC (EIN 13-1432885). The Debtor's noticing address in this chapter 11 case is 33 Winfield Street, Norwalk, Connecticut 06855

2660110260929000000000001

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"), the Local Rules of the United States Bankruptcy Court for the Northern District of New York (the "Local Rules"), the *Order Authorizing the Retention and Employment of Katten Muchin Rosenman LLP as Counsel to the Debtor at the Sole Direction of the Independent Manager and Sole Member of the Independent Special Committee of the Debtor Effective as of the Petition Date*, entered on April 14, 2026 [Docket No. 385] (the "Retention Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees*, entered on April 17, 2026 [Docket No. 419] (the "Interim Compensation Order"), Katten Muchin Rosenman LLP ("Katten"), counsel for Debtor Vanderbilt Minerals, LLC ("Debtor"), at the sole direction of Ben Pickering in his capacity as Independent Manager (the "Independent Manager") and sole member of the Independent Special Committee of the Debtor in the above-captioned chapter 11 case (these "Chapter 11 Case"), hereby submits this *Fourth Monthly Fee Statement of Katten Muchin Rosenman LLP as Counsel to the Debtor at the Sole Direction of the Independent Manager and Sole Member of the Independent Special Committee of the Debtor, for Compensation for Services Rendered and Reimbursement of Expenses for the Period From July 1, 2026 Through and Including July 31, 2026* (this "Monthly Fee Statement") for: (i) interim allowance of $143,240.05 for the reasonable compensation for actual, necessary legal services Katten rendered to Debtor, at the sole direction of the Independent Manager, from July 1, 2026 through and including July 31, 2026 (the "Fee Period"), and actual, necessary expenses Katten incurred in connection therewith; (ii) interim allowance and payment of compensation in the amount of $139,967.60 (80% of $174,959.50) for reasonable compensation for actual, necessary legal services Katten rendered during the Fee Period; and (iii) interim allowance and payment of $3,272.45 for the actual, necessary expenses Katten incurred in connection with such services during the Fee Period.

Itemization of Services Rendered and Disbursements Incurred

1. In support of this Monthly Fee Statement, attached are the following exhibits:

- **Exhibit A** is a schedule for the Fee Period of the number of hours expended and fees incurred (on an aggregate basis) by Katten partners, associates, and paraprofessionals during the Fee Period with respect to each of the project categories Katten established in accordance with its internal billing procedures. As reflected in **Exhibit A**, Katten incurred $174,959.50 in fees during the Fee Period. Pursuant to this Monthly Fee Statement and the Interim Compensation Order, Katten seeks payment of 80% percent of such fees ($139,967.60 in the aggregate).

- **Exhibit B** is a schedule of Katten professionals, including the standard hourly rate for each professional who rendered services to Debtor, on behalf of and at the sole direction of the Independent Manager, in connection with this Chapter 11 Case during the Fee Period, and the title, hourly rate, aggregate hours worked, and amount of fees relating to each professional. The blended hourly billing rate of attorneys for all services provided during the Fee Period is $1,345.52.[2] The blended hourly billing rate of paraprofessionals for all services provided during the Fee Period is $745[3]

- **Exhibit C** is a schedule for the Fee Period setting forth the total payment sought with respect to each category of expenses for which Katten is seeking payment in this Monthly Fee Statement. All of these disbursements comprise the requested sum for Katten's out-of-pocket expenses, which total $3,272.45.

- **Exhibit D** includes the time records of Katten professionals, which provides a daily summary of the time spent by each Katten professional during the Fee Period and an itemization of expenses by project category.

Representations

2. 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. Katten reserves the right to make further application to the United States Bankruptcy Court for the Northern District of New York for allowance of such fees and expenses not included herein in

[2] The blended hourly rate of $1,345.52 for attorneys is derived by dividing the total fees for attorneys of $169,670 by the total hours of 126.10 for those same attorneys.

[3] The blended hourly rate of $745 for paraprofessionals is derived by dividing the total fees for paraprofessionals of $5,289.50 by the total hours of 7.10 for those same paraprofessionals.

accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Interim Compensation Order.

3. The Independent Manager reviewed and approved the filing of this Monthly Fee Statement.

Notice

4. Notice of this Monthly Fee Statement will be provided in accordance with the Interim Compensation Order.

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WHEREFORE, Katten, in connection with services rendered to Debtor, at the sole direction of its Independent Manager in connection with this Chapter 11 Case, respectfully requests: (i) interim allowance of $143,240.05 for reasonable compensation for actual, necessary legal services Katten rendered to Debtor, at the sole direction of its Independent Manager during the Fee Period, and actual, necessary expenses Katten incurred in connection therewith; (ii) interim allowance and payment of compensation in the amount of $139,967.60, which is 80% percent of the total amount of reasonable compensation for actual, necessary legal services Katten rendered during the Fee Period; and (iii) interim allowance and payment of $3,272.45 for the actual, necessary expenses Katten incurred in connection with such services during the Fee Period.

New York, New York
Dated: September 29, 2026

/s/ Cindi M. Giglio

KATTEN MUCHIN ROSENMAN LLP
Cindi M. Giglio
Marc B. Roitman
Summer M. McKee (admitted *pro hac vice*)
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New York, New York 10020-1605
Telephone: (212) 940-8800
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- and -

KATTEN MUCHIN ROSENMAN LLP
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Telephone: (202) 625-3500
Email: dan.barnowski@katten.com

Counsel to the Independent Manager and Sole Member of the Independent Special Committee of the Debtor

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served via CM/ECF on this 29th day of September, 2026, to all parties receiving notice in the above-captioned case and in accordance with the Interim Compensation Order, constituting all necessary parties.

/s/ *Cindi M. Giglio*
Cindi M. Giglio

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:	)	Chapter 11
Vanderbilt Minerals, LLC,[1]	)	Case No. 26-60110 (WAK)
Debtor.	)	

VERIFICATION OF CINDI M. GIGLIO

I, Cindi M. Giglio, hereby declare the following under penalty of perjury:

1. I am a partner of the law firm of Katten Muchin Rosenman LLP ("Katten"), located at 50 Rockefeller Plaza, New York, New York 10020. I am the lead attorney from Katten working on the above-captioned chapter 11 case (these "Chapter 11 Case"). I am a member in good standing of the Bar of the State of New York, and I have been admitted to practice in the Northern, Southern, and Eastern Districts of New York. There are no disciplinary proceedings pending against me.

2. I have personally performed many of the legal services rendered by Katten as counsel to Vanderbilt Minerals, LLC ("Debtor"), at the sole direction of its Independent Manager ("Independent Manager") and sole member of the Independent Special Committee, and am familiar with the work performed at the direction of its Independent Manager by the lawyers and other personnel at Katten.

3. The facts set forth in the foregoing Monthly Fee Statement are true and correct to the best of my knowledge, information, and belief.

[1] The Debtor is Vanderbilt Minerals, LLC (EIN 13-1432885). The Debtor's noticing address in this chapter 11 case is 33 Winfield Street, Norwalk, Connecticut 06855.

4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

New York, New York
Dated: September 29, 2026

/s/ Cindi M. Giglio
Cindi M. Giglio
Partner
Katten Muchin Rosenman LLP

Exhibit A

In re Vanderbilt Minerals, LLC, et al.

Bankruptcy Case No. 26-60110 (WAK)

Summary of Total Fees and Expenses by Project Category
for the Fee Period of July 1, 2026 Through and Including July 31, 2026

In re Vanderbilt Minerals, LLC, et al.
Bankruptcy Case No. 26-60110 (WAK)

Summary of Total Fees and Expenses by Project Category
for the Fee Period of July 1, 2026 Through and Including July 31, 2026

Matter Number	Matter Description	Hours	Amount	Expenses	Total Compensation
2	Retention and Fee Applications	17.80	$ 17,802.00		$ 17,802.00
4	DIP / Cash Collateral	1.20	1,554.00		1,554.00
7	Contested Matters, Adversary Proceedings	45.00	55,497.00		55,497.00
10	Business Operations and Governance	13.10	21,793.00		21,793.00
12	Claims Administrations and Objections	3.00	3,366.50		3,366.50
13	Executory Contracts and Unexpired Leases	0.90	1,165.50		1,165.50
21	Investigation	33.70	44,246.50		44,246.50
22	Plan/Disclosure Statement/Confirmation	18.50	29,535.00		29,535.00
32	Expenses			$ 3,272.45	3,272.45
Totals		**133.20**	**$ 174,959.50**	**$ 3,272.45**	**$ 178,231.95**

Exhibit B
In re Vanderbilt Minerals, LLC, et al.
Bankruptcy Case No. 26-60110 (WAK)

Attorneys' and Paraprofessionals' Information
for the Fee Period of July 1, 2026 Through and Including July 31, 2026

In re Vanderbilt Minerals, LLC, et al.
Bankruptcy Case No. 26-60110 (WAK)

Attorneys' and Paraprofessionals' Information
for the Fee Period of July 1, 2026 Through and Including July 31, 2026

Attorneys

Attorney	Position with the Applicant	Year Admitted	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Cindi M. Giglio	Partner (NYC)	NY - 2007	Restructuring	$2,070	16.60	$ 34,362.00
Marc B. Roitman	Partner (NYC)	NY - 2010	Restructuring	1,895	3.30	6,253.50
Dan Barnowski	Partner (DC)	DC - 1998	Litigation	1,695	1.30	2,203.50
Robert Smith	Partner (DC)	NY - 2006 DC - 2010 MD - 2020	Litigation	1,495	6.20	9,269.00
Summer M. McKee	Counsel (NYC)	NY - 2015	Restructuring	1,295	50.20	65,009.00
Ally Jordan	Associate (DC)	CT - 2021 DC - 2022	Litigation	$1,205	21.20	25,546.00
Neeki Memarzadeh	Associate (DC)	DC - 2023	Litigation	$990	12.00	11,880.00
Arlen Moradi	Associate (LA)	CA - 2023	Restructuring	990	15.30	15,147.00
Totals for Attorneys					**126.10**	**$ 169,670.00**

PARAPROFESSIONALS

Paraprofessional	Position with the Applicant	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Marie Siena	Paraprofessional (NYC)	Restructuring	$745	7.10	$ 5,289.50
Totals for Paraprofessionals				**7.10**	**$ 5,289.50**

Total for Attorneys and Paraprofessionals	**133.20**	**$ 174,959.50**

Exhibit C

In re Vanderbilt Minerals, LLC, et al.

Bankruptcy Case No. 26-60110 (WAK)

Summary of Actual and Necessary Expenses
for the Fee Period of July 1, 2026 Through and Including July 31, 2026

In re Vanderbilt Minerals, LLC, et al.
Bankruptcy Case No. 26-60110 (WAK)

Summary of Actual and Necessary Expenses
for the Fee Period of July 1, 2026 Through and Including July 31, 2026

Expenses by Category	**Amount**
Business Meals	$ 223.19
Legal Research	2,519.26
Service Fees/Court Reporters	530.00
Total	**$ 3,272.45**

Exhibit D

In re Vanderbilt Minerals, LLC, et al.

Bankruptcy Case No. 26-60110 (WAK)

Detailed Description of Fees, Expenses and Disbursements for the Fee Period of July 1, 2026 Through and Including July 31, 2026

Katten

Direct Billing Inquiries to:
Lisa Henry
lisa.henry@katten.com

50 Rockefeller Plaza
New York, NY 10020-1605

September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346887
Client No. 403692
Matter No. 00002

FEIN: 36-2796532

Re: Retention and Fee Applications (403692.00002)

For legal services rendered through July 31, 2026 ..... $17,802.00

CURRENT INVOICE TOTAL: $17,802.00

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

Katten Muchin Rosenman LLP is an Illinois limited liability partnership including professional corporations that has elected to be governed by the Illinois Uniform Partnership Act (1997).
Katten Muchin Rosenman UK LLP is a limited liability partnership of solicitors and Registered Foreign Lawyers registered in England and Wales.

PROFESSIONAL SERVICES

Matter 00002: Retention and Fee Applications

Date	Attorney or Assistant	Description	Hours
13 Jul 26	Siena, Marie A.	Prepare CNO for Katten's 2nd monthly fee statement (.20); emails with A. Moradi regarding same (.10); review June billing statements for compliance with UST guidelines (1.30)	1.60
13 Jul 26	McKee, Summer M	Emails with A. Moradi (.20) and M. Siena (.10) regarding monthly and interim fee applications	0.30
13 Jul 26	Moradi, Arlen P.	Prepare certificate of no objection for Katten's second monthly fee application (.20); emails with S. McKee regarding first interim fee application (.20)	0.40
14 Jul 26	Siena, Marie A.	Incorporate A. Moradi comments to CNO for Second Monthly Fee Statement (.20); email C. Giglio regarding same (.10)	0.30
14 Jul 26	McKee, Summer M	Emails with A. Moradi and M. Siena regarding second monthly fee statement (.10)	0.10
15 Jul 26	Siena, Marie A.	Finalize and file CNO for Second Monthly Fee Statement on the court's docket (.30); emails with Katten regarding same (.10); prepare summary invoice for same (.20)	0.60
15 Jul 26	McKee, Summer M	Emails with Katten regarding interim fee application (.20)	0.20
15 Jul 26	Moradi, Arlen P.	Emails with M. Siena regarding certificate of no objection to Katten's second monthly fee application (.20); emails with D. Vomero regarding payment of same (.20)	0.40
16 Jul 26	Siena, Marie A.	Incorporate A. Moradi comments to June billing statements (.50)	0.50
16 Jul 26	Giglio, Cindi M.	Emails with Katten regarding fee statement (.20)	0.20
16 Jul 26	McKee, Summer M	Emails with M. Siena and A. Moradi regarding interim fee application (.20)	0.20
16 Jul 26	Moradi, Arlen P.	Review Katten's third monthly fee statement and related prebills (1.40); emails with M. Siena regarding same (.20)	1.60
17 Jul 26	Siena, Marie A.	Continue to incorporate A. Moradi comments to June billing statements (.40)	0.40
17 Jul 26	McKee, Summer M	Emails with Katten regarding June fee statement (.10)	0.10
20 Jul 26	Siena, Marie A.	Review June billing statements for compliance with UST guidelines (.50)	0.50
20 Jul 26	Moradi, Arlen P.	Review and revise Katten's third monthly fee statement and attachments to same (.60); emails with M. Siena regarding same (.10)	0.70
21 Jul 26	Siena, Marie A.	Incorporate A. Moradi comments to June billing statements (.50); incorporate S. McKee comments to June billing statements (.50)	1.00
21 Jul 26	McKee, Summer M	Review and revise June prebill to address confidentiality concerns (1.20)	1.20
22 Jul 26	Siena, Marie A.	Prepare exhibits for June monthly fee statement (.40); revise June monthly fee statement (.50)	0.90
22 Jul 26	Giglio, Cindi M.	Review June invoices for compliance with UST Guidelines (.30)	0.30
22 Jul 26	McKee, Summer M	Emails with Katten regarding UST request for fee application details (.30)	0.30
22 Jul 26	Moradi, Arlen P.	Review revisions to Katten's third monthly fee statement (.20)	0.20

PROFESSIONAL SERVICES

Matter 00002: Retention and Fee Applications

Date	Attorney or Assistant	Description	Hours
23 Jul 26	Siena, Marie A.	Compile 3rd Monthly Fee Statement (.10); email with A. Moradi regarding same (.10)	0.20
23 Jul 26	McKee, Summer M	Emails with A. Moradi (.10) and B. Pickering (.10) regarding interim fee application	0.20
23 Jul 26	Moradi, Arlen P.	Email with B. Pickering and S. McKee regarding third monthly fee statement (.10)	0.10
26 Jul 26	McKee, Summer M	Emails with A. Moradi regarding monthly fee statement (.10)	0.10
26 Jul 26	Moradi, Arlen P.	Emails with B. Pickering, S, McKee, and M. Siena regarding Katten's Third Fee Statement (.20)	0.20
27 Jul 26	McKee, Summer M	Emails with Katten regarding June fee statement (.10)	0.10
28 Jul 26	Siena, Marie A.	Revise June Monthly Fee Statement to incorporate client comments (.50); file same on the court's docket (.20); coordinate service of same (.10); calendar objection deadline of same (.10)	0.90
28 Jul 26	Giglio, Cindi M.	Correspond with Katten regarding fee statement (.30)	0.30
28 Jul 26	McKee, Summer M	Emails with A. Moradi (.20) and Katten (.10) regarding June fee statement	0.30
30 Jul 26	Moradi, Arlen P.	Draft and revise Katten's first interim fee application (2.60)	2.60
31 Jul 26	McKee, Summer M	Emails with A. Moradi regarding first interim fee application (.20)	0.20
31 Jul 26	Moradi, Arlen P.	Revise Katten's first interim fee application (.60)	0.60
		TOTALS:	**17.80**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00002: Retention and Fee Applications

	Attorney or Assistant	Hours	Rate	Amount
44904	Giglio, Cindi M.	0.80	2,070.00	$1,656.00
47229	McKee, Summer M	3.30	1,295.00	$4,273.50
47239	Moradi, Arlen P.	6.80	990.00	$6,732.00
41782	Siena, Marie A.	6.90	745.00	$5,140.50
	TOTAL:	**17.80**		**$17,802.00**

TOTAL FEES: **$17,802.00**

Katten

Direct Billing Inquiries to:
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lisa.henry@katten.com

50 Rockefeller Plaza
New York, NY 10020-1605

September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346886
Client No. 403692
Matter No. 00004

FEIN: 36-2796532

Re: DIP / Cash Collateral (403692.00004)

For legal services rendered through July 31, 2026 ..... $1,554.00

CURRENT INVOICE TOTAL: $1,554.00

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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PROFESSIONAL SERVICES

Matter 00004: DIP / Cash Collateral

Date	Attorney or Assistant	Description	Hours
01 Jul 26	McKee, Summer M	Emails with D. Vomero (.10) and M. Siena (.10) regarding estimated fees and expenses	0.20
08 Jul 26	McKee, Summer M	Emails with D. Vomero (.10) and M. Siena (.10) regarding estimated fees and expenses for budget purposes	0.20
14 Jul 26	McKee, Summer M	Emails with D. Vomero regarding estimated fees and expenses (.10)	0.10
15 Jul 26	McKee, Summer M	Emails with M. Siena (.10) and D. Vomero (.10) regarding estimated fees and expenses	0.20
23 Jul 26	McKee, Summer M	Emails with M. Siena (.10) and D. Vomero (.10) regarding estimated fees and expenses	0.20
28 Jul 26	McKee, Summer M	Emails with D. Vomero regarding obligation to pay Holdings' fees under Settlement Agreement (.10)	0.10
29 Jul 26	McKee, Summer M	Emails with M. Siena (.10) and D. Vomero (.10) regarding estimated fees and expenses	0.20
		TOTALS:	**1.20**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00004: DIP / Cash Collateral

	Attorney or Assistant	Hours	Rate	Amount
47229	McKee, Summer M	1.20	1,295.00	$1,554.00
	TOTAL:	**1.20**		**$1,554.00**

TOTAL FEES: **$1,554.00**

Katten

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50 Rockefeller Plaza
New York, NY 10020-1605

September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346888
Client No. 403692
Matter No. 00007

FEIN: 36-2796532

Re: Contested Matters, Adversary Proceedings (403692.00007)

For legal services rendered through July 31, 2026 ..... $55,497.00

CURRENT INVOICE TOTAL: $55,497.00

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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PROFESSIONAL SERVICES

Matter 00007: Contested Matters, Adversary Proceedings

Date	Attorney or Assistant	Description	Hours
07 Jul 26	Smith, Robert T.	Attend bulk of call with Latham regarding settlement appeal (.40); draft e-mail to client updating on the same (.30); draft e-mail to debtor following up on the same (.20); analyze appellate issues (.20)	1.10
07 Jul 26	Giglio, Cindi M.	Update on appeals (.30)	0.30
07 Jul 26	Roitman, Marc B.	Call with Latham regarding appeals (.50)	0.50
07 Jul 26	Jordan, Ally G	Research issues relating to appellate issues and applicable legal standards (1.70)	1.70
07 Jul 26	McKee, Summer M	Call with Katten and Latham regarding UCC appeal response (.50); emails with Katten and B. Pickering regarding same (.20)	0.70
07 Jul 26	McKee, Summer M	Review Debtor's Second Motion seeking to extending time to remove actions (.20)	0.20
08 Jul 26	Jordan, Ally G	Review and analyze prior briefing regarding stay of bankruptcy court orders (2.20); research and analyze case law cited therein (2.10)	4.30
09 Jul 26	Smith, Robert T.	Analyze appellate issue (.10)	0.10
09 Jul 26	Giglio, Cindi M.	Correspond with Katten regarding withdrawal of appeal (.10)	0.10
09 Jul 26	Jordan, Ally G	Research and analyze case law regarding issues relevant to appeal (3.60); draft summary of the same (1.90)	5.50
10 Jul 26	Giglio, Cindi M.	Emails regarding appeal dismissal (.20)	0.20
10 Jul 26	McKee, Summer M	Emails with Latham and Katten regarding appeal of DIP order (.20)	0.20
14 Jul 26	Roitman, Marc B.	Emails with Katten regarding appeal strategy and related matters (.20)	0.20
14 Jul 26	McKee, Summer M	Emails with Debtor's professionals, B. Pickering and D. Vomero regarding UCC request for additional production served on Holdings (.30)	0.30
16 Jul 26	Smith, Robert T.	Analyze research on appellate issues and applicable legal standards (.50)	0.50
16 Jul 26	Jordan, Ally G	Research and analyze case law regarding appellate issues and applicable legal standards and jurisdiction (1.80)	1.80
17 Jul 26	Smith, Robert T.	Analyze appellate issues and applicable legal standards caselaw (2.90)	2.90
17 Jul 26	Jordan, Ally G	Draft of summary of research regarding appellate issues and applicable legal standards (1.90)	1.90
21 Jul 26	Giglio, Cindi M.	Attend to issues regarding stipulation of appeal (.20)	0.20
21 Jul 26	Roitman, Marc B.	Emails with Katten regarding appeal strategy and related matters (.20)	0.20
21 Jul 26	Jordan, Ally G	Research and analyze case law relevant to anticipated arguments on appeal (.90)	0.90
22 Jul 26	Giglio, Cindi M.	Emails with Katten regarding transmittal of notice of record (.10)	0.10
22 Jul 26	McKee, Summer M	Emails with Katten regarding Sale Order appeal schedule (.20)	0.20
22 Jul 26	Moradi, Arlen P.	Review status of appeals and related deadlines (.30); emails with Katten regarding same (.20)	0.50
23 Jul 26	Smith, Robert T.	Call with C. Giglio to discuss research issues related to Chapter 11 case (.50)	0.50
23 Jul 26	Giglio, Cindi M.	Analyze issues related to potential dismissal (.10); call	0.60

PROFESSIONAL SERVICES

Matter 00007: Contested Matters, Adversary Proceedings

Date	Attorney or Assistant	Description	Hours
		with R. Smith regarding same (.50)	
24 Jul 26	McKee, Summer M	Review voluntary stipulation dismissing DIP order appeals (.30); emails with Katten (.10) and B. Pickering (.20) regarding same and schedule set for Sale Order appeal	0.60
24 Jul 26	McKee, Summer M	Review Debtor's motion seeking to lift automatic stay with respect to Barone litigation (.40); emails with Katten and B. Pickering regarding same (.10)	0.50
26 Jul 26	Jordan, Ally G	Prepare case summary and care package of materials related to settlement appeal, with descriptions, for N. Memarzadeh (1.30)	1.30
27 Jul 26	Smith, Robert T.	Meeting with N. Memarzadeh and A. Jordan about UCC appeal (.40); call with Katten about presentation to client (.30)	0.70
27 Jul 26	Jordan, Ally G	Confer with R. Smith and N. Memarzadeh regarding UCC appeal (.40)	0.40
27 Jul 26	Memarzadeh, Neeki	Confer with R. Smith and A. Jordan about research and procedural history related to settlement appeal (.40); review material regarding same (.10)	0.50
28 Jul 26	Smith, Robert T.	Analyze research on structured dismissal of Chapter 11 cases (.40)	0.40
28 Jul 26	Jordan, Ally G	Research and analyze case law regarding structured dismissals and draft summary of the same (3.40)	3.40
28 Jul 26	Memarzadeh, Neeki	Review case law relevant to settlement and sale appeal (2.50)	2.50
29 Jul 26	Memarzadeh, Neeki	Review record of sale appeal (2.25); review case law cited in connection with sale appeal (2.25)	4.50
30 Jul 26	Memarzadeh, Neeki	Review record of settlement appeal (2.25); review District Court record of settlement appeal (2.25)	4.50
		TOTALS:	**45.00**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00007: Contested Matters, Adversary Proceedings

	Attorney or Assistant	Hours	Rate	Amount
44904	Giglio, Cindi M.	1.50	2,070.00	$3,105.00
46340	Jordan, Ally G	21.20	1,205.00	$25,546.00
47229	McKee, Summer M	2.70	1,295.00	$3,496.50
47406	Memarzadeh, Neeki	12.00	990.00	$11,880.00
47239	Moradi, Arlen P.	0.50	990.00	$495.00
45657	Roitman, Marc B.	0.90	1,895.00	$1,705.50
42497	Smith, Robert T.	6.20	1,495.00	$9,269.00
	TOTAL:	**45.00**		**$55,497.00**

TOTAL FEES: **$55,497.00**

Katten

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50 Rockefeller Plaza
New York, NY 10020-1605

September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346892
Client No. 403692
Matter No. 00010

FEIN: 36-2796532

Re: Business Operations and Governance (403692.00010)

For legal services rendered through July 31, 2026	$21,793.00
CURRENT INVOICE TOTAL:	**$21,793.00**

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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PROFESSIONAL SERVICES

Matter 00010: Business Operations and Governance

Date	Attorney or Assistant	Description	Hours
01 Jul 26	Giglio, Cindi M.	Attend board call (.70)	0.70
01 Jul 26	McKee, Summer M	Attend Minerals' Board meeting (.70)	0.70
06 Jul 26	Giglio, Cindi M.	Correspond regarding Special Committee meeting (.10); attend professionals call (.30)	0.40
06 Jul 26	McKee, Summer M	Attend Debtor's professionals' call (.30); follow up emails with Katten regarding same (.10)	0.40
09 Jul 26	McKee, Summer M	Review and comment on draft July 1 board minutes (.10)	0.10
13 Jul 26	Roitman, Marc B.	Attend Board call (.70)	0.70
13 Jul 26	McKee, Summer M	Attend Debtor's pofessionals' call (.70)	0.70
16 Jul 26	Giglio, Cindi M.	Attend board meeting (.70); follow up on proof of claim (.30)	1.00
16 Jul 26	Roitman, Marc B.	Board meeting (.70)	0.70
20 Jul 26	Giglio, Cindi M.	Review agenda for Special Committee meeting (.10)	0.10
20 Jul 26	McKee, Summer M	Attend Debtor's professionals call (.40); emails with Katten regarding same (.10)	0.50
20 Jul 26	Moradi, Arlen P.	Draft agenda for special committee meeting (.10); emails with C. Giglio, S. McKee, and B. Pickering regarding same (.10)	0.20
21 Jul 26	Giglio, Cindi M.	Attend Katten pre-meeting (.20); attend meeting with Special Committee (.40)	0.60
21 Jul 26	McKee, Summer M	Attend Special Committee meeting (.40); pre-call with Katten in advance of same (.20); review materials in preparation for same (.20)	0.80
21 Jul 26	Moradi, Arlen P.	Attend Special Committee meeting (.40); Katten pre-call in advance of same (.20); prepare for same (.10)	0.70
22 Jul 26	Siena, Marie A.	Submit minutes of meeting for execution via DocuSign (.10); email A. Moradi regarding same (.10)	0.20
22 Jul 26	McKee, Summer M	Review draft board minutes from Latham (.20)	0.20
22 Jul 26	McKee, Summer M	Review draft minutes of July 21st Special Committee meeting (.20); emails with A. Moradi regarding same (.20)	0.40
22 Jul 26	Moradi, Arlen P.	Draft minutes from 7.21 special committee meeting (.40)	0.40
23 Jul 26	Giglio, Cindi M.	Attend board call and follow up (.80)	0.80
27 Jul 26	Giglio, Cindi M.	Attend professionals call (.60)	0.60
27 Jul 26	McKee, Summer M	Attend Debtor's professionals' call (.60)	0.60
29 Jul 26	Giglio, Cindi M.	Review minutes (.30)	0.30
30 Jul 26	Giglio, Cindi M.	Attend board meeting (.90); edits to minutes (.20); correspond with B. Pickering (.10); correspond with Katten regarding potential mediation (.10)	1.30
		TOTALS:	**13.10**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00010: Business Operations and Governance

	Attorney or Assistant	Hours	Rate	Amount
44904	Giglio, Cindi M.	5.80	2,070.00	$12,006.00
47229	McKee, Summer M	4.40	1,295.00	$5,698.00
47239	Moradi, Arlen P.	1.30	990.00	$1,287.00
45657	Roitman, Marc B.	1.40	1,895.00	$2,653.00
41782	Siena, Marie A.	0.20	745.00	$149.00

SUMMARY OF PROFESSIONAL SERVICES

Matter 00010: Business Operations and Governance

Attorney or Assistant	Hours	Rate	Amount
TOTAL:	**13.10**		**$21,793.00**
		TOTAL FEES:	**$21,793.00**

Katten

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September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346891
Client No. 403692
Matter No. 00012

FEIN: 36-2796532

Re: Claims Administration and Objections (403692.00012)

For legal services rendered through July 31, 2026	$3,366.50
CURRENT INVOICE TOTAL:	**$3,366.50**

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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PROFESSIONAL SERVICES

Matter 00012: Claims Administration and Objections

Date	Attorney or Assistant	Description	Hours
16 Jul 26	Moradi, Arlen P.	Draft B. Pickering's indemnification proof of claim and addendum to same (.70); review precedents regarding same (.70)	1.40
21 Jul 26	McKee, Summer M	Review and revise draft POC for B. Pickering and related addendum (.50); emails with A. Moradi regarding same (.10); emails with C. Giglio regarding same (.10); further revisions to same (.10); emails with B. Pickering regarding same (.10)	0.90
21 Jul 26	Moradi, Arlen P.	Finalize draft indemnification proof of claim (.20); email with S. McKee regarding same (.10)	0.30
27 Jul 26	McKee, Summer M	Emails with B. Pickering and Katten regarding indemnification proof of claim (.30)	0.30
29 Jul 26	McKee, Summer M	Emails with BSK regarding filing of indemnity POC (.10)	0.10
		TOTALS:	**3.00**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00012: Claims Administration and Objections

	Attorney or Assistant	Hours	Rate	Amount
47229	McKee, Summer M	1.30	1,295.00	$1,683.50
47239	Moradi, Arlen P.	1.70	990.00	$1,683.00
	TOTAL:	**3.00**		**$3,366.50**

TOTAL FEES: $3,366.50

Katten

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September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346893
Client No. 403692
Matter No. 00013

FEIN: 36-2796532

Re: Executory Contracts and Unexpired Leases (403692.00013)

For legal services rendered through July 31, 2026 ..... $1,165.50

CURRENT INVOICE TOTAL: $1,165.50

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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PROFESSIONAL SERVICES

Matter 00013: Executory Contracts and Unexpired Leases

Date	Attorney or Assistant	Description	Hours
02 Jul 26	McKee, Summer M	Emails with Latham regarding executory contracts (.10); review of supporting documents in connection with same (.50)	0.60
17 Jul 26	McKee, Summer M	Review limited objection to rejection notice filed by Barkley Solar (.20); emails with Katten regarding same (.10)	0.30
		TOTALS:	**0.90**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00013: Executory Contracts and Unexpired Leases

	Attorney or Assistant	Hours	Rate	Amount
47229	McKee, Summer M	0.90	1,295.00	$1,165.50
	TOTAL:	**0.90**		**$1,165.50**

TOTAL FEES: $1,165.50

Katten

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September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346890
Client No. 403692
Matter No. 00021

FEIN: 36-2796532

Re: Investigation (403692.00021)

For legal services rendered through July 31, 2026 ..... $44,246.50

CURRENT INVOICE TOTAL: $44,246.50

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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PROFESSIONAL SERVICES

Matter 00021: Investigation

Date	Attorney or Assistant	Description	Hours
01 Jul 26	McKee, Summer M	Draft investigation summary memo (3.20)	3.20
02 Jul 26	McKee, Summer M	Draft investigation summary memo (1.90)	1.90
02 Jul 26	Moradi, Arlen P.	Review diligence materials (.10); email to S. McKee regarding same (.10)	0.20
06 Jul 26	McKee, Summer M	Draft investigation summary file memo (1.70); email with A. Moradi regarding same (.10)	1.80
06 Jul 26	Moradi, Arlen P.	Review diligence materials (.30); emails with S. McKee regarding same (.10)	0.40
09 Jul 26	McKee, Summer M	Draft investigation summary file memo (2.10)	2.10
13 Jul 26	McKee, Summer M	Emails with C. Giglio (.20) and B. Pickering (.10) regarding investigation status and timing of Special Committee meeting	0.30
18 Jul 26	McKee, Summer M	Emails with Katten regarding D&O investigation (.20)	0.20
20 Jul 26	Barnowski, Dan	Katten team meeting to discuss next steps (.40)	0.40
20 Jul 26	Giglio, Cindi M.	Attend call with team to discuss investigation (.50)	0.50
20 Jul 26	Roitman, Marc B.	Call with Katten regarding ongoing investigation matters (.50)	0.50
20 Jul 26	McKee, Summer M	Call with Katten regarding status of D&O-related investigation (.50)	0.50
20 Jul 26	Moradi, Arlen P.	Meeting with Katten regarding investigation updates (.50)	0.50
21 Jul 26	Giglio, Cindi M.	Follow up on remaining investigation issue (.10); calls regarding same (.70); correspondence with Debtor's professionals regarding potential next steps (.40)	1.20
27 Jul 26	Barnowski, Dan	Katten team call regarding investigation matters (partial) (.30)	0.30
27 Jul 26	McKee, Summer M	Call with Katten regarding potential implications of dismissal (.50); follow up call with A. Moradi regarding same (.20); emails with B. Pickering regarding investigation status and Special Committee meeting schedule (.20)	0.90
27 Jul 26	Moradi, Arlen P.	Meeting with Katten regarding investigation presentation and related research (.50); follow up call with S. McKee regarding same (.20); legal research regarding structured and non-structured dismissals of chapter 11 case (2.20); draft memorandum regarding same (.50)	3.40
28 Jul 26	Giglio, Cindi M.	Review and comment on presentation outline (.30)	0.30
28 Jul 26	McKee, Summer M	Review research from A. Moradi regarding standard for dismissal (.50); emails with Katten regarding same and related presentation (.50); call with A. Moradi regarding same (.50); begin drafting same (1.90)	3.40
28 Jul 26	Moradi, Arlen P.	Call with S. McKee regarding presentation (.50)	0.50
29 Jul 26	McKee, Summer M	Review A. Jordan research on impact of dismissal on appeals (.40) and case law in support of same (.80); discussion with C. Giglio regarding impact of dismissal (.40); research related to same (1.40)	3.00
30 Jul 26	McKee, Summer M	Emails with Katten regarding investigation and scheduling (.20); emails with B. Pickering regarding same (.20)	0.40
30 Jul 26	McKee, Summer M	Draft presentation re: implications of potential dismissal (2.80); research in support of same (2.10)	4.90
31 Jul 26	McKee, Summer M	Draft presentation regarding implications of potential	2.90

PROFESSIONAL SERVICES

Matter 00021: Investigation

Date	Attorney or Assistant	Description	Hours
		dismissal and research in support of same (2.90)	
		TOTALS:	**33.70**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00021: Investigation

	Attorney or Assistant	Hours	Rate	Amount
44866	Barnowski, Dan	0.70	1,695.00	$1,186.50
44904	Giglio, Cindi M.	2.00	2,070.00	$4,140.00
47229	McKee, Summer M	25.50	1,295.00	$33,022.50
47239	Moradi, Arlen P.	5.00	990.00	$4,950.00
45657	Roitman, Marc B.	0.50	1,895.00	$947.50
	TOTAL:	**33.70**		**$44,246.50**

TOTAL FEES: **$44,246.50**

Katten

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September 28, 2026

Ben Pickering
[redacted]

Invoice No. 40346889
Client No. 403692
Matter No. 00022

FEIN: 36-2796532

Re: Plan/Disclosure Statement/Confirmation (403692.00022)

For legal services rendered through July 31, 2026 ..... $29,535.00

CURRENT INVOICE TOTAL: $29,535.00

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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PROFESSIONAL SERVICES

Matter 00022: Plan/Disclosure Statement/Confirmation

Date	Attorney or Assistant	Description	Hours
02 Jul 26	Giglio, Cindi M.	Call with Latham regarding Plan issues (.50)	0.50
02 Jul 26	Roitman, Marc B.	Call with Latham on plan matters (.50)	0.50
02 Jul 26	McKee, Summer M	Call with Katten and Latham regarding plan negotiations (.50)	0.50
18 Jul 26	Giglio, Cindi M.	Call with K. Posin (.40); emails with Katten regarding plan issues (.20); call with B. Pickering regarding same (.20)	0.80
22 Jul 26	Giglio, Cindi M.	Discussion with K. Posin regarding plan issues (.40); emails regarding same with Katten (.30)	0.70
27 Jul 26	Giglio, Cindi M.	Call with B. Pickering (.30); call with Katten (.40)	0.70
27 Jul 26	McKee, Summer M	Review and comment on draft plan from Latham (3.10); emails with C. Giglio regarding same (.20); emails with B. Pickering, D. Vomero, Katten, and Debtor's professionals regarding same (.20)	3.50
28 Jul 26	Giglio, Cindi M.	Review and revise draft Plan (1.40); correspond with Katten and B. Pickering regarding plan issues (.50); emails with Latham regarding same (.10)	2.00
28 Jul 26	McKee, Summer M	Review C. Giglio additional plan comments (.50); revise draft plan accordingly (.70); emails with B. Pickering (.20) and Katten (.20) regarding same	1.60
29 Jul 26	Giglio, Cindi M.	Correspond regarding TSA (.10); emails with S. McKee regardng same (.20)	0.30
29 Jul 26	McKee, Summer M	Review further revised draft plan from Latham (.80); emails with Katten regarding same (.10)	0.90
30 Jul 26	Barnowski, Dan	Analysis of plan language concerning privilege (.40); communications with Katten team concerning same (.20)	0.60
30 Jul 26	Giglio, Cindi M.	Review latest draft of plan (.80); correspond regarding privilege issues (.30)	1.10
30 Jul 26	McKee, Summer M	Revisions to draft plan (.30); emails with Katten (.50) and Latham (.20) regarding same; emails with Katten and Latham regarding plan negotiations (.20)	1.20
31 Jul 26	Giglio, Cindi M.	Emails with Katten regarding 9019 motion and draft disclosure statement (.40)	0.40
31 Jul 26	McKee, Summer M	Review and comment on draft disclosure statement from Latham (2.90); emails with Katten regarding same (.30)	3.20
		TOTALS:	**18.50**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00022: Plan/Disclosure Statement/Confirmation

	Attorney or Assistant	Hours	Rate	Amount
44866	Barnowski, Dan	0.60	1,695.00	$1,017.00
44904	Giglio, Cindi M.	6.50	2,070.00	$13,455.00
47229	McKee, Summer M	10.90	1,295.00	$14,115.50
45657	Roitman, Marc B.	0.50	1,895.00	$947.50
	TOTAL:	**18.50**		**$29,535.00**

TOTAL FEES: **$29,535.00**

Katten

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September 28, 2026

Ben Pickering
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Invoice No. 40346885
Client No. 403692
Matter No. 00032

FEIN: 36-2796532

Re: Expenses (403692.00032)

Disbursements and other charges	$ 3,272.45
CURRENT INVOICE TOTAL:	**$3,272.45**

Disbursements and other charges incurred which have not yet been posted as of the above date will be billed at a later date.

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DISBURSEMENTS

Matter 00032: Expenses

Date	Description	Amount
30 Apr 26	Vendor: FLIK International Corp; Invoice#: 5732900236; Date: 4/30/2026 - April 2026 Catering - Reservation - 23774	223.19
30 Apr 26	Vendor: US Courts Pacer Service Center; Invoice#: 043026-PACER; Date: 4/30/2026 - Reallocation of April PACER chargebacks: NYC, CHI, LAX, WAS Offices - Pacer - April Chargebacks - 403692 00019	8.10
30 Apr 26	Vendor: US Courts Pacer Service Center; Invoice#: 043026-PACER; Date: 4/30/2026 - Reallocation of April PACER chargebacks: NYC, CHI, LAX, WAS Offices - Pacer - April Chargebacks - 403692 00001	55.70
30 Apr 26	Vendor: US Courts Pacer Service Center; Invoice#: 043026-PACER; Date: 4/30/2026 - Reallocation of April PACER chargebacks: NYC, CHI, LAX, WAS Offices - Pacer - April Chargebacks - 403692 00001	1.30
30 Apr 26	Vendor: US Courts Pacer Service Center; Invoice#: 043026-PACER; Date: 4/30/2026 - Reallocation of April PACER chargebacks: NYC, CHI, LAX, WAS Offices - Pacer - April Chargebacks - 403692 00021	9.80
01 Jun 26	Vendor: CS Disco, Inc.; Invoice#: 811372; Date: 6/1/2026 - Review DB Monthly Minimum for June 2026	265.00
30 Jun 26	Vendor: US Courts Pacer Service Center; Invoice#: 063026-PACER; Date: 6/30/2026 - Reallocation of JunePACER chargebacks: NYC, CHI, LAX, WAS Offices - PACER - June Chargebacks - 403692 00001	79.60
01 Jul 26	Vendor: CS Disco, Inc.; Invoice#: 829914; Date: 7/1/2026 - Review DB Monthly Minimum for July 2026	265.00
31 Jul 26	Westlaw Legal Research: JORDAN,ALLY on 7/21/2026	317.26
31 Jul 26	Westlaw Legal Research: JORDAN,ALLY on 7/26/2026	97.62
31 Jul 26	Westlaw Legal Research: JORDAN,ALLY on 7/28/2026	798.28
31 Jul 26	Westlaw Legal Research: MORADI,ARLEN on 7/27/2026	4.60
31 Jul 26	Westlaw Legal Research: MORADI,ARLEN on 7/28/2026	2.30
31 Jul 26	Westlaw Legal Research: MORADI,ARLEN on 7/29/2026	446.66
31 Jul 26	Westlaw Legal Research: JORDAN,ALLY on 7/8/2026	317.26
31 Jul 26	Westlaw Legal Research: JORDAN,ALLY on 7/9/2026	250.15
31 Jul 26	Westlaw Legal Research: JORDAN,ALLY on 7/16/2026	24.40
31 Jul 26	Westlaw Legal Research: JORDAN,ALLY on 7/17/2026	24.40
31 Jul 26	Westlaw Legal Research: MCKEE,SUMMER on 7/30/2026	2.51
31 Jul 26	Vendor: Thomson Reuters - West; Invoice#: 073126-WESTLAWR; Date: 7/31/2026 - Reallocation of July Westlaw chargebacks - Westlaw Legal Research: JORDAN,ALLY on 7/7/2026	79.32
	TOTAL DISBURSEMENTS:	**$3,272.45**

SUMMARY OF DISBURSEMENTS

Matter 00032: Expenses

Business Meals	$223.19
Service Fees	$530.00
Legal Research	$2,285.44
Legal Research	$233.82
TOTAL DISBURSEMENTS:	**$3,272.45**