James Lanter
State Bar No. 11940700
JAMES LANTER, P.C.
560 N. Walnut Creek
Suite 120
Mansfield, Texas 76063
(817) 453-4800
(817) 453-4801 FAX
jim.lanter@lanter-law.com
SPECIAL COUNSEL FOR DEBTORS

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
FORT WORTH DIVISION

In re:	§	**Chapter 11**
	§	
VISTA PROPPANTS AND	§	**Case No. 20-42002-ELM-11**
LOGISTICS,	§	
LLC, ET AL.,[1]	§	
	§	**Jointly Administered**
Debtors		

FIRST AND FINAL APPLICATION OF JAMES LANTER, PC, SPECIAL COUNSEL FOR THE DEBTORS, FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES

A HEARING WILL BE CONDUCTED ON THIS MATTER ON MONDAY, DECEMBER 14, 2020 AT 1:30 P.M. IN ROOM 204, U.S. COURTHOUSE,501 W. TENTH STREET, FORT WORTH, TEXAS 76102. IF YOUOBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND INWRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OFTHIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THEBANKRUPTCY COURT WITHIN TWENTY-ONE DAYS FROM THEDATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE

[1]The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Vista Proppants and Logistics, LLC (7817) ("Vista HoldCo"); VPROP Operating, LLC (0269) ("VPROP"); Lonestar Prospects Management, L.L.C. (8451) ("Lonestar Management"); MAALT Specialized Bulk, LLC (2001) ("Bulk"); Denetz Logistics, LLC (8177) ("Denetz"); Lonestar Prospects, Ltd. (4483) ("Lonestar Ltd."); and MAALT, LP (5198) ("MAALT"). The location of the Debtors' service address is 4413 Carey Street, Fort Worth, TX 76119-4219.

2042002201120000000000006

PERSON WHO SENTYOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THEPLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

James Lanter, PC, special counsel for the above-captioned Debtors and Debtors in Possession, file this *First and Final Application of James Lanter, PC, Special Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses* (the "Application"), and respectfully represents the following:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This Application is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

2. On June 9, 2020 (the "Petition Date"), Maalt and certain affiliates ("collectively with Maalt the "Debtors") filed voluntary petitions (the "Bankruptcy Cases") for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division. The Bankruptcy Cases are being jointly administered under case number 20-42002-ELM-11, the Honorable Edward L. Morris presiding.

3. On July 9, 2020, the Debtors filed an application to employ the Firm as special counsel to represent Maalt, LP in a pre-petition lawsuit styled Maalt, LP vs. Permian Sequitur, LLC, then pending in the Texas District Court, Irion County, Texas (Dkt. No. 191.) (the "State Court litigation"). On August 5, 2020, this Court granted the Debtors' application authorizing the employment and retention of James Lanter, PC (the "Firm") as special counsel to Maalt, LP, the

Plaintiff in the State Court litigation, which is now the adversary case styled Maalt, LP vs. Sequitur Permian, LLC, No. 20-04064 (the "Adversary")(Dkt. No. 366).

4. As disclosed in the application to employ the Firm, the Firm has represented Maalt, LP in the Adversary based on a fee that is part hourly and part contingent upon results. With respect to the hourly charges, the Firm has billed Maalt, LP at 50% of the Firm's usual hourly rates. During the Application Period, James Lanter's regular hourly rate was $450.00 per hour, and Maalt, LP was charged at a rate of $225.00 per hour. This application includes only the hourly portion of the fee to be paid by Maalt, LP since the case is ongoing and the contingency part of the agreed fee cannot be determined at this time.

APPLICATION FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES

5. This Application is the Firm's first and final application for allowance of compensation and reimbursement of expenses as special counsel to the Debtors. This Application is made pursuant to Section 330 of the Bankruptcy Code, Bankruptcy Local Rule 2016, and the Guidelines. The Application seeks an order granting (i) approval of compensation for professional services rendered to the Debtors for the period of August 5, 2020 through November 6, 2020 ("the Application Period") in the amount of $27,652.50 and (ii) approval of reimbursement of actual and necessary out-of-pocket expenses incurred during the Application Period in the amount of $1,162.81. These amounts represent the total amounts due for professional services rendered and expenses incurred during the Application Period.

SUMMARY OF SERVICES RENDERED

6. The Firm maintained written records of time expended by its attorneys and paraprofessionals in rendering professional services to the Debtor, which records are made substantially contemporaneously with the rendition of those services. As required by Bankruptcy

Local Rule 2016, the fee summary with copies of the invoices submitted to the Debtors by the Firm for services rendered during the Application Period are attached hereto collectively as Exhibit B.

7. Below is a summary description of the services rendered by each professional employed by the Firm, together with (i) an explanation of the duties undertaken, (ii) the necessity or benefit of the services rendered, (iii) the results obtained or anticipated and, where appropriate, the outcome had the particular services not been performed. Also set forth below is a chart depicting the number of hours devoted, and the corresponding amounts charged, by each professional.

8. Lodestar Analysis: The Firm's professionals charged a total of 122.9 hours to the Debtors during the Application Period, which represents $27,652.50 in professional fees. The following is an itemization of the total fees charged by each professional:

Name	**Discounted Hourly Rate**	**Hours**	**Fees**
James Lanter	225.00	122.9	$27,652.50

9. Duties Undertaken: The services rendered include the provision of legal advice regarding issues related to the protection of the Debtor's interests. The following list summarizes the various services rendered by the Firm's professionals during the Application Period:

- Confer and correspond with Debtors' Counsel regarding the pending bankruptcy proceedings as they relate to the Adversary
- Prepare pleadings, motions, removal documents, and other papers in the Adversary
- Attend hearings in the Adversary

A full description of the services performed is contained in the attached Exhibit B.

10. Necessity and Benefit: The amount of time expended during the Application Period was necessary to allow the Firm to represent the Debtors in an effective and efficient manner.

11. Results Obtained: As a result of the Firm's services, the underlying case was removed to this Court, a scheduling order has been implemented, and other matters have been pursued to advance the Adversary to a resolution.

DISBURSEMENTS FOR OUT-OF-POCKET EXPENSES

12. The Firm incurred actual and necessary expenses in the aggregate amount of $1,162.81in the delivery and performance of professional services to the Debtors during the Application Period. As required by Bankruptcy Local Rule 2016 and the Guidelines, copies of the invoices submitted to the Debtors by the Firm for expenses incurred during the Application Period are included in Exhibit B. The following chart summarizes the types of expenses incurred by the Firm and the corresponding amounts of those expenses:

Expense	**Amount**
Research Expenses	$685.76
Court Reporter Fees	$127.05
Filing Fee	$350.00
Total Expenses	**$1,162.81**

13. Section 330 of the Bankruptcy Code governs the allowance of compensation for professional services and reimbursement of out-of-pocket expenses incurred in the rendering of services to the bankruptcy estate. In pertinent part, Section 330(a) provides:

> (1) After notice to the parties in interest and the United States Trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to

> a trustee,… an examiner,…or a professional person employed under section 327 or 1103—
>
> (A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person, or attorney and by any paraprofessional person employed by any such person; and
>
> (B) reimbursement for actual, necessary expenses.
>
> * * *
>
> (3) In determining the amount of reasonable compensation to be awarded to a…professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—
>
> (A) the time spent on such services;
>
> (B) the rates charged for such services;
>
> (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
>
> (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
>
> (E) with respect to a professional person, whether the compensation is reasonable, based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(1), (3).

14. Bankruptcy courts in the Fifth Circuit also consider the guidelines set out in *Johnson v. Ga. Highway Express, Inc.* to determine the validity of requests for fees under Section 330 of the Bankruptcy Code. *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714, 717–19 (5th Cir. 1974) (enumerating the criteria); *see also In re Pilgrim's Pride Corp.*, 690 F.3d 650, 656 (5th Cir. 2012) (finding the continued validity of the Johnson factors); *In re First Colonial Corp. of*

Am., 544 F.2d 1291, 1298–99 (5th Cir. 1977) (applying Johnson factors to bankruptcy fees). The *Johnson* factors include: (1) the time and labor required; (2) the novelty and difficulty of the questions involved; (3) the skill required to perform the professional services properly; (4) the preclusion of other employment by the professional due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation and ability of the professionals; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *See Johnson*, 488 F.2d at 717–19.

15. As demonstrated by this Application, the Firm has met its burden under both Section 330 of the Bankruptcy Code and the *Johnson* factors. Accordingly, the Court should allow the requested fees and expenses.

A. Time and Labor Expended

16. The professional services rendered by the Firm have required an expenditure of time and effort. During the Application Period, the Firm's attorneys reasonably expended 122.9 hours in the rendition of professional legal services to the Debtor. As disclosed in the application to employ the Firm, the Firm has represented Maalt, LP based on a fee that is part hourly and part contingent upon results. With respect to the hourly charges, the Firm has billed Maalt, LP at 50% of the Firm's usual hourly rates. During the Application Period, James Lanter's regular hourly rate was $450.00 per hour, and Maalt, LP was charged at a rate of $225.00 per hour.

17. Exhibit B to this Application sets forth the names of all attorneys who performed services, the number of hours spent, and the fees billed during the Application Period, and from the time spent and amount charged the hourly rate can be determined. This exhibit reflects of the

time for which compensation is sought for services performed by the Firm's attorneys during the Application Period. The Firm's time records are recorded substantially contemporaneously with the rendition of services and set forth the time expended by each billing professional on a daily basis.

18. The Firm has endeavored to ensure that its professionals did not duplicate the work performed by the Debtors' other professionals. The Firm submits that the time expended during the Application Period was reasonable, given the complexity, importance, and nature of the issues in the Adversary.

B. Novelty and Difficulty of the Case

19. The Firm's representation of the Debtors required a high degree of skill and understanding of the complex issues in this case. The complex issues present in the Adversary required the Debtors to retain professionals with a comprehensive knowledge of and experience in commercial litigation matters.

C. Reputation of Attorneys

20. The Firm's attorneys are well known for their abilities in the field of commercial litigation. The Firm's attorneys have regularly represented parties in large and complex litigation cases, and represented the Debtors in various capacities prior to the Chapter 11 filing. The services provided to the Debtors during the Application Period were rendered in a highly efficient manner by professionals who have achieved a high degree of expertise and skill in the field of commercial litigation.

D. Skill Required

21. For the reasons previously identified, the nature of the Adversary has required the Firm to exercise a high degree of skill in advising and representing the Debtors. The Firm staffed all matters with able and accomplished personnel.

E. Preclusion of Other Employment

22. During the Application Period, the Firm's representation of the Debtors has not precluded other employment.

F. Imposed Time Limitations

23. Throughout the Application Period, this case has involved issues and events requiring the Firm to provide prompt and sophisticated legal services in the Adversary and meet certain deadlines.

G. Customary Fee for the Services Rendered

24. The time and effort required by the Firm to represent the Debtors adequately and the complexities of the Adversary have been described in this Application. The fees and rates charged by the Firm are the same or lower than (i) fees and rates charged by comparable law firms and (ii) fees charged by the Firm for work performed by attorneys of commensurate experience in commercial litigation matters. The Firm submits that under all of the criteria normally examined in bankruptcy cases, and, based on the factors to be considered in accordance with Section 330(a) of the Bankruptcy Code, the results achieved to date in the Adversary justify an allowance of compensation in the requested amounts.

H. Fixed or Contingent Fee

25. The Firm's representation of the Debtors involves a part fixed and part contingent fee arrangement. The Firm's expectation upon accepting this representation was that the Firm

would receive compensation for professional services rendered at the rates and on the basis described in its engagement letter with Maalt, LP.

I. Awards in Similar Cases

26. The compensation sought by the Firm in the Adversary and the hourly rates charged are lower than, or commensurate with, those sought by other professionals in this and other cases of similar size and complexity in this district.

J. The Undesirability of the Case

27. The Firm is not aware of anything that would make the representation in the Adversary undesirable to other attorneys.

CONCLUSION

28. The Firm submits that under all of the criteria normally examined in bankruptcy cases, allowance of compensation and reimbursement of expenses in the amounts requested in this Application is appropriate. Accordingly, James Lanter, PC respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit A (i) granting an allowance of compensation for professional services rendered to the Debtors during the Application Period in the amount of $27,652.50; (ii) granting reimbursement of actual and necessary out-of-pocket expenses incurred during the Application Period in the amount of $1,162.81; and (iii) granting such other and further relief as the Court deems just and proper.

NOTICE

29. Notice of this Application will be served pursuant to Rule 2002(a) of the Federal Rules of Bankruptcy Procedure and Bankruptcy Local Rule 2016.

Respectfully submitted this 20th day of November, 2020.

/s/ *James Lanter*

James Lanter
State Bar No. 11940700
JAMES LANTER, P.C.
560 N. Walnut Creek
Suite 120
Mansfield, Texas 76063
(817) 453-4800
(817) 453-4801 FAX
jim.lanter@lanter-law.com

SPECIAL COUNSEL FOR THE DEBTORS

CERTIFICATION OF CERTIFYING PROFESSIONAL

The undersigned hereby certifies that he has been designated by James Lanter, PC as the Certifying Professional with respect to the Application, and that (a) he has read the Application; (b) to the best of the certifying professional's knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement sought is in conformity with the Guidelines for Compensation and Expense Reimbursement of Professionals for the United States Bankruptcy Court, Northern District of Texas; and (c) the compensation and expense reimbursement requested are billed at rates in accordance with practices no less favorable than those customarily employed by James Lanter, PC and generally accepted by James Lanter's clients.

/s/ *James Lanter*
James Lanter

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
FORT WORTH DIVISION

In re:	§	**Chapter 11**
	§	
VISTA PROPPANTS AND LOGISTICS, LLC, ET AL.,[1]	§	**Case No. 20-42002-ELM-11**
	§	
	§	
Debtors	§	**Jointly Administered**

ORDER GRANTING FIRST AND FINAL APPLICATION OF JAMES LANTER, PC, SPECIAL COUNSEL FOR THE DEBTORS, FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES

Upon consideration of the *First and Final Application of James Lanter, Special Counsel for the Debtors, for Allowance and Payment of Compensation and Reimbursement of Expenses* (the "Final Application") filed by James Lanter, PC, the Court finds that: (i) it has jurisdiction over the matters raised in the Final Application pursuant to 28 U.S.C. § 1334(b); (ii) this is a core

[1] The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Vista Proppants and Logistics, LLC (7817) ("Vista HoldCo"); VPROP Operating, LLC (0269) ("VPROP"); Lonestar Prospects Management, L.L.C. (8451) ("Lonestar Management"); MAALT Specialized Bulk, LLC (2001) ("Bulk"); Denetz Logistics, LLC (8177) ("Denetz"); Lonestar Prospects, Ltd. (4483) ("Lonestar Ltd."); and MAALT, LP (5198) ("MAALT"). The location of the Debtors' service address is 4413 Carey Street, Fort Worth, TX 76119-4219.

proceeding pursuant to 28 U.S.C. § 157(b) for which it is proper for this Court to enter final orders; (iii) the fees sought and expenses incurred were reasonable and necessary to the administration and preservation of the Debtors'[2] estate; (iv) proper and adequate notice of the Final Application has been given and no other or further notice is necessary; and (v) good and sufficient cause exists for the granting of the relief requested in the Final Application after having given due deliberation upon the Final Application and all of the proceedings had before the Court in connection therewith. Therefore, it is hereby ORDERED:

1. The Final Application is GRANTED.

2. James Lanter's fees in the amount of $27,652.50 and expenses in the amount of $1,162.81 for the Application Period (August 5, 2020 through November 6, 2020) are hereby finally approved in their entirety.

3. The Debtors are hereby authorized and directed to pay James Lanter, PC the amount of $28,815.31, which is James Lanter, PC's unpaid fees and expenses for the entire Application Period agreed between James Lanter, PC and the Debtors.

End of Order

Submitted by:

James Lanter
State Bar No. 11940700
JAMES LANTER, P.C.
560 N. Walnut Creek
Suite 120
Mansfield, Texas 76063
(817) 453-4800
(817) 453-4801 FAX
jim.lanter@lanter-law.com

SPECIAL COUNSEL FOR THE DEBTORS

[2] Capitalized terms not otherwise defined herein shall have the meaning assigned to them in the Final Application.

EXHIBIT B

Fee Summary

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
FORT WORTH DIVISION

In re:	**§**	**Chapter 11**
	§	
VISTA PROPPANTS AND LOGISTICS, LLC, ET AL.,[1]	**§**	**Case No. 20-42002-ELM-11**
	§	
	§	
Debtors	**§**	**Jointly Administered**

FEES AND EXPENSES REQUESTED FOR APPLICATION PERIOD
(August 5, 2020 Through November 6, 2020)

Final Fee Approval of:	James Lanter, PC
Capacity:	Special Counsel for the Debtors
Time Period:	August 5, 2020 through November 6, 2020 ("Application Period")
Bankruptcy Petition Filed on:	June 9, 2020
Date of Entry of Retention Order: (Effective as of August 5, 2020)	August 5, 2020
Status of Case:	Open

Amount Requested:

Fees:	$27,652.50
Expenses:	$1,162.81
Other:	$0.00
Total:	**$28,815.31**

Draw Down Request:

Retainer Received:	$0.00
Pre-Petition Draw Down:	$0.00
Remaining Retainer (now):	$0.00
Requested Draw Down:	$0.00

Expense Detail:

Research Expense	$685.76
Court Reporter Fees	$127.05
Other Expense	$0.00
Filing Fees	$350.00

[1]The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Vista Proppants and Logistics, LLC (7817) ("Vista HoldCo"); VPROP Operating, LLC (0269) ("VPROP"); Lonestar Prospects Management, L.L.C. (8451) ("Lonestar Management"); MAALT Specialized Bulk, LLC (2001) ("Bulk"); Denetz Logistics, LLC (8177) ("Denetz"); Lonestar Prospects, Ltd. (4483) ("Lonestar Ltd."); and MAALT, LP (5198) ("MAALT"). The location of the Debtors' service address is 4413 Carey Street, Fort Worth, TX 76119-4219.

Retainer Remaining (after)	$0.00	Travel Expense	$0.00

Hourly Rates:	**Attorney:**	**Paralegal/Clerical:**
Highest Billed Rate:	$225.00	N/A
Total Hours Billed:	122.9	
Blended Rate:	N/A	

JAMES LANTER, P.C.

560 N. Walnut Creek
Suite 120
Mansfield, TX 76063

817-453-4800

Attn: Kristin Smith
Maalt, L.P.
4413 Carey Street
Fort Worth, TX 76119

Statement Date: September 1, 2020
Statement No. 3057
Account No. Maalt.03
Page: 1

RE: Sequitur Permian, LLC

Payments received after 09/01/2020 are not included on this statement.

		Previous Balance		$906.56
		Fees		
			Hours	
05/26/2020	JJL	Corresponded with the mediator's office to provide information and agreements required by the mediator; corresponded with the TXPF attorney regarding having documents available for Mr. Meador in his deposition; corresponded and conversed with Mr. Wickes regarding the mediation and Meador deposition;	4.50	n/c
05/27/2020	JJL	Attended the deposition of Stan Meador.	7.50	n/c
05/28/2020	JJL	Reviewed legal research regarding various matter to prepare for the mediation; reviewed the notice of hearing from the court's administrator regarding the motion for partial summary judgment; reviewed numerous emails from the JAMS administrator and corresponded with her regarding payment of the mediation fee.	2.75	n/c
05/29/2020	JJL	Reviewed emails from Mr. Lissen regarding the industry track agreement between Maalt and TXPF; conferred with Mr. Wickes regarding the Meador deposition and mediation; reviewed email from the mediator.	1.25	n/c
08/05/2020	JJL	Attended the WebEx court hearing on the motion to retain special counsel for the case; reviewed materials to prepare for same in the event the court requested evidence.	0.80	180.00
08/06/2020	JJL	Corresponded with Mr. Peznosky regarding proceeding with the lawsuit and potential removal.	0.20	45.00
08/18/2020	JJL	Reviewed approximately 100 pages of documents produced by the defendant that were obtained from Shell.	0.60	135.00
08/26/2020	JJL	Prepared email to Mr. Pezanosky regarding removal of the Sequitur case, and reviewed response to same; conferred with Mr. Wickes regarding removal of the case to bankruptcy court.	0.30	67.50
08/28/2020	JJL	Prepared draft of requested findings of fact and conclusions of law.	3.20	720.00

Maalt, L.P.
Account No. Maalt.03
RE: Sequitur Permian, LLC

Statement Date: 09/01/2020
Statement No. 3057
Page No. 2

			Hours	
08/31/2020	JJL	Researched law regarding the filing of claims and deemed approval of claims in the context of the claims asserted by Sequitur in the bankruptcy court; corresponded with Mr. Pezanosky regarding same, objections to the claims, and removal of the state court case to the bankruptcy court; conferred with Mr. Wickes; prepared draft of notice of removal.	2.60	585.00
		For Current Services Rendered	7.70	1,732.50
		Total Non-billable Hours	16.00	
		Total Current Work		1,732.50

Payments

08/10/2020		Payment	-906.56
		Balance Due	$1,732.50

Billing History

Fees	Expenses	Advances	Finance Charge	Payments
131,696.25	5,641.62	4,412.15	0.00	140,017.52

Please Remit $1,732.50

Payments are due upon receipt.

Thank you for your business!

JAMES LANTER, P.C.

560 N. Walnut Creek
Suite 120
Mansfield, TX 76063

817-453-4800

Attn: Kristin Smith
Maalt, L.P.
4413 Carey Street
Fort Worth, TX 76119

Statement Date: October 1, 2020
Statement No. 3084
Account No. Maalt.03
Page: 1

RE: Sequitur Permian, LLC

Payments received after 10/01/2020 are not included on this statement.

		Previous Balance		$1,732.50
		Fees		
			Hours	
09/01/2020	JJL	Researched the bankruptcy court's local rules regarding filing adversary actions; corresponded with Mr. Staub at Haynes and Boone; prepared the appendix for the notice of removal and the state court notice; conferred with the clerk at the 51st District Court to obtain the docket sheet for the case.	2.40	540.00
09/03/2020	JJL	Researched law for the purpose of preparing a response to the defendant's motion for summary judgment with respect to the limitations of liability and condition precedent arguments.	4.30	967.50
09/04/2020	JJL	Revised the appendix for the notice of removal; filed the notice and appendix with the bankruptcy court to initiate the adversary proceeding; filed the notice with the state court; prepared email to forward the notice to the defendant's attorney; conferred with Mr. Wickes; continued legal research on issues presented by defendant's motion for summary judgment.	3.60	810.00
09/08/2020	JJL	Reviewed the "objection" filed by Sequitur in the bankruptcy case, and corresponded with Mr. Pezanosky regarding same (.3); researched law regarding conditions precedent for response to Sequitur's motion for summary judgment (3.8).	4.10	922.50
09/10/2020	JJL	Began drafting a response to the defendant's motion for summary judgment.	2.90	652.50
09/11/2020	JJL	Continued preparation of the response and brief responding to Sequitur's motion for summary judgment.	3.30	742.50
09/13/2020	JJL	Worked on the response to the section of defendant's motion for summary judgment alleging condition precedent.	2.00	450.00
09/15/2020	JJL	Reviewed various orders issued by the clerk's office including the Order Regarding Adversary Proceedings Trial Setting and Alternative Scheduling Order (.3); corresponded with Mr. Pezanosky regarding the September 24 hearing (.2); conferred with Mr. Wickes regarding the scheduling order and related matters (.4); continued brief writing and research for the response to		

			Hours	
		defendant's motion for summary judgment (2.3).	3.20	720.00
09/16/2020	JJL	Continued preparation of the response to the defendant's motion for summary judgment.	3.60	810.00
09/17/2020	JJL	Continued preparation of the response to defendant's motion for summary judgment, including briefing and research for same, review of depositions for evidence, and preparation of the appendix.	5.70	1,282.50
09/18/2020	JJL	Conferred with the courtroom deputy regarding the issue with service of summons; reviewed orders setting a status conference; prepared and file the amended adversary cover sheet.	0.70	157.50
09/21/2020	JJL	Continued work on the response to the defendant's motion for summary judgment including preparation of the response, appendix of evidence, supporting brief, and research for same; conferred with Mr. Wickes regarding the same.	5.70	1,282.50
09/22/2020	JJL	Completed the response, brief and appendix to defendant's motion for summary judgment; conferred with Mr. Wickes regarding the upcoming status conference, necessary depositions, and other discovery matters.	4.70	1,057.50
09/23/2020	JJL	Corresponded with the opposing attorney regarding scheduling orders and trial settings (.3); reviewed the defendant's proposed scheduling order (.3); corresponded with Mr. Wickes regarding same (.2); researched law regarding alternative performance contracts (2.6).	3.40	765.00
09/24/2020	JJL	onferred with Mr. Wickes regarding matters to be addressed at the status conference (.5); corresponded with Mr. Pezanosky regarding same (.3); corresponded and conferred with Mr. Ferris regarding the objection to the Sequitur claims (.8); reviewed numerous filings in the bankruptcy case including those filed by Sequitur with respect to its objections to the plan (1.5).	3.10	697.50
09/25/2020	JJL	Reviewed the objection to Sequitur's claims filed by the debtors; reviewed email from Mr. Ferris regarding same; reviewed various bankruptcy filings to determine whether applicable to the adversary proceeding or the Sequitur claims.	0.50	112.50
09/28/2020	JJL	Attended status conference with the Court; conferred with Mr. Wickes to follow up on matters addressed by the Court (1.3); prepared document to file the state court motion for partial summary judgment, and filed same (.4); prepared letter to the Court to forward a paper copy of the motion for summary judgment pursuant to the local rules (.2); prepared proposed partial summary judgment to submit to the Court (.3); revised the scheduling order previously proposed by the opposing attorney, and corresponded with him regarding same (.6); corresponded with the attorney representing Murex and opposing counsel regarding the deposition of Rob Wright (.4); conferred further with Mr. Wickes regarding the proposed scheduling order, settlement strategy, and summary judgment matters (.4).	3.60	810.00
09/29/2020	JJL	Corresponded with the Court deputy regarding setting the second motion for partial summary judgment for hearing (.2); prepared and filed the notice of		

			Hours	
		hearing on the motion (.3); reviewed email from the opposing attorney regarding same (.2); conferred with Messrs. Wickes and Ferris regarding the email, and prepared response (.6).	1.30	292.50
09/30/2020	JJL	Conferred with Ms. DeWees regarding the potential deposition of Rob Wright; conferred with Mr. Wickes regarding same; corresponded with the opposing attorney regarding summary judgment motions.	0.80	180.00
		For Current Services Rendered	58.90	13,252.50

Advances

09/01/2020	Westlaw charges - August	162.02
09/01/2020	Westlaw charges - September	339.21
09/04/2020	Filing fee - Removal	350.00
	Total Advances	851.23
	Total Current Work	14,103.73
	Balance Due	$15,836.23

Billing History

Fees	Expenses	Advances	Finance Charge	Payments
144,948.75	5,641.62	5,263.38	0.00	140,017.52

Please Remit $15,836.23

Payments are due upon receipt.

Thank you for your business!

JAMES LANTER, P.C.

560 N. Walnut Creek
Suite 120
Mansfield, TX 76063

817-453-4800

Attn: Kristin Smith
Maalt, L.P.
4413 Carey Street
Fort Worth, TX 76119

Statement Date: November 2, 2020
Statement No. 3110
Account No. Maalt.03
Page: 1

RE: Sequitur Permian, LLC

Payments received after 11/02/2020 are not included on this statement.

		Previous Balance		$15,836.23
		Fees		
			Hours	
10/02/2020	JJL	Conferred with Suki Rosen and Matt Ferris regarding the Sequitur claims and objection to the claims; conferred with Mr. Wickes regarding same.	0.80	180.00
10/05/2020	JJL	Reviewed documents produced in discovery and depositions to prepare for call with Murex's attorney and client.	1.60	360.00
10/06/2020	JJL	Conferred with Matt Ferris regarding the Sequitur claims and objections; reviewed email from Mr. Ferris to Mr. Barton and Ms. Smith regarding same; regarding prepared for and interviewed potential witness; prepared affidavit for same; reviewed email from the opposing attorneys with their proposed scheduling order for a May trial setting; conferred with Mr. Wickes regarding same.	4.00	900.00
10/07/2020	JJL	Reviewed the transcript of the September 28 status conference; conferred with Mr. Wickes regarding matters relating to the submission of a scheduling order; prepared revised scheduling order, and email to forward to the opposing attorneys; prepared email to the Court Deputy requesting that the summary judgment hearing set for October 26 be removed from the docket; prepared email to potential witness regarding possible affidavit; conferred further with Mr. Wickes regarding disclosures.	2.20	495.00
10/09/2020	JJL	Prepared document to submit proposed scheduling order to the Court; corresponded with Mr. Wickes regarding same.	0.80	180.00
10/12/2020	JJL	Reviewed the defendant's motion for entry of a scheduling order.	0.40	90.00
10/13/2020	JJL	Prepared response to Defendant's motion for scheduling order; conferred with Mr. Wickes regarding same and witnesses; conferred with Jaime DeWees; conferred with Robert Ginsburg regarding the FWWR.	4.20	945.00
10/19/2020	JJL	Prepared for and attended the WebEx conference with the Court to discuss setting a scheduling order; conferred with Mr. Wickes after the conference.	2.90	652.50

Maalt, L.P.
Account No. Maalt.03
RE: Sequitur Permian, LLC

Statement Date: 11/02/2020
Statement No. 3110
Page No. 2

			Hours	
10/20/2020	JJL	Revised the scheduling order per the Court's instructions during the October 19, 2020 conference; conferred with Mr. Wickes; corresponded with the Court's deputy and the opposing attorneys regarding scheduling.	1.20	270.00
10/26/2020	JJL	Reviewed the motion to amend pleadings filed by Sequitur and related documents; researched law regarding grounds for same; conferred and corresponded with Mr. Wickes; reviewed defendant's response to the proposed scheduling order, and ordered transcript of the scheduling conference ruling.	6.40	1,440.00
10/27/2020	JJL	Reviewed the transcript of the scheduling conference; conferred with Mr. Wickes; reviewed various filings in the bankruptcy case.	1.40	315.00
10/28/2020	JJL	Revised the proposed scheduling order in light of the transcript of the scheduling conference; conferred with Mr. Wickes; corresponded with Mr. Ferris; reviewed various bankruptcy filings including the proofs of claim filed by Sequitur; researched law regarding offset and recoupment in the bankruptcy context; reviewed rules regarding federal court summary judgment practice.	3.40	765.00
10/29/2020	JJL	Reviewed email from the opposing attorney regarding the current draft scheduling order; lengthy conference with Messrs. Wickes and Ferris; researched law regarding the impossibility/impracticability defenses asserted by defendant; reviewed the post-confirmation order received from the Court.	4.00	900.00
10/30/2020	JJL	Prepared revision to the draft scheduling order; prepared lengthy email to the opposing attorney regarding same, motion to amend pleadings, motion to consolidate, and deposition of a corporate representative; corresponded with Mr. Ferris regarding the pleadings in the adversary case; researched case law under 28 USC 157 regarding core versus noncore proceedings.	3.90	877.50
		For Current Services Rendered	37.20	8,370.00

Advances

10/12/2020	Online legal research - Pacer fees	52.50
10/30/2020	Transcription fees	127.05
10/31/2020	Westlaw charges	132.03
	Total Advances	311.58
	Total Current Work	8,681.58
	Balance Due	$24,517.81

Billing History

Fees	Expenses	Advances	Finance Charge	Payments
153,318.75	5,641.62	5,574.96	0.00	140,017.52

Please Remit $24,517.81

Payments are due upon receipt.

Thank you for your business!

JAMES LANTER, P.C.

560 N. Walnut Creek
Suite 120
Mansfield, TX 76063

817-453-4800

Attn: Kristin Smith
Maalt, L.P.
4413 Carey Street
Fort Worth, TX 76119

Statement Date: November 13, 2020
Statement No. 3124
Account No. Maalt.03
Page: 1

RE: Sequitur Permian, LLC

Payments received after 11/13/2020 are not included on this statement.

		Previous Balance		$24,517.81
		Fees		
			Hours	
11/02/2020	JJL	Reviewed email from Ms. Rosen regarding agreed orders; uploaded agreed scheduling order to the Court for entry, and reviewed entered order; prepared draft of the statement of position regarding core versus noncore claims, and researched law relating thereto.	4.20	945.00
11/03/2020	JJL	Continued research and preparation of the core versus noncore statement requested by the Court, and forwarded same to Messrs. Wickes and Ferris; reviewed email from the opposing attorney regarding corporate representative depositions, and prepared email to Ms. Smith regarding same.	1.70	382.50
11/04/2020	JJL	Conferred with Mr. Wickes regarding amending the state court motion for summary judgment; reviewed and revised draft of the amended motion; corresponded with Ms. DeWees.	4.80	1,080.00
11/05/2020	JJL	Continued work on the brief for the amended state court motion for partial summary judgment.	4.80	1,080.00
11/06/2020	JJL	Conferred with Mr. Wickes regarding the amended summary judgment motion; further researched law relating to impossibility and impracticability defenses asserted by Sequitur.	3.60	810.00
		For Current Services Rendered	19.10	4,297.50
		Total Current Work		4,297.50
		Balance Due		$28,815.31

Aged Due Amounts

Stmt Date	Stmt #	Billed	Due
09/01/2020	3057	1,732.50	1,732.50
10/01/2020	3084	14,103.73	14,103.73
11/02/2020	3110	8,681.58	8,681.58

Maalt, L.P.
Account No. Maalt.03
RE: Sequitur Permian, LLC

Statement Date: 11/13/2020
Statement No. 3124
Page No. 2

24,517.81

Billing History

Fees	Expenses	Advances	Finance Charge	Payments
157,616.25	5,641.62	5,574.96	0.00	140,017.52

Please Remit $28,815.31

Payments are due upon receipt.

Thank you for your business!