Docket #1034 Date Filed: 10/15/2026

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

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

FIFTH 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 AUGUST 1, 2026 THROUGH AND INCLUDING AUGUST 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:	August 1, 2026 through and including August 31, 2026
Amount of compensation sought as actual, reasonable, and necessary:	$383,318.40 (80% of $479,148)
Amount of expense reimbursement sought as actual, reasonable, and necessary:	$2,060.87
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] First Interim Fee Application [Docket No. 927] Fourth Monthly Fee Statement [Docket No. 993]

[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

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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 *Fifth 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 August 1, 2026 Through and Including August 31, 2026* (this "Monthly Fee Statement") for: (i) interim allowance of $385,379.27 for the reasonable compensation for actual, necessary legal services Katten rendered to Debtor, at the sole direction of the Independent Manager, from August 1, 2026 through and including August 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 $383,318.40 (80% of $479,148) for reasonable compensation for actual, necessary legal services Katten rendered during the Fee

Period; and (iii) interim allowance and payment of $2,060.87[2] 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 $479,148 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 ($383,318.40 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 $1,479.26.[3] The blended hourly billing rate of paraprofessionals for all services provided during the Fee Period is $745[4]

- **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 $2,060.87.

- **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

[2] Katten has written off local transportation in the amount of $336.35 as a courtesy to the Debtor's estate.

[3] The blended hourly rate of $1,479.26 for attorneys is derived by dividing the total fees for attorneys of $476,764 by the total hours of 322.30 for those same attorneys.

[4] The blended hourly rate of $745 for paraprofessionals is derived by dividing the total fees for paraprofessionals of $2,384 by the total hours of 3.20 for those same paraprofessionals.

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 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 $385,379.27 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 $383,318.40, 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 $2,060.87 for the actual, necessary expenses Katten incurred in connection with such services during the Fee Period.

New York, New York
Dated: October 15, 2026

/s/ Cindi M. Giglio

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

KATTEN MUCHIN ROSENMAN LLP
Dan Barnowski (admitted *pro hac vice*)
1919 Pennsylvania Avenue NW, Suite 800
Washington, D.C. 20006-3404
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 15th day of October, 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: October 15, 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 August 1, 2026 Through and Including August 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 August 1, 2026 Through and Including August 31, 2026

Matter Number	Matter Description	Hours	Amount	Expenses	Total Compensation
2	Retention and Fee Applications	13.00	$ 18,856.50		$ 18,856.50
4	DIP / Cash Collateral	1.40	1,968.00		1,968.00
7	Contested Matters, Adversary Proceedings	155.20	220,186.00		220,186.00
10	Business Operations and Governance	33.90	55,023.50		55,023.50
11	Case Administration	0.60	545.00		545.00
12	Claims Administrations and Objections	2.70	3,574.00		3,574.00
19	Hearings	1.50	2,175.00		2,175.00
21	Investigation	80.60	118,120.50		118,120.50
22	Plan/Disclosure Statement/Confirmation	36.60	58,699.50		58,699.50
32	Expenses			$ 2,060.87	2,060.87
Totals[1]		**325.50**	**$ 479,148.00**	**$ 2,060.87**	**$ 481,208.87**

[1] Katten has written off local transportation in the amount of $336.35 as a courtesy to the Debtor's estate.

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

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

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

Attorneys' and Paraprofessionals' Information
for the Fee Period of August 1, 2026 Through and Including August 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	35.00	$ 72,450.00
Shaya Rochester	Partner (NYC)	NY - 2003	Restructuring	1,895	29.90	56,660.50
Marc B. Roitman	Partner (NYC)	NY - 2010	Restructuring	1,895	17.20	32,594.00
Dan Barnowski	Partner (DC)	DC - 1998	Litigation	1,695	7.50	12,712.50
Philip Nemecek	Counsel (NYC)	NY - 1992	Litigation	1,595	6.00	9,570.00
Robert Smith	Partner (DC)	NY - 2006 DC - 2010 MD - 2020	Litigation	1,495	54.60	81,627.00
Summer M. McKee	Counsel (NYC)	NY - 2015	Restructuring	1,295	107.10	138,694.50
Matthew Breen	Associate (NYC)	DC - 2019 NY - 2021	Restructuring	1,205	2.80	3,374.00
Ally Jordan	Associate (DC)	CT - 2021 DC - 2022	Litigation	1,205	34.90	42,054.50
Neeki Memarzadeh	Associate (DC)	DC - 2023	Litigation	990	24.20	23,958.00
Arlen Moradi	Associate (LA)	CA - 2023	Restructuring	990	3.10	3,069.00
Totals for Attorneys					**322.30**	**$ 476,764.00**

PARAPROFESSIONALS

Paraprofessional	Position with the Applicant	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Marie Siena	Paraprofessional (NYC)	Restructuring	$745	3.20	$ 2,384.00
Totals for Paraprofessionals				**3.20**	**$ 2,384.00**

Total for Attorneys and Paraprofessionals	**325.50**	**$ 479,148.00**

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 August 1, 2026 Through and Including August 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 August 1, 2026 Through and Including August 31, 2026

Expenses by Category	Amount
Legal Research	$ 1,673.62
Out of Town Travel	99.40
Postage and Courier	22.85
Service Fees/Court Reporters	265.00
Total[1]	**$ 2,060.87**

[1] Katten has written off local transportation in the amount of $336.35 as a courtesy to the Debtors' estates.

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 August 1, 2026 Through and Including August 31, 2026

Katten

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

50 Rockefeller Plaza
New York, NY 10020-1605

October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349018
Client No. 403692
Matter No. 00002

FEIN: 36-2796532

Re: Retention and Fee Applications (403692.00002)

For legal services rendered through August 31, 2026 ..... $18,856.50

CURRENT INVOICE TOTAL: $18,856.50

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
03 Aug 26	Siena, Marie A.	Prepare exhibits for 1st Interim Fee Application (1.60); revise same (.60)	2.20
07 Aug 26	Siena, Marie A.	Emails with S. McKee regarding interim fee application (.10)	0.10
07 Aug 26	McKee, Summer M	Emails with M. Siena regarding interim fee app (.10); review UCC professionals' fee analysis from Latham (.40)	0.50
10 Aug 26	McKee, Summer M	Review and revise draft interim fee application (.70); emails with M. Siena (.10) and M. Roitman (.10) regarding same; compile UCC professional fee applications for analysis (.40)	1.30
11 Aug 26	Roitman, Marc B.	Revise memorandum analysis of fee statements of estate professionals (1.40); research in connection with Bankruptcy Code standards for compensation (.80); further review of filed fee statements and narratives in connection with same (.70)	2.90
12 Aug 26	Roitman, Marc B.	Further revise memorandum analysis of fee statements of estate professionals (1.10); research in connection with Bankruptcy Code standards for compensation (.70); emails with Katten and Latham regarding same (.30)	2.10
12 Aug 26	McKee, Summer M	Review analysis from M. Roitman regarding estate professionals' fees (.30); emails with Katten regarding same (.10)	0.40
17 Aug 26	McKee, Summer M	Emails with BSK regarding interim fee application coordination (.10); emails with C. Giglio regarding same (.10)	0.20
18 Aug 26	Giglio, Cindi M.	Review and comment on fee application (.70)	0.70
18 Aug 26	McKee, Summer M	Review C. Giglio comments to first interim fee app (.20); emails with C. Giglio regarding same (.20); emails with A. Moradi regarding same (.20)	0.60
18 Aug 26	Moradi, Arlen P.	Attention to rules and procedures governing interim fee applications (.30); emails with Katten regarding same (.20)	0.50
19 Aug 26	Giglio, Cindi M.	Correspond with Katten regarding fee application (.30)	0.30
19 Aug 26	McKee, Summer M	Emails with A. Moradi (.10), C. Giglio (.10) and B. Pickering (.10) regarding first interim fee app	0.30
19 Aug 26	Moradi, Arlen P.	Emails with S. McKee regarding interim fee application (.20)	0.20
20 Aug 26	Siena, Marie A.	Revise 1st interim fee application (.50)	0.50
20 Aug 26	McKee, Summer M	Emails with A. Moradi and M. Siena regarding first interim fee app (.20)	0.20
		TOTALS:	**13.00**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00002: Retention and Fee Applications

	Attorney or Assistant	Hours	Rate	Amount
44904	Giglio, Cindi M.	1.00	2,070.00	$2,070.00
47229	McKee, Summer M	3.50	1,295.00	$4,532.50
47239	Moradi, Arlen P.	0.70	990.00	$693.00
45657	Roitman, Marc B.	5.00	1,895.00	$9,475.00

SUMMARY OF PROFESSIONAL SERVICES

Matter 00002: Retention and Fee Applications

	Attorney or Assistant		Hours	Rate	Amount
41782	Siena, Marie A.		2.80	745.00	$2,086.00
		TOTAL:	**13.00**		**$18,856.50**

TOTAL FEES: **$18,856.50**

Katten

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

50 Rockefeller Plaza
New York, NY 10020-1605

October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349017
Client No. 403692
Matter No. 00004

FEIN: 36-2796532

Re: DIP / Cash Collateral (403692.00004)

For legal services rendered through August 31, 2026	$1,968.00
CURRENT INVOICE TOTAL:	**$1,968.00**

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
03 Aug 26	Giglio, Cindi M.	Follow up with Katten on fee reporting (.20)	0.20
03 Aug 26	McKee, Summer M	Emails with C. Giglio (.10) and D. Vomero (.10) regarding fee estimates; analysis of same (.10)	0.30
06 Aug 26	McKee, Summer M	Emails with M. Siena (.10) and D. Vomero (.10) regarding estimated fees for budget purposes	0.20
12 Aug 26	McKee, Summer M	Emails with H. Do (.10) and M. Siena (.10) regarding weekly estimated fees for budget purposes	0.20
19 Aug 26	McKee, Summer M	Emails with M. Siena (.10) and H. Do (.10) regarding estimated weekly fees	0.20
26 Aug 26	McKee, Summer M	Email to M. Siena regarding estimated fees and expenses for budget purposes (.10)	0.10
27 Aug 26	McKee, Summer M	Email to M. Siena (.10) and ABS (.10) regarding estimated fees and expenses for budget purposes	0.20
		TOTALS:	**1.40**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00004: DIP / Cash Collateral

	Attorney or Assistant		Hours	Rate	Amount
44904	Giglio, Cindi M.		0.20	2,070.00	$414.00
47229	McKee, Summer M		1.20	1,295.00	$1,554.00
		TOTAL:	**1.40**		**$1,968.00**

TOTAL FEES: **$1,968.00**

Katten

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

50 Rockefeller Plaza
New York, NY 10020-1605

October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349019
Client No. 403692
Matter No. 00007

FEIN: 36-2796532

Re: Contested Matters, Adversary Proceedings (403692.00007)

For legal services rendered through August 31, 2026	$220,186.00
CURRENT INVOICE TOTAL:	**$220,186.00**

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
04 Aug 26	Smith, Robert T.	Review UCC appellate brief (1.60)	1.60
04 Aug 26	Barnowski, Dan	Analysis of draft memo on appeal dismissal (.40); analysis of appeal brief (.80)	1.20
04 Aug 26	Giglio, Cindi M.	Review of appeal brief (1.10); communications regarding same (.50)	1.60
05 Aug 26	Smith, Robert T.	Review UCC appellate brief (.70); call with C. Giglio regarding same (.30)	1.00
05 Aug 26	Rochester, Shaya	Review pleadings filed in Bankruptcy Court and District Court in connection with Committee appeal of Settlement (1.20); call with C. Giglio regarding same (.10)	1.30
05 Aug 26	Giglio, Cindi M.	Call with R. Smith regarding appeals (.30); call with S. Rochester regarding same (.10)	0.40
05 Aug 26	Roitman, Marc B.	Review appellants' brief relating to appeal of settlement order (.70); emails with Katten regarding same (.20); research regarding record in Bankruptcy Court in connection with same (.60)	1.50
05 Aug 26	McKee, Summer M	Review UCC opening brief in Settlement Appeal (.90); emails with Katten regarding same (.20); emails with B. Pickering regarding special committee meeting agenda and UCC opening brief in Settlement Appeal (.10)	1.20
05 Aug 26	Memarzadeh, Neeki	Review UCC brief (2.00)	2.00
06 Aug 26	Smith, Robert T.	Analyze UCC's brief (.90); outline response arguments (2.70); meet with N. Memarzadeh regarding same (.50); call with Katten about response brief (.50)	4.60
06 Aug 26	Rochester, Shaya	Review pleadings filed in Bankruptcy Court and District Court in connection with Committee appeal of Settlement (3.50); begin drafting outline of section on abuse of discretion (.90); call with Katten to discuss brief (.50); emails with R. Smith regarding brief (.20)	5.10
06 Aug 26	Barnowski, Dan	Analysis of issues concerning appeal and UCC's appeal brief (.80)	0.80
06 Aug 26	Jordan, Ally G	Review and analyze appellant's brief (1.40); prepare for call with Katten (.30); attend teleconference with Katten to discuss the same (.50)	2.20
06 Aug 26	McKee, Summer M	Emails with Katten and D. Vomero regarding UCC opening brief in Settlement Appeal (.20); emails with Latham and Katten regarding Settlement Appeal (.30)	0.50
06 Aug 26	Breen, Matthew	Compile and transmit to R. Smith the full volume of stay-pending-appeal briefing (District Court and Fifth Circuit) with the appeal docket sheet, and circulate recent Goldblatt opinions (Yellow and Pack) on insider settlements and committee derivative standing (2.30); correspond with Katten regarding entire-fairness arguments (.50)	2.80
06 Aug 26	Memarzadeh, Neeki	Further review of UCC brief and related documents (.50); meet with R. Smith regarding same (.50); call with Katten regarding same (.50)	1.50
07 Aug 26	Smith, Robert T.	Call with Latham and Katten about response brief (.50)	0.50
07 Aug 26	Rochester, Shaya	Call with Latham and Katten teams to discuss appeals (.50)	0.50
07 Aug 26	Barnowski, Dan	Meeting with Latham team concerning appeal (.50);	1.00

PROFESSIONAL SERVICES

Matter 00007: Contested Matters, Adversary Proceedings

Date	Attorney or Assistant	Description	Hours
		attention to issues on appeal (.50)	
07 Aug 26	Giglio, Cindi M.	Attend call with Katten and Latham regarding appellate response brief (.50)	0.50
07 Aug 26	Jordan, Ally G	Draft outline of appellate brief (1.50)	1.50
07 Aug 26	Memarzadeh, Neeki	Call with Latham and Katten regarding response brief (.50)	0.50
10 Aug 26	Smith, Robert T.	Review record on appeal (3.50); analyze consolidation of settlement appeals (.20)	3.70
10 Aug 26	Rochester, Shaya	Review analogous chapter 11 case briefing in connection with proper standard to apply to approve settlement (1.80)	1.80
10 Aug 26	Giglio, Cindi M.	Emails regarding appellate response brief (.20)	0.20
11 Aug 26	Smith, Robert T.	Analyze record associated with settlement appeals (2.30); review draft motion to consolidate (.20)	2.50
11 Aug 26	Rochester, Shaya	Review underlying briefing and prepare outline of abuse of discretion section of merits brief (2.10)	2.10
11 Aug 26	Giglio, Cindi M.	Emails to Katten regarding appellate response brief (.30)	0.30
11 Aug 26	Jordan, Ally G	Draft motion to consolidate appeals (3.80)	3.80
12 Aug 26	Smith, Robert T.	Review and revise motion to consolidate (2.10); review record (3.50); review proposed revisions to motion to consolidate and finalize (.50)	6.10
12 Aug 26	Rochester, Shaya	Continue drafting outline for abuse of discretion section of brief and review underlying briefs (1.90)	1.90
12 Aug 26	Barnowski, Dan	Review motion to consolidate appeals (.20)	0.20
12 Aug 26	Giglio, Cindi M.	Emails with Katten regarding appellate strategy (.40)	0.40
12 Aug 26	Jordan, Ally G	Revise motion to consolidate appeals (2.30); review and analyze briefing regarding settlement (2.00); review and analyze caselaw cited therein (1.50)	5.80
12 Aug 26	McKee, Summer M	Review and comment on draft motion seeking to consolidate pending settlement appeals (.40); emails with Katten (.10) and Latham (.10) regarding same; review Latham comments to same (.10)	0.70
13 Aug 26	Smith, Robert T.	Analyze record related to response brief (3.20); communications with S. Rochester regarding same (.30); review cases cited in response brief (.80)	4.30
13 Aug 26	Rochester, Shaya	Prepare outline for section of appellate brief arguing that Bankruptcy Court did not abuse its discretion (3.60); communications with R. Smith regarding same (.30)	3.90
13 Aug 26	Jordan, Ally G	Review and analyze transcript of settlement proceedings in the Bankruptcy Court (1.50)	1.50
13 Aug 26	McKee, Summer M	Emails with Katten and Latham regarding consolidation of settlement appeals (.30); emails with BSK regarding same (.20)	0.50
14 Aug 26	Smith, Robert T.	Call with S. Rochester and A. Jordan about arguments to be advanced in brief (.70); review stipulation (.30); review record (2.70)	3.70
14 Aug 26	Rochester, Shaya	Review outline for abuse of discretion section (.60); call with R. Smith and A. Jordan regarding same (.70)	1.30
14 Aug 26	Jordan, Ally G	Draft appellate brief (3.50); research caselaw in support of arguments in appellate brief (1.10); teleconference with R. Smith and S. Rochester to	5.30

PROFESSIONAL SERVICES

Matter 00007: Contested Matters, Adversary Proceedings

Date	Attorney or Assistant	Description	Hours
		discuss appellate brief (.70)	
14 Aug 26	McKee, Summer M	Emails with Katten, Latham and BSK regarding possible consolidation of settlement appeals (.40); review draft stipulation regarding same from R. Smith (.20)	0.60
17 Aug 26	Smith, Robert T.	Review settlement hearing transcript from first day of trial (3.10); review settlement hearing transcript from second day of trial (1.00)	4.10
17 Aug 26	Rochester, Shaya	Continue drafting outline of abuse of discretion section of brief (2.40)	2.40
17 Aug 26	Jordan, Ally G	Draft argument section of appellate brief (3.20)	3.20
17 Aug 26	Memarzadeh, Neeki	Review email correspondence between Debtors' professionals and bankruptcy court filings in support of appeal response (1.00); draft section of appellate brief (5.70)	6.70
18 Aug 26	Smith, Robert T.	Review second day transcript for settlement hearing (1.80)	1.80
18 Aug 26	Rochester, Shaya	Review Debtor reply to Committee's request to terminate exclusivity (.30); continue drafting section of outline addressing abuse of discretion argument (2.90)	3.20
18 Aug 26	Giglio, Cindi M.	Emails with Katten regarding appellate brief and related issues (.20)	0.20
18 Aug 26	Jordan, Ally G	Draft memorandum summarizing research on equitable mootness (1.50)	1.50
18 Aug 26	McKee, Summer M	Review Latham comments to draft stipulation to consolidate settlement appeals (.20); emails with Katten regarding draft stipulation (.20); review overview of research related to settlement appeal defense from A. Jordan (.40) and select case law in support of same (.90)	1.70
18 Aug 26	Memarzadeh, Neeki	Draft select section of appellate brief, focusing on Iridium factors 4-5 (4.00); draft Section II.A of appellate brief, focusing on Iridium factors 6-7 (3.80)	7.80
19 Aug 26	Smith, Robert T.	Review hearing transcripts (.60)	0.60
19 Aug 26	Giglio, Cindi M.	Correspond with Debtor's professionals regarding stipulations to consolidate appeals (.30)	0.30
19 Aug 26	Jordan, Ally G	Draft detailed outline of appellate brief (1.70)	1.70
19 Aug 26	McKee, Summer M	Review Holdings' comments to draft stipulation to consolidate (.20); emails with Holdings, Katten and UCC regarding same (.10)	0.30
19 Aug 26	Memarzadeh, Neeki	Cite check select section of appellate brief (2.90); line edit select section of appellate brief (2.80)	5.70
20 Aug 26	Smith, Robert T.	Review hearing transcripts (3.40); analyze response arguments (1.50); review stipulation to consolidate appeals (.50)	5.40
20 Aug 26	Jordan, Ally G	Draft detailed outline of appellate brief (2.10)	2.10
20 Aug 26	McKee, Summer M	Emails with Katten regarding draft stipulation of consolidation of settlement appeals (.30); emails with UCC and other parties in interest regarding same (.20)	0.50
20 Aug 26	Moradi, Arlen P.	Review stipulation dismissing appeal and second bridge order (.30)	0.30
21 Aug 26	Jordan, Ally G	Draft detailed outline of background section of appellate brief (2.10); draft detailed outline of	5.70

PROFESSIONAL SERVICES

Matter 00007: Contested Matters, Adversary Proceedings

Date	Attorney or Assistant	Description	Hours
		argument section of appellate brief (3.60)	
24 Aug 26	Smith, Robert T.	Review record on appeal (3.30); finalize and file stipulations consolidating settlement appeals (.40)	3.70
24 Aug 26	Jordan, Ally G	Finalize stipulation to consolidate appeals (.60)	0.60
24 Aug 26	McKee, Summer M	Emails with A. Jordan (.20), R. Smith (.10), UCC and parties in interest (.20) regarding finalized stipulation consolidating settlement appeals; emails with A. Jordan (.10), M. Siena (.20) and R. Smith (.10) regarding filing of same; emails with A. Jordan and R. Smith regarding UCC prior pleadings in connection with appeal (.30)	1.20
25 Aug 26	Smith, Robert T.	Edit outline of appellee brief (1.20); emails with S. McKee regarding same (.10)	1.30
25 Aug 26	McKee, Summer M	Emails with parties in interest regarding filed stipulation to consolidate (.10); emails with R. Smith regarding same (.10)	0.20
26 Aug 26	Smith, Robert T.	Review and edit background section of appellee outline (2.90); review and edit argument section of appellee outline (3.10)	6.00
27 Aug 26	McKee, Summer M	Review opening brief filed in Schreiner settlement appeal (.80); emails with Katten regarding same (.20)	1.00
28 Aug 26	Rochester, Shaya	Communications with Katten regarding appellate brief (.20)	0.20
28 Aug 26	Giglio, Cindi M.	Review Schriner appellate brief in settlement appeal (.60)	0.60
28 Aug 26	McKee, Summer M	Emails with Katten and Debtor's professionals regarding pending settlement appeal (.80)	0.80
		TOTALS:	**155.20**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00007: Contested Matters, Adversary Proceedings

	Attorney or Assistant	Hours	Rate	Amount
44866	Barnowski, Dan	3.20	1,695.00	$5,424.00
47257	Breen, Matthew	2.80	1,205.00	$3,374.00
44904	Giglio, Cindi M.	4.50	2,070.00	$9,315.00
46340	Jordan, Ally G	34.90	1,205.00	$42,054.50
47229	McKee, Summer M	9.20	1,295.00	$11,914.00
47406	Memarzadeh, Neeki	24.20	990.00	$23,958.00
47239	Moradi, Arlen P.	0.30	990.00	$297.00
44845	Rochester, Shaya	23.70	1,895.00	$44,911.50
45657	Roitman, Marc B.	1.50	1,895.00	$2,842.50
42497	Smith, Robert T.	50.90	1,495.00	$76,095.50
	TOTAL:	**155.20**		**$220,186.00**

TOTAL FEES: **$220,186.00**

Katten

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October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349025
Client No. 403692
Matter No. 00010

FEIN: 36-2796532

Re: Business Operations and Governance (403692.00010)

For legal services rendered through August 31, 2026	$55,023.50
CURRENT INVOICE TOTAL:	**$55,023.50**

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 00010: Business Operations and Governance

Date	Attorney or Assistant	Description	Hours
03 Aug 26	McKee, Summer M	Review and comment on draft board minutes (.30)	0.30
04 Aug 26	Giglio, Cindi M.	Review of latest minutes (.20); correspond with B. Pickering regarding same (.10); emails regarding agenda (.10)	0.40
04 Aug 26	McKee, Summer M	Draft agenda for Special Committee meeting (.10); emails with C. Giglio regarding same (.30)	0.40
05 Aug 26	Smith, Robert T.	Pre-call before meeting with client (.30); attend Special Committee meeting (1.30)	1.60
05 Aug 26	Barnowski, Dan	Katten pre-call (.30); special committee meeting (1.30)	1.60
05 Aug 26	Giglio, Cindi M.	Prepare for SC meeting (.20); attend same (1.30)	1.50
05 Aug 26	McKee, Summer M	Attend Special Committee Meeting (1.30); pre-call with Katten in advance of same (.30)	1.60
06 Aug 26	Giglio, Cindi M.	Attend board call (1.20); emails with Katten regarding same (.50); call with B. Pickering regarding same (.40)	2.10
06 Aug 26	Roitman, Marc B.	Attend Board meeting (1.20)	1.20
06 Aug 26	McKee, Summer M	Participate in Debtor's Board meeting (1.20)	1.20
10 Aug 26	Giglio, Cindi M.	Emails with Katten regarding board minutes (.10)	0.10
10 Aug 26	McKee, Summer M	Review and comment on draft Board minutes for Aug. 6 Board meeting (.20); emails with M. Roitman regarding same (.10); Emails with C. Giglio (.10) and B. Pickering (.10) regarding Special Committee meeting schedule	0.50
11 Aug 26	McKee, Summer M	Emails with B. Pickering regarding draft Debtors' board minutes (.20)	0.20
13 Aug 26	Roitman, Marc B.	Attendance at Board meeting (1.00)	1.00
13 Aug 26	McKee, Summer M	Emails with B. Pickering and Latham regarding comments to Aug. 6th Board meeting minutes (.10); attend Debtors' Board meeting (1.00)	1.10
17 Aug 26	Giglio, Cindi M.	Attend professionals call (.40)	0.40
17 Aug 26	McKee, Summer M	Draft agenda for Aug. 18 Special Committee meeting (.20); emails with C. Giglio regarding same (.10); attend Debtors' professionals call (.40)	0.70
18 Aug 26	Giglio, Cindi M.	Attend Katten pre-call (.30); attend Special Committee meeting (.40)	0.70
18 Aug 26	Roitman, Marc B.	Attend Special Committee meeting (.40); pre-call with Katten in preparation for same (.30)	0.70
18 Aug 26	McKee, Summer M	Attend Special Committee meeting (.40); pre-call with Katten in advance of same (.30); emails with B. Pickering and Katten regarding agenda for same in advance of same (.20)	0.90
18 Aug 26	Moradi, Arlen P.	Attend Special Committee meeting (.40); attend Katten pre-call in advance of same (.30); review agenda in advance of same (.10)	0.80
19 Aug 26	McKee, Summer M	Review and revise draft Aug. 18th minutes from A. Moradi (.20); draft minutes of Aug. 5th Special Committee meeting (.50); emails with C. Giglio regarding same (.20)	0.90
19 Aug 26	Moradi, Arlen P.	Draft special committee meeting minutes (.50); email with S. McKee regarding same (.10)	0.60
20 Aug 26	Giglio, Cindi M.	Attend professionals call (1.00); review board minutes (.10); review Special Committee meeting minutes (.20); call with D. Vomero (.40)	1.70
20 Aug 26	McKee, Summer M	Review and revise minutes for Aug. 13 Board meeting	2.10

PROFESSIONAL SERVICES

Matter 00010: Business Operations and Governance

Date	Attorney or Assistant	Description	Hours
		(.50); emails with C. Giglio (.10) and B. Pickering (.10) regarding same; emails with Latham regarding same (.20); attend Debtor's Board meeting (1.00); emails with C. Giglio regarding Special Committee meeting minutes (.20)	
24 Aug 26	Siena, Marie A.	Submit minutes of meetings for execution via DocuSign (.10); email with S. McKee regarding same (.10)	0.20
24 Aug 26	Giglio, Cindi M.	Attend professionals call (.40); call with S. McKee regarding same (.20); correspond with B. Pickering regarding same (.30)	0.90
24 Aug 26	McKee, Summer M	Call with C. Giglio regarding professionals call (.20); email with B. Pickering and Katten regarding Special Committee meeting scheduling (.20); emails with B. Pickering regarding draft Special Committee meeting minutes (.20); emails with M. Siena regarding same (.10); attend Debtor's professionals call (.40); call with C. Giglio regarding same (.20)	1.30
26 Aug 26	Giglio, Cindi M.	Emails with Katten regarding board presentation (.30)	0.30
27 Aug 26	Giglio, Cindi M.	Attend portion of board call (.50)	0.50
27 Aug 26	McKee, Summer M	Attend Board meeting (.60)	0.60
28 Aug 26	Rochester, Shaya	Attend pre-call with Katten team before Special Committee meeting (.30)	0.30
28 Aug 26	Barnowski, Dan	Katten pre-call (.30); special committee meeting (1.20)	1.50
28 Aug 26	Giglio, Cindi M.	Katten team pre-call (.30); attend meeting with B. Pickering (1.20)	1.50
28 Aug 26	McKee, Summer M	Attend Special Committee meeting (1.20); pre-call with Katten in advance of same (.30)	1.50
31 Aug 26	Giglio, Cindi M.	Call with B. Pickering in advance of professionals call (.10); attend portion of professionals call (.20)	0.30
31 Aug 26	Roitman, Marc B.	Attend portion of Debtors' Professionals call regarding Plan matters (.20)	0.20
31 Aug 26	McKee, Summer M	Attend Debtor's professionals call (.40); emails with C. Giglio regarding same (.10)	0.50
		TOTALS:	**33.90**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00010: Business Operations and Governance

	Attorney or Assistant	Hours	Rate	Amount
44866	Barnowski, Dan	3.10	1,695.00	$5,254.50
44904	Giglio, Cindi M.	10.40	2,070.00	$21,528.00
47229	McKee, Summer M	13.80	1,295.00	$17,871.00
47239	Moradi, Arlen P.	1.40	990.00	$1,386.00
44845	Rochester, Shaya	0.30	1,895.00	$568.50
45657	Roitman, Marc B.	3.10	1,895.00	$5,874.50
41782	Siena, Marie A.	0.20	745.00	$149.00
42497	Smith, Robert T.	1.60	1,495.00	$2,392.00
	TOTAL:	**33.90**		**$55,023.50**

TOTAL FEES: **$55,023.50**

Katten

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October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349022
Client No. 403692
Matter No. 00011

FEIN: 36-2796532

Re: Case Administration (403692.00011)

For legal services rendered through August 31, 2026 ..... $545.00

CURRENT INVOICE TOTAL: $545.00

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 00011: Case Administration

Date	Attorney or Assistant	Description	Hours
17 Aug 26	Moradi, Arlen P.	Review and revise case calendar (.20); review docket filings regarding same (.20)	0.40
24 Aug 26	Siena, Marie A.	Update case calendar with upcoming hearing details and deadlines (.20)	0.20
		TOTALS:	**0.60**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00011: Case Administration

	Attorney or Assistant	Hours	Rate	Amount
47239	Moradi, Arlen P.	0.40	990.00	$396.00
41782	Siena, Marie A.	0.20	745.00	$149.00
	TOTAL:	**0.60**		**$545.00**

TOTAL FEES: $545.00

Katten

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October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349024
Client No. 403692
Matter No. 00012

FEIN: 36-2796532

Re: Claims Administration and Objections (403692.00012)

For legal services rendered through August 31, 2026 ..... $3,574.00

CURRENT INVOICE TOTAL: $3,574.00

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 00012: Claims Administration and Objections

Date	Attorney or Assistant	Description	Hours
17 Aug 26	Giglio, Cindi M.	Emails with S. McKee regarding PBGC claims (.10)	0.10
18 Aug 26	McKee, Summer M	Review and analyze proofs of claim filed by PBGC (.70); call with D. Vomero regarding same (.40); emails with C. Giglio regarding same (.20)	1.30
19 Aug 26	McKee, Summer M	Emails with C. Giglio regarding PBGC claim (.20)	0.20
24 Aug 26	McKee, Summer M	Emails (.10) and call (.20) with A. Yerramalli regarding PBGC claims; emails with G. Howard (.10) and C. Giglio (.10) regarding same	0.50
25 Aug 26	McKee, Summer M	Emails with G. Howard regarding PBGC claims (.10); emails with B. Pickering regarding same (.10); email to Latham regarding same (.10)	0.30
26 Aug 26	McKee, Summer M	Review 9019 stipulation between Debtor and the Insurers (.30)	0.30
		TOTALS:	**2.70**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00012: Claims Administration and Objections

	Attorney or Assistant	Hours	Rate	Amount
44904	Giglio, Cindi M.	0.10	2,070.00	$207.00
47229	McKee, Summer M	2.60	1,295.00	$3,367.00
	TOTAL:	**2.70**		**$3,574.00**

TOTAL FEES: $3,574.00

Katten

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October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349020
Client No. 403692
Matter No. 00019

FEIN: 36-2796532

Re: Hearings (403692.00019)

For legal services rendered through August 31, 2026	$2,175.00
CURRENT INVOICE TOTAL:	**$2,175.00**

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 00019: Hearings

Date	Attorney or Assistant	Description	Hours
17 Aug 26	McKee, Summer M	Emails with M. Siena and A. Moradi regarding hearing registration (.20)	0.20
19 Aug 26	Giglio, Cindi M.	Attend a portion of omnibus hearing (.30)	0.30
19 Aug 26	McKee, Summer M	Attend hearing on insurer stipulation and exclusivity bridge (.50)	0.50
20 Aug 26	McKee, Summer M	Emails with Debtor's professionals regarding August 19th hearing (.50)	0.50
		TOTALS:	**1.50**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00019: Hearings

	Attorney or Assistant		Hours	Rate	Amount
44904	Giglio, Cindi M.		0.30	2,070.00	$621.00
47229	McKee, Summer M		1.20	1,295.00	$1,554.00
		TOTAL:	**1.50**		**$2,175.00**

TOTAL FEES: **$2,175.00**

Katten

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October 14, 2026

Ben Pickering
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Invoice No. 40349023
Client No. 403692
Matter No. 00021

FEIN: 36-2796532

Re: Investigation (403692.00021)

For legal services rendered through August 31, 2026 ..... $118,120.50

CURRENT INVOICE TOTAL: $118,120.50

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 Aug 26	McKee, Summer M	Draft presentation regarding chapter 11 exit strategy (4.50); research in support of same (2.40)	6.90
02 Aug 26	McKee, Summer M	Draft presentation regarding chapter 11 exit strategy (4.60); research in support of same (2.20)	6.80
03 Aug 26	Giglio, Cindi M.	Review and revisions to Special Committee presentation (2.20); confer with S. McKee regarding same (.40)	2.60
03 Aug 26	McKee, Summer M	Discussion with C. Giglio regarding presentation regarding chapter 11 exit strategy (.40); research related to same (1.10); revisions to presentation (3.70)	5.20
04 Aug 26	Smith, Robert T.	Review and offer edits on presentation deck to client (2.10)	2.10
04 Aug 26	Rochester, Shaya	Call with C. Giglio regarding presentation on chapter 11 exit strategy (.20); review and provide comments on presentation and communications with team regarding same (2.10)	2.30
04 Aug 26	Giglio, Cindi M.	Review latest draft of presentation (.50); call with S. Rochester regarding same (.20); correspondence with team (.20)	0.90
04 Aug 26	Roitman, Marc B.	Review legal analysis regarding considerations relevant to chapter 11 exit strategy (.80); revise presentation to client regarding same (.80); emails with Katten regarding same (.20)	1.80
04 Aug 26	McKee, Summer M	Revisions to draft presentation regarding chapter 11 exit strategy (3.60); research in support of same (1.30)	4.90
05 Aug 26	McKee, Summer M	Finalize presentation regarding chapter 11 exit strategy (2.10); emails with C. Giglio regarding same (.20); emails with B. Pickering regarding same (.10)	2.40
12 Aug 26	Nemecek, Philip A.	Exchange emails with S. Rochester (.20); telephone conference with S. Rochester regarding review and analysis of updated insurance documents (.20); email with Katten regarding updated policy information (.90)	1.30
12 Aug 26	Rochester, Shaya	Call with P. Nemecek regarding insurance memo (.20)	0.20
12 Aug 26	Roitman, Marc B.	Call with Independent Manager regarding case matters (.40); follow up with Katten regarding same (.20)	0.60
12 Aug 26	McKee, Summer M	Emails with S. Rochester (.10) and B. Pickering (.20) regarding pending investigation workstreams; correspondence with M. Roitman regarding same (.10)	0.40
13 Aug 26	Nemecek, Philip A.	Exchange emails with S. McKee and S. Rochester regarding review of updated insurance policies (.40)	0.40
13 Aug 26	Rochester, Shaya	Communications with P. Nemecek regarding insurance policies (.20); emails with S. McKee regarding memo analyzing creditor standing (.10); review and provide comments on same (.30)	0.60
14 Aug 26	Nemecek, Philip A.	Finalize revised memo regarding insurance policies (1.90); exchange multiple emails with S. Rochester and S. McKee regarding further revisions to memo and additional questions concerning insurance coverage (.40)	2.30
14 Aug 26	Rochester, Shaya	Review and provide comments on memo analyzing insurance coverage and communications with P. Nemecek regarding same (.50); review and provide comments on memo analyzing individual creditors'	0.90

PROFESSIONAL SERVICES

Matter 00021: Investigation

Date	Attorney or Assistant	Description	Hours
		standing to bring claims (.30); communications with S. McKee regarding same (.10)	
17 Aug 26	Nemecek, Philip A.	Receipt and review emails from S. Rochester and C. Giglio regarding insurance review memo (.30); review and revision of memo summarizing available coverage (.50); email to S. Rochester forwarding revised version of memo (.30)	1.10
17 Aug 26	Rochester, Shaya	Emails with team regarding status of memos (.40)	0.40
17 Aug 26	Giglio, Cindi M.	Review memos for B. Pickering (.60); call with B. Pickering regarding same (.50)	1.10
19 Aug 26	McKee, Summer M	Research related to potential claims (.60)	0.60
20 Aug 26	McKee, Summer M	Draft investigation presentation (1.70)	1.70
25 Aug 26	McKee, Summer M	Draft presentation of analysis of potential insurance matters (5.60); research and review of record in support of same (2.90)	8.50
25 Aug 26	Moradi, Arlen P.	Emails with S. McKee regarding investigation presentation (.10); review documents regarding same (.20)	0.30
26 Aug 26	McKee, Summer M	Complete initial draft of investigation presentation (5.20); review of record (1.60) and legal research (2.70) in support of same	9.50
27 Aug 26	Giglio, Cindi M.	Edits to investigation deck (4.40)	4.40
27 Aug 26	McKee, Summer M	Revisions to investigation presentation (3.20); legal research in support of same (1.60); emails with C. Giglio regarding same (.60); emails with B. Pickering regarding Special Committee meeting scheduling (.10)	5.50
28 Aug 26	Barnowski, Dan	Revise draft special committee presentation (.70); communications with team concerning revised presentation (.30)	1.00
28 Aug 26	Giglio, Cindi M.	Final revisions to presentation (.40)	0.40
28 Aug 26	McKee, Summer M	Review and revise draft agenda for Special Committee meeting (.30); revisions to investigation presentation (1.80); legal research in support of same (.60); emails with C. Giglio and D. Barnowski regarding same (.60)	3.30
31 Aug 26	Rochester, Shaya	Review investigation presentation (.20)	0.20
		TOTALS:	**80.60**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00021: Investigation

	Attorney or Assistant	Hours	Rate	Amount
44866	Barnowski, Dan	1.00	1,695.00	$1,695.00
44904	Giglio, Cindi M.	9.40	2,070.00	$19,458.00
47229	McKee, Summer M	55.70	1,295.00	$72,131.50
47239	Moradi, Arlen P.	0.30	990.00	$297.00
06625	Nemecek, Philip A.	5.10	1,595.00	$8,134.50
44845	Rochester, Shaya	4.60	1,895.00	$8,717.00
45657	Roitman, Marc B.	2.40	1,895.00	$4,548.00
42497	Smith, Robert T.	2.10	1,495.00	$3,139.50
	TOTAL:	**80.60**		**$118,120.50**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00021: Investigation

Attorney or Assistant	Hours	Rate	Amount
TOTAL FEES:			**$118,120.50**

Katten

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October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349021
Client No. 403692
Matter No. 00022

FEIN: 36-2796532

Re: Plan/Disclosure Statement/Confirmation (403692.00022)

For legal services rendered through August 31, 2026 ..... $58,699.50

CURRENT INVOICE TOTAL: $58,699.50

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 00022: Plan/Disclosure Statement/Confirmation

Date	Attorney or Assistant	Description	Hours
02 Aug 26	Giglio, Cindi M.	Review Disclosure Statement (.40); emails with Katten regarding same (.20)	0.60
02 Aug 26	Roitman, Marc B.	Revise draft Disclosure Statement regarding matters concerning Special Committee and investigation (.60); emails with Katten regarding same (.20)	0.80
02 Aug 26	McKee, Summer M	Review and comment on updated draft disclosure statement from Latham (.80); emails with C. Giglio and M. Roitman regarding same (.30)	1.10
04 Aug 26	McKee, Summer M	Review file version of plan and DS (1.20); emails with Katten regarding same (.20)	1.40
05 Aug 26	Giglio, Cindi M.	Review latest draft of deck (.30); emails with Katten regarding same (.20); emails with Katten regarding mediation (.30); emails with Katten regarding conversion (.10)	0.90
07 Aug 26	Nemecek, Philip A.	Exchange emails with S. Rochester and S. McKee regarding insurance coverage (.90)	0.90
07 Aug 26	Rochester, Shaya	Call with C. Giglio regarding new memo for B. Pickering (.30); communications with P. Nemecek and S. McKee regarding memo for client (.50); call with S. McKee regarding research on standing issues (.50)	1.30
07 Aug 26	Barnowski, Dan	Teleconference with C. Giglio concerning plan strategy (.20)	0.20
07 Aug 26	Giglio, Cindi M.	Call with D. Barnowski regarding plan matters (.20); call with S. Rochester regarding same (.30); call with Latham regarding same (portion) (.50)	1.00
07 Aug 26	Roitman, Marc B.	Call with Latham regarding plan matters (partial attendance) (.60)	0.60
07 Aug 26	McKee, Summer M	Emails with Katten regarding insurance policies and analysis of same (.30); call with S. Rochester regarding potential standing issues related to same (.50); call with K. Posin, G. Davis, C. Giglio and M. Roitman regarding plan considerations (.80)	1.60
10 Aug 26	McKee, Summer M	Research regarding key plan provisions (1.60)	1.60
12 Aug 26	Roitman, Marc B.	Review of UCC objection to exclusivity extension (.40); emails with Katten regarding same (.20)	0.60
12 Aug 26	McKee, Summer M	Review UCC motion seeking to terminate plan exclusivity (.50); emails with B. Pickering regarding same (.30); research related to key plan provisions (2.40); draft summary of same (.90); emails with S. Rochester regarding same (.20)	4.30
13 Aug 26	Giglio, Cindi M.	Emails with Katten regarding exclusivity updates (.30)	0.30
13 Aug 26	Roitman, Marc B.	Call with S. McKee regarding Plan matters (.30); call with Independent Manager regarding same (partial attendance) (.70)	1.00
13 Aug 26	McKee, Summer M	Call with B. Pickering and M. Roitman regarding dynamics of proposed plan (1.00); pre-call with M. Roitman in advance of same (.30); emails with S. Rochester and P. Nemecek regarding key plan provisions (.20)	1.50
14 Aug 26	Giglio, Cindi M.	Emails with Katten regarding exclusivity (.30)	0.30
14 Aug 26	Roitman, Marc B.	Call with Debtors' professionals regarding Plan matters (.90); follow up call with S. McKee regarding same (.10); review of Plan (.30)	1.30

Matter: 26-60110-5-wak
Invoice #: 403402
Invoice Date: October 14, 2026

PROFESSIONAL SERVICES

Matter 00022: Plan/Disclosure Statement/Confirmation

Date	Attorney or Assistant	Description	Hours
14 Aug 26	McKee, Summer M	Call with M. Roitman, K. Posin and BSK regarding exclusivity objection (.90); follow up emails regarding same (.10); call with B. Pickering regarding same (.20); emails with S. Rochester regarding memo regarding key plan provisions (.20); revisions to draft memo addressing same (.70); review draft memo from P. Nemecek regarding insurance related issues (.80); emails with P. Nemecek regarding same (.10); call with M. Roitman regarding plan matters (.10)	3.10
15 Aug 26	McKee, Summer M	Emails with C. Giglio regarding UCC exclusivity objection (.10)	0.10
17 Aug 26	Giglio, Cindi M.	Edits to exclusivity reply (.50); emails with Katten regarding same (.40)	0.90
17 Aug 26	Roitman, Marc B.	Review draft reply to UCC exclusivity objection (.40)	0.40
17 Aug 26	McKee, Summer M	Review Debtor's draft reply to UCC objection to exclusivity from Latham (.60); review C. Giglio (.40) and BSK (.30) comments to same; emails with Katten and Latham regarding same (.20); emails with C. Giglio regarding draft memo regarding key plan elements (.20)	1.70
18 Aug 26	Giglio, Cindi M.	Call with counsel to Holdings (.40)	0.40
18 Aug 26	McKee, Summer M	Finalize memos regarding key plan elements (.50); emails with B. Pickering regarding same (.10)	0.60
24 Aug 26	McKee, Summer M	Review UCC motion seeking to terminate exclusivity (.70); emails with Katten regarding same (.20)	0.90
25 Aug 26	Giglio, Cindi M.	Review motion to terminate exclusivity and related emails (.90)	0.90
25 Aug 26	Roitman, Marc B.	Review UCC motion to terminate exclusivity (.30); emails with Katten regarding same (.20)	0.50
25 Aug 26	McKee, Summer M	Emails with Katten regarding UCC's motion seeking to terminate exclusivity (.30)	0.30
29 Aug 26	Giglio, Cindi M.	Emails and strategy with Katten related to potential settlement construct (.60)	0.60
31 Aug 26	Giglio, Cindi M.	Prepare for mediation (3.20)	3.20
31 Aug 26	McKee, Summer M	Review relevant case law and materials, including proposed plan provisions, in advance of plan settlement mediation (1.70)	1.70
		TOTALS:	**36.60**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00022: Plan/Disclosure Statement/Confirmation

	Attorney or Assistant	Hours	Rate	Amount
44866	Barnowski, Dan	0.20	1,695.00	$339.00
44904	Giglio, Cindi M.	9.10	2,070.00	$18,837.00
47229	McKee, Summer M	19.90	1,295.00	$25,770.50
06625	Nemecek, Philip A.	0.90	1,595.00	$1,435.50
44845	Rochester, Shaya	1.30	1,895.00	$2,463.50
45657	Roitman, Marc B.	5.20	1,895.00	$9,854.00
	TOTAL:	**36.60**		**$58,699.50**

SUMMARY OF PROFESSIONAL SERVICES

Matter 00022: Plan/Disclosure Statement/Confirmation

Attorney or Assistant	Hours	Rate	Amount
TOTAL FEES:			**$58,699.50**

Katten

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

50 Rockefeller Plaza
New York, NY 10020-1605

October 14, 2026

Ben Pickering
[redacted]

Invoice No. 40349016
Client No. 403692
Matter No. 00032

FEIN: 36-2796532

Re: Expenses (403692.00032)

Disbursements and other charges	$ 2,060.87
CURRENT INVOICE TOTAL:	**$2,060.87**

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.

DISBURSEMENTS

Matter 00032: Expenses

Date	Description	Amount
31 Jul 26	Vendor: US Courts Pacer Service Center; Invoice#: 073126-PACER; Date: 7/31/2026 - Reallocation of July PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00001 Pacer - July Chargebacks	46.30
31 Jul 26	Vendor: US Courts Pacer Service Center; Invoice#: 073126-PACER; Date: 7/31/2026 - Reallocation of July PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00032 Pacer - July Chargebacks	20.00
31 Jul 26	Vendor: US Courts Pacer Service Center; Invoice#: 073126-PACER; Date: 7/31/2026 - Reallocation of July PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00032 Pacer - July Chargebacks	0.90
01 Aug 26	Vendor: CS Disco, Inc.; Invoice#: 842665; Date: 8/1/2026 - Review DB Monthly Minimum for August 2026	265.00
10 Aug 26	Vendor: Federal Express (all US offices) Invoice#: 941456522 Date: 8/10/2026 - - Trking# 875112894907, on 7/30/2026 to: c/o KCC dba Verita	22.85
11 Aug 26	Vendor: Rochester, Shaya Invoice#: 8403604011161717 Date: 9/11/2026 - Various Expenses - Attend client meeting cab home from meeting Date Incurred: 08/11/26 010084036040	99.40
31 Aug 26	Westlaw Legal Research: MCKEE,SUMMER on 8/1/2026	2.92
31 Aug 26	Westlaw Legal Research: MCKEE,SUMMER on 8/3/2026	2.92
31 Aug 26	Westlaw Legal Research: MCKEE,SUMMER on 8/25/2026	2.92
31 Aug 26	Westlaw Legal Research: MCKEE,SUMMER on 8/27/2026	5.83
31 Aug 26	Westlaw Legal Research: MCKEE,SUMMER on 8/28/2026	5.83
31 Aug 26	Westlaw Legal Research: SMITH,ROBERT on 8/31/2026	263.91
31 Aug 26	Westlaw Legal Research: JORDAN,ALLY on 8/11/2026	368.90
31 Aug 26	Westlaw Legal Research: JORDAN,ALLY on 8/14/2026	212.83
31 Aug 26	Westlaw Legal Research: JORDAN,ALLY on 8/17/2026	184.45
31 Aug 26	Westlaw Legal Research: JORDAN,ALLY on 8/21/2026	92.23
31 Aug 26	Westlaw Legal Research: MEMARZADEH, NEEKI on 8/18/2026	120.60
31 Aug 26	Westlaw Legal Research: MEMARZADEH, NEEKI on 8/19/2026	276.68
31 Aug 26	Vendor: US Courts Pacer Service Center; Invoice#: 083126-PACER; Date: 8/31/2026 - Reallocation of August PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00001 August Chargebacks	5.60
31 Aug 26	Vendor: US Courts Pacer Service Center; Invoice#: 083126-PACER; Date: 8/31/2026 - Reallocation of August PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00001 August Chargebacks	5.20
31 Aug 26	Vendor: US Courts Pacer Service Center; Invoice#: 083126-PACER; Date: 8/31/2026 - Reallocation of August PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00032 August Chargebacks	51.80
31 Aug 26	Vendor: US Courts Pacer Service Center; Invoice#: 083126-PACER; Date: 8/31/2026 - Reallocation of August PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00032 August Chargebacks	0.90
31 Aug 26	Vendor: US Courts Pacer Service Center; Invoice#: 083126-PACER; Date: 8/31/2026 - Reallocation of August PACER chargebacks: NYC, CHI, LAX, WAS Offices - 403692-00001 August Chargebacks	2.90
	TOTAL DISBURSEMENTS:	**$2,060.87**

SUMMARY OF DISBURSEMENTS

Matter 00032: Expenses

Out of Town Travel	$99.40
Courier	$22.85
Service Fees	$265.00
Legal Research	$1,540.02
Legal Research	$133.60

SUMMARY OF DISBURSEMENTS

Matter 00032: Expenses	
TOTAL DISBURSEMENTS:	**$2,060.87**