

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

In re: DRF LOGISTICS, LLC, <i>et al.</i> , Debtors. ¹	§ § § § § § § §	Chapter 11 Case No. 24-90447 (CML) (Jointly Administered)
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**SUMMARY SHEET FOR FINAL FEE APPLICATION OF LOWENSTEIN
SANDLER LLP AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE
PERIOD FROM AUGUST 28, 2024 THROUGH AND INCLUDING DECEMBER 9, 2024**

Name of Applicant:	Lowenstein Sandler LLP	
Applicant's Role in Case:	Co-Counsel to the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	October 22, 2024 effective as of August 28, 2024 [Docket No. 389]	
Interim Application () No. _____ Final Application (X)	Indicate whether this is an interim or final Application. If interim, indicate the number (1 st , 2 nd , 3 rd , etc.)	
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	August 28, 2024	December 9, 2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y) Y/N		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y) Y/N		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y) Y/N		
Do expense reimbursements represent actual and necessary expenses incurred? (Y) Y/N		

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: DRF Logistics, LLC (6861) and DRF, LLC (7236). The Debtors' mailing address is 7171 Southwest Parkway, Bldg. 300, Suite 400, Austin, TX 78735.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$2,501,960.50
Total professional hours covered by this Application:	2,709.30
Average hourly rate for professionals:	\$923.47
Total paraprofessional fees requested in this Application:	\$48,158.00
Total paraprofessional hours covered by this Application:	118.30
Average hourly rate for paraprofessionals:	\$407.08
Total fees requested in this Application:	\$2,550,118.50
Total expense reimbursements requested in this Application:	\$47,942.53
Total fees and expenses requested in this Application:	\$2,618,061.03 ²
Total fees and expenses awarded in all prior Applications:	N/A
Plan Status: On November 25, 2024, the United States Bankruptcy Court for the Southern District of Texas entered its <i>Findings of Fact, Conclusions of Law, and Order Confirming Debtors' Third Amended Joint Plan of Liquidation</i> [Docket No. 530] confirming the <i>Debtors' Third Amended Joint Plan of Liquidation</i> [Docket No. 497] (the " <u>Plan</u> "). The Effective Date ³ occurred on December 9, 2024.	
Primary Benefits: Lowenstein Sandler LLP (" <u>Lowenstein Sandler</u> "), as co-counsel the Committee, worked alongside co-counsel McDermott Will & Emery LLP (" <u>McDermott</u> ") and Alvarez and Marsal North America, LLC (" <u>A&M</u> "), the Committee's financial advisor, to guide the Committee through the Debtors' chapter 11 process and to maximize recoveries for unsecured creditors, which efforts ultimately culminated in a settlement with the Debtors and Pitney Bowes, Inc. that was embodied in the Plan. As a result of the Committee's investigation and subsequent plan negotiations, the confirmed Plan included materially enhanced recoveries for unsecured creditors than those originally proposed by the Debtors.	

² This amount includes \$20,000 in estimated fees and expenses incurred after the Effective Date (as defined herein; *see also* footnote 3, *infra*, regarding the use of capitalized terms) in connection with the preparation, filing and prosecution of this final fee application. The Liquidating Agent is authorized to pay such fees and expenses pursuant to Article 2.2(a) of the Plan. For the avoidance of doubt, to the extent that the fees and expenses incurred post-Effective Date total less than \$20,000, Lowenstein Sandler shall only seek payment of the fees and expenses actually incurred.

³ Capitalized terms used but not otherwise defined in this Cover Sheet shall have the meanings ascribed to them in the Plan [Docket No. 530].

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

In re: DRF LOGISTICS, LLC, <i>et al.</i>, Debtors.¹	§ § § § § § § §	Chapter 11 Case No. 24-90447 (CML) (Jointly Administered)
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**FINAL FEE APPLICATION OF LOWENSTEIN SANDLER LLP FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
PERIOD FROM AUGUST 28, 2024 THROUGH AND INCLUDING DECEMBER 9, 2024**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Lowenstein Sandler LLP (“**Lowenstein Sandler**”), as co-counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the chapter 11 cases of DRF Logistics, LLC, *et al.*, the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”), hereby files its *Final Application of Lowenstein Sandler LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Co-Counsel to the Official Committee of Unsecured Creditors for the Period August 28, 2024 Through and Including December 9, 2024* (the “**Application**”) for final allowance and approval of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: DRF Logistics, LLC (6861) and DRF, LLC (7236). The Debtors’ mailing address is 7171 Southwest Parkway, Bldg. 300, Suite 400, Austin, TX 78735.

compensation for professional services performed by Lowenstein Sandler in the amount of \$2,570,118.50 and for reimbursement of its actual and necessary expenses in the amount of \$47,942.53 incurred from August 28, 2024 through and including December 9, 2024 (the “**Compensation Period**”).² The total amount of fees and expenses requested in this Application is \$2,618,061.03.³ This Application is supported by the *Declaration of Jeffrey L. Cohen in Support of Final Fee Application of Lowenstein Sandler LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Co-Counsel to the Official Committee of Unsecured Creditors for the Period August 28, 2024 Through and Including December 9, 2024* (the “**Cohen Declaration**”), which is attached hereto as **Exhibit A** and incorporated by reference herein. In further support of the Application, Lowenstein Sandler respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 157(b)(2). This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). In addition, the Committee confirms its consent, pursuant to Bankruptcy Rule 7008 and Bankruptcy Local Rule 7008-1, to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution).

² Capitalized terms used but not otherwise defined in this Application shall have the meanings ascribed to them in the Plan (as defined below).

³ This amount includes \$20,000 in estimated fees and expenses incurred after the December 9, 2024 effective date (the “**Effective Date**”) of the *Debtors’ Third Amended Joint Plan of Liquidation* (the “**Plan**”) in connection with the preparation, filing and prosecution of this final fee application. The Liquidating Agent is authorized to pay such fees and expenses pursuant to Article 2.2(a) of the Plan. For the avoidance of doubt, to the extent that the fees and expenses incurred post-Effective Date total less than \$20,000, Lowenstein Sandler shall only seek payment of the fees and expenses actually incurred.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 330, 331, and 1103 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas, and the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the “**UST Guidelines**”).

PRELIMINARY STATEMENT

4. Lowenstein Sandler requests final allowance of (a) compensation in the amount of \$2,570,118.50⁴ in fees on account of reasonable and necessary professional services rendered to the Committee by Lowenstein Sandler; and (b) reimbursement of actual and necessary costs and expenses in the amount of \$47,942.53 incurred by Lowenstein Sandler during the Compensation Period.

5. From and after its appointment, the Committee played an active and important role in the Chapter 11 Cases. Among the many projects undertaken during the Compensation Period, Lowenstein Sandler:

- (a) Reviewed and analyzed the “first day” pleadings and proposed orders, negotiated with the Debtors to obtain consensual modifications to such orders and advised the Committee as to whether and which actions to take regarding the various first day pleadings;
- (b) Engaged in an extensive investigation of potential claims and causes of action against various parties slated to receive releases under the Plan, including Pitney Bowes, Inc. (“**Pitney Bowes**”), in order to maximize recoveries to general unsecured creditors;

⁴ This amount also includes the \$20,000 estimated post-Effective Date fees and expenses discussed in footnote 2, *supra*.

- (c) Conducted a thorough investigation and analysis of the extent to which certain purported creditors of the Debtors were more appropriately creditors of Pitney Bowes due to a lack of contractual privity with the Debtors (the “**Contractual Privity Analysis**”); and
- (d) Negotiated a global settlement with the Debtors and Pitney Bowes that resulted in materially increased recoveries for unsecured creditors, with recoveries for certain creditors increasing from no more than 10% to 52.5%.

6. Lowenstein Sandler’s efforts throughout the Compensation Period played a key role in nearly all aspects of the Chapter 11 Cases, most notably investigating potential estate claims and causes of action, conducting the Contractual Privity Analysis, and negotiating a global settlement that was incorporated into the Debtors’ Plan. The accomplishments by the Committee required Lowenstein Sandler to devote significant time for the benefit of the unsecured creditors. Lowenstein Sandler respectfully submits that its services during the Compensation Period warrant approval of its requested fees and expenses.

7. Pursuant to the Interim Compensation Order, during these Chapter 11 Cases, Lowenstein Sandler prepared and served monthly fee statements for services rendered and expenses incurred to the Fee Notice Parties (as defined in the Interim Compensation Order) for the following periods:

- (i) August 28, 2024 through September 30, 2024 (the “**September Fee Statement**”);
- (ii) October 1, 2024 through October 31, 2024 (the “**October Fee Statement**”); and
- (iii) November 1, 2024 through and including November 30, 2024 (the “**November Fee Statement**” and, together with the September Fee Statement and October Fee Statement, the “**Monthly Fee Statements**”).

Lowenstein Sandler did not receive any objections to the Monthly Fee Statements.

8. As of the date of this Application, Lowenstein Sandler has received payment of 80% of fees and 100% of expenses for services rendered and expenses incurred from August 28,

2024 through November 30, 2024. A summary of the amounts paid to Lowenstein Sandler in accordance with the Interim Compensation Order for the Monthly Fee Statements relating to the Compensation Period is below:

Period Covered	Fees & Expenses Incurred		Fees & Expenses Paid		20% Holdback
	Fees	Expenses	Fees	Expenses	
August 28, 2024 – September 30, 2024	\$638,900.50	\$503.69	\$511,120.40	\$503.69	\$127,780.10
October 1, 2024 – October 31, 2024	\$1,185,667.50	\$13,409.88	\$948,534.00	\$13,409.88	\$237,133.50
November 1, 2024 – November 30, 2024	\$684,378.50	\$34,028.96	\$547,502.80	\$34,028.96	\$136,875.70
Totals	\$2,508,946.50	\$47,942.53	\$2,007,157.20	\$47,942.53	\$501,789.30

9. Additionally, Lowenstein Sandler requests payment for fees for services rendered in the amount of \$41,172.00 from December 1, 2024 through and including December 9, 2024 (the “**December Monthly Fees**”). Lowenstein Sandler did not incur any expenses from December 1, 2024 through and including December 9, 2024. The time detail for the December Monthly Fees is included in **Exhibit F**.

10. Pursuant to this Application, Lowenstein Sandler seeks final allowance of all fees and expenses incurred from August 28, 2024 through and including December 9, 2024, including on account of fees and expenses set forth in the Monthly Fee Statements that were served plus (i) the December Monthly Fees and (ii) the estimated fees and expenses incurred post-Effective Date in connection with this Application and the prosecution of the same.

BACKGROUND

11. On August 8, 2024 (the “**Petition Date**”), each of the Debtors filed voluntary petitions for relief (the “**Chapter 11 Cases**”) under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas.

12. On August 26, 2024, the Office of the United States Trustee appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. [Docket No. 155]. The Committee is comprised of seven members: (i) Ambi Robotics; (ii) Spot Freight, Inc.; (iii) Hackbarth Delivery Service, Inc.⁵; (iv) RXO Capacity Solutions, LLC (f/k/a XPO Logistics, LLC); (v) U.S. Pack Logistic, LLC; (vi) Mailatin America SA; and (vii) Ryder Transportation Services.

13. On August 28, 2024, the Committee selected Lowenstein Sandler to serve as its counsel, together with McDermott, Will & Emery LLP (“**McDermott**”). Thereafter, the Committee selected Alvarez & Marsal LLC (“**A&M**”) to serve as its financial advisor in the Chapter 11 Cases.

14. On October 9, 2024, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 347] (the “**Interim Compensation Order**”).

15. On October 22, 2024, the Court entered the *Order Authorizing and Approving the Employment and Retention of Lowenstein Sandler LLP as Co-Counsel to the Official Committee of Unsecured Creditors Effective as of August 28, 2024* [Docket No. 389] (“**Retention Order**”). The Retention Order authorizes Lowenstein Sandler to be compensated in accordance with the procedures set forth in 11 U.S.C. §§ 328, 330 and 331, the applicable Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas and the Interim Compensation Order.

⁵ On or about November 12, 2024, Hackbarth Delivery Service, Inc. tendered its resignation and as such, the Committee was reconstituted. See Notice of Reconstitution of the Official Committee of Unsecured Creditors [Docket No. 460].

16. On November 19, 2024, the Debtors filed the *Third Amended Joint Plan of Liquidation* [Docket No. 497] (the “**Plan**”).

17. On November 25, 2024, the Court entered its *Findings of Fact, Conclusions of Law, and Order Confirming Debtors’ Third Amended Joint Plan of Liquidation* [Docket No. 530] (the “**Confirmation Order**”). The Effective Date of the Plan occurred on December 9, 2024 [Docket No. 559].

RELIEF REQUESTED

18. By this Application, Lowenstein Sandler seeks final approval and allowance of compensation in the amount of \$2,570,118.50 and reimbursement of its actual and necessary expenses in the amount of \$47,942.53 incurred during the Compensation Period.

19. During the Compensation Period, Lowenstein Sandler expended a total of 2,827.60 hours on behalf of the Committee on matters relating to the Debtors’ Chapter 11 Cases for which it seeks compensation. The blended hourly rate for the attorneys and paraprofessionals who worked on this case is \$901.87. A summary sheet listing each attorney and paraprofessional who worked on these Chapter 11 Cases during the Compensation Period, his or her hourly rate during the Compensation Period, and the amount of fees attributed to each individual is attached hereto as **Exhibit B**.

20. In addition, a summary of compensation by project category listing the amount of fees attributed to each project category is attached hereto as **Exhibit C**.

21. Lowenstein Sandler incurred reasonable and necessary out-of-pocket expenses in the sum of \$47,942.53 in connection with rendering legal services to the Committee during the Compensation Period. A description of the expenses is set forth in **Exhibit D**. The disbursements are itemized in the annexed schedule. These disbursements were necessary to effectively render

legal services in these Chapter 11 Cases. During the course of these Chapter 11 Cases, Lowenstein Sandler has incurred and paid its actual and necessary disbursements and expenses.

22. In addition, a summary of customary and comparable compensation disclosures is attached hereto as **Exhibit E**.

**SUMMARY OF SERVICES PERFORMED BY
LOWENSTEIN SANDLER DURING THE COMPENSATION PERIOD**

23. During the Compensation Period, Lowenstein Sandler rendered professional services to the Committee solely in connection with these Chapter 11 Cases and, on behalf of the Committee, in accordance with Lowenstein Sandler's professional responsibilities. The services performed were necessary to the administration of these Chapter 11 Cases and were beneficial at the time at which the services were rendered. All services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed. Recitation of each and every item of the professional services performed by Lowenstein Sandler during the Compensation Period would be extremely burdensome. Hence, the following summary highlights the major areas to which Lowenstein Sandler devoted time and attention during the Compensation Period. This summary is organized in accordance with Lowenstein Sandler's internal system of project categories. Moreover, the detailed time records are attached hereto as **Exhibit F**.

Case Administration (142.80 hours; \$137,944.00). This category includes many different tasks necessary to comply with the requirements of this Court, the Office of the United States Trustee, and/or the Bankruptcy Code, including without limitation, reviewing general case documents, reviewing and maintaining dockets and case calendars, as well as other miscellaneous tasks not otherwise separately classifiable.

Asset Analysis and Recovery (1,644.70 hours; \$1,338,870.00). The Committee conducted an exhaustive investigation into potential estate causes of action and asset recovery claims as well as the Contractual Privity Analysis, which, in part, formed the basis for the settlement between the Committee, the Debtors, and Pitney Bowes set forth in the confirmed Plan. The Committee's investigation included extensive documentary discovery and a number of depositions of various individuals employed or formerly employed by the

Debtors and Pitney Bowes. This category includes, among other things, time spent by Lowenstein Sandler: (a) reviewing and analyzing background materials and public filings for development of an investigation and research strategy, including theories of recovery; (b) drafting discovery demands and subpoenas directed at the Debtors, Pitney Bowes, Hilco, and Oaktree; (c) extensively reviewing and analyzing documents produced by Debtors, Pitney Bowes, Hilco, and Oaktree; (d) creating a document review protocol and memoranda with search queues; (e) participating in multiple meet and confer conferences with counsel to the Debtors, Pitney Bowes, and Oaktree; (f) addressing confidentiality issues and reviewing and revising protective order; (g) drafting discovery deficiency letters, analyzing outstanding diligence requests, and drafting supplemental document demands to various parties; (h) attending meetings amongst the Committee's professionals to analyze and develop case strategies relating to theories of recovery, plan structure and contractual privity; (i) conducting legal research, drafting memoranda, and analyzing the claims matrix regarding the Contractual Privity Analysis; (j) drafting several deposition outlines, exhibits, and binders for independent director and other witness depositions and attending same; (k) extensive communications and meetings of the Lowenstein Sandler investigation team to prepare for depositions and witness interviews; and (l) communicating with various parties regarding document productions and related matters.

Asset Disposition (13.30 hours; \$13,786.50). This category includes time spent by Lowenstein Sandler attending to the proposed sale of the Debtors' de minimis assets, including: (a) reviewing and analyzing the Debtors' de minimis asset sale procedures and motion; (b) providing comments on the proposed sale order; (c) communicating with the Debtors and the Committee regarding the markup of the proposed sale order; and (d) reviewing the auction catalog and related auction materials.

Meetings of and Communication with Creditors (165.00 hours; \$177,410.00). This category includes time spent by Lowenstein Sandler addressing the initial organizational matters associated with establishing a functioning Committee and all communications with the Committee throughout the Chapter 11 Cases, including, but not limited to, (a) interviewing and retaining the Committee's financial advisor; (b) preparing Committee by-laws; preparing Committee meeting agendas and other discussion materials; (c) attending meetings with the Committee professionals; (d) communicating with the members of the Committee, by telephone and e-mail, to discuss the status of the asset investigation, plan structure and amendments, contractual privity, document productions, depositions and witness interviews, settlement updates, as well as various creditor inquiries, status of DIP negotiations, litigation, other pending motions, post-effective date oversight board and general case status; and (e) addressing Committee member resignation and reconstitution.

Fee/Employment Applications (36.30 hours; \$26,220.00). This category includes time spent preparing and filing Lowenstein Sandler's retention application and preparing its monthly fee statements.

Assumption/Rejection of Leases and Contracts (53.50 hours; \$61,408.00). This category includes time spent: (a) reviewing and analyzing proposed rejection procedures, rejection motions, related objections and rejection damages claims; (b) conducting legal research regarding abandoned property and disguised lease analysis; (c) reviewing and

commenting on revised rejection procedures order; (d) reviewing and analyzing the Debtors' alleged contracts and leases, including those with Trilogy Leasing Co., LLC ("**Trilogy**") and Gatik AI, Inc.; (e) preparing objections to the Debtors' requests to reject certain contracts and leases.

Financing/Cash Collateral (36.40 hours; \$42,107.50). This category includes time spent by Lowenstein Sandler: (a) reviewing and analyzing the Debtors' DIP financing motion [Docket No. 33], the Interim DIP Order [Docket No. 57], and the DIP Budget; (b) conferring and negotiating with the Debtors' and Pitney Bowes' counsel regarding resolution of the Committee's DIP issues; (c) drafting and revising the Committee's Reservation of Rights to Debtors' DIP financing motion; (d) reviewing several iterations of revised Final DIP Order; and (e) conferring with McDermott regarding DIP related matters.

Claims Administration and Objections (32.90 hours, \$30,843.00). This category includes time spent by Lowenstein Sandler: (a) reviewing and summarizing the Debtors' bar date motion [Docket No. 149] and critical vendor motion [Docket No. 7]; (b) reviewing and analyzing various claims filed by general unsecured creditors, including drafting a claims analysis report; (c) reviewing the Debtors' and Pitney Bowes' settlement with certain unsecured creditors, (d) reviewing and analyzing claims of Oaktree and reviewing the Committee's objection to the same; and (e) reviewing claims recovery analysis and reconciliation prepared by A&M.

Plan and Disclosure Statement (513.10 hours, \$561,674.50). This category includes time spent by Lowenstein Sandler: (a) reviewing and analyzing the Plan, Plan-related documents, the Disclosure Statement, the motion to approve same, the liquidation analysis, the Plan Supplement, and all other Plan-related documents; (b) developing a strategy regarding Plan issues; (c) drafting and revising a Disclosure Statement issues list and objection to the motion to approve the Disclosure Statement; (d) negotiating resolutions to the Committee's Disclosure Statement issues with the Debtors and reviewing drafts of the amended Disclosure Statement; (e) drafting the Committee's solicitation letter; (f) revising the order approving the Disclosure Statement and the related solicitation procedures; (g) preparing for and attending the Disclosure Statement hearing; (h) reviewing and addressing confirmation issues, including drafting a letter to the Court regarding the confirmation timeline and requesting a status conference; (i) addressing all other aspects of plan-related issues, including creditor treatment, releases, and opt-out mechanics; (j) conducting research regarding confirmation objections identified; (k) preparing for the October 18, 2024 status conference regarding confirmation hearing discovery and the confirmation timeline; (l) drafting a confirmation objection; (m) drafting outlines for confirmation witness examinations; (n) reviewing and analyzing Plan settlement proposals and extensively negotiating the settlement embodied in the Plan with the Debtors and Pitney Bowes; (o) drafting the Committee's letter in support of confirmation; (p) reviewing the Debtors' brief in support of confirmation, and all objections to confirmation; and (r) analyzing potential wind-down and post-effective date issues, and reviewing final Effective Date documents.

Court Hearings (24.60 hours; \$26,519.50). This category includes time spent by Lowenstein Sandler attending various court hearings and status conferences on behalf of the Committee.

Adversary Proceedings and Bankruptcy Court Litigation (91.50 hours; \$81,982.00). This category includes, among other things, time spent by Lowenstein Sandler in connection with the adversary proceeding involving *DRF, LLC v. Trilogy Leasing Co., LLC* adversary proceeding [Adv. Pro. No. 24-03205] (the “**Trilogy Adversary Proceeding**”) and general Bankruptcy Court litigation, including, but not limited to: (a) reviewing and analyzing the causes of action set forth in the Trilogy Adversary Proceeding complaint, the motion to intervene filed by Pitney Bowes, Trilogy’s opposition to Pitney Bowes’ motion to intervene, Trilogy’s motion to dismiss, and Mitsubishi’s motion to intervene; (b) drafting the Committee’s motion to intervene in the Trilogy Adversary Proceeding; (c) conducting extensive legal research regarding a draft standing motion, declaratory judgment precedents, preliminary injunctions, and temporary restraining orders; and (d) drafting a motion seeking standing to commence certain causes of action and a complaint for declaratory judgment.

Non-Working Travel (49.30 hours; \$25,215.00). This category includes time spent by Lowenstein Sandler attorneys traveling to Houston and back for court hearings, status conferences, depositions, witness interviews and meetings on behalf of the Committee. Non-working travel time is billed at 50%.

REQUESTED COMPENSATION AND REIMBURSEMENT SHOULD BE ALLOWED

24. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court’s award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

25. In determining the amount of reasonable compensation to be awarded, the court should consider the nature, 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;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (f) 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)(3).

26. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (a) the complexity of these Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the cost of comparable services other than in a case under this title.

27. As a supplement to the factors enumerated in section 330, courts within the Fifth Circuit consider the twelve factors identified in *Johnson v. Ga. Highway Express, Inc.* to determine the reasonableness of compensation incurred by a professional based upon the particular circumstances of a given case.⁶ These factors include: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the skill requisite to perform the legal services; (4) the preclusion of employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by client or the circumstances of the case; (8) the amount involved and the results obtained; (9) the experience,

⁶ See *Johnson v. Ga. Highway, Inc.*, 488 F.2d 714, 717 (5th Cir. 1974).

reputation, and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases.⁷

28. Utilizing these factors and the standards customarily applied to fee awards under Bankruptcy Code sections 330 and 331, Lowenstein Sandler respectfully submits that its request for compensation and reimbursement of expenses is reasonable and proper, and that such request should be allowed in the amounts sought herein. The following analysis of the *Johnson* factors supports the reasonableness of Lowenstein Sandler's requested fees and expenses:

- (a) *The Time and Labor Required.* The foregoing summary, together with the exhibits attached hereto, detail the time, nature and extent of the professional services rendered by Lowenstein Sandler for the benefit of the Committee during the Compensation Period. As reflected in the foregoing summary and the exhibits, Lowenstein Sandler devoted substantial time to these matters on a wide variety of legal issues presented in these cases. Lowenstein Sandler regularly communicated with the Committee to ensure that the rights of unsecured creditors were protected and that the Committee judiciously proceeded with motion practice only when appropriate.
- (b) *The Novelty and Difficulty of Questions.* The issues presented by these cases demanded a high level of skill during a short period of time. Lowenstein Sandler spent considerable time analyzing difficult restructuring issues, including issues relating to the Contractual Privity Analysis, the Plan, investigation of estate claims and causes of action, preparing relevant pleadings as necessary, and negotiation with the relevant interested parties to protect the interests of, and maximization of value for, general unsecured creditors.
- (c) *The Skill Required to Perform the Legal Services Properly.* In rendering services to the Committee, Lowenstein Sandler demonstrated substantial legal skill and expertise in the areas of bankruptcy, corporate law, commercial law, debtor-creditor rights, secured transactions, and litigation.
- (d) *The Preclusion of Other Employment by Applicant Due to Acceptance of the Cases.* Given the size and depth of Lowenstein Sandler's restructuring practice, Lowenstein Sandler's representation of the Committee has not necessarily precluded it from seeking other engagements. However,

⁷ See *In re First Colonial Corp. of America*, 544 F.2d 1291, 1298–99 (5th Cir. 1977), cert. denied, 431 U.S. 904 (1977) (applying the twelve-factor test to an analysis of fee awards in bankruptcy cases).

Lowenstein Sandler's devotion of time to one matter inevitably detracts from its ability to seek out other employment opportunities.

- (e) *The Customary Fee.* Lowenstein Sandler agreed to perform its services for the Committee during the pendency of these cases pursuant to its customary compensation practices for engagements of this type and regular hourly billing practices. Lowenstein Sandler is normally compensated on an hourly basis and bills clients on a periodic basis, which is most often monthly.
- (f) *Whether the Fee is Fixed or Contingent.* The fees charged in this Application are based on Lowenstein Sandler's standard hourly rates for engagements of this type.
- (g) *Time Limitations Imposed by Client or other Circumstances.* The Chapter 11 Cases proceeded on an expedited timeline, and there were numerous instances that necessitated Lowenstein Sandler's provision of capable legal services on short notice and under significant time constraints in order to address complex legal issues.
- (h) *The Amount Involved and Results Obtained.* For the reasons described in this Application, Lowenstein Sandler respectfully submits that the amount of fees for which compensation is sought is reasonable under the circumstances given the size and nature of the Debtors' operations and business relationships, and the number and complexity of issues addressed. Lowenstein Sandler conducted extensive research and analysis on various issues impacting the Debtors' business, including but not limited to potential claims and causes of action on behalf of the Debtors' estates and the Debtors' Plan and Disclosure Statement.
- (i) *The Experience, Reputation and Ability of the Attorneys.* Lowenstein Sandler is a well-known law firm and has proven substantial ability in the fields of bankruptcy, litigation, finance, and corporate law, among others. Jeffrey L. Cohen, David M. Posner, and Gianfranco Finizio, partners at Lowenstein Sandler, had primary responsibility for this case. Each of Mr. Cohen, Mr. Posner, and Mr. Finizio has a wide breadth of experience in bankruptcy matters, including with respect to representing creditor interests and official creditor committees, enabling them to effectively render services to the Committee in an efficient manner. In addition, Lowenstein Sandler's restructuring & insolvency attorneys were supported by partners from the corporate, litigation, tax, and finance practice groups at Lowenstein Sandler.
- (j) *The Undesirability of the Case.* While this engagement is not "undesirable," the Chapter 11 Cases are challenging given, among other things, the complexity of the Debtors' business and operational

arrangements and the nature and value of the claims asserted against the Debtors in the Chapter 11 Cases.

- (k) *Nature and Length of Professional Relationship.* Lowenstein Sandler had no relationship with the Committee prior to being retained in this case, subject to the disclosures set forth in the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of Lowenstein Sandler LLP as Co-Counsel, Effective as of August 28, 2024* and accompanying *Declaration of Jeffrey L. Cohen* attached thereto as Exhibit B. See Docket No. 294.
- (l) *Awards In Similar Cases.* The fees and expenses for which Lowenstein Sandler seeks compensation and reimbursement are not excessive and are substantially similar to those awarded in similar cases for similar services rendered and results obtained.

29. In sum, the services rendered by Lowenstein Sandler were necessary and beneficial to the Debtors' estates and were consistently performed in a timely manner commensurate with the types of issues involved in the Chapter 11 Cases. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought in this Application is warranted.

THE UST GUIDELINES

30. Lowenstein Sandler has made reasonable efforts to comply with the UST Guidelines. In accordance with section C.5 of the U.S. Trustee Guidelines, Lowenstein Sandler states as follows:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: No.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: Lowenstein Sandler's fees are within the estimates set forth in the case budgets that were negotiated with the DIP lender in these cases.

Question: Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the fee application includes any rate increases since retention:

i. Did your client review and approve those rate increases in advance?

ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

Response: The Compensation Period covered in this Application does not include any rate increases since Lowenstein Sandler's retention.

**SUMMARY OF PROFESSIONAL COMPENSATION AND
REIMBURSEMENT OF EXPENSES REQUESTED**

31. During the Compensation Period, Lowenstein Sandler's professionals and paraprofessionals expended a total of 2,827.60 hours in connection with providing necessary services. Lowenstein Sandler has been able to efficiently provide services by utilizing the expertise of professionals and paraprofessionals within relevant practice groups to effectively advise the

Committee regarding discrete issues and ensuring that the level of seniority is commensurate with the assignment. Lowenstein Sandler, in connection with services rendered on behalf of the Committee, respectfully requests allowance of reasonable compensation of such services rendered in the total amount of \$2,570,118.50 and reimbursement of actual and necessary expenses incurred in the amount of \$47,942.53, for an aggregate total of \$2,618,061.03⁸ for the Compensation Period.

32. There is no agreement or understanding between Lowenstein Sandler and any other person, other than members of the firm, for the sharing of compensation to be received for services rendered in the Chapter 11 Cases. During the Compensation Period, Lowenstein Sandler received no payment and no promises of payment from any source for services rendered in connection with the Chapter 11 Cases, other than payments received from the Debtors pursuant to the Interim Compensation Order.

NOTICE

33. Pursuant to the Interim Compensation Order, notice of this Application has been served upon the Fee Notice Parties as follows:

- (a) the Debtors, c/o DRF Logistics, LLC, Attn: Eric Kaup, Chief Restructuring Officer (ekaup@hilcoglobal.com);
- (b) counsel for the Debtors, Weil, Gotshal & Manges LLP, Attn: Ray C. Schrock, Esq., Ronit J. Berkovich, Esq., Lauren Tauro, Esq., and Alexander P. Cohen, Esq. (Ray.Schrock@weil.com; Ronit.Berkovich@weil.com; Lauren.Tauro@weil.com; and Alexander.Cohen@weil.com);
- (c) the U.S. Trustee, Attn: Andrew Jimenez, Esq. and Christopher R. Travis, Esq. (Andrew.Jimenez@usdoj.gov and (C.Ross.Travis@usdoj.gov); and
- (d) counsel for the DIP Lender, Gibson, Dunn & Crutcher LLP, Attn: Matthew J. Williams, Esq., C. Lee Wilson, Esq., and Keith R. Martorana, Esq.

⁸ This amount includes \$20,000 in estimated fees and expenses incurred after the Effective Date in connection with the preparation, filing and prosecution of this final fee application. The Liquidating Agent is authorized to pay such fees and expenses pursuant to Article 2.2(a) of the Plan. For the avoidance of doubt, to the extent that the fees and expenses incurred post-Effective Date total less than \$20,000, Lowenstein Sandler shall only seek payment of the fees and expenses actually incurred.

(MJWilliams@gibsondunn.com, CLWilson@gibsondunn.com, and
KMartorana@gibsondunn.com).

WHEREFORE, by this Application, Lowenstein Sandler respectfully requests the Court enter an order, substantially in the form attached hereto as **Exhibit G**, authorizing (a) that a final allowance be made to Lowenstein Sandler LLP for the Compensation Period, in the amount of (i) \$2,570,118.50 for reasonable and necessary professional services rendered and (ii) \$47,942.53 for actual and necessary costs and expenses incurred, for a total of \$2,618,061.03⁹; (b) that the Debtors are authorized and directed to pay Lowenstein Sandler the outstanding amount of such sums; and (c) for such other and further relief as the Court deems just and proper.

Dated: January 23, 2025

LOWENSTEIN SANDLER LLP

/s/ Jeffrey L. Cohen

Jeffrey L. Cohen (admitted *pro hac vice*)

David M. Posner (admitted *pro hac vice*)

Gianfranco Finizio (admitted *pro hac vice*)

Kelly E. Moynihan (admitted *pro hac vice*)

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*Counsel to the Official Committee of
Unsecured Creditors*

⁹ This amount includes \$20,000 in estimated fees and expenses incurred after the Effective Date in connection with the preparation, filing and prosecution of this final fee application. The Liquidating Agent is authorized to pay such fees and expenses pursuant to Article 2.2(a) of the Plan. For the avoidance of doubt, to the extent that the fees and expenses incurred post-Effective Date total less than \$20,000, Lowenstein Sandler shall only seek payment of the fees and expenses actually incurred.

EXHIBIT A

DECLARATION OF JEFFREY L. COHEN

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

In re:	§	
	§	Chapter 11
	§	
DRF LOGISTICS, LLC, <i>et al.</i> ,	§	Case No. 24-90447 (CML)
	§	
Debtors. ¹	§	(Jointly Administered)

**DECLARATION OF JEFFREY L. COHEN IN SUPPORT OF FINAL FEE APPLICATION
OF LOWENSTEIN SANDLER LLP AS CO-COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE
PERIOD FROM AUGUST 28, 2024 THROUGH AND INCLUDING DECEMBER 9, 2024**

Jeffrey L. Cohen hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with the law firm of Lowenstein Sandler LLP (“**Lowenstein Sandler**” or the “**Firm**”), which maintains offices in New York, New Jersey, California, Utah, and Washington, D.C. I am an attorney at law, duly admitted and a member in good standing of the bar of the State of New York. I have been admitted to appear in these Chapter 11 Cases before this Court *pro hac vice*.

2. I have personally performed many of the legal services rendered by Lowenstein Sandler as co-counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the above-captioned chapter 11 cases (“**Chapter 11 Cases**”) of DRF Logistics, LLC, *et al.* and the above-captioned affiliated debtors and debtors in possession and am thoroughly familiar with the other work performed on behalf of the Committee by the attorneys and other persons in the Firm.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: DRF Logistics, LLC (6861) and DRF, LLC (7236). The Debtors’ mailing address is 7171 Southwest Parkway, Bldg. 300, Suite 400, Austin, TX 78735.

3. This Declaration is submitted in support of the *Final Application of Lowenstein Sandler LLP as Co-Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from August 28, 2024 Through and Including December 9, 2024* (the “Application”)².

4. To the best of my knowledge, information, and belief, the statements contained in the Application are true and correct. Moreover, I have reviewed the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of Texas and submit that the Application substantially complies with such rules. However, to the extent that the Application does not comply in all respects with such rules, I believe that such deviations are not material.

5. In accordance with 18 U.S.C. § 155 and the Rules of this Court, neither I nor any attorney of my firm has entered into any agreement, written or oral, express or implied, with the Debtors, any creditor, or any other party in interest, or any attorney of such person, for the purpose of fixing the amount of any of the fees or other compensation to be allowed out of or paid from the assets of the Debtors.

6. In accordance with section 504 of the Bankruptcy Code, no agreement or understanding exists between me, my firm or any attorney thereof, on the one hand, and any other person, on the other hand, for the division of such compensation as my firm may receive from the Debtors herein, nor will any division of fees prohibited by section 504 of the Bankruptcy Code be made by me, or any partner or associate of my firm.

[Remainder of page intentionally left blank]

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

I declare, under penalty of perjury, that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief.

Dated: January 23, 2025

/s/ Jeffrey L. Cohen
Jeffrey L. Cohen, Esq.

EXHIBIT B**SUMMARY OF TIMEKEEPERS IN THIS APPLICATION**

Name	Title	Department	Date of 1st Admission	Fees Billed	Hours Billed	Number of Rate Increases	Hourly Rate
Besikof, Daniel B.	Partner	Bankruptcy	2005	\$1,248.50	1.10	0	\$1,135.00
Chafetz, Eric S.	Partner	Bankruptcy	2004	\$434.00	0.40	0	\$1,085.00
Citron, Lowell A.	Partner	Corporate / Tax	1995	\$4,688.00	3.20	0	\$1,465.00
Cohen, Jeffrey	Partner	Bankruptcy	2000	\$314,837.50	222.50	0	\$1,415.00
*Finizio, Gianfranco - Travel Time	Partner	Bankruptcy	2010	\$3,010.00	5.60	0	\$537.50
Finizio, Gianfranco	Partner	Bankruptcy	2010	\$322,500.00	300.00	0	\$1,075.00
*Kaplan, Michael A. - Travel Time	Partner	Litigation	2011	\$2,060.00	4.00	0	\$515.00
Kaplan, Michael A.	Partner	Litigation	2011	\$262,753.00	255.10	0	\$1,030.00
*Posner, David M. - Travel Time	Partner	Bankruptcy	1989	\$8,100.00	12.00	0	\$675.00
Posner, David M.	Partner	Bankruptcy	1989	\$409,320.00	303.20	0	\$1,350.00
Chahil, Rasmeet K.	Counsel	Litigation	2017	\$3,717.00	4.20	0	\$885.00
Julceus, Markiana J.	Counsel	Litigation	2017	\$3,805.50	4.30	0	\$885.00
*Mannix, Erica G. - Travel Time	Counsel	Bankruptcy	2019	\$2,854.50	6.60	0	\$432.50
Mannix, Erica G.	Counsel	Bankruptcy	2019	\$302,750.00	350.00	0	\$865.00
*Moynihan, Kelly E. - Travel Time	Counsel	Bankruptcy	2016	\$8,228.00	17.60	0	\$467.50
Moynihan, Kelly E.	Counsel	Bankruptcy	2016	\$251,795.50	269.30	0	\$935.00
Candelario, Pati	Associate	Litigation	2021	\$715.00	1.00	0	\$715.00
Cherubini, Christopher T.	Associate	Litigation	1996	\$8,823.00	17.30	0	\$510.00
Clark, Brittany M.	Associate	Bankruptcy	2023	\$13,440.00	22.40	0	\$600.00
Diaz, Madison	Associate	Litigation	2024	\$25,481.50	45.10	0	\$565.00
*Gauvin, Carolyn - Travel Time	Associate	Bankruptcy	2024	\$962.50	3.50	0	\$275.00
Gauvin, Carolyn	Associate	Bankruptcy	2024	\$60,390.00	109.80	0	\$550.00
Giblin, Anna Maria	Associate	Litigation	2023	\$87,143.00	147.70	0	\$590.00

Name	Title	Department	Date of 1st Admission	Fees Billed	Hours Billed	Number of Rate Increases	Hourly Rate
Ismail, Ali	Associate	Bankruptcy	2024	\$57,900.00	96.50	0	\$600.00
Matthews, Nicholas Stratton	Associate	Litigation	2023	\$34,928.00	59.20	0	\$590.00
Rodriguez, Nina Renee	Associate	Litigation	2021	\$2,860.00	4.00	0	\$715.00
Seltzer, Eric James	Associate	Bankruptcy	2022	\$206,921.00	289.40	0	\$715.00
Stewart, Cristina G.	Associate	Litigation	2022	\$72,995.00	112.30	0	\$650.00
Zimmerman, Ruth Fong	Associate	Litigation	2022	\$27,300.00	42.00	0	\$650.00
Claussen, Diane	Paralegal	Bankruptcy		\$13,724.00	37.60	0	\$365.00
Jara, Gabriel	Paralegal	Practice Support		\$1,171.50	3.30	0	\$355.00
King, Crystal	Paralegal	Practice Support		\$450.00	1.50	0	\$300.00
Pagano, Jamie J.	Paralegal	Practice Support		\$12,126.50	30.70	0	\$395.00
Suhail, Aneela	Paralegal	Practice Support		\$5,346.00	16.20	0	\$330.00
Taboada, Valerie	Paralegal	Litigation		\$2,677.50	6.30	0	\$425.00
Carlson, Griffin	Law Clerk	Litigation		\$12,317.00	21.80	0	\$565.00
Hayter, Carrie T.	Research Services	Knowledge and Research Services		\$37.50	0.10	0	\$375.00
Michaud, Zoraida	Research Services	Knowledge and Research Services		\$308.00	0.80	0	\$385.00

* Reflects 50% rate reduction due to non-working travel time

EXHIBIT C**SUMMARY OF COMPENSATION BY PROJECT CATEGORY**

Project Category	Hours Billed	Fees Sought
Adversary Proceedings and Bankruptcy Court Litigation	91.50	\$81,982.00
Asset Analysis and Recovery	1,644.70	\$1,338,870.00
Asset Disposition	13.30	\$13,786.50
Assumption/Rejection of Leases and Contracts	53.50	\$61,408.00
Business Operations	0.60	\$705.00
Case Administration	142.80	\$137,944.00
Claims Administration and Objections	32.90	\$30,843.00
Court Hearings	24.60	\$26,519.50
Employment and Retention Applications – Others	6.10	\$7,750.00
Fee Applications and Invoices – Others	0.90	\$1,040.50
Fee/Employment Applications	36.30	\$26,220.00
Financing/Cash Collateral	36.40	\$42,107.50
General Bankruptcy Advice/Opinions	1.10	\$605.00
Investigation of Prepetition Lenders	0.60	\$810.00
Meetings of and Communication with Creditors	165.00	\$177,410.00
Non-Working Travel	49.30	\$25,215.00
Other – Insurance Matters	1.80	\$1,564.00
Other Contested Matters (excluding assumption/rejection motions)	8.00	\$8,600.00
Plan and Disclosure Statement (including Business Plan)	513.10	\$561,674.50
Relief from Stay/Adequate Protection Proceedings	0.10	\$93.50
Schedules and Statements	5.00	\$4,970.50
TOTAL	2,827.60	\$2,550,118.50

EXHIBIT D**SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY**

Category	Amount
Computerized legal research	\$13,047.31
Messenger and delivery charges	\$421.00
Transcript charges	\$19,362.50
Travel	\$13,117.05
Working meals	\$1,254.65
Document conversion and scanning services	\$740.02
Total Disbursements	\$47,942.53

EXHIBIT D - continued**Detailed Description of Expenses**

Date	Description	Amount
<u>Document conversion and scanning services</u>		
09/26/24	eDiscovery Review (VENDOR: Relativity DATE:2024-09-26 11.75 GB eDiscovery Review)	\$63.45
10/26/24	eDiscovery Review (VENDOR: Relativity DATE:2024-10-26 48.37 GB eDiscovery Review)	\$261.20
11/26/24	eDiscovery Review (VENDOR: Relativity DATE:2024-11-26 76.92 GB eDiscovery Review)	\$415.37
<u>Messenger and delivery charges</u>		
11/04/24	External Messenger Service (VENDOR: Betsko, Robert INVOICE#: 2024-10 DATE: 11/26/2024 Job No. 13028 - Early a.m. delivery to Kelly Moynihan at the Courtyard Stamford in Stamford, CT)	\$185.00
11/05/24	External Messenger Service (VENDOR: Betsko, Robert INVOICE#: 2024-10 DATE: 11/26/2024 Job No. 13029 - Early a.m. delivery to Kelly Moynihan at Courtyard Stamford, in Stamford, CT)	\$185.00
11/29/24	External Messenger Service (VENDOR: Champion Courier Logistic INVOICE#: 2970212 DATE: 11/29/2024 11/6/24 - Courier service from NYO to Well Gotshal & Manges, LLP)	\$51.00
<u>Meals</u>		
11/01/24	Meals (local) (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/01/24; Lunch with Erica Mannix; Alan Carr Deposition - lunch for Michael Kaplan, David Posner, Andrea Gonzalez and Erica Mannix)	\$83.87
11/06/24	Meals (local) (VENDOR: Finizio, Gianfranco INVOICE#: 7046605211120202 DATE: 11/12/2024 ; 11/06/24; Dinner with Gianfranco Finizio; Late Night Working Dinner)	\$19.60
11/19/24	Meals (local) (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/19/24; Breakfast with Gianfranco Finizio; DRF Conference)	\$4.08
11/19/24	Meals (local) (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/19/24; Breakfast with Gianfranco Finizio; DRF Conference)	\$5.43
11/19/24	Meals (local) (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/19/24; Lunch with Kelly Moynihan, David Posner; DRF Hearing)	\$22.72
11/04/24	Meals (out of town travel) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/04/24; Dinner with Kelly Moynihan; DRF Deposition)	\$25.22
11/04/24	Meals (out of town travel) (VENDOR: Kaplan, Michael A. INVOICE#: 7039665511080202 DATE: 11/8/2024 ; 11/04/24; Hotel - Dinner with Michael Kaplan; Interview with Garfield Bryan at Weil, Gotshal & Manges)	\$189.44
11/05/24	Meals (out of town travel) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/05/24; Breakfast with Kelly Moynihan; DRF Deposition)	\$22.92

11/05/24	Meals (out of town travel) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/05/24; Lunch with Kelly Moynihan; DRF Deposition)	\$5.74
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11/05/24	Meals (out of town travel) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/05/24; Dinner with Kelly Moynihan; DRF Deposition)	\$47.12
11/05/24	Meals (out of town travel) (VENDOR: Posner, David M. INVOICE#: 7049234011130201 DATE: 11/13/2024 ; 11/05/24; Lunch with David Posner; Working lunch for deposition of Roberta Mittleman)	\$16.05
11/06/24	Meals (out of town travel) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/06/24; Breakfast with Kelly Moynihan; DRF Deposition)	\$6.02
11/19/24	Meals (out of town travel) (VENDOR: Posner, David M. INVOICE#: 7071272611220204 DATE: 11/22/2024 ; 11/19/24; Hotel - Meals - Other with David Posner; DRF Hearing in Houston)	\$35.23
11/19/24	Meals (out of town travel) (VENDOR: Posner, David M. INVOICE#: 7071272611220204 DATE: 11/22/2024 ; 11/19/24; Dinner with David Posner, Gianfranco Finizio, Kelly Moynihan; Dinner - DRF Hearing in Houston)	\$663.53
11/19/24	Meals (out of town travel) (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/19/24; Hotel - Lunch with Gianfranco Finizio; DRF Conference)	\$32.06
11/20/24	Meals (out of town travel) (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/20/24; Lunch with Gianfranco Finizio; DRF Conference)	\$9.96
11/20/24	Meals (out of town travel) (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/20/24; Lunch with Gianfranco Finizio; DRF Conference)	\$12.93
11/20/24	Meals (out of town travel) (VENDOR: Posner, David M. INVOICE#: 7071272611220204 DATE: 11/22/2024 ; 11/20/24; Meals Other with David Posner; Airport beverage - DRF Hearing in Houston)	\$11.36
11/20/24	Meals (out of town travel) (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/20/24; Lunch with Kelly Moynihan; DRF Hearing)	\$11.36
11/20/24	Meals (out of town travel) (VENDOR: Posner, David M. INVOICE#: 7071272611220204 DATE: 11/22/2024 ; 11/20/24; Hotel - Breakfast with David Posner; Breakfast - DRF Hearing in Houston)	\$30.01

Computerized legal research

10/24/24	Computerized legal research: Lexis: User: STEWART, CRISTINA; Service: SEARCH; Charge Type: ACCESS CHARGE-11; DOC ACCESS-1; ;	\$1,217.54
10/25/24	Computerized legal research: Lexis: User: STEWART, CRISTINA; Service: SEARCH; Charge Type: ACCESS CHARGE-9; ;	\$949.93
10/30/24	Computerized legal research: Lexis: User: STEWART, CRISTINA; Service: SEARCH; Charge Type: ACCESS CHARGE-2; ;	\$211.10
10/30/24	Computerized legal research: Lexis: User: STEWART, CRISTINA; Service: SEARCH; Charge Type: ACCESS CHARGE-2; ;	\$211.10
10/30/24	Computerized legal research: Lexis: User: STEWART, CRISTINA; Service: SEARCH; Charge Type: ACCESS CHARGE-2; ;	\$-211.10
08/30/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/30/2024 Court: TXSBK Pages: 59	\$5.90
09/03/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/03/2024 Court: TXSBK Pages: 49	\$4.90

09/03/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/03/2024 Court: NJBK Pages: 2	\$0.20
09/03/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/03/2024 Court: TXSBK Pages: 4	\$0.40
09/03/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/03/2024 Court: DEBK Pages: 39	\$3.90
09/11/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/11/2024 Court: TXSBK Pages: 23	\$2.30
09/11/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/11/2024 Court: DEBK Pages: 23	\$2.30
09/16/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/16/2024 Court: TXSBK Pages: 41	\$4.10
09/17/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/17/2024 Court: TXSBK Pages: 100	\$10.00
09/18/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/18/2024 Court: TXSBK Pages: 32	\$3.20
09/20/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/20/2024 Court: TXSBK Pages: 18	\$1.80
09/23/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/23/2024 Court: TXSBK Pages: 147	\$14.70
09/24/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/24/2024 Court: DEBK Pages: 45	\$4.50
09/24/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/24/2024 Court: TXSBK Pages: 35	\$3.50
09/24/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/24/2024 Court: TXSBK Pages: 0	\$2.40
09/25/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/25/2024 Court: TXSBK Pages: 60	\$6.00
09/26/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/26/2024 Court: TXSBK Pages: 64	\$6.40
09/27/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/27/2024 Court: TXSBK Pages: 100	\$10.00
09/27/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/27/2024 Court: ILNBK Pages: 36	\$3.60
09/26/24	Computerized legal research: Westlaw: User Name: MOYNIHAN,KELLY / Duration of Search: 00:00 / Transaction: 3 / Docs/Lines: 0	\$350.14
10/17/24	Computerized legal research: Westlaw: User Name: MOYNIHAN,KELLY / Duration of Search: 00:00 / Transaction: 5 / Docs/Lines: 0	\$288.48
10/17/24	Computerized legal research: Westlaw: User Name: BESI KOF,DANIEL / Duration of Search: 00:00 / Transaction: 5 / Docs/Lines: 0	\$144.24
10/18/24	Computerized legal research: Westlaw: User Name: ZIMMERMAN,RUTH / Duration of Search: 00:00 / Transaction: 28 / Docs/Lines: 0	\$141.26
10/24/24	Computerized legal research: Westlaw: User Name: STEWART,CRISTINA / Duration of Search: 00:00 / Transaction: 38 / Docs/Lines: 0	\$847.54
10/25/24	Computerized legal research: Westlaw: User Name: STEWART,CRISTINA / Duration of Search: 00:00 / Transaction: 92 / Docs/Lines: 0	\$2,542.62

10/25/24	Computerized legal research: Westlaw: User Name: MICHAUD,ZORAIDA / Duration of Search: 00:00 / Transaction: 2 / Docs/Lines: 0	\$141.26
10/29/24	Computerized legal research: Westlaw: User Name: STEWART,CRISTINA / Duration of Search: 00:00 / Transaction: 17 / Docs/Lines: 0	\$706.29
10/30/24	Computerized legal research: Westlaw: User Name: STEWART,CRISTINA / Duration of Search: 00:00 / Transaction: 157 / Docs/Lines: 0	\$4,566.28
10/31/24	Computerized legal research: Westlaw: User Name: STEWART,CRISTINA / Duration of Search: 00:00 / Transaction: 13 / Docs/Lines: 0	\$706.29
11/02/24	Computerized legal research: Westlaw: User Name: MOYNIHAN,KELLY / Duration of Search: 00:00 / Transaction: 9 / Docs/Lines: 0	\$144.24

Transcript charges

11/12/24	Transcript Charges (VENDOR: Veritext/NJ Reporting Co., L.L.C. INVOICE#: 7858637 DATE: 11/12/2024 Transcript charges for DRF Logistics, LLC Creditors' Committee)	\$2,100.50
11/14/24	Transcript Charges (VENDOR: Planet Depos LLC INVOICE#: 710367 DATE: 11/14/2024 EXPEDITED TRANSCRIPT WITH INDEX OF: Garfield Bryan)	\$1,138.00
11/14/24	Transcript Charges (VENDOR: Planet Depos LLC INVOICE#: 710897 DATE: 11/14/2024 EXPEDITED TRANSCRIPT WITH INDEX OF: Lauren Thomas)	\$1,615.50
11/14/24	Transcript Charges (VENDOR: Planet Depos LLC INVOICE#: 710048 DATE: 11/14/2024 EXPEDITED TRANSCRIPT WITH INDEX OF: James Fairweather, Corporate Designee & Individually)	\$3,247.05
11/14/24	Transcript Charges (VENDOR: Planet Depos LLC INVOICE#: 710709 DATE: 11/14/2024 EXPEDITED TRANSCRIPT WITH INDEX OF: Roberta Mittleman)	\$1,284.45
11/15/24	Transcript Charges (VENDOR: Planet Depos LLC INVOICE#: 712427 DATE: 11/15/2024 LATE CANCELLATION Geoffrey Kupferschmid)	\$395.00
11/18/24	Transcript Charges (VENDOR: Planet Depos LLC INVOICE#: 710874 DATE: 11/18/2024 EXPEDITED TRANSCRIPT WITH INDEX OF: Eric Kaup)	\$1,470.55
11/18/24	Transcript Charges (VENDOR: Planet Depos LLC INVOICE#: 710816 DATE: 11/18/2024 EXPEDITED TRANSCRIPT WITH INDEX OF: Mackenzie Shea)	\$2,498.95
11/14/24	Video taped depositions/Video copies (VENDOR: Planet Depos LLC INVOICE#: 712095 DATE: 11/14/2024 VIDEOCONFERENCING SERVICES: Roberta Mittleman - MVC)	\$565.00
11/14/24	Video taped depositions/Video copies (VENDOR: Planet Depos LLC INVOICE#: 711642 DATE: 11/14/2024 VIDEOCONFERENCING SERVICES: James Fairweather, Corporate Designee & Individually - MVC)	\$1,442.50
11/14/24	Video taped depositions/Video copies (VENDOR: Planet Depos LLC INVOICE#: 712066 DATE: 11/14/2024 VIDEOCONFERENCING SERVICES: Garfield Bryan - MVC)	\$565.00
11/14/24	Video taped depositions/Video copies (VENDOR: Planet Depos LLC INVOICE#: 712143 DATE: 11/14/2024 VIDEOCONFERENCING SERVICES: Lauren Thomas - MVC)	\$662.50
11/15/24	Video taped depositions/Video copies (VENDOR: Planet Depos LLC INVOICE#: 712428 DATE: 11/15/2024 LATE CANCELLATION Geoffrey Kupferschmid - MVC)	\$565.00
11/18/24	Video taped depositions/Video copies (VENDOR: Planet Depos LLC INVOICE#: 712422 DATE: 11/18/2024 VIDEOCONFERENCING SERVICES: Mackenzie Shea - MVC)	\$1,247.50

11/18/24	Video taped depositions/Video copies (VENDOR: Planet Depos LLC INVOICE#: 712813 DATE: 11/18/2024 VIDEOCONFERENCING SERVICES: Eric Kaup - MVC)	\$565.00
<u>Travel</u>		
11/01/24	Travel - Accommodations (VENDOR: Kaplan, Michael A. INVOICE#: 7026216711050203 DATE: 11/5/2024 ; 11/01/24; Hotel - Lodging; Travel to and from Stamford, Connecticut for the deposition of J. Fairweather)	\$359.96
11/01/24	Travel - Accommodations (VENDOR: Kaplan, Michael A. INVOICE#: 7026216711050203 DATE: 11/5/2024 ; 11/01/24; Hotel - Parking; Travel to and from Stamford, Connecticut for the deposition of J. Fairweather)	\$15.95
11/04/24	Travel - Accommodations (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/04/24; Hotel - Lodging; DRF Deposition)	\$650.92
11/04/24	Travel - Accommodations (VENDOR: Kaplan, Michael A. INVOICE#: 7039665511080202 DATE: 11/8/2024 ; 11/04/24; Hotel - Lodging; Interview with Garfield Bryan at Weil, Gotshal & Manges)	\$2,098.82
11/04/24	Travel - Accommodations (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/04/24; Hotel - Parking; DRF Deposition)	\$40.42
11/15/24	Travel - Accommodations (VENDOR: Gauvin, Carolyn INVOICE#: 7056458611150201 DATE: 11/15/2024 ; 11/15/24; Hotel - Lodging; Confirmation hearing in Houston, Texas)	\$3,473.96
11/19/24	Travel - Accommodations (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/19/24; Hotel - Lodging; DRF Hearing)	\$345.15
11/19/24	Travel - Accommodations (VENDOR: Posner, David M. INVOICE#: 7071272611220204 DATE: 11/22/2024 ; 11/19/24; Hotel - Lodging; DRF Hearing in Houston)	\$345.15
11/19/24	Travel - Accommodations (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/19/24; Hotel - Lodging; DRF Conference)	\$345.15
11/01/24	Travel - Airfare (VENDOR: Seltzer, Eric INVOICE#: 7028060511050203 DATE: 11/5/2024 ; 11/01/24; Baggage Fee; FROM: Newark, NJ (EWR); TO: Houston, TX - All airports (HOU); Hearing for DRF Logistics with the bankruptcy team.)	\$70.00
11/12/24	Travel - Airfare (VENDOR: Posner, David M. INVOICE#: 7080535711270205 DATE: 11/27/2024 ; 11/12/24; Airfare; FROM: New York, NY - La Guardia (LGA); TO: Houston, TX - Intercontinental (IAH); Flights to DRF Hearing)	\$576.95
11/15/24	Travel - Airfare (VENDOR: American Express/Trv.; INVOICE#: 112824; DATE: 11/28/2024 EWR IAH EWR)	\$497.95
11/15/24	Travel - Airfare (VENDOR: American Express/Trv.; INVOICE#: 112824; DATE: 11/28/2024 EWR IAH EWR)	\$48.75
11/15/24	Travel - Airfare (VENDOR: American Express/Trv.; INVOICE#: 112824; DATE: 11/28/2024 EWR IAH EWR)	\$43.99
11/16/24	Travel - Airfare (VENDOR: Posner, David M. INVOICE#: 7061736111190200 DATE: 11/19/2024 ; 11/16/24; Change Ticket Fee; FROM: New York, NY - La Guardia (LGA); TO: Houston, TX - Intercontinental (IAH); DRF Hearing date changed.)	\$120.00
11/16/24	Travel - Airfare (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/16/24; Airfare; FROM: New York, NY - La Guardia (LGA); TO: Houston, TX - Intercontinental (IAH); DRF Conference)	\$656.95
11/21/24	Travel - Airfare (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/21/24; Airfare; FROM: NPage 5	\$656.95

TO: Houston, TX - Intercontinental (IAH); DRF Hearing)

10/24/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7018121110300201 DATE: 10/30/2024 ; 10/24/24; Taxi/Car Service; FROM: Roseland Office; TO: New York; Travel to and from New York for the deposition of A. Carr)	\$229.69
10/25/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7018121110300201 DATE: 10/30/2024 ; 10/25/24; Taxi/Car Service; FROM: New York; TO: Roseland Office; Travel to and from New York for the deposition of A. Carr)	\$271.98
10/31/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7026216711050203 DATE: 11/5/2024 ; 10/31/24; Mileage; FROM: Roseland Office; TO: Stamford, Connecticut; Travel to and from Stamford, Connecticut for the deposition of J. Fairweather)	\$40.98
11/01/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7026216711050203 DATE: 11/5/2024 ; 11/01/24; Mileage; FROM: Marriott Hotel (Stamford, CT); TO: Washington Blvd., Stamford, CT (return to Yardley, PA); Travel to and from Stamford, Connecticut for the deposition of J. Fairweather)	\$76.19
11/01/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7026216711050203 DATE: 11/5/2024 ; 11/01/24; Toll; Travel to and from Stamford, Connecticut for the deposition of J. Fairweather)	\$27.55
11/01/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Posner, David M. INVOICE#: 7049234011130201 DATE: 11/13/2024 ; 11/01/24; Parking; Parking for deposition of James Fairweather)	\$7.50
11/01/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Posner, David M. INVOICE#: 7049234011130201 DATE: 11/13/2024 ; 11/01/24; Parking; Parking for deposition of James Fairweather)	\$2.00
11/03/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7039665511080202 DATE: 11/8/2024 ; 11/03/24; Toll; Interview with Garfield Bryan at Weil, Gotshal & Manges)	\$22.36
11/03/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7039665511080202 DATE: 11/8/2024 ; 11/03/24; Mileage; FROM: Yardley, PA; TO: New York; Interview with Garfield Bryan at Weil, Gotshal & Manges)	\$65.96
11/03/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Kaplan, Michael A. INVOICE#: 7039665511080202 DATE: 11/8/2024 ; 11/03/24; Parking; Interview with Garfield Bryan at Weil, Gotshal & Manges)	\$255.00
11/04/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/04/24; Toll; DRF Deposition)	\$1.74
11/04/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/04/24; Toll; DRF Deposition)	\$6.94
11/04/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Stewart, Cristina G. INVOICE#: 7033106411070201 DATE: 11/7/2024 ; 11/04/24; Taxi/Car Service; FROM: Location of Deposition ; TO: Home to then go to the office ; Travel back from deposition)	\$121.00
11/05/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Gauvin, Carolyn INVOICE#: 7047911011120202 DATE: 11/12/2024 ; 11/05/24; Taxi/Car Service; FROM: Morristown, NJ; TO: 200 Park Avenue, New York, New York; Travel to and from New York for deposition of M. Shea)	\$160.74
11/06/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Gauvin, Carolyn	\$155.70

	INVOICE#: 7047911011120202 DATE: 11/12/2024 ; 11/06/24; Taxi/Car Service; FROM: 200 Park Avenue, New York, NY; TO: Morristown, NJ; Travel to and from New York for deposition of M. Shea)	
11/06/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Moynihan, Kelly E. INVOICE#: 7039716911080202 DATE: 11/8/2024 ; 11/06/24; Toll; DRF Deposition)	\$6.94
11/11/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Gauvin, Carolyn INVOICE#: 7047899311120202 DATE: 11/12/2024 ; 11/11/24; Taxi/Car Service; FROM: Morristown, NJ; TO: 60 W. 57th Street, New York, NY; Travel to and from New York for the deposition of E. Kaup)	\$145.93
11/19/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/19/24; Taxi/Car Service; FROM: Airport; TO: Hotel; DRF Hearing)	\$37.10
11/19/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/19/24; Taxi/Car Service; FROM: Dinner; TO: Hotel; DRF Hearing)	\$8.15
11/19/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/19/24; Taxi/Car Service; FROM: Houston Airport; TO: Hotel; DRF Conference)	\$61.27
11/20/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Moynihan, Kelly E. INVOICE#: 7071571711220204 DATE: 11/22/2024 ; 11/20/24; Taxi/Car Service; FROM: Court; TO: Hotel; DRF Hearing)	\$11.75
11/20/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/20/24; Taxi/Car Service; FROM: Hotel; TO: Court; DRF Hearing)	\$12.33
11/20/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/20/24; Taxi/Car Service; FROM: Court; TO: Houston Airport; DRF Conference)	\$60.87
10/25/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 10/25/24; Taxi/Car Service; FROM: meeting ; TO: deposition; Alan Carr Deposition Uber to deposition)	\$27.89
10/25/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 10/25/24; Taxi/Car Service; FROM: Home ; TO: meeting; Alan Carr Deposition Uber to NYC was to meet with Michael Kaplan in preparation for deposition)	\$54.35
10/26/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 10/26/24; Taxi/Car Service; FROM: deposition; TO: home; Alan Carr Deposition Uber home from deposition)	\$60.96
11/01/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/01/24; Mileage; FROM: home; TO: deposition; James Fairweather Deposition)	\$28.61
11/01/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/01/24; Parking; Tolls from deposition for James Fairweather)	\$15.38
11/01/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/01/24; Parking; Tolls from deposition for James Fairweather)	\$8.25
11/01/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/01/24; Parking; Tolls to deposition for James Fairweather)	\$8.25
11/01/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/01/24; Mileage; FROM: deposition ; TO: home ; James Fairweather Deposition)	\$28.81

11/04/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/04/24; Taxi/Car Service; FROM: home ; TO: deposition; Uber to deposition for Garfield Bryan)	\$52.86
11/04/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/04/24; Taxi/Car Service; FROM: deposition; TO: home; Garfield Bryan Deposition -Uber home)	\$65.07
11/05/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/05/24; Taxi/Car Service; FROM: office; TO: deposition; Uber to deposition for Mackenzie Shea)	\$25.29
11/05/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/05/24; Taxi/Car Service; FROM: home; TO: office; Uber to office to pick up documents for Mackenzie Shea deposition)	\$50.92
11/06/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/06/24; Taxi/Car Service; FROM: office; TO: deposition; Uber to deposition for – Eric Kaup)	\$16.85
11/06/24	Local Travel (VENDOR: Mannix, Erica INVOICE#: 7056747211190200 DATE: 11/19/2024 ; 11/06/24; Taxi/Car Service; FROM: deposition; TO: home; Uber from deposition for Mackenzie Shea)	\$48.37
11/19/24	Local Travel (VENDOR: Moynihan, Kelly E. INVOICE#: 7071502811220204 DATE: 11/22/2024 ; 11/19/24; Parking; DRF Hearing)	\$178.00
11/20/24	Local Travel (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/20/24; Taxi/Car Service; FROM: LGA; TO: Home; DRF Conference)	\$174.00
11/20/24	Local Travel (VENDOR: Finizio, Gianfranco INVOICE#: 7071981211250205 DATE: 11/25/2024 ; 11/20/24; Taxi/Car Service; FROM: Home; TO: LGA; DRF Conference)	\$136.50

Total Disbursements

\$47,942.53

EXHIBIT E**CUSTOMARY AND COMPARABLE COMPENSATION
DISCLOSURES WITH FEE APPLICATIONS**

	BLENDED HOURLY RATE	
Category of Timekeeper (using categories already maintained by the firm)	Billed Preceding Year, Excluding Bankruptcy	Billed This Fee Application
Partner	\$1,082.21	\$1,200.39
Counsel	\$817.98	\$879.07
Associate	\$615.81	\$631.30
Law Clerk	\$527.68	\$565.00
Paralegal	\$365.76	\$371.29
Research Services	\$300.85	\$383.89
All Timekeepers Aggregated	\$800.74	\$901.87

Lowenstein Sandler's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. The "Blended Hourly Rate – Billed Preceding Year, Excluding Bankruptcy" (the "BHREB") noted above reflects the firm's blended hourly rate billed for calendar year 2024 excluding bankruptcy related work, but including all alternative fee arrangements other than contingency fee cases. In calendar year 2024, the firm increased its billing rates on January 1st in accordance with its normal practice. The BHREB also represents the billed rate across a larger, more expansive population of the firm's attorneys with a multitude of rates that are impacted by a number of factors, including level of experience, complexity of the work and office location. For example, approximately 32% of Lowenstein Sandler's attorneys are based in New York, while approximately 57% are based in NJ, approximately 7% are based in California and Utah, and 4% are based in Washington DC. Thus, the "Blended Hourly Rate – Billed This Fee Application" is a function of, among other things, the experience and location of the subset of attorneys delivering the services and the sophistication and complexity of the specific matter.

EXHIBIT F

ITEMIZED TIME RECORDS FOR THE COMPENSATION PERIOD

Full Detailed List of Services Rendered by Lowenstein Sandler by Project Category

Code	Date	Timekeeper	Time Narrative	Hours	Amount
<u>B100 - Administration</u>					
<u>B110 Case Administration</u>					
B110	08/28/24	DC	E-mail with attorney team re: conflicts	0.10	\$36.50
B110	08/28/24	DMP	Correspondence with LS team members and MWE team members regarding case administration and organization (.6); correspondence with financial advisor candidates regarding interviews (.3); correspondence with G. Finizio, J. Cohen, K. Moynihan and E. Mannix regarding bylaws and roster (.2); correspondence with J. Cohen, E. Chafez, G. Finizio and K. Moynihan regarding protocol with MWE (.2)	1.30	\$1,755.00
B110	08/28/24	ESC	Review various documents and emails re: proposed work allocation between LS and MWE	0.20	\$217.00
B110	08/28/24	GF	Prepare work allocation chart for committee professionals (1.1); review first day declarations for immediate case issues (.8); review debtor first-day powerpoint presentation (.3), review FA presentation materials regarding case issues (.9); review docket for list of matters scheduled for September 9 hearing (.1)	3.20	\$3,440.00
B110	08/28/24	JC	Telephone call with PBI advisors re: introductory call	0.80	\$1,132.00
B110	08/28/24	KEM	Correspondence with L. Foody regarding pro hac vice motions (.1); correspondence with D. Posner regarding bylaws (.1); emails to financial advisor candidates regarding interviews (.2); correspondence from J. Cohen and R. Shrock regarding initial call with Committee and Debtor professionals (.1)	0.50	\$467.50
B110	08/29/24	DC	Review docket, download pleadings, prepare critical dates memo and update attorney calendar	1.40	\$511.00
B110	08/29/24	DMP	Correspondence with LS team regarding financial advisor interviews (.1); review work sharing protocol with MWE and LS and correspondence with LS team regarding same (.1); review financial advisor materials (1.8); conference call with G. Finizio, E. Mannix and M. Helt to prepare for call with Debtors' counsel (.2); conference call with Debtors' counsel regarding case and case issues, timeline and first day motions (.5); correspondence with LS team regarding review of second day motions and roster, bylaws, fiduciary duties, critical dates as well as follow up with Weil (.7)	3.40	\$4,590.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	08/29/24	EGM	Attend to emails regarding, among other things, Committee logistics, workstream, and professionals calls (.5); call with M. Kaplan re litigation strategy and workstream (.3); participate on call with D. Posner, G. Finizio and M. Helt in advance of call with Debtors' professionals (.3); participate on call with L. Tauro, A. Cohen, D. Posner, J. Cohen, and G. Finizio re kick off call and introductions (.5); review and analyze proposed final orders from Weil team and related motions (1.2); review Committee professionals' workstream (.2)	3.00	\$2,595.00
B110	08/29/24	GF	Prepare revisions to work allocation chart (.2); review draft pro hac and notice of appearance (.1); call with M. Greenberg regarding case issues (.2); internal prep call with McDermott team prior to call with Weil (.3); participate on kickoff call with Weil (.5); email to J. Cohen and D. Posner regarding immediate task list items (.1); review markups of other first day orders in cases involving parent company that provides insurance and other services (.4)	1.80	\$1,935.00
B110	08/29/24	KEM	Draft bylaws (.5); draft roster (1.2); review pro hac vice motions (.2); review notice of appearance (.2); correspondence with J. Bishop (MWE) regarding same (.1); correspondence with E. Mannix regarding first day motions (.1); correspondence with D. Posner regarding fiduciary duties memo and critical dates memo (.1); correspondence from J. Cohen and G. Finizio regarding work allocation protocol (.1)	2.50	\$2,337.50
B110	08/30/24	DC	Confer with E. Mannix via e-mail re: upcoming deadlines and hearing dates (.20); download and review Interim Orders (.30)	0.50	\$182.50
B110	08/30/24	DC	Revisions and updates to critical dates memo and attorney calendar per comments received from E. Mannix	1.10	\$401.50
B110	08/30/24	DMP	Review draft of bylaws and roster (.3); correspondence with LS team regarding same and regarding email to Committee (.2); correspondence to MWE regarding protocol (.1); review critical dates memo (.1)	0.10	\$135.00
B110	08/30/24	EGM	Review and analyze critical vendor motion and revise proposed final order	1.50	\$1,297.50
B110	08/30/24	GF	Review fiduciary duties memo (.3), case contact list (.2), and committee bylaws (.2); prepare edits to contact list and bylaws (.5); review drafts of marked first day orders from E. Mannix	2.30	\$2,472.50
B110	08/30/24	JC	Review markups of draft final orders and analysis of related first day motions	1.20	\$1,698.00
B110	08/30/24	JC	Review A&M analysis of first day motion expenditures	0.80	\$1,132.00
B110	08/30/24	JC	Review draft diligence requests and comment re: same	2.20	\$3,113.00
B110	08/30/24	KEM	Correspondence with G. Finizio regarding bylaws (.1); correspondence with E. Mannix regarding pending first day motions (.1)	0.20	\$187.00
B110	08/31/24	EGM	Review and analyze cash management motion and revise proposed final order related thereto	1.20	\$1,038.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	08/31/24	EGM	Further revise proposed final order in connection with the Vendors Motion to incorporate G. Finizio comments	0.80	\$692.00
B110	08/31/24	KEM	Correspondence from G. Finizio and E. Mannix regarding first day orders and first day motions memorandum	0.10	\$93.50
B110	09/01/24	DMP	Correspondence with LS team regarding first day motions and comments thereto (.1); correspondence with LS and MWE teams regarding first day motions and extension of time with regarding to same (.2)	0.30	\$405.00
B110	09/01/24	EGM	Further revise proposed final vendor order to incorporate additional comments from G. Finizio	0.40	\$346.00
B110	09/01/24	EGM	Review and analyze first day motion issues list from A&M team (.4); emails to Committee Professionals and Weil team re extension request for objection deadline on pending first day motions (.3); further revise proposed final cash management order to incorporate G. Finizio comments (.5)	1.20	\$1,038.00
B110	09/01/24	KEM	Review revisions to critical vendors order (.1); review A&M diligence request list (.2); correspondence from D. Posner and M. Kaplan regarding same (.1); review A&M first day motions issues list (.4); correspondence from D. Posner and M. Helt regarding first day motions (.1); review email from G. Finizio regarding first day motion orders (.1)	1.00	\$935.00
B110	09/02/24	DMP	Review markups of critical vendor motion, insurance motion and cash management motion (.3); correspondence with J. Cohen, G. Finizio and E. Mannix regarding same (.2); correspondence with A. Cohen of Weil regarding extension of objection deadline for motions (.1)	0.60	\$810.00
B110	09/02/24	EGM	Further revise proposed orders on first day matters	0.90	\$778.50
B110	09/02/24	KEM	Correspondence from S. Gibbons regarding dataroom (.1); correspondence from J. Cohen, G. Finizio and E. Mannix regarding first day orders (.1); review revised first day orders (.1)	0.30	\$280.50
B110	09/03/24	DMP	Review email from R. Newman regarding critical vendor, cash management and insurance motion caps and language (.1); correspondence with G. Finizio regarding conversation with R. Newman re budget and payables (.2); telephone call with M. Helt regarding protocol and DIP (.2); review draft of memo summarizing first day motions for UCC (.2); email to E. Mannix regarding same (.1); correspondence with LS team regarding preparing an RoR (.1); review and analysis of facts and circumstances with respect to Debtors and its transactions for case strategy (2.2)	3.10	\$4,185.00
B110	09/03/24	EGM	Email with Weil team re interested party list (.1); review comments to Committee bylaws from C. Hardman (.1)	0.20	\$173.00
B110	09/03/24	GF	Review motion to assume Shared Servies Agreement with related exhibits	1.30	\$1,397.50
B110	09/03/24	JC	Review motion to assume amended Shared Services Agreement	0.80	\$1,132.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	09/03/24	KEM	Draft reservation of rights regarding 1st day motions (.3);	0.30	\$280.50
B110	09/04/24	DMP	Correspondence with LS team regarding question from Committee member re critical vendors and review list of CV (.2); review ROR on first day motions (.2)	0.40	\$540.00
B110	09/04/24	GF	Emails with A. Cohen (.1) and R. Newman (.1) regarding critical vendor caps; emails with team regarding critical vendor list (.1); prepare edits to rejection procedures order (.2); emails with K. Moynihan regarding committee member inquiry on critical vendors (.1); emails with K. Moynihan regarding rejection procedures (.1); prepare edits to reservation of rights for pending first day motions (.8)	1.50	\$1,612.50
B110	09/04/24	JC	Telephone call with PBI re: creditor claims	0.80	\$1,132.00
B110	09/04/24	KEM	Draft reservation of rights regarding first day motions (.4); revise same (.3); correspondence with G. Finizio regarding same (.1); correspondence from J. Cohen and G. Finizio regarding critical vendor payments (.1)	0.90	\$841.50
B110	09/05/24	DC	Review docket, download pleadings and update critical dates memo	0.20	\$73.00
B110	09/05/24	DMP	Review Weil mark up of insurance, critical vendor and cash management motion orders (.3); correspondence from G. Finizio regarding first day motions and call with Weil regarding same (.1); review correspondence from G. Finizio regarding status of negotiations on motions for second day hearing other than DIP (.2); review correspondence from G. Finizio and K. Moynihan regarding further edits to first day motions and review markups of same (.3)	0.90	\$1,215.00
B110	09/05/24	GF	Call with M. Helt and Weil team regarding comments to second day motions (.5); call with R. Newman regarding monetary caps for second day orders (.2); review Weil markups of second day orders (.7); email to K. Moynihan regarding comments to second day orders (.2); review further revised proposed orders from K. Moynihan (.5)	2.10	\$2,257.50
B110	09/05/24	JC	Review Debtors' redlines of first day orders	0.60	\$849.00
B110	09/05/24	KEM	Review Weil revisions to first day orders (.5); draft email to G. Finizio and E. Mannix regarding same (.2); correspondence from G. Finizio regarding call with Weil on first day orders (.1); revise first day motion orders (.5); correspondence with G. Finizio regarding same (.2); call with G. Finizio regarding first day motion orders and objection deadline extension (.1); email to A. Cohen regarding critical vendor and cash management orders (.1).	1.70	\$1,589.50
B110	09/06/24	DC	Review docket and update attorney calendar	0.20	\$73.00
B110	09/06/24	DMP	Correspondence with LS team regarding CV and cash management revisions for Weil (.1); telephone call with J. Cohen regarding case strategy (.3)	0.40	\$540.00
B110	09/06/24	EGM	Attend to emails re Shared Services Motion and meeting with A&M team to discuss issues list	0.30	\$259.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	09/06/24	GF	Emails with D. Posner and E. Mannix regarding Shared Services Agreement	0.10	\$107.50
B110	09/06/24	KEM	Correspondence with A. Cohen regarding 9/9 hearing	0.10	\$93.50
B110	09/07/24	EGM	Review and analyze Shared Services Motion	0.90	\$778.50
B110	09/07/24	KEM	Correspondence with J. Cohen and D. Posner regarding 9/9 hearing cancellation	0.10	\$93.50
B110	09/08/24	DMP	Review RSA (.6); review settlement agreement (.4); review Shared Services Agreement motion and Agreement (.6); prepare notes regarding same (.2)	1.80	\$2,430.00
B110	09/08/24	EGM	Review and analyze Shared Services Motion and draft issues list	1.20	\$1,038.00
B110	09/08/24	GF	Emails with D. Posner and E. Mannix regarding Shared Services Agreement	0.10	\$107.50
B110	09/08/24	KEM	Review email from D. Posner regarding RSA and Shared Services Agreement	0.10	\$93.50
B110	09/09/24	DC	Review agenda for 9/9/24 hearing, download filed pleadings, update critical dates memo and attorney calendar	0.50	\$182.50
B110	09/09/24	DMP	Review E. Mannix list of comments /questions to Shared Services Agreement and motion (.1); conference call with G. Finizio and E. Mannix regarding Shared Services Agreement Motion and Agreement (.4); conference call with A&M and Lowenstein teams regarding Shared Services Agreement and motion comments/issues (.4); correspondence with G. Finizio and E. Mannix regarding issues list re Shared Services Agreement (.3)	1.20	\$1,620.00
B110	09/09/24	EGM	Summarize issues list and send same to D. Posner and G. Finizio (.6); participate in call with D. Posner and G. Finizio re: Shared Services Motion issue list (.5); emails with S. Waschitz re Committee professionals call on Shared Services Motion (.2); participate in call with S. Waschitz, C. Ragan, R. Newman, D. Posner, and G. Finizio to discuss issues list for Shared Services Motion (.3); draft and revise legal issues list to incorporate comments from D. Posner and G. Finizio and send to Weil team (.8)	2.40	\$2,076.00
B110	09/09/24	GF	Call with D. Posner and E. Mannix regarding Shared Services Motion (.4); analysis of Shared Services Agreement and amendment (1.2) prepare additional comments for issues list (.5); call with A&M team regarding Shared Services Agreement (.3)	2.40	\$2,580.00
B110	09/09/24	KEM	Correspondence with E. Mannix regarding bylaws	0.10	\$93.50
B110	09/10/24	EGM	Further revise issues list in connection with Shared Services Motion and send same to Weil team	0.50	\$432.50
B110	09/10/24	GF	Prepare additional edits to Shared Services issues list (.4) and emails with E. Mannix regarding same (.1)	0.50	\$537.50
B110	09/10/24	KEM	Review email from E. Mannix regarding Shared Services Agreement	0.10	\$93.50
B110	09/10/24	ZM	Retrieve SEC filings for the past 3 years for Pitney Bowes per E. Mannix	0.30	\$115.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	09/11/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$73.00
B110	09/11/24	EGM	Revise critical dates memo, Committee roster, memo re Shared Shervices issues list, and agenda in advance of weekly Committee meeting	1.20	\$1,038.00
B110	09/11/24	KEM	Correspondence from G. Finizio and E. Mannix regarding creditor call and inquiries	0.10	\$93.50
B110	09/12/24	DC	Update attorney calendar	0.10	\$36.50
B110	09/12/24	DMP	Conference call with A&M team regarding Shared Services Agreement and call with Portage re same (.3); correspondence with E. Mannix regarding limited objection in connection with Shared Services Agreement motion (.1); correspondence with E. Mannix and G. Finizio regarding Shared Services Agreement Motion and status of objection/negotiations (.3); correspondence with Weil regarding Shared Services Agreement (.2)	0.90	\$1,215.00
B110	09/12/24	EGM	Emails with Weil team re Committee's issues list for Shared Services Motion, requesting objection deadline extension (.5); discuss same with D. Posner and G. Finizio (.2); call with R. Newman, C. Ragan, S. Waschitz, and D. Posner re update on Shared Services issues list and discussions with Portage (.3); draft limited objection to Shared Services Motion (1.4)	2.40	\$2,076.00
B110	09/12/24	GF	Emails with E. Mannix regarding status of Shared Services Agreement issues (.2); call with R. Newman regarding critical vendor payments (.1); review Shared Services Agreement issues (.3); review draft email to Dollar Shave Club regarding case status (.1)	0.70	\$752.50
B110	09/12/24	KEM	Correspondence from E. Mannix regarding call with creditor regarding case status (.1); email from L. Foody regarding 341 Meeting (.1)	0.20	\$187.00
B110	09/13/24	DMP	Correspondence with E. Mannix and G. Finizio regarding Shared Services Agreement Motion including negotiations and comments from PBI (.8); correspondence with J. Cohen and G. Finizio regarding Weil markup of bylaws confi and review of same (.2); correspondence with G. Finizio, J. Cohen, E. Mannix and K. Moynihan regarding interim compensation order motion (.2)	1.20	\$1,620.00
B110	09/13/24	EGM	Participate in call with Weil team and G. Finizio re Shared Services issues list (.8); discuss call resolution with G. Finizio (.1); email J. Cohen and D. Posner re outcome from call with Weil team and outstanding issues (.2)	1.10	\$951.50
B110	09/13/24	GF	Prepare for call with Weil regarding Shared Services issues list (.2); participate on call with Weil team and E. Mannix regarding Shared Services Agreement (.7); correspondence with E. Mannix regarding next steps on Shared Services Agreement (.1); review Debtor W&E list for September 17 hearing (.1)	1.10	\$1,182.50
B110	09/13/24	JC	Review proposed revisions to bylaw confidentiality provision and corresponding protective order	1.20	\$1,698.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	09/13/24	KEM	Review email from E. Mannix regarding status of Shared Services Agreement negotiations	0.10	\$93.50
B110	09/14/24	DMP	Correspondence from L. Tauro regarding Shared Services Agreement and removal of fee and automatic extension	0.20	\$270.00
B110	09/14/24	KEM	Review correspondence from M. Kaplan regarding protective order (.1); review protective order revisions (.1)	0.20	\$187.00
B110	09/14/24	KEM	Review email from L. Tauro regarding Shared Services Agreement revisions	0.10	\$93.50
B110	09/15/24	DMP	Correspondence with G. Finizio and E. Mannix regarding Shared Services Agreement and reaching a resolution on issues re same (.3)	0.30	\$405.00
B110	09/15/24	GF	Emails with D. Posner and E. Mannix regarding Shared Services resolution (.1)	0.10	\$107.50
B110	09/15/24	KEM	Correspondence with N. Rowles regarding first day hearing transcript	0.10	\$93.50
B110	09/16/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$73.00
B110	09/16/24	DMP	Correspondence with G. Finizio and M. Kaplan regarding Weil markup of bylaws confi provision (.1); review proposed revised Shared Services Agreement (.3); correspondence with E. Mannix and G. Finizio regarding Shared Services Agreement markup (.2); correspondence with E. Mannix, G. Finizio and J. Sullivan of Weil regarding Shared Services Agreement including resolution of same and extension of objection deadline (.2)	0.80	\$1,080.00
B110	09/16/24	EGM	Review and analyze amended and restated Shared Services Agreement (.5); discuss same with D. Posner and G. Finizio (.3); email J. Sullivan and Weil team re Committee sign off and request for extension of objection deadline (.2)	1.00	\$865.00
B110	09/16/24	GF	Emails with E. Mannix regarding updated Shared Services Agreement (.1); call with E. Mannix regarding Shared Services Agreement (.1); emails with A. Cohen regarding September 17 hearing (.1)	0.30	\$322.50
B110	09/16/24	KEM	Correspondence from G. Finizio and M. Kaplan regarding protective order and bylaws confidentiality provisions	0.10	\$93.50
B110	09/16/24	KEM	Review email from E. Mannix regarding Shared Services Agreement	0.10	\$93.50
B110	09/17/24	DC	Download and review final orders on first day motions for upcoming deadlines, update critical dates memo and attorney calendar	0.40	\$146.00
B110	09/17/24	EGM	Email J. Sullivan and Weil team re amendments to Shared Services Agreement	0.20	\$173.00
B110	09/17/24	GF	Emails with E. Mannix regarding amended schedules for Shared Services Agreement (.2); review amendment to Shared Services Agreement (.1)	0.30	\$322.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	09/17/24	GF	Emails with E. Mannix regarding amended schedules for Shared Services Agreement (.2); review amendment to Shared Services Agreement (.1)	0.30	\$322.50
B110	09/18/24	AS	Provide assistance to J. Pagano re: create external users account and case group as accordingly	0.40	\$132.00
B110	09/18/24	DC	Update critical dates memo in preparation for committee call	0.30	\$109.50
B110	09/19/24	AS	Provide assistance to E. Mannix re: create external users accounts and group; create coding layout and add tags; attend zoom meeting with external user re: Relativity login and coding layout	3.10	\$1,023.00
B110	09/20/24	AS	Provide assistance to A. Gonzalez re: add tags in the external users group coding layout	0.50	\$165.00
B110	09/20/24	DC	Review Agenda for 9/23/24 hearing and update attorney calendar	0.10	\$36.50
B110	09/20/24	EJS	Email correspondence with K. Moynihan re onboarding (.1); begin reviewing First Day Declaration and internal correspondence re case background and status (.8); call with K. Moynihan re onboarding/case issues (.4)	1.30	\$929.50
B110	09/20/24	GF	Emails with R. Newman regarding case updates (.1); review Kaup declaration for amended Shared Services Agreement (.2)	0.30	\$322.50
B110	09/20/24	KEM	Correspondence with E. Seltzer regarding case status (.1); call with E. Seltzer regarding case background and action items (.3); correspondence with G. Finizio regarding 9/22 hearing (.1)	0.50	\$467.50
B110	09/23/24	DC	Review amended agenda for 9/23/24 hearing and update attorney calendar	0.10	\$36.50
B110	09/24/24	DC	Update critical dates memo for circulation to the Committee	0.20	\$73.00
B110	09/24/24	EGM	Participate in weekly Committee professionals' calls	0.70	\$605.50
B110	09/24/24	GF	Participate in UCC professionals weekly call	0.70	\$752.50
B110	09/24/24	KEM	Call with Committee professionals regarding case status and immediate action items (.8); correspondence from E. Mannix and L. Tauro regarding outstanding diligence requests (.1)	0.90	\$841.50
B110	09/25/24	JC	Contracts review contractual privity annotation list and related contracts	1.40	\$1,981.00
B110	09/25/24	KEM	Review email from G. Finizio regarding potential adversary proceeding against equipment lessor	0.10	\$93.50
B110	09/26/24	DC	Review and circulate filed pleadings, update critical dates memo and attorney calendar	0.20	\$73.00
B110	09/26/24	KEM	Review and analysis of case strategy with G. Finizio	0.20	\$187.00
B110	09/27/24	DC	Review docket, download pleadings, update critical dates memo with objection deadlines	0.20	\$73.00
B110	09/27/24	NSM	Discuss document review project with E. Mannix	0.20	\$118.00
B110	09/30/24	GF	Review upcoming critical dates and deadlines	0.10	\$107.50
B110	10/01/24	DC	Review docket, download pleadings and update critical dates memo for attorney circulation	0.40	\$146.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	10/01/24	DMP	Review and analysis of work streams and email to N. Rowles regarding same	0.20	\$270.00
B110	10/01/24	DMP	Participate on conference call with Committee professionals regarding case strategy and discovery	0.80	\$1,080.00
B110	10/01/24	EGM	Participate in weekly Committee professionals' call	0.70	\$605.50
B110	10/01/24	EJS	Attend Committee professionals strategy call with MWE and A&M	0.70	\$500.50
B110	10/01/24	GF	Participate on committee professionals strategy call (.7); call with A&M team regarding diligence requests regarding real property leases (.1)	0.80	\$860.00
B110	10/01/24	KEM	Attend portion of Committee professionals call regarding case status	0.30	\$280.50
B110	10/01/24	MAK	Participate in committee professionals call to prepare committee update	0.80	\$824.00
B110	10/02/24	DC	Review docket for updated hearing dates, review adversary complaint and update critical dates memo	0.30	\$109.50
B110	10/03/24	KEM	Correspondence with N. Rowles regarding witness and exhibit list for 10/8 hearing	0.10	\$93.50
B110	10/04/24	DC	Update attorney calender	0.10	\$36.50
B110	10/07/24	DC	E-mails with E. Mannix re: general bar date and other pending related deadlines	0.20	\$73.00
B110	10/07/24	DC	Update electronic pleadings file	0.10	\$36.50
B110	10/08/24	EGM	Participate in weekly Committee professionals' call	0.50	\$432.50
B110	10/08/24	EJS	Attend weekly professionals call with Lowenstein, MWE, and A&M teams	0.50	\$357.50
B110	10/08/24	GF	Participate in weekly committee professionals' strategy call	0.50	\$537.50
B110	10/08/24	JC	Weekly committee professionals' call re: pending matters	0.60	\$849.00
B110	10/08/24	JC	Strategy meeting with D. Posner re: solvency and related issues	0.40	\$566.00
B110	10/08/24	KEM	Call with all UCC professionals regarding case status and immediate action items (.5); correspondence with N. Rowles regarding 10/8 hearing (.1)	0.60	\$561.00
B110	10/08/24	MAK	Participate in committee professionals call to prepare committee update	0.80	\$824.00
B110	10/09/24	DC	Review docket, circulate entered orders (.1); update critical dates memo and attorney calendar (.2)	0.30	\$109.50
B110	10/11/24	DC	Research local rules re: service of deposition notice	0.40	\$146.00
B110	10/14/24	DC	Review docket, download filed pleadings, update critical dates memo for circulation to the committee	0.50	\$182.50
B110	10/15/24	DC	Update calendar with adjourned status conference (.1); and circulate updated critical dates memo (.1)	0.20	\$73.00
B110	10/15/24	DMP	Professionals meeting regarding case issues and strategy	0.50	\$675.00
B110	10/15/24	EGM	Participate in weekly Committee professionals call	0.50	\$432.50
B110	10/15/24	EJS	Attend DRF professionals call with Lowenstein, MWE, and A&M teams	0.50	\$357.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	10/15/24	GF	Participate in committee professionals strategy call	0.50	\$537.50
B110	10/15/24	JC	Weekly committee professionals' meeting	0.60	\$849.00
B110	10/15/24	KEM	Participate on UCC professionals call	0.50	\$467.50
B110	10/15/24	MAK	Participate in weekly committee professional call to prepare for committee meeting	0.40	\$412.00
B110	10/16/24	GF	Call with team regarding chambers conference preparations (.6); review E. Mannix email with chambers conference notes (.1); review updated OCP list (.1)	0.80	\$860.00
B110	10/16/24	JC	Case admin review committee update email	0.20	\$283.00
B110	10/17/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$73.00
B110	10/17/24	EGM	Email L. Foody re Committee bylaws	0.10	\$86.50
B110	10/18/24	EJS	Prepare for (.1) and attend (.9) case strategy meeting with Lowenstein team	1.00	\$715.00
B110	10/18/24	GF	Participate on follow up strategy call with Lowenstein team	0.60	\$645.00
B110	10/20/24	GF	Emails with MWE regarding pending workstreams (.1); call with M. Helt regarding same (.2)	0.30	\$322.50
B110	10/20/24	KEM	Correspondence from N. Rowles regarding 10/23 hearing witness and exhibit list	0.10	\$93.50
B110	10/21/24	DC	Review docket, update critical dates memo and attorney calendar (.3); Manage and update electronic files (.3)	0.60	\$219.00
B110	10/21/24	DMP	Correspondence from Weil regarding extension of Shared Services Agreement	0.10	\$135.00
B110	10/21/24	GF	Emails with E. Seltzer regarding matters for hearing on October 23	0.10	\$107.50
B110	10/21/24	KEM	Correspondence with N. Rowles regarding witness and exhibit list for 10/23 hearing	0.10	\$93.50
B110	10/22/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$73.00
B110	10/22/24	DMP	Committee professionals call on case strategy and analysis	0.80	\$1,080.00
B110	10/22/24	EGM	Meet with D. Posner re case strategy (.3); participate in Committee professionals' call (.8); meet with D. Posner, G. Finizio and K. Moynihan re (.5)	1.60	\$1,384.00
B110	10/22/24	EJS	Prepare for (.1) and attend (.8) weekly Committee professionals call with Lowenstein, MWE, and A&M teams re case strategy and next steps	0.90	\$643.50
B110	10/22/24	GF	Participate on portion of UCC professionals' strategy call (.8); follow up strategy call with D. Posner, E. Mannix and K. Moynihan (.6)	1.40	\$1,505.00
B110	10/22/24	KEM	Correspondence with J. Cohen and D. Posner regarding professionals call (.1); UCC professionals call (.8)	0.90	\$841.50
B110	10/22/24	MAK	Participate in professionals call to prepare committee update	1.00	\$1,030.00
B110	10/23/24	EJS	Call with C. Gauvin re case background and onboarding	0.30	\$214.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	10/24/24	GF	Emails with J. Cohen regarding settlement proposal structure (.1); update letter communicating proposal structure (.3)	0.40	\$430.00
B110	10/25/24	DC	Coordinate deposition and interview schedules with E. Mannix (.2); update and maintain attorney calendar (.9)	1.10	\$401.50
B110	10/25/24	GF	Multiple emails with J. Cohen, D. Posner, R. Newman and M. Helt regarding potential proposal structure (.5); review and revise potential settlement letter (1.3)	1.80	\$1,935.00
B110	10/28/24	DC	Review docket, download pleadings, update critical dates memo	0.20	\$73.00
B110	10/28/24	EJS	Attend case strategy meeting with Lowenstein team (1.6); prepare summary of same (.3)	1.90	\$1,358.50
B110	10/29/24	CG	Participate in Committee Professionals Meeting	0.50	\$275.00
B110	10/29/24	DMP	Participate in committee professionals call regarding case strategy	0.60	\$810.00
B110	10/29/24	EGM	Participate in weekly Committee professionals call	0.60	\$519.00
B110	10/29/24	EJS	Attend weekly Committee professionals meeting with Lowenstein, MWE, and A&M teams (.6); prepare for same (.1)	0.70	\$500.50
B110	10/29/24	GF	Review PBI 8K regarding new board members (.4); review motion and exhibits regarding Lighting Resources agreement (.5); emails with A&M regarding trading value of PBI secured notes (.2); participate on portion of UCC professionals strategy call (.6)	1.70	\$1,827.50
B110	10/29/24	JC	Weekly professionals call with Committee professionals	0.80	\$1,132.00
B110	10/29/24	KEM	Participate in committee professionals call (.6); correspondence from J. Silber regarding LRI services agreement (.1); correspondence with D. Claussen regarding critical dates memo (.1)	0.80	\$748.00
B110	10/30/24	DC	Review docket, update critical dates memo for distribution to the committee (.3); download pleadings to electronic files (.2)	0.50	\$182.50
B110	10/30/24	EGM	Participate in Committee professionals call	0.20	\$173.00
B110	10/30/24	GF	Revise 408 letter per Committee call discussion	0.50	\$537.50
B110	10/31/24	DC	E-mails with local counsel re: service of monthly fee applications (.1); update critical dates memo (.1); update attorney calendar with zoom links for depositions (.2)	0.40	\$146.00
B110	10/31/24	GF	Review updated critical vendor matrix and email same to A&M (.1); review Debtor MORs (.2)	0.30	\$322.50
B110	11/01/24	DC	Update critical dates memo, attorney calendar and fee application status chart	0.40	\$146.00
B110	11/01/24	GF	Call with D. Posner regarding all hands call to discuss 408 letter	0.10	\$107.50
B110	11/04/24	DC	Review docket, update critical dates memo and attorney calendar (.4); confer with E. Mannix re: deposition schedule and update deposition calendar (.2)	0.60	\$219.00
B110	11/04/24	GF	Review email from R. Newman regarding call with BRG on settlement construct (.1) and emails with D. Posner and K. Moynihan regarding same (.2)	0.30	\$322.50
B110	11/05/24	EJS	Attend weekly Committee professionals call	0.70	\$500.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B110	11/05/24	GF	Prepare side by side analysis of PBI counterproposal (1.3); participate on weekly professionals' call (.7); review stipulation with First-Citizens Bank (.1)	2.10	\$2,257.50
B110	11/05/24	JC	Participate on weekly committee professionals call	1.10	\$1,556.50
B110	11/05/24	KEM	Attend Committee professionals call	0.70	\$654.50
B110	11/06/24	DC	Review Planet Depo confirmation sheets for 11/7-11/8, update attorney calendar; review docket and update critical dates memo	0.30	\$109.50
B110	11/07/24	GF	Review emails from M. Shea regarding case issues (.2); call with D. Posner, J. Cohen and M. Shea regarding case issues (.7); follow up calls with D. Posner and J. Cohen (.2); follow up call with M. Shea regarding case issues (.2); analysis of PBI 8K regarding quarterly results (.3); emails with D. Posner and J. Cohen regarding next steps (.1)	1.70	\$1,827.50
B110	11/08/24	DC	Update deposition schedule and calendar	0.30	\$109.50
B110	11/11/24	DC	Review dockets, update attorney ECF accounts and attorney calendar	0.40	\$146.00
B110	11/11/24	GF	Call with Weil team regarding next steps	0.50	\$537.50
B110	11/12/24	DC	Review docket, download objections to plan, update critical dates memo	0.30	\$109.50
B110	11/18/24	DC	Review hearing schedule and update attorney calendar	0.30	\$109.50
B110	11/19/24	EJS	Review (.4) and summarize (.4) Debtors' Motion to Enter Services Agreement; email correspondence with G. Finizio and K. Moynihan re same (.1)	0.90	\$643.50
B110	11/21/24	GF	Emails with K. Moynihan regarding Penske Truck motion (.2); review Penske Truck summary (.1)	0.30	\$322.50
B110	11/21/24	KEM	Review Penske settlement (.4); correspondence with G. Finizio regarding same (.2)	0.60	\$561.00
B110	11/22/24	DC	Review docket, update critical dates memo and attorney calendar	0.50	\$182.50
B110	11/29/24	GF	Review DRF monthly operating reports	0.30	\$322.50
B110	12/02/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$73.00
B110	12/03/24	GF	Review emails from Weil regarding inquiries on Penske settlement motion (.1); review wages matrix (.1); review critical vendor matrix (.1)	0.30	\$322.50
B110	12/05/24	GF	Emails with E. Seltzer regarding amendments to SSA	0.10	\$107.50
B110	12/06/24	EJS	Review Amended Shared Services Agreement (.8); draft summary of issues in connection with same (.3); email correspondence with G. Finizio and Lowenstein team re same (.1)	1.20	\$858.00
B110	12/06/24	GF	Review E. Seltzer summary of amended SSA (.1) and amended schedules/statements (.1)	0.20	\$215.00
B110	12/06/24	KEM	Review E. Seltzer summary of Amended SSA	0.10	\$93.50
Total B110 - Case Administration				142.80	\$137,944.00

B120 Asset Analysis and Recovery

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	08/29/24	DMP	Correspondence with M. Kaplan regarding initial thoughts on potential investigation areas (.1); Telephone call with R. Newman regarding investigation (.2); telephone call with M. Kaplan regarding investigation (.3)	0.60	\$810.00
B120	08/29/24	EGM	Meet with M. Kaplan re investigation strategy for the cases and next steps	0.50	\$432.50
B120	08/29/24	MAK	Review and analyze background materials to prepare investigation discovery	2.30	\$2,369.00
B120	08/30/24	DMP	Conference call with M. Kaplan, E. Mannix and A&M team regarding initial thoughts and topics for investigation	0.30	\$405.00
B120	08/30/24	EGM	Call with J. Cohen, D. Posner, M. Kaplan, G. Finizio, R. Newman, A. Gonzalez, and D. Green re Committee's investigation (.3); call with M. Kaplan re investigation strategy (.2); draft document demands to the Debtors (1.8)	2.30	\$1,989.50
B120	08/30/24	GF	Call with M. Kaplan and Lowenstein bankruptcy team regarding Committee investigations	0.30	\$322.50
B120	08/30/24	JC	Zoom call with LW and MWE litigation teams re: document demand strategy	0.60	\$849.00
B120	08/30/24	MAK	Review and analyze background materials to prepare investigation discovery	1.70	\$1,751.00
B120	08/31/24	EGM	Draft document demands for 2004 subpoena to Debtors, PBI, Hilco, and Oaktree	3.50	\$3,027.50
B120	09/01/24	DMP	Review draft of A&M initial diligence list (.2); email correspondence with team regarding same (.1); review A&M comments to first day motions (.3)	0.60	\$810.00
B120	09/01/24	EGM	Continue drafting document demands for 2004 subpoena to Debtors, PBI, Hilco, and Oaktree	0.90	\$778.50
B120	09/02/24	DMP	Review drafts of RFPs to Debtors, PBI, Hilco and Oaktree (.5); review J. Cohen comments to same (.1); correspondence with LS team regarding same (.1)	0.70	\$945.00
B120	09/02/24	EGM	Further revise document requests	2.30	\$1,989.50
B120	09/02/24	JC	Review and comment on draft document demands to PBI, DRF, Oaktree and PBIH	2.20	\$3,113.00
B120	09/02/24	KEM	Review draft Rule 2004 document requests (.6); correspondence from J. Cohen, D. Posner, and E. Mannix regarding same (.1)	0.70	\$654.50
B120	09/02/24	MAK	Review and revise draft 2004 requests	2.90	\$2,987.00
B120	09/03/24	DMP	Telephone call with P. Heath regarding case and potential discovery (.4); review of redline of 2004 document requests (.1); confer with J. Cohen regarding discovery and case strategy/calls to creditors (.2)	0.70	\$945.00
B120	09/03/24	EGM	Review comments from J. Cohen, D. Posner and G. Finizio in connection with document requests (.2); further revise 2004 document requests to Debtors, PBI, Hilco and Oaktree (1.7); email draft document requests to A&M and MWE teams for comments and review (.2)	2.10	\$1,816.50
B120	09/03/24	JC	Further review and revision of draft document demands to Debtors, PBI, Oaktree and Hilco	1.40	\$1,981.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/03/24	KEM	Review revisions to document requests	0.10	\$93.50
B120	09/03/24	MAK	Review and revise draft 2004 requests	1.40	\$1,442.00
B120	09/04/24	DMP	Review and analysis of issues for investigation (1.1); correspondence with LS team regarding case issues and analysis (.2); review MWE draft of 2004 motion (.4); correspondence with M. Kaplan, J. Cohen, G. Finizio, K. Moynihan and E. Mannix regarding same (.2)	1.90	\$2,565.00
B120	09/04/24	EGM	Revise draft 2004 motion (2.4); call with M. Kaplan to discuss same (.5); email C. Gibbs and M. Helt re pro hac motion for M. Kaplan (.1); email J. Cohen, D. Posner and G. Finizio re document request strategy (.2); email Committee professionals re same (.2); call with D. Green re 2004 motion and local rules for proceeding with document requests to third parties (.1); finalize all document requests for service on the various targets (.7); email to Weil team serving Committee's document requests to the Debtors and Hilco (.2); email to PBI and PBIH counsel re document requests (.2); email to Oaktree counsel re document requests (.1)	4.70	\$4,065.50
B120	09/04/24	JC	Review and revise draft 2004 motion	1.20	\$1,698.00
B120	09/04/24	MAK	Review and revise draft 2004 motion (2.3); confer with E. Mannix re: the same (.5)	2.80	\$2,884.00
B120	09/05/24	DMP	Review and analysis of materials for claims, causes of action and investigation (1.1); review settlement agreement regarding analysis and investigation (.5)	1.60	\$2,160.00
B120	09/05/24	KEM	Correspondence from L. Tauro regarding meet and confer for 2004 document requests and confidentiality agreement	0.10	\$93.50
B120	09/05/24	MAK	Continue review of background materials and first day pleadings	1.90	\$1,957.00
B120	09/06/24	EGM	Attend to emails with Weil team and others re meet and confer in connection with document requests (.2); discuss 2004 discovery strategy with M. Kaplan (.5)	0.70	\$605.50
B120	09/06/24	JC	Review document requests in preparation for meet and confer with responsive parties	1.30	\$1,839.50
B120	09/06/24	JC	Correspondence with PBI and DRF counsel re: meet and confer	0.30	\$424.50
B120	09/09/24	DMP	Conference call with M. Kaplan, J. Cohen and E. Mannix regarding discovery requests, meet and confer and strategy (.4); meet and confer conference call with Lowenstein, Weil and Gibson teams regarding committee document requests (.5)	0.90	\$1,215.00
B120	09/09/24	EGM	Review emails re: Committee's document requests (.2); participate on call with J. Cohen, D. Posner, and M. Kaplan re Committee's 2004 discovery in advance of meet and confers (.4); email Oaktree counsel re meet and confer (.1); participate on meet and confer call with Debtors and PBI's counsel re Committee's 2004 discovery requests (.5); call with M. Kaplan re next steps for document requests and 2004 discovery (.3)	1.50	\$1,297.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/09/24	GF	Review April 2024 sale process materials in VDR regarding potential leasehold values (.5); review process letters to prospective buyers from April 2024 process (.3)	0.80	\$860.00
B120	09/09/24	JC	Precall with LS team re: document demands	0.80	\$1,132.00
B120	09/09/24	MAK	Inter-office call to prepare for call with PBI and Debtors (.4); telephone call with PBI and Debtors re: document requests (.6); continue review and analysis of background documents and public filings re: debtor (2.6)	3.60	\$3,708.00
B120	09/10/24	DMP	Meet and confer call with counsel to Oaktree (.5); conference call with M. Kaplan and E. Mannix regarding requests to Oaktree and strategy (.1)	0.60	\$810.00
B120	09/10/24	EGM	Participate in meet and confer call with B. Beller and D. Rosenthal (Oaktree counsel), M. Kaplan and D. Posner re Committee document demands to Oaktree (.5); discuss strategy of same with M. Kaplan and D. Posner (.2); draft follow up email to B. Beller re Oaktree document requests (.3)	1.00	\$865.00
B120	09/10/24	MAK	Conference call with Oaktree re: document requests (.5); continue review and analysis of background documents and public filings re: debtor (2.8)	3.40	\$3,502.00
B120	09/11/24	EGM	Emails with B. Beller re Committee's requests for documents and Oaktree third-party communications	0.30	\$259.50
B120	09/11/24	JC	Review debtors' markup of committee confidentiality provisions	0.40	\$566.00
B120	09/11/24	JJP	Incorporate new document sets into the case database as requested by E. Mannix	0.60	\$237.00
B120	09/11/24	KEM	Review email from E. Mannix regarding Oaktree document requests	0.10	\$93.50
B120	09/12/24	DMP	Correspondence with Weil team regarding investigation (.1); correspondence with Sullivan regarding document requests (.1)	0.20	\$270.00
B120	09/12/24	EGM	Emails with T. Dougherty re Hilco document requests, protective order, and examinations of the independent directors (.4); emails with E. Kaup, T. Schrader and C. Wray re Hilco document requests and scheduling meet and confer (.3)	0.70	\$605.50
B120	09/12/24	JC	Review Debtors' markup of confidentiality provisions of bylaws	0.90	\$1,273.50
B120	09/12/24	JC	Review draft protective order and comment re: same	1.30	\$1,839.50
B120	09/12/24	KEM	Correspondence from E. Mannix regarding Hilco document requests	0.10	\$93.50
B120	09/12/24	MAK	Continue review and analysis of background documents and public filings re: debtor	2.40	\$2,472.00
B120	09/13/24	DMP	Correspondence from B. Beiler regarding document requests to Oaktree (.2); correspondence with E. Mannix and Weil regarding committee document requests (.2); correspondence from E. Mannix regarding Hilco document requests (.2)	0.60	\$810.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/13/24	EGM	Review draft protective order from Weil and discuss same with M. Kaplan (.5); email C. Gibbs, M. Helt and D. Green re comments on protective order (.1); email T. Dougherty and Weil team re status of production of documents (.2)	0.80	\$692.00
B120	09/13/24	KEM	Review correspondence from E. Mannix and B. Beller regarding status of document productions	0.10	\$93.50
B120	09/13/24	MAK	Continue review and analysis of background documents and public filings re: debtor (2.0); review and revise draft protective order (.9)	2.90	\$2,987.00
B120	09/14/24	DMP	Review correspondence from M. Kaplan to Weil regarding protective order and comments thereto (.1); review committee comments to protective order communicated to Weil (.2)	0.30	\$405.00
B120	09/14/24	EGM	Revise draft protective order to incorporate Committee's comments (.2); email T. Dougherty of Weil re same (.1)	0.30	\$259.50
B120	09/15/24	EGM	Attend to emails re Debtors' first production of documents (.2); discuss same with M. Kaplan (.1); draft document review protocol (3.2)	3.50	\$3,027.50
B120	09/16/24	DMP	Conference call with Lowenstein and Hilco regarding document requests to Hilco (.2); correspondence with G. Finizio and M. Kaplan regarding Weil markup of bylaws confi provision (.1); review proposed revised Shared Services Agreement (.3); correspondence with E. Mannix and G. Finizio regarding Shared Services Agreement markup (.2); correspondence with E. Mannix, G. Finizio and J. Sullivan of Weil regarding Shared Services Agreement including resolution of same and extension of objection deadline (.2); review and analysis of investigation issues (1.3); correspondence with G. Finizio and K. Moynihan regarding large intercreditor claim on SOFAs (.2)	1.50	\$2,025.00
B120	09/16/24	EGM	Review Hilco document requests in advance of call with E. Kaup, T. Schrader, and C. Wesley (.3); call with Hilco team and M. Kaplan, D. Posner re Committee document requests (.2); call with M. Kaplan to discuss Weil's involvement in Hilco's production (.1); further revise document review protocol (.4); send same to J. Cohen, D. Posner, G. Finizio, K. Moynihan, and M. Kaplan (.1); review documents produced by the Debtors (.5); emails to R. Zimmerman re document review and investigation generally (.3)	1.90	\$1,643.50
B120	09/16/24	JC	Discuss document review with E. Mannix	0.60	\$849.00
B120	09/16/24	JC	Review document review protocol	0.40	\$566.00
B120	09/16/24	JJP	Incorporate incoming production sets into the case database as requested by E. Mannix (.7); provide summary information re: same (.1); prepare document review queues and coding panels (.3)	1.10	\$434.50
B120	09/16/24	KEM	Correspondence from J. Cohen, M. Kaplan and E. Mannix regarding document productions and review protocol (.1); review document review protocol (.1)	0.20	\$187.00
B120	09/16/24	MAK	Continue review and analysis of background documents and public filings re: debtor	2.10	\$2,163.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/17/24	DMP	Conference call with M. Kaplan, E. Mannix and MWE team regarding investigation	0.10	\$135.00
B120	09/17/24	EGM	Emails with MWE and J. Cohen, D. Posner, M. Kaplan re investigation touch base (.2); review document production from the Debtors (.5); participate in investigation touchbase call with M. Kaplan, D. Posner, D. Green, L. Foody and N. Rowles re status of document production and workstreams (.2); call with M. Kaplan re same (.2)	1.10	\$951.50
B120	09/17/24	JC	Multiple correspondence with MWE re: document demands and related production	0.40	\$566.00
B120	09/17/24	JJP	Provide assistance to the case team re: document review (.2); process new document sets into the case database as requested by E. Mannix (.5)	0.70	\$276.50
B120	09/17/24	RFZ	Conduct document review	3.50	\$2,275.00
B120	09/18/24	DMP	Review E. Mannix correspondence to Oaktree and Debtors regarding documents and depositions as part of investigation (.2); correspondence with B. Beller of Sullivan regarding documents and declaration regarding lack thereof (.2); correspondence with A&M and Lowenstein regarding investigation (.2); conference call with A&M team and Lowenstein team regarding investigation (.5); correspondence with Lowenstein team regarding investigation and analysis of issues related thereto (.2)	1.30	\$1,755.00
B120	09/18/24	EGM	Review Hilco document production of one document (.2); participate in call with M. Kaplan, D. Posner, K. Moynihan, and A&M team re Committee's investigation (.4); review Debtors' production of documents (.5); attend to emails with T. Dougherty re Hilco document production and Committee's request for examinations of independent directors (.2); email B. Beller re Oaktree declaration in connection with responses to Committee's document requests (.1); email L. Wilson re status of Pitney Bowes' responses to Committee's document requests (.2); emails with N. Rowles and J. Pagano re MWE team review of document productions (.3)	1.90	\$1,643.50
B120	09/18/24	JC	Review PBI response to document requests	0.60	\$849.00
B120	09/18/24	JJP	Incorporate new production sets into the case database as requested by E. Mannix (.8); configure external users groups for security access as requested (.1); translate documents and provide access to same (.2)	1.10	\$434.50
B120	09/18/24	KEM	Correspondence from M. Kaplan, E. Mannix, and B. Beller regarding Oaktree document requests (.1); correspondence with D. Posner regarding investigation call (.1)	0.20	\$187.00
B120	09/18/24	MAK	Telephone call with A&M re: investigation status	0.40	\$412.00
B120	09/18/24	MAK	Second level review of produced documents (2.2); telephone calls and e-mails with E. Mannix re: document production (.3); review and analyze PBI responses to document demands (.4)	2.90	\$2,987.00
B120	09/19/24	MAK	Second level review of produced documents	2.30	\$2,369.00
B120	09/19/24	RFZ	Conduct document review	4.10	\$2,665.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/20/24	AMG	Review document review protocol (0.3); review Debtors' and non-debtor affiliates' document productions (3.8)	4.10	\$2,419.00
B120	09/20/24	DMP	Correspondence with M. Kaplan regarding pace of document production (.1); review and analysis of claims and potential causes of action (1.6); conference call with J. Cohen, G. Finizio, E. Mannix and K. Moynihan regarding investigation and strategy (.7)	2.50	\$3,375.00
B120	09/20/24	EGM	Review and analyze Pitney Bowes response letter and draft letter reply to same (1.8); participate in call with J. Cohen, D. Posner, G. Finizio, and K. Moynihan re case strategy (.7); call with M. Kaplan re same (.3)	2.80	\$2,422.00
B120	09/20/24	JC	Participate in LS investigation strategy call	0.80	\$1,132.00
B120	09/20/24	KEM	Call with J. Cohen, D. Posner, G. Finizio and E. Mannix regarding investigation (.7); correspondence from T. Doughty regarding discovery meeting (.1)	0.80	\$748.00
B120	09/21/24	DMP	Review PBI letter re discovery (.2); review Committee responsive letter to PBI regarding discovery (.2); correspondence with J. Cohen, M. Kaplan and E. Mannix regarding same (.1)	0.50	\$675.00
B120	09/21/24	EGM	Further draft and revise letter response to Pitney Bowes in connection with the Committee's document requests (1.9); emails with M. Kaplan, J. Cohen re same (.2)	2.10	\$1,816.50
B120	09/21/24	JJP	Provide assistance A. Gonzalez re: document review, searches and coding panel access	0.20	\$79.00
B120	09/21/24	KEM	Correspondence from J. Cohen, M. Kaplan and E. Mannix regarding Pitney Bowes discovery	0.10	\$93.50
B120	09/21/24	MAK	Revise draft deficiency letter to PBI	0.40	\$412.00
B120	09/22/24	EGM	Finalize letter response to Pitney Bowes in connection with Committee's document requests (.4); send same to L. Wilson and Gibson Dunn team (.2); review Debtors' document production (1.3)	1.90	\$1,643.50
B120	09/22/24	KEM	Review letter to Pitney Bowes regarding discovery	0.20	\$187.00
B120	09/23/24	AMG	Review Debtors' and non-debtor affiliates' document productions (5.5); phone call with R. Zimmerman re: same (0.2)	5.70	\$3,363.00
B120	09/23/24	DMP	Meet and confer with Weil team regarding investigation including document production and depositions	0.60	\$810.00
B120	09/23/24	EGM	Participate in call with Weil team, M. Kaplan, D. Posner, G. Finizio, K. Moynihan, N. Rowles, and M. Helt re meet and confer on Committee's document requests	0.50	\$432.50
B120	09/23/24	EJS	Review document review protocol from E. Mannix (.7); correspondence with E. Mannix re next steps re: document review (.1)	0.80	\$572.00
B120	09/23/24	JC	Review index of produced documents and discuss with E. Mannix	1.30	\$1,839.50
B120	09/23/24	JJP	Process production sets into the case database and provide summary information re: same to E. Mannix	1.40	\$553.00
B120	09/23/24	KEM	Call with Debtors' counsel regarding investigation and document productions	0.50	\$467.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/23/24	MAK	Continue review and analysis of tagged documents from production (1.0); outline topics for deposition of independent director (1.2)	2.20	\$2,266.00
B120	09/23/24	RFZ	Conduct document review	2.00	\$1,300.00
B120	09/24/24	AMG	Review Debtors' and non-debtor affiliates' document productions and update internal document review tracker (4.1); email with E. Mannix re: same (0.3)	4.40	\$2,596.00
B120	09/24/24	DMP	Review correspondence with Sullivan & Cromwell regarding discovery (.3); review and analysis of correspondence with Lowenstein team regarding privacy issue (.4); telephone call with M. Kaplan regarding privacy issue (.1)	0.80	\$1,080.00
B120	09/24/24	EGM	Participate in call with Pitney Bowes counsel, M. Kaplan, K. Moynihan re Committee document requests (.5); emails with B. Beller and M. Kaplan re Oaktree document requests (.4); email to Weil team (T. Dougherty and P. Patel) in connection with protective order and A&M's outstanding diligence requests (.2); calls with M. Kaplan re investigation, document requests, and document review status (.4); call with E. Seltzer re memo summarizing transactions under investigation and theories of recovery (.6); emails with A. Giblin and R. Zimmerman re analysis of documents and summary of findings (.7); review documents produced by Pitney Bowes (.5)	3.30	\$2,854.50
B120	09/24/24	EGM	Attend to emails from M. Kaplan re case issues list and response from G. Finizio re same	0.40	\$346.00
B120	09/24/24	EJS	Call with E. Mannix re prepetition transactions and theories of recovery (.6); begin to review background re same (.3)	0.90	\$643.50
B120	09/24/24	GF	Review email from M. Kaplan regarding litigation strategy (.1); prepare follow up email to M. Kaplan regarding PBI demand letter (.2); Review A&M outstanding diligence requests (.2); review strategy for potential fraudulent transfer claims relating to Hilco Transaction (.9)	1.40	\$1,505.00
B120	09/24/24	JC	Multiple correspondence with M. Kaplan re: meet and confer with Gibson	0.80	\$1,132.00
B120	09/24/24	JJP	Transfer files from S. Dudding and incorporate same into the case database for review	0.60	\$237.00
B120	09/24/24	KEM	Call with M. Kaplan, E. Mannix, L. Wilson and K. Martorana regarding document productions (.5); correspondence with M. Kaplan regarding privacy issues (.2); review correspondence from M. Kaplan and G. Finizio regarding investigation status (.2); correspondence from M. Kaplan, E. Mannix, B. Beller and L. Wilson regarding PBI and Oaktree document productions (.2)	1.10	\$1,028.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/24/24	MAK	Review PBI document production and discovery letters to prepare for conference call (.4); conference call with PBI counsel re: document production (.5); e-mails with counsel for Oaktree re: discovery dispute (.3); second level review of document productions (1.9); begin outlining issues for deposition of independent directors (1.7); inter-office conferences re: investigation status (1.2)	5.90	\$6,077.00
B120	09/24/24	RFZ	Conduct document review	0.70	\$455.00
B120	09/25/24	AMG	Review Debtors' and non-debtor affiliates' document productions and update internal document review tracker	5.60	\$3,304.00
B120	09/25/24	DMP	Email correspondence with Lowenstein team regarding privacy issue and examination of contracts with creditors (.1); email correspondence with Pitney Bowes counsel regarding same (.1); review and analysis of contractual privacy issue and case strategy including investigation (1.9); correspondence with T. Dougherty and Lowenstein team regarding documents and meet and confer (.3); correspondence with B. Beller and Lowenstein team regarding declaration in lieu of documents (.2); review top 30 creditor contract analysis provided by Weil (.1); correspondence with A&M team and Lowenstein team regarding same (.2)	2.90	\$3,915.00
B120	09/25/24	EGM	Call with M. Kaplan to discuss action items and strategy for Committee's investigation (.3); review emails from L. Tauro re protective order and A&M requests to Portage (.2); email L. Tauro, P. Patel, and T. Dougherty re search terms for communication requests and A&M diligence requests (.3); emails with C. Cheribini re document review needed (.2) and call with C. Cheribini re same (.1)	1.10	\$951.50
B120	09/25/24	KEM	Correspondence from T. Dougherty regarding deposition schedule and document production (.1); review debtor analysis of top 30 creditor contractual privacy (.1); correspondence from B. Beller and M. Kaplan regarding Oaktree declaration (.1)	0.30	\$280.50
B120	09/25/24	MAK	Second level review of document productions (2.3); continue outlining issues for deposition of independent directors (1.4); review and revise ESI search terms for debtors and PBI (.8)	4.50	\$4,635.00
B120	09/25/24	MJJ	Draft proposed search terms for document request to PBI and PBIH	1.70	\$1,504.50
B120	09/25/24	MJJ	Confer with E. Mannix re: search terms for document requests to Debtors, PBI, and PBIH	0.40	\$354.00
B120	09/25/24	MJJ	Draft proposed search terms for document request to Debtors	2.20	\$1,947.00
B120	09/25/24	RFZ	Conduct document review	1.60	\$1,040.00
B120	09/26/24	DMP	Meet and confer with Weil regarding discovery issues and search terms (.4); telephone call with M. Kaplan regarding discovery (.2); conference call with Lowenstein team regarding strategy and pleadings (.9); review and analysis of contractual privacy issues (1.1)	2.60	\$3,510.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/26/24	EGM	Review search terms from M. Julceus in connection with Committee's document requests (.4); participate on meet and confer call with Weil team and M. Kaplan, D. Posner, K. Moynihan, D. Green, and N. Rowles (.4); participate on call with D. Posner, M. Kaplan, G. Finizio, K. Moynihan and E. Seltzer re case strategy and confirmation timeline (.9); email N. Matthews re document review needed (.2); email C. L. Wilson and Gibson Dunn team re priority requests for communications from Pitney Bowes, among other things (.4); email J. Cohen, D. Posner, G. Finizio, M. Kaplan, and K. Moynihan re summary of case strategy discussions and action items (.3)	2.50	\$2,162.50
B120	09/26/24	EJS	Attend strategy video conference with M. Kaplan, G. Finizio, K. Moynihan, and E. Mannix re theories of recovery (.9); follow-up call with E. Mannix re same (.2); analyze plan and RSA re issues i/c/w same (1.3); research Texas and Delaware case law re same and choice of law issues (1.6); begin drafting theories of recovery memo (2.2)	6.20	\$4,433.00
B120	09/26/24	JC	Zoom call with team re: existing plan timeline	0.70	\$990.50
B120	09/26/24	JC	Review updated legal research on various case strategies re: plan structure	2.40	\$3,396.00
B120	09/26/24	KEM	Call with D. Posner, M. Kaplan, L. Tauro and P. Patel regarding discovery and document productions (.4); call with D. Posner, M. Kaplan, G. Finizio, E. Mannix and E. Seltzer regarding investigation status and case strategy (.9); correspondence from E. Mannix regarding PBI document productions (.1)	1.30	\$1,215.50
B120	09/26/24	MAK	Telephone call with Debtors' counsel re: document production (.4); second level review of document productions (1.6); continue outlining issues for deposition of independent directors (2.4); inter-office conferences re: investigation status (1.1)	5.50	\$5,665.00
B120	09/26/24	RFZ	Conduct document review	1.00	\$650.00
B120	09/27/24	AMG	Review Debtors' and non-debtor affiliates' document productions and update internal document review tracker (8.3); email with E. Mannix, R. Zimmerman, & N. Matthews re: same (0.2)	8.50	\$5,015.00
B120	09/27/24	DMP	Correspondence with Lowenstein team regarding case strategy (.5); review M. Kaplan response to Gibson Dunn regarding discovery (.2)	0.70	\$945.00
B120	09/27/24	EGM	Call with N. Matthews re document review and investigation (.2); email N. Matthews, R. Zimmerman, and A. Giblin re investigation (.1); review email from L. Wilson re Committee's document requests to Pitney Bowes (.2); attend to emails from M. Kaplan and J. Cohen re investigation strategy (.3)	0.80	\$692.00
B120	09/27/24	EJS	Research choice of law issues w/r/t potential theories of recovery for the Committee (3.4); prepare analysis re same (1.7); email same to E. Mannix (.2); begin researching substantive elements re theories of recovery under Delaware and Texas law (2.4); begin preparing analysis re same (.9)	8.60	\$6,149.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	09/27/24	JC	Review further case strategy and discuss same with M. Kaplan	2.20	\$3,113.00
B120	09/27/24	JC	Draft supplemental documents and interrogatories re: PBI	1.40	\$1,981.00
B120	09/27/24	KEM	Correspondence from J. Cohen and M. Kaplan regarding complaint and discovery (.1); correspondence from G. Finizio and C. Gibbs regarding extension letter (.1); correspondence from M. Kaplan and L. Wilson regarding PBI discovery (.1)	0.30	\$280.50
B120	09/27/24	MAK	Develop topics and strategy for supplemental discovery to Debtors and PBI (1.8); continue second level review of document productions (1.6); continue outlining topics for deposition of independent director (.8)	4.20	\$4,326.00
B120	09/29/24	AMG	Review Debtors' and non-debtor affiliates' document productions and update internal document review tracker	0.60	\$354.00
B120	09/29/24	EGM	Draft supplemental document requests to the Debtors	0.90	\$778.50
B120	09/30/24	DMP	Review correspondence from M. Kaplan to Weil regarding discovery (.1); review draft supplemental document requests to the Debtors (.2); correspondence with Lowenstein team regarding same and regarding additional discovery strategy (.4)	0.70	\$945.00
B120	09/30/24	EGM	Review and analyse memo from E. Seltzer re alter ego and other causes of action	1.00	\$865.00
B120	09/30/24	EGM	Further revise supplemental document requests (.9); discuss same with M. Kaplan (.2); email R. Newman and A. Gonzalez re list of top 60 creditors (.1)	1.20	\$1,038.00
B120	09/30/24	EJS	Continue research into substantive elements of theories of recovery under Delaware and Texas law (1.8); draft analysis of findings (1.4)	3.20	\$2,288.00
B120	09/30/24	EJS	Continue research into substantive elements of theories of recovery under Delaware and Texas law (2.5); draft memo re findings (4.8); reverse same (1.2); email correspondence with E. Mannix re same (.3)	8.80	\$6,292.00
B120	09/30/24	JC	Office Call with M. Kaplan re: litigation strategy for PBI	1.10	\$1,556.50
B120	09/30/24	JC	Review and comment on supplemental document requests	1.20	\$1,698.00
B120	09/30/24	JC	Review annotated creditor list from PBI and discuss same with M. Kaplan	0.60	\$849.00
B120	09/30/24	JJP	Provide assistance to D. Greene re: database access	0.10	\$39.50
B120	09/30/24	JJP	Provide assistance to N. Rowles re: document review	0.20	\$79.00
B120	09/30/24	KEM	Correspondence from M. Kaplan regarding Debtor document productions (.1); review supplemental document request (.1); correspondence from J. Cohen, M. Kaplan and E. Mannix regarding same (.1); review PBI analysis of top 60 creditor contracts (.1); review A&M analysis regarding same (.1)	0.50	\$467.50
B120	09/30/24	MAK	Develop topics and strategy for supplemental discovery to debtors and PBI (.8); review and revise supplemental discovery requests (.7); inter-office conferences re: discovery strategy (.6); review and analyze legal research on potential causes of action (2.7)	4.80	\$4,944.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/01/24	DMP	Review and analysis of 60 top contracts with detail (.2); correspondence with A&M team regarding same (.2); review and analysis of case strategy (1.1); confer with M. Kaplan regarding case strategy (.2); review drafts of supplemental discovery (.4); correspondence with Lowenstein team regarding supplemental discovery (.2); review Oaktree declaration and email from B. Beller regarding same (.2)	2.50	\$3,375.00
B120	10/01/24	EGM	Review and analyze revised investigation memo from E. Seltzer (.9); meet with M. Kaplan re discovery to Debtors and Pitney Bowes (.2); revise supplemental document requests and draft interrogatories (.4); confer with E. Seltzer re investigation memo analyzing, among other things, certain potential causes of action (.2); review Oaktree declaration from B. Beller (.2)	1.90	\$1,643.50
B120	10/01/24	EJS	Call with E. Mannix asset recovery strategy (.2); conduct research re additional theories of recovery under Bankruptcy Code (4.5); draft (5.1) and revise (.8) memorandum analyzing same; correspondence with E. Mannix re same (.2)	10.80	\$7,722.00
B120	10/01/24	GF	Emails with E. Mannix and K. Moynihan regarding contractual privity analysis	0.10	\$107.50
B120	10/01/24	GF	Review discovery requests to debtors and Pitney Bowes (.5) and provide comments to same (.2)	0.70	\$752.50
B120	10/01/24	KEM	Review Oaktree declaration (.1); correspondence from E. Mannix and A. Gonzalez regarding Debtors' insolvency (.1); review supplemental document requests (.2); correspondence from J. Cohen, G. Finizio, E. Mannix regarding same (.1); correspondence from F. Rhine regarding information requests and witness interviews (.1)	0.60	\$561.00
B120	10/01/24	KEM	Correspondence with G. Finizio and E. Mannix regarding PBI analysis and protective order	0.20	\$187.00
B120	10/01/24	MAK	Review and revise supplemental discovery requests (1.2); review and analyze legal research on potential causes of action (1.8)	3.00	\$3,090.00
B120	10/02/24	DMP	Review and respond to correspondence from E. Mannix regarding draft email with discovery to Debtors and PBHI and PB (.2); conference call with A&M and Lowenstein regarding strategy and preliminary analysis by A&M (.3)	0.50	\$675.00
B120	10/02/24	EGM	Call with M. Kaplan, D. Posner, G. Finizio, K. Moynihan, E. Seltzer and A&M team re financial advisor analysis to date and outstanding diligence requests (.3); draft document requests and interrogatories for Pitney Bowes entities (1.4); draft email to Weil and Gibson Dunn for service of document requests and interrogatories (.3); emails with M. Kaplan, J. Cohen and D. Posner re same (.2); review, analyze and provide comments on the investigation memo from E. Seltzer (.8)	3.00	\$2,595.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/02/24	EJS	Email correspondence with E. Mannix re theories of recovery memo (.3); revise same (2.9); research additional theory of recovery under Bankruptcy Code (3.6)	6.80	\$4,862.00
B120	10/02/24	EJS	Attend video conference with Lowenstein and A&M teams re Debtors' insolvency (.3); review case correspondence (.2)	0.50	\$357.50
B120	10/02/24	GF	Participate on call with Lowenstein and A&M teams regarding document productions	0.30	\$322.50
B120	10/02/24	JC	Review supplemental discovery and discuss with E. Mannix	0.90	\$1,273.50
B120	10/02/24	KEM	Call with A&M and Lowenstein teams regarding diligence items	0.30	\$280.50
B120	10/02/24	MAK	Second level review of debtor and PBI document production (1.3); review and analyze assertions of privilege over investigation materials (2.2)	3.50	\$3,605.00
B120	10/03/24	DMP	Correspondence with Weil regarding discovery and further meet and confer re same (.3); review and analysis of potential theories of recovery for investigation (2.3)	2.60	\$3,510.00
B120	10/03/24	EGM	Emails with J. Pagano and M. Kaplan re upload Debtors' production of documents	0.20	\$173.00
B120	10/03/24	EJS	Continue researching additional theory of recover re: prepetition transactions (2.7); draft memorandum detailing findings re same (3.6); email correspondence with K/ Moynihan and E. Mannix re same (.2)	6.50	\$4,647.50
B120	10/03/24	JJP	Access and process documents into the case database as requested by E. Mannix	1.30	\$513.50
B120	10/03/24	KEM	Correspondence from M. Kaplan regarding investigation interviews	0.10	\$93.50
B120	10/03/24	MAK	Review and analyze research on contractual privity (1.3); continue outlining topics for witness interviews and independent director depositions (3.4); strategise on supplemental discovery demands and timing (1.7)	6.40	\$6,592.00
B120	10/04/24	AMG	Review and analyze document production	4.60	\$2,714.00
B120	10/04/24	DMP	Conference call with Weil and Lowenstein regarding discovery including 18 individuals interviewed as part of the investigation (.2); telephone call with A. Gonzalez regarding Debtors' insolvency (.2); review A&M email regarding documents requested and notes re same (.2); begin review of memorandum on theories of recovery and analysis of same (2.1)	2.70	\$3,645.00
B120	10/04/24	EGM	Participate in call with M. Kaplan, D. Posner, G. Finizio, K. Moynihan, and Weil team re interviews of witnesses from independent director investigation (.2); email with N. Rowles re Oaktree note and review relevant documents (.3)	0.50	\$432.50
B120	10/04/24	EGM	Draft common interest agreement and discuss same with M. Kaplan (1.8); send common interest agreement to Weil team for review (.1)	1.90	\$1,643.50
B120	10/04/24	EJS	Revise memo re theories of recovery (1.6); correspondence with K. Moynihan re same (.1)	1.70	\$1,215.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/04/24	GF	Participate in litigation/document status call with Weil team (.5); review E. Mannix follow-up email regarding same (.1)	0.60	\$645.00
B120	10/04/24	JC	Multiple correspondence with A&M re: document production deficiencies	1.20	\$1,698.00
B120	10/04/24	KEM	Call with M. Kaplan, D. Posner, G. Finizio and P. Patel regarding discovery (.2); review E. Seltzer memo regarding investigation theories (.3); correspondence with E. Seltzer regarding same (.1); correspondence from E. Mannix and N. Rowles regarding Oaktree documents (.1); correspondence from A. Gonzalez regarding discovery issues (.1)	0.80	\$748.00
B120	10/04/24	MAK	Conference call with debtors counsel (.2); second level review of debtor and PBI document production (1.3); review and analyze research on contractual privity (.9); continue outlining topics for witness interviews and independent director depositions (3.8); review and revise common interest agreement (.4)	6.60	\$6,798.00
B120	10/07/24	AMG	Review and analyze document production (8.9); email with E. Mannix re: document review and investigation strategy (0.3)	9.20	\$5,428.00
B120	10/07/24	DMP	Correspondence with Lowenstein team regarding strategy of investigation and extension of case timelines (.4); review summary of documents produced and missing categories (.3); review and analysis of theories of recovery (1.8)	2.50	\$3,375.00
B120	10/07/24	EGM	Review Weil's comments to common interest agreement and revise same	0.50	\$432.50
B120	10/07/24	EGM	Review and analyze document productions	3.90	\$3,373.50
B120	10/07/24	EJS	Review status of document production to date (.2); review production re: potential theories of recovery (.5); revise memo re theories of recovery (2.8); email correspondence re same (.2)	3.70	\$2,645.50
B120	10/07/24	JC	Review document production update and discuss same with E. Mannix (1.2); review selected documents (0.9)	2.10	\$2,971.50
B120	10/07/24	JJP	Incorporate new production sets into the case database (1.1); export and organize documents requested by E. Mannix (.5)	1.60	\$632.00
B120	10/07/24	KEM	Revise memo regarding investigation (1.4); email to E. Seltzer regarding same (.2); call with E. Mannix regarding investigation status (.1); correspondence from J. Cohen, M. Kaplan, and E. Mannix regarding call with Debtors and PBI regarding discovery and confirmation timeline (.1); review email from E. Mannix regarding status of discovery (.2)	2.00	\$1,870.00
B120	10/07/24	MAK	Review summary of investigation status (.4); inter-office e-mails re: investigation status (.6); continue second level review of document productions (1.3); review Debtors' comments to common interest agreement (.6); outline supplemental discovery demands with ESI terms (2.5)	5.40	\$5,562.00
B120	10/08/24	AMG	Review and analyze document production	4.40	\$2,596.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/08/24	DMP	Review and analysis of theories of recovery and memorandum regarding same (3.9); review and analysis of solvency issues (.8); confer with J. Cohen regarding solvency analysis issues (.2); telephone call with M. Kaplan re same (.2); telephone call with E. Mannix re same (.1); MWE and LS professionals call regarding case strategy and analysis (.6); review and analysis of board minutes and other documents produced (.5); telephone call with E. Mannix regarding theories of recovery and preparation with Debtors and Pitney Bowes re extension of case timelines (.2)	6.50	\$8,775.00
B120	10/08/24	EGM	Call with M. Kaplan re common interest agreement (.2); further revise common interest agreement and draft acknowledgement (.7); review and analyze draft investigation memo and email E. Seltzer and K. Moynihan re same (.5); email P. Patel re common interest agreement (.2); review and analyze list of outstanding diligence requests from A. Gonzalez at Alvarez & Marsal (.3); send email to Weil team and Gibson Dunn team re same (.4); emails with M. Kaplan re bill of sale agreement from Debtors' document production (.2); draft summary in preparation of call and send same to D. Posner (.3); conduct research in connection with insolvency analysis (.5)	3.30	\$2,854.50
B120	10/08/24	EJS	Finalize memo re theories of recovery for distribution to Lowenstein team (2.9); email correspondence with D. Posner, K. Moynihan, and E. Mannix re same (.2)	3.10	\$2,216.50
B120	10/08/24	KEM	Review contract sale agreement with PBI (.2); draft letter requesting status conference (2.2); correspondence with E. Mannix and E. Seltzer regarding investigation memo (.2); review and analysis of same with D. Posner (.2); correspondence with J. Cohen regarding meet and confer letter (.1); review and analysis of status conference letter with G. Finizio (.2); review E. Mannix email regarding outstanding discovery requests (.1)	3.20	\$2,992.00
B120	10/08/24	MAK	Outline additional discovery demands (2.2); second level review of document productions (1.9)	4.10	\$4,223.00
B120	10/09/24	AMG	Review and analyze document production	5.50	\$3,245.00
B120	10/09/24	DMP	Prepare for call with Weil and Gibson regarding investigation, discovery and timeline (.3); conference call with Weil and Gibson regarding investigation and case timeline (.3); telephone call with M. Kaplan regarding same (.2); review and analysis of investigation and theories of recovery as well as memorandum (1.8); confer with E. Mannix regarding theories of recovery (.2); confer with E. Seltzer regarding research memorandum (.3); conference call with A&M team regarding Debtors' insolvency and documentation (.4)	3.50	\$4,725.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/09/24	EGM	Participate in call with Weil team, Gibson Dunn team, M. Kaplan, J. Cohen, D. Posner, G. Finizio, K. Moynihan, and E. Seltzer re confirmation timeline extension (.3); draft deposition notices (.9); finalize common interest agreement and email P. Patel re same (.4); call with D. Posner to discuss investigation memo and comments (.2); further research guarantees re insolvency analysis (.3); participate on call with D. Posner, M. Kaplan, A. Gonzalez and A&M Team re financial analysis status update (.5)	2.60	\$2,249.00
B120	10/09/24	EJS	Attend meet and confer with Lowenstein, Weil, and Gibson teams re document production and confirmation timeline (.3); meet with D. Posner re comments to theories of recovery memo (.3); begin revising same (.4)	1.00	\$715.00
B120	10/09/24	GF	Review draft deposition notices circulated by E. Mannix (.2); emails with M. Kaplan regarding deposition notices (.1)	0.30	\$322.50
B120	10/09/24	KEM	Correspondence from G. Finizio and M. Kaplan regarding deposition schedules	0.10	\$93.50
B120	10/09/24	MAK	Continue outlining topics for witness interviews and independent director depositions (1.8); outline additional discovery demands (1.4); second level review of document productions (1.6); telephone call with debtors' counsel and PBI counsel re: litigation timeline (.4)	5.20	\$5,356.00
B120	10/09/24	NSM	Review and tag documents from recent productions	2.50	\$1,475.00
B120	10/10/24	AMG	Review and analyze document production (2.6); email with E. Mannix re: document review and investigation strategy (0.2)	2.80	\$1,652.00
B120	10/10/24	EGM	Email J. Pagano re Pitney Bowes' production of documents (.1); review updated document tracker (.4); email MWE team re A. Carr deposition notice (.2); emails with A. Gonzalez re outstanding diligence requests to Portage and BRG (.4); draft 30(b)(6) deposition notices and topics (.6)	1.70	\$1,470.50
B120	10/10/24	EJS	Revise theories of recovery memo	0.50	\$357.50
B120	10/10/24	JC	Telephone call with M. Kaplan re: litigation strategy	0.80	\$1,132.00
B120	10/10/24	JJP	Process new documents into the case database as requested by E. Mannix (.4); provide assistance to L. Foody (.1)	0.50	\$197.50
B120	10/10/24	KEM	Revise letter requesting conference (.6); review LS team revisions to letter (.3); correspondence with D. Posner regarding same (.1); correspondence with C. Gibbs, M. Helt, and N. Rowles regarding letter (.1); correspondence from A. Gonzalez regarding outstanding diligence requests (.1); correspondence from E. Mannix and N. Rowles regarding A. Carr deposition notice (.1)	1.30	\$1,215.50
B120	10/10/24	MAK	Continue outlining topics for witness interviews and independent director depositions (1.1); second level review of document productions (1.3); review research and analysis on potential claims and causes of action (3.6); review and revise investigation status letter to Court (.8)	6.80	\$7,004.00
B120	10/10/24	NSM	Review and analyze document production	2.50	\$1,475.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/11/24	DC	Coordinate with MWE re: service of deposition notice on A. Carr (.2); confer with E. Mannix re: service on the Rule 2002 service list (.2); exchange e-mails with local counsel and confirm service requirements with E. Mannix (.2)	0.60	\$219.00
B120	10/11/24	DMP	Extensive correspondence with Lowenstein and MWE teams regarding letter to court regarding extension (.9); telephone call with L. Tauro regarding case timeline (.2); telephone call with J. Cohen to prepare for call with Debtors' and PBI's counsel (.2); Conference call with Weil and Gibson regarding investigation and case resolution (.5); review and analysis of theories of recovery and contractual privity issue (2.2)	4.00	\$5,400.00
B120	10/11/24	EGM	Emails with N. Rowles and D. Claussen re A. Carr deposition notice (.3); email P. Thomas re investigation and strategy (.3); email support team re upload Debtors' production (.1); email A. Giblin, N. Matthews and R. Zimmerman re same (.2); conduct second level review of document productions (1.4); email to Alvarez & Marsal and McDermott teams re common interest agreement (.2)	2.50	\$2,162.50
B120	10/11/24	EJS	Research contractual privity issues in connection with Committee investigation	3.00	\$2,145.00
B120	10/11/24	GJ	Download production and import it into database for attorney review	1.00	\$355.00
B120	10/11/24	KEM	Revise letter to chambers (.5); correspondence with J. Cohen, G. Finizio and N. Rowles regarding same (.5); email to the Committee regarding same (.2); call with G. Finizio regarding same (.1); correspondence from J. Cohen and L. Tauro regarding status conference (.1)	1.40	\$1,309.00
B120	10/11/24	MAK	Continue outlining topics for witness interviews and independent director depositions (2.1); second level review of document productions (1.8); review research and analysis on potential claims and causes of action (0.7)	4.60	\$4,738.00
B120	10/12/24	KEM	Correspondence from L. Wilson regarding PBI productions	0.10	\$93.50
B120	10/12/24	NSM	Review and tag documents from recent productions	0.80	\$472.00
B120	10/13/24	AS	Provide assistance to A. Gonzalez re: add tags in the external users group coding layout	0.30	\$99.00
B120	10/14/24	AMG	Review and analyze document production	3.40	\$2,006.00
B120	10/14/24	AS	Provide assistance to A. Gonzalez re: add tags in the external users group coding layout	0.30	\$99.00
B120	10/14/24	DMP	Conference call with Weil team regarding investigation and information learned from interviews (.8); conference call with Lowenstein team re strategy and information learned from Weil re interviews (.4); review email from A. Gonzalez regarding updates on outstanding diligence requests (.3)	1.50	\$2,025.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/14/24	EGM	Participate in meet and confer with Weil team (.8); call with M. Kaplan, D. Posner, G. Finizio, K. Moynihan and E. Seltzer to recap meet and confer call (.4); review and revise summary email re meet and confer from E. Seltzer (.2); email to support team re upload Pitney Bowes' fourth production (.1); email M. Kaplan re same (.1); conduct review and analysis of documents (1.5); email L. Wilson re Alvarez & Marsal outstanding diligence requests (.4); email M. Kaplan re litigation and investigation workstreams and potential witnesses to interview (.5)	4.00	\$3,460.00
B120	10/14/24	EJS	Revise memo re theories of recovery re bankruptcy law considerations (4.5); call with E. Mannix re same (.2); email correspondence with E. Mannix and K. Moynihan re same (.2); review status conference request letter (.2) and FCBT objection (.2) re contractual privity issues; email correspondence with Lowenstein team re same (.2); attend meet and confer video conference with Weil (.8); follow-up call with Lowenstein team re same (.4); draft internal summary of meet and confer (2.9); correspondence with E. Mannix re same (.1); distribute same to Lowenstein DRF team (.1)	9.80	\$7,007.00
B120	10/14/24	GF	Participate in portion Lowenstein conference call regarding meet and confer meeting with Weil	0.20	\$215.00
B120	10/14/24	GJ	Download production received and import it into database and prepare productions for attorney review	1.30	\$461.50
B120	10/14/24	KEM	Attend meet and confer with Debtors counsel regarding investigation (.8); call with D. Posner, M. Kaplan, and E. Mannix regarding same (.4); call with G. Finizio regarding same (.3); correspondence from E. Seltzer regarding revised investigation memo (.1); correspondence from E. Mannix and A. Gonzalez regarding document request status (.1); review E. Seltzer summary of independent director investigation (.2)	1.90	\$1,776.50
B120	10/14/24	MAK	Second level review of document productions (1.8); review and revise deposition outlines (2.2); conference call with Debtors' counsel re: witness interviews (.8); follow up call with internal team on witness interviews (.4)	5.20	\$5,356.00
B120	10/14/24	NSM	Review and analyze document production	1.00	\$590.00
B120	10/15/24	AMG	Review and analyze document production	2.70	\$1,593.00
B120	10/15/24	DMP	Review and analysis of notes of call with Weil regarding investigation interview (.9); review and analysis of strategy and investigation issues/pleadings (.7)	1.60	\$2,160.00
B120	10/15/24	EGM	Continue review and analysis of documents in connection with A. Carr deposition (.8); email MWE team re list of interviewees (.2); conduct document review re interviewees of interest (.5); email A. Giblin, R. Zimmerman, and N. Matthews re document review and investigation strategy (.2); email E. Seltzer re same (.1); call with M. Kaplan re investigation strategy (.3)	2.10	\$1,816.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/15/24	EJS	Email correspondence with MWE and A&M teams re 10/14/24 meet and confer (.2); email correspondence with D. Posner re analysis in connection with same (.1); prepare preliminary outline re facts in support of potential causes of action (1.2); email correspondence with E. Mannix re PBI document review timeline and next steps (.2); review tracker (.2) and prior correspondence (.1)	2.00	\$1,430.00
B120	10/15/24	GF	Review emails from Weil regarding list of PBI interviews (.1); review emails regarding A&M document productions (.1)	0.20	\$215.00
B120	10/15/24	JC	Review document summary and discuss with E. Seltzer	1.20	\$1,698.00
B120	10/15/24	JC	Review summary of meet and confer with DRF re: investigation and discuss same with M. Kaplan	1.10	\$1,556.50
B120	10/15/24	JJP	Update project tracking re: incoming data sets	0.20	\$79.00
B120	10/15/24	KEM	Correspondence from C. Gibbs, L. Tauro and L. Wilson regarding status conference (.1); correspondence from E. Mannix and P. Patel regarding list of deponents (.1); correspondence from A. Gonzalez regarding document production status (.1)	0.30	\$280.50
B120	10/15/24	MAK	Second level review of document productions (1.6); review and revise deposition outlines (3.5)	5.10	\$5,253.00
B120	10/15/24	NSM	Review and analyze document production	0.20	\$118.00
B120	10/16/24	AMG	Review and analyze document production	13.50	\$7,965.00
B120	10/16/24	DMP	Conference call with Lowenstein team regarding case strategy for status conference (.6); review and analysis of summary of points for status conference (.7); correspondence with L. Wilson and Lowenstein team regarding interviews of 8 individuals related to investigation (.3); correspondence with L. Wilson and E. Mannix regarding discovery (.2)	1.80	\$2,430.00
B120	10/16/24	EGM	Call with E. Seltzer re document request tracker and review of documents (.5); call with M. Kaplan re case strategy and investigation (.2); review and analyze document production from Pitney Bowes (1.6); review and revise contract document tracker (.2); emails with A. Giblin, R. Zimmerman, N. Matthews, P. Thomas, and E. Seltzer re investigation and document review updates/status (.5); review email from C.L. Wilson re diligence requests and Pitney Bowes' production of documents (.2)	3.20	\$2,768.00
B120	10/16/24	EJS	Video conference with E. Mannix re document review issues (.5); review interrogatories (.2); prepare creditor matrix chart (.4); email correspondence with E. Mannix re same (.1); conduct document review in connection with asset recovery analysis and contractual privity issues (6.8); update document review trackers re same (1.4); email correspondence with Lowenstein team re next steps (.1)	9.50	\$6,792.50
B120	10/16/24	GF	Review contractual privity document tracker	0.30	\$322.50
B120	10/16/24	JC	Litigation LS team strategy call re: status conference	0.80	\$1,132.00
B120	10/16/24	JC	Litigation preliminary preparation for status conference	1.20	\$1,698.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/16/24	KEM	Call with J. Cohen, D. Posner, M. Kaplan, G. Finizio and E. Mannix regarding status conference strategy (.6); prepare summary notes regarding same (.3); correspondence from M. Kaplan and L. Wilson regarding depositions (.1)	1.00	\$935.00
B120	10/16/24	MAK	Review and revise deposition outlines for debtor and PBI witnesses (3.3); prepare for discovery status conference (.4); review and analyze potential claims and causes of action (1.6); inter-office conference re: discovery status and litigation strategy (.6)	5.90	\$6,077.00
B120	10/16/24	NSM	Review and analyze document production	9.80	\$5,782.00
B120	10/17/24	AMG	Review and analyze document production	6.10	\$3,599.00
B120	10/17/24	AS	Provide assistance to G. Sinclair re: add tags in the external users group coding layout	0.30	\$99.00
B120	10/17/24	EGM	Draft deposition outline for A. Carr and review and analyze relevant documents (1.8); continue drafting 30(b)(6) deposition notice to Pitney Bowes (.8)	2.60	\$2,249.00
B120	10/17/24	EGM	Review email from A. Giblin and analyze updated document review tracker (.5); email M. Kaplan, J. Cohen updated bullets for status conference incorporating new document production details (.3); analyze document productions from Debtors and Pitney Bowes (.3); email MWE team re Oaktree 30(b)(6) topics needed (.2); review and analyze letter filed by Pitney Bowes in response to Committee letter requesting status conference (.3); review Debtors letter re same (.3); calls with M. Kaplan re preparation for status conference and investigation strategy (.8)	2.70	\$2,335.50
B120	10/17/24	EJS	Review documents produced by PBI on October 16 re theories of recovery (2.4); update document review trackers (.4); email correspondence with E. Mannix and Lowenstein team re same (.3)	3.10	\$2,216.50
B120	10/17/24	GF	Emails with M. Kaplan regarding next steps on litigation strategy	0.10	\$107.50
B120	10/17/24	JC	Office conference with M. Kaplan re: document production from PBI	0.70	\$990.50
B120	10/17/24	JJP	Process new production sets into the case database (.7); prepare database searches and create sets for review (.4); modify coding panels (.2); provide assistance to E. Seltzer re: document review (.3)	1.60	\$632.00
B120	10/17/24	KEM	Correspondence from E. Mannix regarding document production breakdown (.1); review PBI response to status conference request (.2); review debtor response to status conference request (.2)	0.50	\$467.50
B120	10/17/24	MAK	Second level review of document productions (2.9); review and revise deposition outlines for debtor and PBI witnesses (2.1); prepare for discovery status conference (.7); review and analyze potential claims and causes of action (1.2); call with J. Cohen and C. Gibbs re: status conference (.5)	7.40	\$7,622.00
B120	10/17/24	NSM	Review and analyze document production	4.80	\$2,832.00
B120	10/18/24	AMG	Review and analyze document production	1.60	\$944.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/18/24	CTH	Locate suit against I-Pack filed in Nassau County NY and obtain filings, per E. Seltzer	0.10	\$37.50
B120	10/18/24	DMP	Review PBI and Debtor letters in response to request for status conference (.4); conference call with Lowenstein team regarding strategy for confirmation hearing and investigation (.8); correspondence with Lowenstein team regarding strategy (.2); correspondence re email to Debtors re contractual privity issue (.2); correspondence with L. Tauro re contractual privity issue (.2); telephone with R. Newman regarding Debtors' insolvency (.2); review and analysis of solvency issues and claim by claim analysis (1.8); correspondence with L. Wilson and Lowenstein team regarding A. Carr deposition (.3); review initial draft of 30(b)(6) notice to PBI (.2); correspondence with PBI and Debtors counsel regarding witness for interviews and witness availability (.3); correspondence with Lowenstein team regarding same (.2)	4.80	\$6,480.00
B120	10/18/24	EGM	Call with Lowenstein team re investigation and case strategy (.3); call with E. Seltzer re investigation and document review/hot documents (.8); revise notes for M. Kaplan in preparation for status conference (.7); discuss result of status conference with M. Kaplan and review related notes (.6); email C.L. Wilson re scheduling interviews for witnesses (.1); email A. Gonzalez re customer shipment spreadsheets in document production (.2)	2.70	\$2,335.50
B120	10/18/24	EGM	Continue drafting deposition outline for A. Carr and review and analyze relevant documents (2.4); finalize draft 30(b)(6) deposition notice to Pitney Bowes and send same to Lowenstein team for comments (.5); email MWE team re additional witnesses and questions for A. Carr deposition related to investigation of prepetition sale process and Oaktree alleged claims and lien (.2)	3.10	\$2,681.50
B120	10/18/24	EJS	Continue reviewing documents produced by PBI on October 16 re theories of recovery (4.1); update tracker with respect to same (.5); multiple calls with E. Mannix re interview preparation (.6); research pending litigation issue (.3)	5.50	\$3,932.50
B120	10/18/24	JC	Review index of recently produced documents and discuss same with E. Mannix	1.30	\$1,839.50
B120	10/18/24	JJP	Provide assistance to the review team re: document review, export requests and configuration	2.60	\$1,027.00
B120	10/18/24	KEM	Correspondence from E. Mannix and A. Gonzalez regarding PBI document productions (.1); correspondence from M. Kaplan, E. Mannix and L. Wilson regarding deposition schedule (.1); review email to L. Tauro regarding contractual privity (.1); review G. Finizio comments to PBI deposition notice (.1)	0.40	\$374.00
B120	10/18/24	MAK	Outline topics and review potential exhibits for deposition of A. Carr	2.90	\$2,987.00
B120	10/18/24	NSM	Review and analyze document production	2.20	\$1,298.00
B120	10/19/24	AMG	Review and analyze document production	2.40	\$1,416.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/19/24	EGM	Continue drafting deposition outline for A. Carr and review and analyze relevant documents	3.40	\$2,941.00
B120	10/19/24	EGM	Revise 30(b)(6) deposition notice to Pitney Bowes to incorporate M. Kaplan and G. Finizio comments	0.60	\$519.00
B120	10/19/24	GF	Emails with M. Kaplan regarding deposition attendance	0.10	\$107.50
B120	10/19/24	JC	Review draft 30(b)(6) notice and comment re: same	1.20	\$1,698.00
B120	10/19/24	KEM	Correspondence from D. Posner and M. Kaplan regarding A. Carr deposition	0.10	\$93.50
B120	10/19/24	MAK	Outline topics and review potential exhibits for deposition of A. Carr (1.7); review and revise draft subpoena to PBI (.6)	2.30	\$2,369.00
B120	10/19/24	NSM	Review and analyze document production	2.10	\$1,239.00
B120	10/20/24	AMG	Review and analyze document production	4.90	\$2,891.00
B120	10/20/24	DMP	Review revised 30(b)(6) deposition notice to Pitney Bowes (.2); email to Lowenstein team regarding same (.1)	0.30	\$405.00
B120	10/20/24	EGM	Further revise 30(b)(6) deposition notice to Pitney Bowes (.3); email Lowenstein team re same (.1); continue drafting A. Carr deposition outline and reviewing relevant documents (.9); conduct review and analysis of document production from Pitney Bowes (second level review) (2.6)	3.90	\$3,373.50
B120	10/20/24	EJS	Continue to review PBI document production re asset recovery analysis (3.1); update tracker re same (.3); further review and analyze PBI document production(2.4); prepare issues list re same (.3); email correspondence with E. Mannix re same (.1).	6.20	\$4,433.00
B120	10/20/24	GF	Review revised PBI 30(b)(6) notice	0.10	\$107.50
B120	10/20/24	KEM	Correspondence from D. Posner and E. Mannix regarding PBI deposition notice	0.10	\$93.50
B120	10/20/24	MAK	Review research and analysis on alter ego liability under 3rd and 5th circuit law	2.20	\$2,266.00
B120	10/21/24	AI	Attend call with E. Mannix, B. Clark, M. Diaz, C. Gauvin, and G. Carlson re: document review and investigation strategy (.6); conduct review of first round of documents produced by Debtors (11.4)	12.00	\$7,200.00
B120	10/21/24	AMG	Review and analyze document production (4.2); email and correspond with E. Mannix re: document review and investigation strategy (.2)	4.40	\$2,596.00
B120	10/21/24	BMC	Participate in meeting with E. Mannix, A. Mannix, M. Diaz, C. Gauvin, and G. Carlson re: document review and investigation strategy (.6); review and analyze document production (1.3)	1.90	\$1,140.00
B120	10/21/24	CG	Conduct document review	1.70	\$935.00
B120	10/21/24	CG	Participate in meeting with E. Mannix, B. Clark, M. Diaz, G. Carlson, and A. Ismail on document review protocol (.6); receive instruction in Relativity document review tutorial (.6); conduct document review (4.6); send and review email correspondence to document review team to clarify document codes (.1)	5.90	\$3,245.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/21/24	CGS	Call with M. Kaplan re: contractual privity analysis and investigation (.3); participate on call with E. Mannix re: contractual privity analysis and investigation (1.0); review associated documents for background for contractual privity analysis and investigation (.5)	1.80	\$1,170.00
B120	10/21/24	DMP	Correspondence with M. Kaplan and team regarding review of documents produced (.2); correspondence with M. Kaplan and team regarding outline of confirmation/investigation strategy and tasks (.2); correspondence from L. Wilson regarding witness depositions (.1); correspondence with MWE regarding Oaktree related items (.2); correspondence with M. Kaplan regarding depositions (.2)	0.90	\$1,215.00
B120	10/21/24	EGM	Prepare for (.2) and participate in meeting with B. Clark, A. Ismail, M. Diaz, C. Gauvin, and G. Carlson re document review and investigation strategy (.6); email same team re pleadings and document trackers (.2); call with M. Kaplan re investigation strategy and deposition notices (.2); email C. Stewart re contractual privity analysis (.2); email document review team re new production of documents (.1); email (.1) and call with N. Rodriguez re document review and investigation strategy (.4); participate on call with C. Stewart re contractual privity analysis and investigation (1.0); emails with document review team re questions and issues with documents (.3)	3.30	\$2,854.50
B120	10/21/24	EGM	Further revise Pitney Bowes 30(b)(6) deposition notice and send same to MWE team (.9); further revise deposition notice re E. Kaup (.3); draft deposition and interview schedule and discuss same with M. Kaplan (.8); review and analyze summary of document review from E. Seltzer and proposed additional interviewees (.2); email M. Kaplan re same (.1); further draft A. Carr deposition outline and review and analyze relevant documents (3.4)	5.70	\$4,930.50
B120	10/21/24	EJS	Call with E. Mannix re next steps in connection with asset recovery analysis (.3); review documents produced by the Debtors and PBI re issues with respect to Oaktree Note and prepetition sale process (4.6); prepare key issues summaries for E. Mannix (.5); multiple email correspondence with Lowenstein document review team (.4)	5.80	\$4,147.00
B120	10/21/24	GC	Meet with E. Mannix, B. Clark, A. Ismail, M. Diaz, and C. Gauvin re document review strategy (.6); meet with J. Pagano, A. Ismail, M. Diaz, C. Gauvin, and B. Clark to discuss document review protocol on Relativity (.6); review and analyze document production (.3)	1.50	\$847.50
B120	10/21/24	GF	Review M. Kaplan email regarding confirmation litigation (.1); review emails regarding deposition scheduling (.1)	0.20	\$215.00
B120	10/21/24	JC	Review draft discovery demands and related correspondence	1.60	\$2,264.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/21/24	JJP	Conference with review team (.6); process new documents into the case database (.7); update review sets (.2); prepare searches and provide document information to E. Mannix as requested (.5)	2.00	\$790.00
B120	10/21/24	KEM	Correspondence from M. Kaplan, L. Wilson and P. Patel regarding deposition schedules (.1); review deposition questions for A. Carr prepared by A&M (.2)	0.30	\$280.50
B120	10/21/24	MAK	Outline topics and review potential exhibits for deposition of A. Carr (1.3); outline topics and review potential exhibits for deposition of E. Kaup (2.6); outline topics and review potential exhibits for deposition of PBI corporate designee (2.3)	6.20	\$6,386.00
B120	10/21/24	MD	Participate in meeting with E. Mannix, B. Clark, C. Gauvin, G. Carlson, and A. Ismail (.6); receive instruction in Relativity document review tutorial (.6); review and analyze document production (.8)	2.00	\$1,130.00
B120	10/21/24	NRR	Participate on call with E. Mannix re: document review and investigation strategy (.3)	0.30	\$214.50
B120	10/21/24	RFZ	Review and analyze document production	1.20	\$780.00
B120	10/22/24	AI	Continue review of documents produced by Debtors	10.90	\$6,540.00
B120	10/22/24	AMG	Review and analyze document production (5.1); phone call with M. Kaplan re: document review and investigation strategy (0.1); email with M. Diaz & G. Carlson re: document review and investigation strategy (0.1)	5.30	\$3,127.00
B120	10/22/24	AS	Search and export out creditors documents from Relativity case database	5.10	\$1,683.00
B120	10/22/24	BMC	Review and analyze document production	1.80	\$1,080.00
B120	10/22/24	CG	Conduct document review (5.1); participate in document review team meeting on zoom (.3)	5.40	\$2,970.00
B120	10/22/24	CGS	Review notes from 10/21/24 meeting with E. Mannix (.5); draft contractual privity analysis excel (.2); review and analyze creditor agreements (6.0); participate in call with E. Mannix (.4)	7.10	\$4,615.00
B120	10/22/24	CK	Assist with document management in Relativity	1.50	\$450.00
B120	10/22/24	DMP	Meet with J. Cohen regarding case strategy (.5); meet with E. Mannix regarding discovery and strategy (.2); telephone call with M. Kaplan regarding discovery/depositions (.4); conference call with G. Finizio, K. Moynihan and E. Mannix regarding case strategy (.7); review and analysis of A&M questions for A. Carr deposition (2.5); review and analysis of potential depositions including scheduling and strategy (.8); correspondence with Lowenstein team regarding deposition schedule (.4); correspondence with L. Wilson and P. Patel regarding depositions (.3); correspondence with J. Cohen and M. Kaplan regarding report of investigation (.2); review and analysis of certain facts and potential claims for fraudulent conveyance as raised by A&M (2.7)	8.70	\$11,745.00
B120	10/22/24	EGM	Continue drafting A. Carr deposition outline and review and analyze comments from A&M	3.50	\$3,027.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/22/24	EGM	Meet with E. Seltzer re hot documents from review (.3); review and analyze documents, second level review, in preparation for depositions and interviews (4.6); call with C. Stewart to review current findings of contractual privity analysis (.4); call with B. Clark, A. Ismail, E. Seltzer and C. Gauvin re document review issues and analysis still required (.3)	5.60	\$4,844.00
B120	10/22/24	EJS	Review documents produced by the Debtors and PBI re issues in connection with Plan/RSA, Oaktree Note, and Settlement Agreement (5.0); prepare email summarizing findings (.3); video conference with E. Mannix, B. Clark, and LS team findings with respect to same (.4); call with G. Finizio potential plan settlement mechanics (.2); prepare draft settlement letter (.9); correspondence with E. Mannix re same (.1); revise same (.2)	7.10	\$5,076.50
B120	10/22/24	GC	Meet with M. Diaz and C. Gauvin re document review strategy (.5); review and analyze document production (3.5)	4.00	\$2,260.00
B120	10/22/24	GF	Confer with A. Gonzalez regarding fraudulent transfer analysis (.1); email to D. Posner regarding fraudulent transfer analysis (.1)	0.20	\$215.00
B120	10/22/24	JJP	Locate and provide documents sets requested by E. Mannix (.8); provide assistance to the review teams (.7); test external database user accounts for security (.4)	1.90	\$750.50
B120	10/22/24	KEM	Correspondence from M. Kaplan, L. Wilson, and P. Patel regarding deposition schedules (.1); review list of outstanding documents (.1); review current deposition schedule (.1)	0.30	\$280.50
B120	10/22/24	MAK	Outline topics and review potential exhibits for deposition of A. Carr (1.1); outline topics and review potential exhibits for deposition of E. Kaup (2.1); outline topics and review potential exhibits for deposition of PBI corporate designee (1.9)	5.10	\$5,253.00
B120	10/22/24	MD	Participate in meeting with C. Gauvin, G. Carlson to discuss document review procedure (.5); review and analyze document production (3.7)	4.20	\$2,373.00
B120	10/22/24	RFZ	Review and analyze document production	3.10	\$2,015.00
B120	10/23/24	AI	Continue review of documents produced by Debtors	14.10	\$8,460.00
B120	10/23/24	AMG	Review and analyze document production (8.8); email and message with E. Mannix, M. Diaz, & C. Gauvin re: document review and investigation strategy (.4)	9.20	\$5,428.00
B120	10/23/24	AS	Provide assistance to J. Pagano re: export out multiple deponents documents from Relativity case database	0.90	\$297.00
B120	10/23/24	BMC	Review and analyze document production	5.10	\$3,060.00
B120	10/23/24	CG	Analyze and investigate document production	6.50	\$3,575.00
B120	10/23/24	CG	Revise spreadsheet of investigation and review results	0.40	\$220.00
B120	10/23/24	CGS	Participate in meeting with E. Mannix (.5); populate contractual privity analysis matrix (1.0); review and analyze creditor agreements (10.0)	11.50	\$7,475.00
B120	10/23/24	CTC	Review document review protocol and case materials re: document review and investigation strategy	0.90	\$459.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/23/24	DMP	Conference call with K. Moynihan and E. Mannix regarding discovery schedule and depositions (.3); email correspondence with M. Kaplan regarding same (.5); review and analysis of potential settlement constructs (1.1); telephone calls with G. Finizio regarding same (.5); review and analysis of revised memorandum on theories of potential recovery (1.2)	3.60	\$4,860.00
B120	10/23/24	EGM	Review and analyze documents (second level review) (3.3); continue drafting A. Carr deposition outline (4.1); participate on call with C. Stewart re contractual privity analysis update (.8) participate on call with D. Posner and K. Moynihan re deposition and interview schedule (.3); review email from C.L. Wilson re deposition schedule and revise internal memo re same (.4); call with M. Kaplan re deposition prep and scheduling (.5)	9.40	\$8,131.00
B120	10/23/24	EJS	Call with C. Cherubini re document review protocol (.2); review documents produced by the Debtors and PBI re asset recovery analysis (5.3); email correspondence with Lowenstein document review team re same (.3); revise 408 settlement offer letter (.2); email correspondence with G. Finizio re same (.1)	6.10	\$4,361.50
B120	10/23/24	GC	Review and analyze document production	2.90	\$1,638.50
B120	10/23/24	GF	Email to E. Mannix with additional topics for Oaktree 30(b)(6) (.5); begin drafting committee report and voting recommendation regarding plan (1.7)	2.20	\$2,365.00
B120	10/23/24	JC	Further analyze contractual privity analysis	1.40	\$1,981.00
B120	10/23/24	JC	Review updated deposition schedule and discuss with M. Kaplan	0.80	\$1,132.00
B120	10/23/24	JJP	Prepare searches to locate documents and export documents sets requested E. Mannix re: customer contracts; prepare witness name searches and export documents sets; prepare review queues as requested by J. Haake	3.30	\$1,303.50
B120	10/23/24	KEM	Call with D. Posner and E. Mannix regarding deposition schedules (.2); call with E. Mannix regarding same (.1); revise motion to intervene (.7); review current deposition schedules (.1)	1.10	\$1,028.50
B120	10/23/24	MD	Perform document review and analysis	11.70	\$6,610.50
B120	10/23/24	NRR	Review and analyze document production	1.00	\$715.00
B120	10/23/24	PC	Review document review protocol; review documents re: bankruptcy filing	1.00	\$715.00
B120	10/23/24	RFZ	Review and analyze document production	3.30	\$2,145.00
B120	10/24/24	AI	Continue review of first round of documents produced by Debtors (3.3); email E. Mannix re: new production of documents by Debtors (0.1); conduct review of documents produced by Debtors (11.1)	14.50	\$8,700.00
B120	10/24/24	AMG	Review and analyze document production (5.8); phone call with E. Mannix re: document review and investigation strategy (0.3)	6.10	\$3,599.00
B120	10/24/24	BMC	Review and analyze document production	2.40	\$1,440.00
B120	10/24/24	CG	Update creditor tracker with analyzed document productions	0.10	\$55.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/24/24	CG	Perform document review and analysis	9.80	\$5,390.00
B120	10/24/24	CGS	Participate in check-in with E. Mannix (.1); conduct research re: contractual privity analysis (10.0); draft memorandum re same (1.0)	11.10	\$7,215.00
B120	10/24/24	CTC	Review and analyze document production	3.00	\$1,530.00
B120	10/24/24	DMP	Correspondence with M. Kaplan regarding discovery (.3); correspondence with J. Cohen and G. Finizio regarding potential settlement letter (.3); review and analysis of settlement letter (.9); telephone call with G. Finizio regarding settlement letter edits/comments (.3); review and analysis of A&M analysis of claims buckets and consider for settlement (.7)	2.50	\$3,375.00
B120	10/24/24	EGM	Meetings with M. Diaz, C. Gauvin, and E. Seltzer re document review and investigation (1.4); meet with C. Stewart to discuss contractual privity analysis and strategize re same (.9); conduct second level review of documents including as it relates to the contractual privity analysis (2.5); finalize A. Carr deposition outline (.8); prepare for A. Carr deposition including exhibits for M. Kaplan review (3.1); discuss same with M. Kaplan (.5); email C.L. Wilson re M. Shea deposition (.1); emails with F. Rhine re A. Carr deposition logistics (.1) emails with J. Pagano re upload of documents and batching queues (.2); email Alvarez & Marsal team re additional document productions (.1)	9.70	\$8,390.50
B120	10/24/24	EJS	Revise 408 settlement letter (.2); review documents produced by the Debtors on 10/23/24 re asset recovery analysis (5.7)	5.90	\$4,218.50
B120	10/24/24	GC	Review and analyze document production	4.10	\$2,316.50
B120	10/24/24	JJP	Incorporate new production sets into the case database (1.3); update review sets (.4); provide summary information requested by E. Mannix (.2)	1.90	\$750.50
B120	10/24/24	KEM	Correspondence with J. Cohen and G. Finizio regarding investigation letter (.2); review settlement proposal letter (.3); correspondence from M. Kaplan and L. Wilson regarding deposition schedule (.1)	0.60	\$561.00
B120	10/24/24	MAK	Review and revise deposition outline for A. Carr	1.40	\$1,442.00
B120	10/24/24	MD	Perform document review and analysis	7.00	\$3,955.00
B120	10/24/24	NRR	Review and analyze document production	2.70	\$1,930.50
B120	10/24/24	RFZ	Review and analyze document production	2.90	\$1,885.00
B120	10/24/24	VT	Confer with E. Mannix and Veritext re: deposition of A. Carr	0.60	\$255.00
B120	10/25/24	AI	Continue review of documents produced by Debtors	2.20	\$1,320.00
B120	10/25/24	AMG	Review and analyze document production	0.10	\$59.00
B120	10/25/24	AS	Search and export out creditors documents from Relativity case database	3.30	\$1,089.00
B120	10/25/24	CG	Update creditor contract reviewed documents into tracker	0.30	\$165.00
B120	10/25/24	CGS	Conduct research re: contract privity analysis (4.0); compose memorandum re: same (4.0)	8.00	\$5,200.00
B120	10/25/24	CTC	Review and analyze document production	0.10	\$51.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/25/24	DMP	Prepare for and attend Alan Carr deposition (5.5); correspondence with Lowenstein and MWE teams regarding Oaktree 30(b)(6) notice and Oaktree deposition (.3); review and edit proposed settlement letter and construct of proposed unsecured pools received from A&M (.5); correspondence between and among MWE, Lowenstein and A&M regarding settlement proposal (.4)	6.70	\$9,045.00
B120	10/25/24	EGM	Prepare for (.8) and participate in A. Carr deposition (4.5)	5.30	\$4,584.50
B120	10/25/24	EGM	Review contract privity research from C. Stewart and provide comments re same (.9); call with M. Kaplan to discuss investigation strategy and upcoming depositions (.4); review and analyze documents in preparation for J. Fairweather interview/deposition (1.8); email D. Green re S. Cannon interview (.1); email L. Foody re Oaktree 30(b)(6) notice (.1)	3.30	\$2,854.50
B120	10/25/24	JC	Participate in deposition of A. Carr	4.60	\$6,509.00
B120	10/25/24	JJP	Prepare database searches and export documents as requested by E. Mannix	1.20	\$474.00
B120	10/25/24	KEM	Virtually attend A. Carr deposition (3.6); call with D. Posner regarding same (.2); correspondence from E. Mannix and L. Foody regarding Oaktree deposition notice (.1); correspondence from J. Cohen, D. Posner, and E. Mannix regarding Oaktree deposition (.2)	4.10	\$3,833.50
B120	10/25/24	MAK	Prepare for deposition of A. Carr (1.8); deposition of A. Carr (4.5); confer with E. Mannix re: preparation for witness interviews (.8); second level review of document productions (2.6)	9.70	\$9,991.00
B120	10/25/24	NSM	Review and analyze document production	0.70	\$413.00
B120	10/25/24	RFZ	Review and analyze document production	0.50	\$325.00
B120	10/25/24	ZM	Search for cases that establishes contract privity under CT and DE law per C. Stewart	0.50	\$192.50
B120	10/26/24	AI	Confer with E. Mannix and E. Seltzer re: document production from Debtors	0.10	\$60.00
B120	10/26/24	AMG	Review document productions and draft interview outline	5.30	\$3,127.00
B120	10/26/24	AS	Provide assistance to C. Stewart re: Relativity web page login (.5); provide access to the L drive files and folders to the case team and export out S. Cannon deposition documents as requested by A. Gilbin (.5); modify creditors review batch search in the Relativity case database as requested by E. Mannix (1.0)	2.00	\$660.00
B120	10/26/24	BMC	Participate in zoom meeting with E. Mannix and C. Stewart re: contract analysis (.4); review and analyze contracts from document production (2.7)	3.10	\$1,860.00
B120	10/26/24	CG	Review communication re: assignment from E. Mannix to draft deposition outline of Pitney Bowes witness	0.40	\$220.00
B120	10/26/24	CG	Draft deposition outline for J. Fairweather	3.00	\$1,650.00
B120	10/26/24	CG	Send J. Fairweather deposition outline to E. Seltzer along with discovery attachments	0.10	\$55.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/26/24	CGS	Participate in call with E. Mannix and B. Clark re: contract review (.4); review and analyze creditor contracts (12.6)	13.00	\$8,450.00
B120	10/26/24	DMP	Correspondence with M. Kaplan, E. Mannix and J. Cohen regarding work streams and potential J. Lillis deposition	0.50	\$675.00
B120	10/26/24	EGM	Review and analyze A&M creditor contract analysis and Lowenstein tracker for contractual privity analysis reconciliation (3.7); draft lists of creditors without contracts or agreements (1.0); call with C. Stewart re contractual privity analysis (.2); emails to N. Matthews, R. Zimmerman and A. Giblin re interview outlines (.5); call with M. Kaplan to discuss case strategy and upcoming interview preparation (.2); call with C. Stewart and B. Clark re contracts still needing review and analysis (.4); call with N. Matthews re J. Fairweather interview outline (.3); call with D. Green re Oaktree deposition (.2); review and revise 30(b)(6) deposition notice for Oaktree (.4); review and analyze creditor contract and agreement documents and creditors with no contracts produced (1.4); email Weil and Gibson Dunn teams re same (.2)	8.50	\$7,352.50
B120	10/26/24	EJS	Email correspondence with E. Mannix and C. Gauvin re new PBI document production and 30(b)(6) deposition outline for J. Fairweather (.3); review background information re 30(b)(6) depositions (.2); begin drafting J. Fairweather deposition outline (3.3)	3.80	\$2,717.00
B120	10/26/24	GF	Review updated deposition schedule	0.10	\$107.50
B120	10/26/24	JJP	Process new documents into the case database as requested by E. Mannix (1.4); update review queues and searches (.5); review and respond to email correspondence re: review sets (.2)	2.10	\$829.50
B120	10/26/24	KEM	Correspondence from E. Mannix and A. Gonzalez regarding creditor contract analysis	0.10	\$93.50
B120	10/26/24	MAK	Second level review of document productions (1.8); review potential exhibits and outline topics for deposition of J. Fairweather (3.9)	5.70	\$5,871.00
B120	10/26/24	NSM	Review and analyze documents for J. Fairweather interview outline	3.90	\$2,301.00
B120	10/27/24	AI	Conduct review of documents produced by Debtors	11.40	\$6,840.00
B120	10/27/24	AMG	Draft interview outline for deponent	6.10	\$3,599.00
B120	10/27/24	BMC	Review and analyze contracts from document production for contract privity analysis (1.6); review and analyze document production (1.2)	2.80	\$1,680.00
B120	10/27/24	CG	Call with E. Seltzer re deposition outline discussion and strategy planning on same	0.40	\$220.00
B120	10/27/24	CG	Analyze creditor contracts and draft deposition outline for J. Fairweather re same	6.10	\$3,355.00
B120	10/27/24	CGS	Draft contractual privity analysis summary	7.00	\$4,550.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/27/24	EGM	Review and analyze documents in preparation for J. Fairweather deposition (1.9); review and analyze relevant contracts and agreements for contractual privity analysis (2.7); call with E. Seltzer re J. Fairweather deposition preparation (.3); review and analyze documents in preparation for deposition (1.0)	5.90	\$5,103.50
B120	10/27/24	EJS	Call with C. Gauvin re J. Fairweather 30(b)(6) deposition topics (.4); call with E. Mannix re deposition outline (.2); draft deposition outline and review documents produced with respect to same (8.9)	9.50	\$6,792.50
B120	10/27/24	GC	Review and analyze document production re: creditors' contracts	5.40	\$3,051.00
B120	10/27/24	JJP	Review email correspondence from E. Mannix and modify review sets as requested (.7); prepare searches as requested by J. Haake (.4) process additional documents into the case database (.9)	2.00	\$790.00
B120	10/27/24	MAK	Outline topics and review potential exhibits for deposition of E. Kaup (2.6); outline topics and review potential exhibits for deposition of M. Shea (2.3); review exhibits for PBI/DRF witness interviews (.9)	5.80	\$5,974.00
B120	10/27/24	MD	Perform document review	8.30	\$4,689.50
B120	10/27/24	NSM	Review and analyze documents for J. Fairweather interview outline	5.60	\$3,304.00
B120	10/28/24	AI	Continue third review of documents produced by Debtors	10.60	\$6,360.00
B120	10/28/24	AMG	Draft interview outline for deponent	3.70	\$2,183.00
B120	10/28/24	BMC	Review and analyze documents production	2.70	\$1,620.00
B120	10/28/24	CG	Continue drafting deposition outline for J. Fairweather and review document production of creditor contracts for same	6.20	\$3,410.00
B120	10/28/24	CG	Prepare for and participate in video conference with Lowenstein team re: depositions and confirmation hearing	1.60	\$880.00
B120	10/28/24	CG	Revise meeting notes and send same to E. Mannix and E. Seltzer	0.10	\$55.00
B120	10/28/24	CG	Call with E. Seltzer on deposition outline progress	0.10	\$55.00
B120	10/28/24	CGS	Review new responsive documents re: contract privity analysis (5.2); Participate in call with E. Mannix re: contract privity analysis (.4)	5.60	\$3,640.00
B120	10/28/24	CTC	Review and analyze document production	6.30	\$3,213.00
B120	10/28/24	DMP	Review updated deposition schedule (.1); correspondence with Lowenstein and A&M regarding contractual privity analysis (.3); conference call with Lowenstein team regarding discovery and deposition of investigation interviewees (1.6); review draft letter regarding investigation (.8); telephone call with G. Finizio regarding same (.3); review draft of email to MWE team regarding discovery and J. Lillis (.1); review draft of 30(b)(6) to Oaktree and provide comments to same (.2); correspondence with D. Green regarding J. Lillis deposition (.2); review documents regarding S. Cannon deposition (1.1)	4.70	\$6,345.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/28/24	EGM	Draft M. Shea and E. Kaup deposition outlines (2.8); participate on call with LS team re investigation strategy (1.5); call with G. Finizio re investigation update letter (.1); email to G. Finizio re summary of notes for letter (.3); call with M. Kaplan to strategize deposition preparation and discuss document production update (.5); email court reporting company re depositions for following week (.2); review and revise deposition outline for interviewees (1.5)	6.90	\$5,968.50
B120	10/28/24	EJS	Continue drafting deposition outline for J. Fairweather and reviewing related documents (7.7); call with C. Gauvin re same (.1); email correspondence with E. Mannix and C. Gauvin re same (.3); wmail correspondence with J. Finizio re alter ego claims (.1)	8.20	\$5,863.00
B120	10/28/24	GC	Review and analyze document production re: creditors' contracts	3.20	\$1,808.00
B120	10/28/24	GF	Review E. Seltzer memo regarding theories of recovery for creditors	0.20	\$215.00
B120	10/28/24	GF	Participate on strategy call regarding depositions and witness interviews (1.5)	1.50	\$1,612.50
B120	10/28/24	GJ	Prepare PDF files from documents requested by E. Seltzer	1.00	\$355.00
B120	10/28/24	JC	Team meeting in preparation for upcoming interviews/depositions	1.80	\$2,547.00
B120	10/28/24	JJP	Conference with J. Haake (.2); prepare searches as requested by J. Haake (.4); update review queues (.1)	0.70	\$276.50
B120	10/28/24	KEM	Review updated deposition schedule (.1); correspondence with D. Posner regarding same (.1); call with LS team regarding deposition strategy (1.5); correspondence from G. Finizio and E. Mannix regarding investigation letter (.1)	1.80	\$1,683.00
B120	10/28/24	MAK	Confer with LS team re: interview topics and issues	1.50	\$1,545.00
B120	10/28/24	MAK	Outline topics and review potential exhibits for deposition of M. Shea	3.10	\$3,193.00
B120	10/28/24	MD	Review and analyze document production	4.60	\$2,599.00
B120	10/28/24	NSM	Review and analyze documents for J. Fairweather interview outline	3.20	\$1,888.00
B120	10/28/24	RFZ	Draft outline re: interviews of witnesses	1.70	\$1,105.00
B120	10/29/24	AI	Continue review of documents	13.40	\$8,040.00
B120	10/29/24	AMG	Phone call with N. Matthews re: interview outlines	0.20	\$118.00
B120	10/29/24	BMC	Review and analyze document production	1.20	\$720.00
B120	10/29/24	CG	Review deposition outline edits from E. Mannix (.4); incorporate deposition outline revisions for J. Fairweather deposition (2.1); proofread and send same to E. Mannix (1.1)	3.60	\$1,980.00
B120	10/29/24	CG	Review draft of voting investigation letter written by G. Franco (.3); review comments and revisions by M. Kaplan and J. Cohen re same (.2)	0.50	\$275.00
B120	10/29/24	CG	Review notes on M. Shea deposition subjects (.2); draft deposition outline (2.1)	2.30	\$1,265.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/29/24	CG	Review and analyze documents and draft M. Shea deposition outline	1.40	\$770.00
B120	10/29/24	CGS	Draft contractual privity analysis summary (4.0); Compose memorandum re: research re: contractual privity analysis (4.0)	8.00	\$5,200.00
B120	10/29/24	CTC	Review and analyze document production	2.70	\$1,377.00
B120	10/29/24	DC	Coordinate deposition schedule and calendar with E Mannix and MWE team (.3); update and maintain attorney calendar (.4)	0.70	\$255.50
B120	10/29/24	DMP	Review potential Cannon documents (3.2); conference call regarding case strategy with M. Kaplan, J. Cohen, and G. Finizio (.5); review and analysis of A&M deck re contractual analysis (.2); review and analysis of outline for S. Cannon examination (1.5); conference call with D. Green and E. Mannix regarding S. Cannon deposition (.3); review, edit and analyze letter on report of investigation and recommendation (1.1)	6.80	\$9,180.00
B120	10/29/24	EGM	Review and revise J. Fairweather deposition outline and analyze related documents	4.90	\$4,238.50
B120	10/29/24	EGM	Call with A. Gonzalez re preparation for upcoming depositions (.2); call with D. Posner re S. Cannon deposition (.1); call with D. Green from MWE re depositions and Oaktree 30(b)(6) (.1); review Oaktree 30(b)(6) deposition notice (.2); finalize draft deposition outline for D. Posner review and analyze related exhibits (2.0); call with D. Green and D. Posner re prep for S. Cannon deposition (.3)	2.90	\$2,508.50
B120	10/29/24	EJS	Revise 30(b)(6) deposition outline for J. Fairweather (2.8); call with E. Mannix re next steps in connection with depositions (.3); email correspondence with E. Mannix and C. Gauvin re same (.2)	3.30	\$2,359.50
B120	10/29/24	GF	Litigation strategy call with J. Cohen, M. Kaplan and D. Posner regarding next steps (.5); prepare revisions to investigative report letter (2.5); review A. Carr deposition transcript (.9)	3.90	\$4,192.50
B120	10/29/24	JJP	Provide assistance to E. Seltzer re: document review	0.10	\$39.50
B120	10/29/24	KEM	Review voting recommendation letter (.3); correspondence from J. Cohen and G. Finizio regarding same (.1); call with E. Mannix regarding standing motion (.2); correspondence from E. Mannix regarding deposition schedule (.1); review correspondence and filings regarding PBI director resignation (.2)	0.90	\$841.50
B120	10/29/24	MAK	Outline topics and review potential exhibits for deposition of M. Shea	2.80	\$2,884.00
B120	10/29/24	MD	Review and analyze document production	2.80	\$1,582.00
B120	10/29/24	NSM	Review and analyze documents for J. Fairweather interview outline (8.0) and draft interview outline for J. Fairweather (6.0)	14.00	\$8,260.00
B120	10/29/24	VT	Telephone conference with Veritext re: rough draft of A. Carr deposition (0.2); download deposition file for attorney review (0.1); confer with E. Mannix regarding logistics for upcoming depositions (0.2)	0.50	\$212.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/30/24	AI	Continue review of documents (7.1); update E. Mannix re: document review and confer re: next steps (.2)	7.30	\$4,380.00
B120	10/30/24	BMC	Review and analyze document production	1.40	\$840.00
B120	10/30/24	CG	Continue drafting M. Shea deposition outline	4.30	\$2,365.00
B120	10/30/24	CG	Participate in committee call preparation with Lowenstein team via Zoom (.5); draft notes and send to E. Mannix and E. Seltzer (.1)	0.60	\$330.00
B120	10/30/24	CG	Review and revise J. Fairweather deposition outline	2.60	\$1,430.00
B120	10/30/24	CGS	Meet with E. Mannix to review and discuss contractual privity analysis (.7)	0.70	\$455.00
B120	10/30/24	CTC	Review and analyze document production	4.30	\$2,193.00
B120	10/30/24	DMP	Review potential exhibits for S. Cannon deposition (1.6); attend S. Cannon deposition (3.0); review and analysis of contractual privity issues (.6); conference call with Lowenstein and A&M regarding same and settlement construct (.5)	5.70	\$7,695.00
B120	10/30/24	EGM	Participate in S. Cannon deposition	4.00	\$3,460.00
B120	10/30/24	EGM	Calls with M. Kaplan re investigation strategy (.5); meet with C. Stewart re contractual privity analysis (.7); further review and analyze contracts and agreements related to privity analysis and revise summary charts re same (1.3); review research from C. Stewart (.2)	2.70	\$2,335.50
B120	10/30/24	EGM	Continue reviewing and revising J. Fairweather deposition outline and analyzing related documents	5.50	\$4,757.50
B120	10/30/24	EJS	Correspondence with E. Mannix re J. Fairweather deposition outline (.1); draft additional questions in connection with same (.3); call with E. Mannix re R. Mittleman deposition (.2); draft R. Mittleman deposition outline (6.8)	7.40	\$5,291.00
B120	10/30/24	GF	Update report summarizing Committee's investigation	1.60	\$1,720.00
B120	10/30/24	JJP	Provide production totals to E. Mannix	0.10	\$39.50
B120	10/30/24	KEM	Correspondence from G. Finizio regarding revised investigation letter	0.10	\$93.50
B120	10/30/24	MAK	Telephone call with A&M re: contractual privity analysis	0.50	\$515.00
B120	10/30/24	MD	Review and analyze document production	3.70	\$2,090.50
B120	10/30/24	NSM	Draft interview outline for J. Fairweather	1.10	\$649.00
B120	10/30/24	VT	Confer with E. Mannix re: logistics for upcoming depositions (0.3); e-mail communications with Planet Depos regarding deposition of J. Fairweather (0.3)	0.60	\$255.00
B120	10/31/24	AMG	Draft deposition outline for E. Kaup (6.2); highlight and organize exhibits for J. Fairweather depositions (5.3)	11.50	\$6,785.00
B120	10/31/24	CG	Further revise deposition outline for J. Fairweather	0.80	\$440.00
B120	10/31/24	CG	Meet with M. Kaplan to prepare for deposition	0.30	\$165.00
B120	10/31/24	CG	Participate in call with E. Seltzer on Oak tree note and Debtor Intercompany Note to incorporate relevant questions into deposition outline	0.30	\$165.00
B120	10/31/24	CG	Draft deposition outline for M. Shea and review and analyze related documents	7.70	\$4,235.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	10/31/24	CG	Review UCC Settlement proposal to debtors sent by D. Posner	0.10	\$55.00
B120	10/31/24	CGS	Participate in contractual privity analysis meeting with E. Mannix, A. Gonzalez, K. Moynihan, R. Newman (.9); review and analyze additional documents for contract privity analysis (3.5); assist in preparation for deposition of J. Fairweather (1.9)	6.30	\$4,095.00
B120	10/31/24	DMP	Review revised settlement letter (.1); telephone call with M. Kaplan regarding case strategy and testimony for confirmation (.3); correspondence with G. Finizio regarding settlement letter (.3); correspondence with Lowenstein and A&M teams regarding settlement and contractual privity analysis (.2); review documents for R. Mittleman deposition (2.8)	3.70	\$4,995.00
B120	10/31/24	EGM	Revise and finalize J. Fairweather 30(b)(6) deposition outline and accompanying exhibits (8.8); prepare for deposition (2.0); review and revise J. Fairweather interview outline (2.4)	13.20	\$11,418.00
B120	10/31/24	EGM	Prepare for (.5) and participate on call with A&M team, C. Stewart, and K. Moynihan re contractual privity analysis (.9); call with G. Finizio re same (.1); call with M. Kaplan re same (.2)	1.70	\$1,470.50
B120	10/31/24	EJS	Draft R. Mittleman deposition outline (1.9); call with C. Guavin re same (.3); call with E. Mannix re: J. Fairweather interview outline (.3); draft and revise same (6.5); follow-up call with E. Mannix re issues in connection with same (.2); review revised settlement proposal (.2)	9.40	\$6,721.00
B120	10/31/24	GF	Prepare edits to summary report on committee investigation (1.1); call with E. Mannix regarding November 1 interview (.1)	1.20	\$1,290.00
B120	10/31/24	JJP	Review deposition outline and locate documents requested (.4); rename files requested by E. Seltzer (.3)	0.70	\$276.50
B120	10/31/24	KEM	Call with D. Posner, G. Finizio, E. Mannix, R. Newman and A. Gonzalez regarding prepetition transactions (.3); call with E. Mannix, R. Newman and A. Gonzalez regarding contractual privity analysis (.8); correspondence with E. Mannix regarding R. Mittleman deposition (.1); correspondence from B. Beller regarding Oaktree deposition (.1)	1.30	\$1,215.50
B120	10/31/24	MAK	Finalize outline and exhibits for deposition of J. Fairweather as corporate designee and individually	5.70	\$5,871.00
B120	10/31/24	MD	Analyze document production	0.80	\$452.00
B120	10/31/24	RFZ	Draft outline re: interview of G. Bryan (1.2); revise draft deposition outline of J. Fairweather (1.8)	3.00	\$1,950.00
B120	10/31/24	VT	Confer with E. Mannix re: upcoming depositions (0.3); prepare chart of upcoming depositions for court reporter (0.4); confer with Planet Depos regarding depositions (0.3)	1.00	\$425.00
B120	11/01/24	AMG	Highlight and organize exhibits for J. Fairweather deposition (0.3); draft deposition outline for E. Kaup (5.4); email with E. Mannix re: deposition outline for E. Kaup (0.1)	5.80	\$3,422.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	11/01/24	CG	Perform citation checks on M. Shea deposition outline and revise outline draft (1.2); send same to E. Mannix (.1)	1.30	\$715.00
B120	11/01/24	CG	Analyze document production and include relevant portions of same into deposition outline for M. Shea	6.40	\$3,520.00
B120	11/01/24	CGS	Apply changes to contract privity analysis	1.00	\$650.00
B120	11/01/24	DC	Prepare Deposition Notice to R. Williams and update attorney calendar	0.40	\$146.00
B120	11/01/24	DMP	Attend J. Fairweather deposition (7.0); meet with M. Kaplan and E. Mannix regarding case strategy (.9); correspondence with Lowenstein team regarding standing motion and demand letter (.3); correspondence with Gibson, Weil, MWE and Lowenstein regarding call re settlement proposal (.5)	8.70	\$11,745.00
B120	11/01/24	EGM	Prepare for (1.9) and participate in deposition of J. Fairweather (6.5)	8.40	\$7,266.00
B120	11/01/24	EJS	Draft R. Mittleman deposition outline (4.9); revise same (1.8); email correspondence with E. Mannix re same (.1)	6.80	\$4,862.00
B120	11/01/24	GC	Review and analyze document production re: creditors (.7)	0.70	\$395.50
B120	11/01/24	JC	Review deposition transcript	1.20	\$1,698.00
B120	11/01/24	JC	Post-deposition download discussions with D. Posner and M. Kaplan	2.20	\$3,113.00
B120	11/01/24	JJP	Provide assistance to J. Haake re: searches	0.10	\$39.50
B120	11/01/24	KEM	Attend portions of J. Fairweather deposition (3.0); correspondence with G. Finizio regarding standing demand letter (.1)	3.10	\$2,898.50
B120	11/01/24	MAK	Take deposition of J. Fairweather	6.50	\$6,695.00
B120	11/01/24	NSM	Draft deposition outline for L. Thomas	2.60	\$1,534.00
B120	11/01/24	RFZ	Draft outline re: interview of G. Bryan	4.10	\$2,665.00
B120	11/01/24	VT	Confer with Planet Depos re: scheduled depositions and logistics for same	0.40	\$170.00
B120	11/02/24	CG	Correspond with E. Mannix on revisions on M. Shea deposition outline (.7); send revised version to E. Mannix (.1)	0.80	\$440.00
B120	11/02/24	CGS	Update contract privity analysis	1.50	\$975.00
B120	11/02/24	DMP	Telephone call with G. Finizio to prepare for call with Weil and Gibson regarding settlement (.1); conference call with Weil and Gibson teams regarding settlement (.6); correspondence with Lowenstein team regarding same (.2); review summary of settlement call (.2); correspondence with G. Finizio and K. Moynihan regarding settlement and case strategy (.2); correspondence with MWE and Lowenstein teams regarding settlement meeting (.3); correspondence with M. Shea of BRG regarding settlement and call with A&M (.2); correspondence with Lowenstein and A&M regarding same (.2); review documents for Mittleman deposition (.8); correspondence with A&M and Lowenstein regarding contracts in settlement buckets (.3)	3.10	\$4,185.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	11/02/24	EGM	Review and revise G. Bryan deposition outline and analyze related documents (4.0); review Alvarez & Marsal's questions for G. Bryan deposition (.6); email A. Gonzalez re same (.1)	4.70	\$4,065.50
B120	11/02/24	EJS	Draft G. Kupferschmidt deposition outline and review related document productions	5.40	\$3,861.00
B120	11/02/24	GF	Review interview transcripts form J. Fairweather and S. Cannon	1.30	\$1,397.50
B120	11/02/24	KEM	Review R. Mittleman outline (.2); correspondence with D. Posner and E. Mannix regarding same (.1); correspondence with D. Posner and G. Finizio regarding declaratory action (.2)	0.50	\$467.50
B120	11/02/24	MAK	Telephone call with E. Mannix re: G. Bryan deposition preparation	0.20	\$206.00
B120	11/02/24	NSM	Draft L. Thomas deposition outline	2.00	\$1,180.00
B120	11/02/24	RFZ	Revise outline re: interview of G. Bryan	1.10	\$715.00
B120	11/03/24	CG	Review document production related to confirmation objection; send same to K. Moynihan	0.70	\$385.00
B120	11/03/24	CGS	Apply edits to contract privity analysis (1.5); compare grouping of creditor agreements with contract privity analysis (1.0)	2.50	\$1,625.00
B120	11/03/24	DMP	Telephone call with M. Kaplan regarding settlement construct and contracts in buckets (.1); correspondence with M. Kaplan regarding same (.2); conference call with Lowenstein and A&M teams to prepare for A&M call with BRG (.5); correspondence with A&M and Lowenstein teams regarding contractual analysis (.4); review email from R. Newman regarding report on call with BRG (.2); correspondence with Lowenstein and A&M teams regarding same (.2); review email from N. Rowles regarding J. Lillis deposition (.1); correspondence with Lowenstein team regarding same (.2); correspondence with N. Rowles regarding same (.1)	2.00	\$2,700.00
B120	11/03/24	EGM	Continue to revise G. Bryan deposition outline (3.9); calls with M. Kaplan re same (.2); confer with E. Seltzer about preparation of G. Bryan exhibits (.3); review and revise M. Shea 30b6 deposition outline (2.7)	7.10	\$6,141.50
B120	11/03/24	EJS	Draft G. Kuperschmidt deposition outline and review related document productions (4.9); revise same (.8); email correspondence with E. Mannix re same (.1); revise G. Bryan deposition outline (1.4); correspondence with E. Mannix re same (.1)	7.30	\$5,219.50
B120	11/03/24	KEM	Call with E. Mannix regarding depositions and outlines (.5); correspondence with D. Posner regarding R. Mittleman and L. Thomas depositions (.1)	0.60	\$561.00
B120	11/03/24	MAK	Prepare for deposition of G. Bryant (1.7); prepare for deposition of M. Shea (2.6); prepare for deposition of E. Kaup (1.9)	6.20	\$6,386.00
B120	11/04/24	CG	Prepare final deposition outline for M. Shea and organize deposition documents for e-binder for E. Mannix	1.60	\$880.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	11/04/24	CG	Review and analyze memorandum on the committee's investigation overview and theories of recovery	1.20	\$660.00
B120	11/04/24	CG	Prepare and download documents in preparation for Mittleman deposition and organize certain deposition folders for K. Moynihan in preparation for same	0.70	\$385.00
B120	11/04/24	CGS	Attend deposition of G. Bryan	1.80	\$1,170.00
B120	11/04/24	DMP	Review outline for Mittleman deposition and documents for same (2.5); review email from R. Newman regarding potential counter from PBI/Debtors (.2); correspondence with G. Finizio and K. Moynihan regarding same (.2); review email from L. Wilson regarding Lillis deposition (.1); telephone call with M. Kaplan regarding Garfield Bryan deposition and settlement (.2); telephone call with K. Moynihan regarding Mittleman deposition outline and exhibits (.2); conference call with M. Helt, D. Green, and G. Finizio regarding Oaktree deposition and theories of potential recovery (.5)	3.90	\$5,265.00
B120	11/04/24	EGM	Further review and revise E. Kaup deposition outline and analyze related documents	2.50	\$2,162.50
B120	11/04/24	EGM	Prepare for (.7) and participate in G. Bryan deposition (1.0)	1.70	\$1,470.50
B120	11/04/24	EGM	Further review and revise M. Shea deposition outline (3.9); analyze related documents (.8); and incorporate questions from Alvarez & Marsal (1.8)	6.50	\$5,622.50
B120	11/04/24	EJS	Revise G. Kuperschmidt deposition outline (2.3); call with K. Moynihan re R. Mittleman deposition (.2); prepare for (.1) and attend (.6) call with Lowenstein and A&M teams re alter ego analysis; review settlement term sheet from the Debtors/PBI (.3)	3.50	\$2,502.50
B120	11/04/24	JC	Multiple correspondence with M. Kaplan re: deposition progress and next steps	1.30	\$1,839.50
B120	11/04/24	JJP	Review deposition outlines and pull documents requested for same	0.80	\$316.00
B120	11/04/24	KEM	Revise L. Thomas deposition outline (2.1); prepare L. Thomas exhibits (.8) Call with D. Posner regarding depositions (.2); call with E. Seltzer regarding R. Mittleman deposition (.1); revise R. Mittleman deposition outline (.4); prepare exhibits for R. Mittleman deposition (.8); correspondence with E. Seltzer and C. Gauvin regarding deposition exhibits (.3); correspondence with E. Mannix regarding depositions (.2)	4.90	\$4,581.50
B120	11/04/24	MAK	Take deposition of G. Bryan	1.40	\$1,442.00
B120	11/04/24	MAK	Prepare for deposition of M. Shea	5.70	\$5,871.00
B120	11/05/24	CG	Attend and participate in Mackenzie Shea deposition	6.00	\$3,300.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	11/05/24	DMP	Review and analyze PBI counter proposal (.5); prepare for Mittleman deposition (1.5); conference call with MWE and Lowenstein regarding case strategy and counter proposal (.7); Mittleman deposition (2.0); prepare for Thomas deposition including review of outline and potential exhibits (3.5); review A&M deck re summary of counter proposal (.3); correspondence with Lowenstein and A&M regarding same and regarding further proposal thoughts (.8); correspondence with MWE regarding Lillis deposition potential (.2); correspondence with M. Kaplan and J. Cohen regarding same (.2); correspondence with Lowenstein and L. Tauro regarding settlement (.2);	9.90	\$13,365.00
B120	11/05/24	EGM	Prepare for (1.5) and participate in M. Shea deposition (4.5)	6.00	\$5,190.00
B120	11/05/24	EGM	Further revise E. Kaup outline and analyze related documents (2.6); discuss L. Thomas outline with K. Moynihan (.2); revise G. Kupfershmid outline and analyze related docuemtns (1.1)	3.90	\$3,373.50
B120	11/05/24	EJS	Revise E. Kaup deposition outline (2.3); correspondence with E. Mannix re same (.1)	2.40	\$1,716.00
B120	11/05/24	JC	Virtually attend a portion of M. Shea deposition	4.80	\$6,792.00
B120	11/05/24	KEM	Attend R. Mittleman deposition (2.7); call with D. Posner regarding depositions (.2); prepare for L. Thomas deposition (1.6); call with D. Posner, M. Kaplan and E. Mannix regarding 11/5 depositions (.4); correspondence with D. Posner regarding depositions (.1); revise L. Thomas deposition outline (1.1); finalize L. Thomas deposition exhibits (.5)	6.60	\$6,171.00
B120	11/05/24	MAK	Take deposition of M. Shea	5.70	\$5,871.00
B120	11/05/24	MAK	Prepare for deposition of M. Shea	1.80	\$1,854.00
B120	11/05/24	MAK	Prepare for deposition of E. Kaup	2.60	\$2,678.00
B120	11/05/24	VT	Attend to multiple e-mail communications from Planet Depos re: upcoming depositions (0.7); prepare chart of confirmations received and meeting links for distribution (0.5)	1.20	\$510.00
B120	11/06/24	CG	Review deposition outline for G. Kupferschmid and prepare related exhibits for deposition binder; send updated outline to E. Mannix	2.40	\$1,320.00
B120	11/06/24	CG	Prepare for and participate in the E. Kaup deposition at Weil office	1.80	\$990.00
B120	11/06/24	CGS	Add information re: creditors' other agreements into Draft Complaint	3.50	\$2,275.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	11/06/24	DMP	Attend L. Thomas deposition (3.5); review documents for Kupferschmid deposition (2.6); conference call with M. Kaplan, G. Finizio, M. Helt and D. Green regarding litigation strategy (.6); review email from J. Cohen regarding settlement (.2); review draft of counter proposal prepared by G. Finizio (.3); correspondence with Lowenstein and A&M regarding same (.5); correspondence with M. Kaplan, E. Mannix and J. Cohen regarding Kupferschmid deposition (.3); telephone call with G. Finizio regarding settlement counter proposal (.1)	8.10	\$10,935.00
B120	11/06/24	EGM	Prepare for (.9) and participate in E. Kaup deposition (2.0)	2.90	\$2,508.50
B120	11/06/24	EGM	Further revise G. Kupferschmid deposition outline and analyze related documents	4.30	\$3,719.50
B120	11/06/24	EJS	Revise G. Kupferschmid deposition outline (1.6); email correspondence with E. Mannix re same (.1); correspondence with C. Gauvin re question in connection with G. Kupferschmid deposition (.1); review and analyze J. Fairweather (2.6), S. Canon (1.2), and M. Shea (1.0); deposition transcripts re facts in support of confirmation objection; draft summaries with respect to same (.5); email correspondence with G. Finizio and K. Moynihan re findings (.2)	7.30	\$5,219.50
B120	11/06/24	JC	Virtually attend a portion of E. Kaup deposition	2.60	\$3,679.00
B120	11/06/24	JC	Telephone call with M. Kaplan and G. Finizio re: litigation strategy	0.60	\$849.00
B120	11/06/24	KEM	Prepare for L. Thomas deposition (1.1); attend L. Thomas deposition (2.5); review correspondence from D. Posner regarding M. Goglia interview (.1)	3.70	\$3,459.50
B120	11/06/24	MAK	Take deposition of E. Kaup	2.20	\$2,266.00
B120	11/06/24	RKC	Confer with E. Mannix re: trial subpoenas	0.10	\$88.50
B120	11/06/24	VT	Receive e-mail from E. Mannix re: deposition of R. Williams (0.1); prepare e-mail to Planet Depos requesting cancellation of R. Williams (0.1); coordinate duplication and delivery of documents for G. Kupferschmid (0.7)	0.90	\$382.50
B120	11/07/24	DMP	Review emails from M. Shea regarding case issues and settlement (.2); call with G. Finizio, J. Cohen and M. Shea regarding case issues and settlement (.7); follow up calls with D. Posner and J. Cohen re same (.8); analysis of PBI 8K regarding quarterly results (.3); emails with G. Finizio and J. Cohen regarding next steps (.1); call with K. Martorana regarding settlement (.2); extensive email correspondence with Lowenstein team and MWE team regarding settlement (2.5); call with M. Helt regarding settlement (.4); emails with K. Moynihan regarding confirmation objection (.1); call with M. Kaplan regarding confirmation deadlines and settlement (.3); review and comment upon revised settlement letter (.5) and email to A&M team regarding same (.2); correspondence with Lowenstein team regarding same (.9)	7.20	\$9,720.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B120	11/07/24	EJS	Review and analyze G. Bryan (1.9), L. Thomas (1.2), and R. Mittleman (1.0) deposition transcripts re facts in support of confirmation objection; draft summaries with respect to same (.4); email correspondence with G. Finizio and K. Moynihan re findings (.2)	4.70	\$3,360.50
B120	11/08/24	EGM	Email F. Rhine re deposition transcript information	0.10	\$86.50
B120	11/08/24	EJS	Review and analyze E. Kaup deposition transcript re facts in support of confirmation objection (1.3); draft summary re same (.2); correspondence with K. Moynihan re same (.1)	1.60	\$1,144.00
B120	11/11/24	DMP	Correspondence with G. Finizio and J. Cohen regarding next steps (.2); conference call with Weil regarding settlement and next steps (.3); review K. Moynihan summary of call with Weil re next steps (.1)	0.60	\$810.00
B120	11/11/24	VT	Attend to download of deposition transcript files for multiple depositions	1.10	\$467.50
B120	11/15/24	EGM	Review invoices for transcripts from Planet Depot in connection with depositions (.1); review motion to dismiss adversary proceeding filed by Trilogy (.3); emails from G. Finizio, C. Gibbs, and K. Moynihan re settlement and amended plan (.2); review email from S. Dudding and certain transcript confidential designations (.4)	1.00	\$865.00
B120	11/16/24	KEM	Correspondence from M. Kaplan and S. Dudding regarding confidentiality designations	0.10	\$93.50
B120	11/21/24	EGM	Review exhibits from transcription company and email re filing with records	0.30	\$259.50
Total B120 - Asset Analysis and Recovery				1,644.70	\$1,338,870.00
<u>B120A Investigation of Prepetition Lenders</u>					
B120A	10/14/24	DMP	Correspondence with M. Helt and J. Cohen regarding investigation of Oaktree liens and claims (.3); review objection filed regarding Oaktree claims (.3)	0.60	\$810.00
Total B120A - Investigation of Prepetition Lenders				0.60	\$810.00
<u>B130 Asset Disposition</u>					
B130	09/25/24	DMP	Correspondence with Lowenstein team regarding de minimis asset sale motion	0.40	\$540.00
B130	09/25/24	GF	Review motion to sell de minimis assets (.4); review precedent de minimis asset sale procedures (.7); prepare email to K. Moynihan with comments to de minimis assets motion (.5); review A&M email regarding de minimis asset sale procedures (.1); review email from M. Burrus on de minimis asset sales and prepare draft response to same (.1)	1.80	\$1,935.00
B130	09/25/24	KEM	Review de minimis asset sale motion (1.0); revise related order (.6); call with G. Finizio regarding same (.2); correspondence with G. Finizio regarding same (.1); correspondence with A. Gonzalez regarding same (.2); correspondence with M. Burrus regarding same (.1)	2.20	\$2,057.00
B130	09/27/24	GF	Review markup to de minimis asset sales motion	0.30	\$322.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B130	09/30/24	DMP	Correspondence with G. Finizio and K. Moynihan regarding de minimis asset sale motion (.1); correspondence with Weil regarding same (.1)	0.20	\$270.00
B130	09/30/24	KEM	Correspondence with G. Finizio and M. Burrus regarding de minimis asset sale motion	0.10	\$93.50
B130	10/01/24	DMP	Correspondence from Weil regarding de minimis asset sales, motion and values of assets	0.20	\$270.00
B130	10/02/24	GF	Review auction catalog for de minimis asset sales (.7); email to A&M team regarding same (.2)	0.90	\$967.50
B130	10/02/24	KEM	Correspondence from M. Burrus regarding de minimis asset sale (.1); review related auction materials (.1)	0.20	\$187.00
B130	10/03/24	DMP	Correspondence with Lowenstein team regarding de minimis asset sale motion	0.30	\$405.00
B130	10/03/24	EGM	Review email from K. Moynihan and analyze Committee comments in connection with De Minimis Asset Sale motion	0.50	\$432.50
B130	10/03/24	GF	Emails with R. Newman and K. Moynihan regarding de minimis asset sales (.1); review further markup of de minimis asset sale order (.2); emails with J. Cohen and K. Moynihan regarding markup of de minimis asset sale order (.2)	0.50	\$537.50
B130	10/03/24	JC	Multiple correspondence with K. Moynihan re: de minimis asset sale procedures	0.80	\$1,132.00
B130	10/03/24	KEM	Calls with G. Finizio regarding de minimis asset order (.4); revise order (.3); call with G. Finizio, A. Cohen and M. Burrus regarding de minimis asset sale order (.3); email to J. Cohen and D. Posner regarding same (.3); correspondence with J. Cohen and G. Finizio regarding same (.1); email to M. Burrus regarding revised order and 10/14 auction (.1)	1.50	\$1,402.50
B130	10/04/24	DMP	Review K. Moynihan summary of call with Weil and Hilco re. de minimis asset disposition motion	0.10	\$135.00
B130	10/04/24	EGM	Emails from K. Moynihan and M. Burrus re De Minimis Sale Motion negotiations update	0.30	\$259.50
B130	10/04/24	GF	Call with Weil team regarding de minimis assets	0.50	\$537.50
B130	10/04/24	KEM	Call with G. Finizio, M. Burrus, A. Cohen, and T. Schrader regarding de minimis asset sale order (.7); call with G. Finizio regarding same (.2); email to J. Cohen and D. Posner regarding same (.3)	1.20	\$1,122.00
B130	10/06/24	KEM	Correspondence with G. Finizio and M. Burrus regarding de minimis asset sale order (.1); review revised order (.2)	0.30	\$280.50
B130	10/07/24	GF	Emails with K. Moynihan regarding de minimis asset sale hearing	0.10	\$107.50
B130	10/07/24	KEM	Correspondence with M. Burrus regarding de minimis asset sale order and related hearing (.1); correspondence with G. Finizio regarding same (.1)	0.20	\$187.00
B130	10/20/24	GF	Emails with K. Moynihan regarding auction results	0.10	\$107.50
B130	10/20/24	KEM	Correspondence with G. Finizio regarding de minimis asset auction	0.10	\$93.50
B130	10/21/24	GF	Review A&M email regarding de minimis asset sale	0.10	\$107.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B130	10/21/24	KEM	Correspondence with A. Gonzalez regarding auction results	0.10	\$93.50
B130	10/22/24	KEM	Review email from M. Burrus regarding auction outcome	0.10	\$93.50
B130	10/23/24	CG	Review E. Seltzer email and proof of claim chart, respond with questions	0.20	\$110.00
Total B130 - Asset Disposition				13.30	\$13,786.50
<u>B140 Relief from Stay/Adequate Protection Proceedings</u>					
B140	12/03/24	KEM	Review docket regarding motion for relief from stay 12/3 hearing and correspondence with D. Claussen regarding same	0.10	\$93.50
Total B140 - Relief from Stay/Adequate Protection Proceedings				0.10	\$93.50
<u>B150 Meetings of and Communication with Creditors</u>					
B150	08/28/24	DMP	Correspondence with Committee members regarding financial advisor candidates and interviews	0.30	\$405.00
B150	08/28/24	GF	Review emails from K. Moynihan regarding first Committee call	0.10	\$107.50
B150	08/28/24	JC	Initial call with Committee chair and members after selection as counsel	0.60	\$849.00
B150	08/28/24	KEM	Correspondence from J. Cohen and Committee members regarding 8/29 Committee call	0.20	\$187.00
B150	08/29/24	DMP	Prepare for Committee meeting to select FA candidate (.5); Creditors' Committee meeting to interview and select FA candidate (2.0)	2.50	\$3,375.00
B150	08/29/24	DMP	Correspondence with M. Mandell regarding Province	0.10	\$135.00
B150	08/29/24	EGM	Review and analyze second day motions and begin drafting summary of same for Committee memorandum (1.4); draft Committee memorandum re fiduciary duties (.8)	2.20	\$1,903.00
B150	08/29/24	GF	Emails with K. Moynihan regarding Committee call (.1); call with C. Hardman regarding status of call (.1); call with K. Moynihan regarding Committee call preparations (.1); participate on Committee call for FA interviews (2.0)	2.30	\$2,472.50
B150	08/29/24	JC	Attend portion of Committee meeting to interview financial advisor candidates	1.10	\$1,556.50
B150	08/29/24	JC	Zoom call with Debtors' counsel re: initial call and case status update	0.80	\$1,132.00
B150	08/29/24	KEM	Correspondence with J. Cohen, D. Posner, G. Finizio, Committee members and financial advisor candidates regarding 8/29 Committee call (.6); call with M. Helt regarding Committee call (.1); prepare for call with Committee (.2); participate in Committee call (1.9)	2.80	\$2,618.00
B150	08/30/24	EGM	Further review second day motions and continue drafting summary of same for the Committee memorandum	3.40	\$2,941.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	08/30/24	EGM	Draft email update to the Committee re standing call and documents including review and finalize bylaws, roster and memoranda (.9); emails to Committee professionals re scheduling standing Committee call (.3)	1.20	\$1,038.00
B150	08/30/24	GF	Call with M. Helt regarding next Committee call (.1); call with E. Mannix regarding scheduling of next Committee call (.1)	0.20	\$215.00
B150	08/30/24	KEM	Review email to Committee regarding standing call and bylaws	0.10	\$93.50
B150	08/31/24	GF	Review pending first day motions and orders regarding proposed Committee comments to same (.9); prepare revisions to first day orders and emails with E. Mannix regarding same (1.0)	2.80	\$3,010.00
B150	09/01/24	GF	Review A&M memo regarding first day motions (.5) and email to E. Mannix regarding same (.2); prepare edits to Committee memo regarding recommendations on pending first day orders (.8); call with E. Mannix regarding pending first day orders (.2); review emails from D. Posner and J. Cohen regarding strategy for first day motions and scheduling (.1)	1.80	\$1,935.00
B150	09/02/24	GF	Prepare further comments to proposed final orders for first day relief (1.3); emails with M. Helt regarding extension for September 9 matters (.1); emails with A. Cohen regarding markups of first day orders (.1)	1.50	\$1,612.50
B150	09/03/24	EGM	Emails with Committee members and creditors re call scheduling and other matters (.6); emails with LS team re standing Committee call and one-off calls with Committee members (.2); revise memo summarizing pending motions and send same to D. Posner and J. Cohen for review (.5); draft agenda for Committee meeting (.3); draft email to the Committee confirming standing call on Wednesdays, and providing other relevant documents (.5)	2.10	\$1,816.50
B150	09/03/24	GF	Review and revise draft agenda for September 4 Committee call (.2); emails with A&M regarding Committee call prep (.1); review Lowenstein deliverables for Committee call (.6); review MailLatin edits to bylaws (.1) and email to E. Mannix regarding same (.1)	1.10	\$1,182.50
B150	09/03/24	KEM	Correspondence with J. Cohen, D. Posner and E. Mannix regarding Committee call (.2); review email to Committee regarding 9/4 call (.1); review agenda (.1); correspondence from E. Mannix to Committee members regarding individual calls (.1)	0.50	\$467.50
B150	09/03/24	KEM	Revise 9/4 agenda (.2); correspondence with G. Finizio and E. Mannix regarding same (.2)	0.40	\$374.00
B150	09/04/24	DMP	Call with MWE and LS teams to prepare for Committee meeting (.5); participate in Committee meeting (1.0); correspondence with Committee members and LS team regarding calls with Committee members (.6)	2.10	\$2,835.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/04/24	EGM	Participate on call with J. Cohen, D. Posner, G. Finizio, and other Committee professionals in advance of Committee call (.3); prepare for call (.2); participate on weekly Committee call (1.0); emails with Committee members re one-off calls with Lowenstein team (.3)	1.80	\$1,557.00
B150	09/04/24	GF	Participate in portion of Lowenstein and MWE call to prepare for Committee call (.3); participate in Committee call (1.0)	1.10	\$1,182.50
B150	09/04/24	JC	Participate on weekly Committee call	1.10	\$1,556.50
B150	09/04/24	KEM	Correspondence with D. Posner, G. Finizio and E. Mannix regarding Committee call (.1); email to A. Krop regarding critical vendors (.1)	0.20	\$187.00
B150	09/05/24	EGM	Emails with Committee members re one-off calls with Lowenstein team	0.10	\$86.50
B150	09/05/24	KEM	Correspondence from D. Posner regarding status update for Committee	0.10	\$93.50
B150	09/06/24	DMP	Conference call with US Pack and counsel regarding case issues (.3); call with Ambi Robotics regarding case issues (.5); conference call with RXO regarding case issues (.4)	1.20	\$1,620.00
B150	09/06/24	EGM	Draft email to Committee re update on first day matters, 2004 document requests (.8); send email to Committee re same (.1)	0.90	\$778.50
B150	09/06/24	GF	Review draft Committee email with status update (.1) call with E. Mannix regarding edits to same (.1); call with MaiLatin regarding case matters (.7) and email to LS team regarding same (.2); review email from K. Moynihan regarding calls with Committee members (.1)	1.20	\$1,290.00
B150	09/06/24	JC	Telephone call with individual Committee members re: claim composition	1.10	\$1,556.50
B150	09/06/24	KEM	Call with D. Posner, M. Bishop, and M. Kachaluba regarding case (.3); revise email to Committee regarding first day orders (.1); call with G. Finizio, C. Hardman, and C. Cook regarding case (.5); call with J. Cohen and A. Krop regarding case (.5); call with D. Posner and S. Kazee (.4); call with D. Posner, M. Herz and J. Anthony regarding case (.3); draft summary regarding calls with Committee Members (.5); call with D. Posner regarding Committee Member calls (.1)	2.70	\$2,524.50
B150	09/07/24	GF	Emails with D. Posner and L. Tauro regarding status of September 9 hearing	0.10	\$107.50
B150	09/09/24	EGM	Emails with creditors re scheduling calls to discuss unsecured claims	0.20	\$173.00
B150	09/09/24	KEM	Review A&M presentation for Committee	0.10	\$93.50
B150	09/10/24	DMP	Review A&M deck for Committee meeting (.2); review G. Finizio comments regarding same (.1); review agenda for Committee meeting and email to team regarding same (.2)	0.50	\$675.00
B150	09/10/24	EGM	Calls to Committee members to follow up on bylaws and one-on-one calls (.4); review agenda for weekly Committee meeting (.1); email update to LS team re Hackbarth touchbase (.2)	0.70	\$605.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/10/24	GF	Review (.1) and revise agenda for September 11 Committee call (.1); review LS deliverables for Committee call (.5)	0.70	\$752.50
B150	09/10/24	KEM	Draft 9/11 Committee call agenda (.2); correspondence with J. Cohen, G. Finizio and E. Mannix regarding same (.2)	0.40	\$374.00
B150	09/11/24	DMP	Correspondence with J. Cohen, E. Mannix, G. Finizio and K. Moynihan regarding Committee meeting and confidentiality (.2); conference call with E. Mannix, K. Picard and Hackbarth counsel regarding case and Committee service (.5); prepare for Committee meeting including review materials and agenda (.3); participate in Committee meeting (1.0)	2.00	\$2,700.00
B150	09/11/24	EGM	Emails re Hackbarth one-off call (.2); draft email to Committee re weekly meeting (.3); participate in call with D. Posner and Hackbarth (.5); call with D. Posner re same (.1); email to Committee with A&M presentation (.2); participate on weekly Committee call (1.0); call with Dollar Shave Club and G. Finizio (.6); emails with J. Cohen, D. Posner and G. Finizio re same (.1); attend to emails with B. Kottman re Dollar Shave Club (.2) emails with Committee members re meeting materials and critical vendor list (.4)	3.40	\$2,941.00
B150	09/11/24	GF	Emails with R. Newman and E. Mannix regarding Committee call deliverables (.2); participate on weekly Committee call (1.0); call with creditor (Dollar Shave Club) and E. Mannix (.6); email to J. Cohen and D. Posner regarding call with Dollar Shave (.2)	2.00	\$2,150.00
B150	09/11/24	JC	Participate in weekly Committee call re: pending matters	1.00	\$1,415.00
B150	09/11/24	KEM	Correspondence with E. Mannix regarding Committee call agenda	0.10	\$93.50
B150	09/12/24	DMP	Review summary of conversation with DSC and Nexus (.1); review DSC/Nexus questions and proposed responses (.1); confer with G. Finizio regarding same (.1); review draft of email responding to DSC/Nexus questions and call with E. Mannix regarding same (.2)	0.50	\$675.00
B150	09/12/24	EGM	Review emails from B. Kottman re general case questions and treatment of unsecured creditors under the plan (.2); discuss same with J. Cohen, D. Posner, G. Finizio, K. Moynihan (.4); call with creditor International Bridge re unsecured creditor recoveries and bar date and email re same (.2)	0.80	\$692.00
B150	09/13/24	DMP	Review draft of update email to Committee regarding DIP negotiations (.1); correspondence with J. Cohen and G. Finizio regarding comments to same (.1)	0.20	\$270.00
B150	09/13/24	DMP	Review draft of update email to Committee regarding DIP negotiations	0.10	\$135.00
B150	09/13/24	DMP	Lowenstein conference call with CRF	1.10	\$1,485.00
B150	09/13/24	EGM	Call with B. Kottman re creditor questions	0.20	\$173.00
B150	09/13/24	GF	Draft email to Committee regarding DIP negotiations status (.3)	0.30	\$322.50
B150	09/13/24	KEM	Review email to Committee regarding DIP status	0.10	\$93.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/14/24	GF	Draft Committee email regarding DIP order negotiations (.3); emails with M. Mandell regarding DIP resolution (.1)	0.40	\$430.00
B150	09/14/24	KEM	Review email to Committee regarding DIP negotiations status	0.10	\$93.50
B150	09/16/24	GF	Email to Committee regarding DIP resolution	0.10	\$107.50
B150	09/17/24	DMP	Review A&M DIP report deck and SOFA/SOAL deck for Committee meeting	0.20	\$270.00
B150	09/17/24	EGM	Email Committee member re DIP Financing update	0.20	\$173.00
B150	09/17/24	GF	Review A&M presentation for September 17 Committee call (.4); review LS deliverables for Committee call (.2)	0.60	\$645.00
B150	09/18/24	DMP	Review agenda for Committee meeting (.1); correspondence with LS team regarding agenda and materials for meeting (.2); prepare for Committee meeting (.2); participate in Committee meeting (1.0)	1.50	\$2,025.00
B150	09/18/24	EGM	Draft Committee meeting agenda and prepare related exhibits (.6); emails with J. Cohen, D. Posner, G. Finizio, M. Kaplan, and K. Moynihan re same (.2); email Committee with agenda and exhibits in advance of meeting (.2); participate in weekly Committee meeting (1.0)	2.00	\$1,730.00
B150	09/18/24	GF	Review agenda for Committee call and provide suggestions to same (.1); prepare for Committee call (.1); participate on portion of Committee call (.6)	0.80	\$860.00
B150	09/18/24	JC	Participate in weekly Committee call	1.00	\$1,415.00
B150	09/18/24	KEM	Correspondence with E. Mannix regarding Committee call agenda and related materials (.2); attend Committee call (1.0)	1.20	\$1,122.00
B150	09/18/24	MAK	Participate in Committee call (partial)	0.40	\$412.00
B150	09/19/24	KEM	Draft email to Committee regarding statement on disclosure statement and solicitation letter (.2)	0.20	\$187.00
B150	09/23/24	DMP	Review draft of report of Disclosure Statement hearing prepared by G. Finizio (.1)	0.10	\$135.00
B150	09/23/24	EGM	Email to Committee with disclosure statement hearing update	0.30	\$259.50
B150	09/23/24	KEM	Review email to Committee regarding disclosure statement hearing	0.10	\$93.50
B150	09/24/24	MAK	Participate in Committee professionals conference call to prepare for Committee conference call	0.60	\$618.00
B150	09/25/24	DMP	Review agenda for potential Committee meeting (.1); correspondence with Lowenstein team regarding same (.2); review draft of email to Committee canceling call and correspondence re same (.2); review draft of update email to Committee (.2)	0.70	\$945.00
B150	09/25/24	GF	Emails regarding status of next Committee call (.1); revise email report for Committee in lieu of call (.2); email to A&M regarding next Committee call (.1)	0.40	\$430.00
B150	09/25/24	KEM	Draft emails to Committee regarding 9/25 call and case updates (.8); correspondence with G. Finizio regarding same (.1)	0.90	\$841.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	10/02/24	DMP	Review M. Bishop email regarding the plan and respond to same (.2)	0.20	\$270.00
B150	10/02/24	EGM	Draft Committee update email in lieu of call and revise to incorporate Lowenstein team comments (.8); email M. Kaplan re protective order and response to Committee member's question in connection with Pitney Bowes' contract analysis (.3); attend to email from M. Bishop (.2)	1.30	\$1,124.50
B150	10/02/24	GF	Review draft committee email report (.1); call with K. Moynihan regarding edits to same (.1); review revised email report for committee (.1)	0.30	\$322.50
B150	10/02/24	GF	Review email from committee member regarding inquiries on chapter 11 plan (.1); review chapter 11 plan to address committee member inquiries (.4)	0.50	\$537.50
B150	10/02/24	JC	Correspondence from creditors' counsel re: plan objections	0.80	\$1,132.00
B150	10/02/24	KEM	Revise email to Committee regarding case updates (.2); call with G. Finizio regarding same (.1); revise email to Committee per G. Finizio's comments (.4)	0.70	\$654.50
B150	10/02/24	KEM	Correspondence from M. Bishop regarding confirmation issues	0.10	\$93.50
B150	10/04/24	EGM	Emails with J. Anthony and M. Herz re contractual privity issues (.3); emails with J. Cohen and D. Posner re same (.2)	0.50	\$432.50
B150	10/04/24	JC	Multiple correspondence with committee members re: contract analysis	1.20	\$1,698.00
B150	10/04/24	KEM	Correspondence from J. Cohen, E. Mannix and Committee members regarding contractual privity analysis	0.10	\$93.50
B150	10/09/24	DMP	Review draft of agenda for committee meeting (.1); participate in committee meeting (.5)	0.60	\$810.00
B150	10/09/24	EGM	Draft agenda and prepare related documents for weekly Committee meeting (.4); review and revise critical dates memo (.3); emails with LS team re same (.2); send email to Committee re same (.1); participate in Committee call (.4)	1.40	\$1,211.00
B150	10/09/24	EJS	Review agenda and A&M analysis ahead of Committee Call (.2); attend Committee Call (.5)	0.70	\$500.50
B150	10/09/24	GF	Review A&M powerpoint for committee call (.4); emails with R. Newman regarding A&M powerpoint (.2); participate on committee call (.5)	1.10	\$1,182.50
B150	10/09/24	KEM	Correspondence with E. Mannix regarding agenda (.1); participate in committee call (.5); review A&M cash presentation (.1); correspondence from G. Finizio and R. Newman regarding same (.1)	0.80	\$748.00
B150	10/09/24	MAK	Participate in committee call	0.50	\$515.00
B150	10/14/24	DC	Telephone call from creditor VCC Holdings re: claims agent contact information	0.20	\$73.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	10/14/24	DMP	Correspondence with G. Finizio and team regarding update email to committee (.2); review draft of update email to committee and email to K. Moynihan regarding same (.2)	0.40	\$540.00
B150	10/14/24	GF	Emails with K. Moynihan regarding committee update (.1); review and revise draft committee update (.1)	0.20	\$215.00
B150	10/14/24	KEM	Draft email to the Committee regarding status conference letter	0.20	\$187.00
B150	10/15/24	EGM	Cancel scheduled weekly Committee meeting (.1); draft email to the Committee providing update in lieu of meeting (.4)	0.50	\$432.50
B150	10/16/24	EGM	Revise email to Committee to incorporate comments (.1); email same to MWE team for comments (.1); email Committee update in lieu of weekly call (.1); email M. Bishop re question about weekly Committee call (.1)	0.40	\$346.00
B150	10/16/24	GF	Review draft committee update email	0.10	\$107.50
B150	10/16/24	KEM	Review update email to Committee	0.10	\$93.50
B150	10/18/24	DMP	Review draft of email to Committee reporting on status conference result and confirmation timeline (.2)	0.20	\$270.00
B150	10/18/24	GF	Emails with K. Moynihan regarding committee member inquiry on proof of claim submission	0.10	\$107.50
B150	10/18/24	KEM	Correspondence with Committee Member regarding proof of claim filing (.1); draft email to Committee regarding status conference (.4)	0.50	\$467.50
B150	10/21/24	KEM	Correspondence with committee member regarding proof of claim filing	0.20	\$187.00
B150	10/22/24	JC	Attend weekly committee professionals' call	1.10	\$1,556.50
B150	10/22/24	KEM	Email to Committee regarding bar date	0.20	\$187.00
B150	10/23/24	EGM	Email to Committee cancelling weekly call (.1); revise Committee update email to provide more details on discovery and investigation (.5); email Committee re same (.1)	0.70	\$605.50
B150	10/23/24	GF	Emails with E. Mannix and R. Newman regarding status of committee call (.2); prepare detailed case update for committee in lieu of committee call (.6); review revisions to committee email update (.1)	0.90	\$967.50
B150	10/23/24	KEM	Review update email to the Committee	0.20	\$187.00
B150	10/25/24	DMP	Review email to Committee regarding settlement proposal	0.20	\$270.00
B150	10/25/24	GF	Prepare draft email regarding settlement proposal	0.30	\$322.50
B150	10/25/24	KEM	Email to Committee regarding settlement proposal	0.10	\$93.50
B150	10/26/24	DMP	Review email from A. Krop re settlement proposal (.2); correspondence with Lowenstein team regarding a response (.2); review, edit and send response to A. Krop regarding settlement (.2)	0.60	\$810.00
B150	10/26/24	GF	Correspondence with K. Moynihan regarding committee member inquiry on next steps (.2)	0.20	\$215.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	10/26/24	KEM	Draft email to Committee member regarding settlement proposal (.3); correspondence with J. Cohen and D. Posner regarding same (.1); call with D. Posner regarding same (.1)	0.50	\$467.50
B150	10/28/24	DMP	Review draft of email to Committee regarding meeting	0.10	\$135.00
B150	10/28/24	KEM	Email to Committee regarding Wednesday call	0.10	\$93.50
B150	10/29/24	DMP	Review draft of committee agenda	0.10	\$135.00
B150	10/29/24	EGM	Email to Committee re weekly meeting on October 30 and meeting materials for review	0.20	\$173.00
B150	10/29/24	GF	Emails with K. Moynihan regarding agenda for committee call (.1); review committee deliverables for October 30 call (.3)	0.40	\$430.00
B150	10/29/24	KEM	Draft agenda (.2); correspondence with D. Posner regarding same (.1); draft email to committee regarding 10/30 call (.2); prepare materials for 10/30 call (.4)	0.90	\$841.50
B150	10/30/24	CG	Call with D. Posner re weekly committee call	0.10	\$55.00
B150	10/30/24	CG	Participate in weekly committee call and transcribe and distribute notes on same	1.60	\$880.00
B150	10/30/24	DMP	Prepare for committee meeting (.8); conference call with Lowenstein and A&M teams to prepare for committee meeting (.5); attend committee meeting (1.6); telephone call with D. Perry regarding committee meeting and settlement construct (.3); review revised settlement letter (.1)	3.30	\$4,455.00
B150	10/30/24	EJS	Attend call with Lowenstein, MWE, and A&M teams re Committee call preparation (.7); attend weekly Committee call re case strategy and updates (1.6); review agenda for same (.1)	2.40	\$1,716.00
B150	10/30/24	GF	Participate on LS and A&M prep call for committee call (.5); participate on committee call (1.5); follow up call with A&M team (.3); call with D. Posner regarding committee responses to next steps (.1); call with Ambi Robotics regarding follow up questions (.4); prepare email report for team regarding follow up questions from committee member (.1); emails with D. Posner and A. Gonzalez regarding October 31 call with committee member (.2)	3.10	\$3,332.50
B150	10/30/24	KEM	Committee professionals call regarding 10/30 committee call (.5); participate in committee call (1.6); review and analysis of same with D. Posner (.2); correspondence from committee member regarding settlement (.1)	2.40	\$2,244.00
B150	10/30/24	MAK	Participate in committee call	0.80	\$824.00
B150	10/31/24	DMP	Conference call with A&M and Lowenstein teams re claims and causes of action to prepare for call with A. Krop (.3); conference call with A&M, G. Finizio, E. Mannix, A. Krop and J. Cannizzaro regarding claims and causes of action analysis and settlement construct (.5); correspondence with A. Krop regarding settlement letter (.2)	1.00	\$1,350.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	10/31/24	DMP	Review draft of email to committee regarding settlement letter (.1); correspondence from JP Anthony regarding settlement letter (.1); correspondence from A. Krop regarding settlement letter (.1)	0.30	\$405.00
B150	10/31/24	EGM	Call with LS team and A&M team to discuss Committee call (.3); call with A. Krop to discuss questions (.3)	0.60	\$519.00
B150	10/31/24	GF	Prep call with A&M team before call with Spot Freight (.3); call with Spot and Spot's counsel to discuss case status (.5); call with K. Moynihan regarding discussion with Spot (.1); call with RXO regarding case strategy (.3); report to team regarding RXO call (.1); emails to committee regarding updated settlement letter (.2); call with Ambi Robotics regarding case strategy (.2); emails to team regarding one-off calls with committee members regarding case strategy (.3); emails with A. Krop regarding updated settlement letter (.2); emails with D. Perry and Spot's counsel regarding edits to settlement letter (.2); emails with JP Anthony regarding settlement letter (.1); prepare further revisions to settlement letter per discussions with committee members (.5); call with K. Moynihan regarding committee email circulating final settlement letter (.1); email to D. Posner regarding final 408 letter (.1)	3.20	\$3,440.00
B150	10/31/24	KEM	Review email to committee regarding settlement proposal (.1); correspondence with D. Posner and G. Finizio regarding same (.2)	0.30	\$280.50
B150	11/01/24	GF	Email to committee regarding committee letter (.1); emails with M. Bishop regarding edits to letter (.1)	0.20	\$215.00
B150	11/05/24	GF	Emails with committee regarding settlement status and next committee call (.3); review A&M presentation materials for committee call and prepare comments to same (.8); review updated A&M deck (.2)	1.30	\$1,397.50
B150	11/06/24	CG	Prepare for and participate in DRF Committee Call	0.30	\$165.00
B150	11/06/24	DMP	Review materials to prepare for Committee meeting (.5); committee meeting (1.7)	2.20	\$2,970.00
B150	11/06/24	EGM	Participate on weekly Committee meeting call	1.80	\$1,557.00
B150	11/06/24	EJS	Attend weekly meeting with Creditors Committee re case status and strategy	1.80	\$1,287.00
B150	11/06/24	GF	Prepare for committee call (.5); prepare agenda for committee call (.3); participate on call (1.7); emails with committee members regarding settlement structure (.3)	2.80	\$3,010.00
B150	11/06/24	JC	Participate weekly committee call	1.80	\$2,547.00
B150	11/06/24	KEM	Committee call (1.7); email to Committee regarding settlement counterproposal (.1)	1.80	\$1,683.00
B150	11/06/24	MAK	Participate in committee call	1.80	\$1,854.00
B150	11/07/24	DMP	Email to committee regarding settlement update (.3); extensive emails with committee members regarding settlement structures (.9); extensive calls with committee members and counsel to committee members regarding settlement and issue (1.1); telephone call with M. Mandell regarding settlement (.2); correspondence with D. Perry regarding settlement (.4)	2.90	\$3,915.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	11/07/24	EGM	Email G. Finizio re Committee update email (.2); discuss same with K. Moynihan (.1); emails with Committee re updated voting letter and proposed changes (.3); emails with Committee members re questions on proposed settlement (.3)	0.90	\$778.50
B150	11/07/24	GF	Email to committee regarding settlement update (.3); multiple emails with committee members regarding settlement structures (.5); calls with Ambi Robotics regarding potential settlement (.2); call with C. Hardman regarding settlement (.1)	1.10	\$1,182.50
B150	11/07/24	JC	Multiple correspondence with committee members re: settlement discussions	1.60	\$2,264.00
B150	11/07/24	KEM	Email to Committee regarding deposition list (.2); correspondence with G. Finizio and E. Mannix regarding same (.2); review correspondence from G. Finizio and Committee members regarding settlement (.4)	0.80	\$748.00
B150	11/07/24	KEM	Call with W. Schumacher (SICK Inc.) regarding case status and client claim (.2); correspondence with J. Cohen regarding same (.2)	0.40	\$374.00
B150	11/08/24	DMP	Review and edit draft email to committee regarding settlement status (.5); multiple emails with committee members regarding settlement construct (.4); exchanges with G. Finizio and J. Cohen regarding committee member feedback on settlement (.2); correspondence with K. Picard regarding settlement and resignation (.2); correspondence with M. Herz regarding settlement (.2); telephone call with M. Herz regarding settlement issues and construct (.7); correspondence with Spot's counsel regarding settlement (.3)	2.50	\$3,375.00
B150	11/08/24	EGM	Email from G. Finizio re update email to Committee	0.20	\$173.00
B150	11/08/24	GF	Prepare draft email to committee regarding settlement status (.4) and revise various drafts of same (.2); call with Ambi Robotics (2x) regarding case status (.2); multiple emails with committee members regarding settlement construct (.4); exchanges with D. Posner and J. Cohen regarding committee member feedback on settlement (.2)	1.40	\$1,505.00
B150	11/08/24	KEM	Correspondence from G. Finizio and Committee members regarding settlement	0.40	\$374.00
B150	11/11/24	DMP	Correspondence with C. Gibbs and Lowenstein/MWE team regarding committee member resignation and response to UST	0.20	\$270.00
B150	11/11/24	KEM	Review correspondence from C. Gibbs to UST regarding Committee member resignation	0.10	\$93.50
B150	11/12/24	DMP	Correspondence with Lowenstein team regarding cancelling committee meeting (.1); review and revise email to committee (.1); correspondence from counsel to Spot regarding call re settlement (.1); correspondence with Lowenstein and A&M teams regarding same (.3)	0.60	\$810.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	11/12/24	GF	Emails with team regarding next committee call (.1); prepare comments to draft committee email report (.1); emails with Spot's counsel regarding call to discuss case status (.1)	0.30	\$322.50
B150	11/12/24	KEM	Draft email to Committee regarding amended plan (.2); correspondence with M. Mandell regarding committee reconstitution (.1); correspondence with J. Cohen and D. Posner regarding bylaws (.1); correspondence from M. Kaplan, G. Finizio and committee member regarding call on amended plan (.1)	0.50	\$467.50
B150	11/13/24	GF	Pre-call with A&M regarding case update for committee member (.2); case update with Spot's counsel and A&M (.4); report back to team regarding call with Spot (.1)	0.70	\$752.50
B150	11/13/24	KEM	Correspondence with D. Posner and M. Mandell regarding bylaws (.2); correspondence with J. Cohen, D. Posner, and G. Finizio regarding same (.1)	0.30	\$280.50
B150	11/14/24	DMP	Review email to committee regarding plan and confirmation order (.2); correspondence with D. Perry regarding same (.1)	0.30	\$405.00
B150	11/14/24	GF	Emails with K. Moynihan regarding committee member inquiries on plan status (.1); emails with committee members regarding plan status (.2); revise committee email regarding plan markups (.1); call with D. Perry and D. Posner regarding plan status (.2)	0.60	\$645.00
B150	11/14/24	KEM	Email to the Committee regarding amended plan (.3); correspondence with J. Cannizarro regarding same (.1); correspondence with D. Perry regarding same (.1); draft email to committee member regarding amended plan questions (.3)	0.80	\$748.00
B150	11/15/24	DMP	Review draft of email to committee regarding settlement status and plan edits	0.10	\$135.00
B150	11/15/24	GF	Call with Spot's counsel regarding case issues (.4); call with M. Bishop regarding plan (.2); emails to team regarding calls with committee members (.2)	0.80	\$860.00
B150	11/15/24	KEM	Draft email to Committee regarding plan status	0.10	\$93.50
B150	11/16/24	DMP	Email from M. Bishop regarding committee meeting (.1); prepare response regarding committee meeting and correspondence with J. Cohen and G. Finizio regarding same (.3); correspondence with M. Mandell regarding committee meeting (.1); correspondence with Lowenstein, A&M and MWE regarding committee meeting (.2); correspondence with G. Finizio and J. Cohen regarding A&M demonstrative for committee meeting (.2)	0.90	\$1,215.00
B150	11/16/24	GF	Emails regarding potential committee call on Monday	0.10	\$107.50
B150	11/16/24	KEM	Correspondence from committee members regarding amended plan (.1); correspondence from D. Posner and G. Finizio regarding 11/18 committee call (.1)	0.20	\$187.00
B150	11/17/24	DMP	Review draft of email to Committee regarding Plan revisions (.1); correspondence with J. Cohen, G. Finizio and K. Moynihan regarding same (.2); correspondence with A&M and Lowenstein regarding side by side for Committee meeting (.2); review draft of same (.2)	0.70	\$945.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	11/17/24	GF	Prepare for committee call	0.30	\$322.50
B150	11/17/24	KEM	Email to Committee Members regarding amended plan	0.20	\$187.00
B150	11/18/24	CG	Prepare for and participate in weekly committee meeting and take notes for Lowenstein team re same	1.00	\$550.00
B150	11/18/24	DMP	Telephone call with D. Perry regarding plan language and concerns regarding same (.2); correspondence with D. Perry regarding same (.2); participate on committee meeting (1.0); review draft of committee email re plan (.1); review email (x2) from J. Cannizzaro regarding plan language and proposed edits (.8); correspondence with J. Cohen and G. Finizio regarding same (.5)	2.80	\$3,780.00
B150	11/18/24	EGM	Participate in Committee call re settlement and amended plan	1.00	\$865.00
B150	11/18/24	EJS	Prepare for (.1) and attend (1.1) video call with Creditors' Committee, Lowenstein, MWE, and A&M teams re Plan updates and projected recoveries; prepare internal summary re same (.3)	1.50	\$1,072.50
B150	11/18/24	GF	Participate on committee call (1.0); emails with S. Ramsey regarding creditor inquiry (.1); emails and calls with Ambi Robotics regarding plan (.2); emails with Spot's counsel regarding plan revisions (.3); calls (2x) with J. Canizzaro regarding plan (.5); emails with D. Perry regarding plan edits (.2); revise emails to committee regarding revised plan (.2)	2.50	\$2,687.50
B150	11/18/24	JC	Conduct emergency committee meeting in advance of confirmation to discuss revised plan	1.10	\$1,556.50
B150	11/18/24	KEM	Prepare for committee call (.2); participate on Committee call (1.0); email to Committee regarding amended plan (.2); correspondence from J. Cohen, D. Posner, G. Finizio and committee members regarding amended plan (.5); call with D. Posner regarding committee email (.1); correspondence with G. Finizio regarding same (.1)	2.10	\$1,963.50
B150	11/19/24	EGM	Participate on call with J. Cohen, E. Seltzer and Committee member to discuss amended plan (.7); discuss outcome of call with J. Cohen, D. Posner and G. Finizio (.1); emails to Committee sending Committee letter in support of confirmation and canceling weekly call (.3)	1.10	\$951.50
B150	11/19/24	EJS	Prepare for (.1) and attend (.7) call with Spot Freight; correspondence with J. Cohen re same (.2)	1.00	\$715.00
B150	11/19/24	GF	Review draft email circulating updated letter in support of plan	0.10	\$107.50
B150	11/19/24	JC	Zoom call with committee member re: open plan language issue	1.10	\$1,556.50
B150	11/19/24	KEM	Draft email to the Committee regarding Trilogy motion to continue confirmation hearing	0.10	\$93.50
B150	11/20/24	DMP	Review draft of email to committee regarding confirmation hearing	0.10	\$135.00
B150	11/20/24	EGM	Email from Committee member re UCC Support Letter (.1); review email update to Committee re confirmation hearing (.1)	0.20	\$173.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	11/24/24	DMP	Correspondence with G. Finizio and K. Moynihan regarding email to committee re schedule of avoidance actions (.2); review and comment upon draft of same (.2)	0.40	\$540.00
B150	11/24/24	GF	Emails with D. Posner and K. Moynihan regarding committee updates (.2); revise draft email to committee with confirmation update (.1); email to D. Posner regarding request from Ryder and suggested next steps (.1); emails with D. Perry and L. Tauro regarding schedule of retained causes of action (.2)	0.60	\$645.00
B150	11/24/24	KEM	Draft email to Committee regarding retained causes of action schedule (.2); correspondence with D. Posner and G. Finizio regarding same (.1); correspondence from G. Finizio and D. Perry regarding same (.1)	0.40	\$374.00
B150	11/25/24	DMP	Review draft of email to committee regarding confirmation (.1); correspondence with team regarding same (.1)	0.20	\$270.00
B150	11/25/24	EJS	Prepare hearing summary for Committee (.3); revise same (.1); email correspondence with J. Finizio re same (.1)	0.50	\$357.50
B150	11/25/24	GF	Revise email update to committee regarding plan confirmation	0.20	\$215.00
B150	11/25/24	KEM	Revise email to the Committee (.1); correspondence with G. Finizio and E. Seltzer regarding same (.1)	0.20	\$187.00
B150	11/26/24	DMP	Review draft of email to committee regarding confirmation order and effective date	0.10	\$135.00
B150	11/26/24	EGM	Email re cancellation of Committee meeting	0.10	\$86.50
B150	11/26/24	GF	Email with team regarding cancelation of committee call (.1); email to committee regarding confirmation order and GUC Oversight Board (.2); review emails from committee members regarding interest for oversight board (.1)	0.40	\$430.00
B150	11/27/24	DMP	Correspondence with Committee regarding post-effective date board	0.20	\$270.00
B150	11/27/24	GF	Emails with S. Kazee regarding oversight board and next steps	0.20	\$215.00
B150	11/27/24	KEM	Correspondence from committee member regarding GUC Oversight Board	0.10	\$93.50
B150	12/02/24	GF	Revise email to Ambi Robotics regarding interest on GUC oversight board	0.10	\$107.50
B150	12/02/24	KEM	Draft email to committee member regarding GUC Oversight Board (.2); correspondence with G. Finizio regarding same (.1)	0.30	\$280.50
B150	12/03/24	DMP	Review draft of email to committee regarding opt in letter (.1); correspondence with G. Finizio, K. Moynihan and J. Cohen regarding same (.1)	0.20	\$270.00
B150	12/03/24	GF	Review emails regarding interest for GUC Oversight Board	0.10	\$107.50
B150	12/03/24	KEM	Draft email to Committee regarding 12/4 committee call	0.20	\$187.00
B150	12/04/24	GF	Emails regarding GUC Oversight Board composition	0.20	\$215.00
B150	12/05/24	GF	Emails with MailLatin regarding GUC Oversight board	0.10	\$107.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	12/06/24	DMP	Correspondence with M. Mandell regarding trust oversight board (.1); correspondence with C. Hardman regarding same (.1)	0.20	\$270.00
B150	12/06/24	GF	Emails with C. Hardman regarding GUC Oversight Board	0.10	\$107.50
B150	12/09/24	DMP	Correspondence with P. Wu counsel for creditor regarding opt-in letter (.2); correspondence to Committee regarding notice of effective date (.2)	0.40	\$540.00
B150	12/09/24	GF	Draft email to committee regarding effective date (.1); exchanges with D. Posner regarding same (.1)	0.20	\$215.00

Total B150 - Meetings of and Communication with Creditors

165.00 \$177,410.00

B160 Fee/Employment Applications

B160	08/29/24	DC	Commence drafting LS retention pleadings	1.10	\$401.50
B160	09/03/24	DC	Continue drafting LS' retention pleadings	0.90	\$328.50
B160	09/03/24	DC	Download and circulate pro hac orders and update attorney ECF accounts for notifications	0.30	\$109.50
B160	09/04/24	DC	Revise LS retention pleadings and prepare redlined versions for review by K. Moynihan	0.70	\$255.50
B160	09/04/24	DC	Prepare Schedule 1 to Cohen Declaration in support of LS Retention and coordinate with conflicts group re: parties in interest	1.00	\$365.00
B160	09/04/24	DMP	Review draft of Lowenstein retention application, declaration and proposed order including K. Moynihan comments thereto	0.40	\$540.00
B160	09/04/24	KEM	Correspondence with D. Claussen regarding retention applications (.1); revise Lowenstein retention application (1.6); correspondence with J. Cohen regarding same (.1); correspondence with D. Posner regarding retention application revision (.1)	1.90	\$1,776.50
B160	09/05/24	DC	Edit and format Schedule 1 to Cohen Declaration in support of LS retention	0.50	\$182.50
B160	09/05/24	DMP	Correspondence with D. Claussen regarding LS retention application (.1); correspondence with G. Finizio, J. Cohen and K. Moynihan regarding retention application edit (.1)	0.20	\$270.00
B160	09/05/24	JC	Review draft LS retention application	0.60	\$849.00
B160	09/05/24	KEM	Correspondence from D. Posner regarding revision to retention application (.1); revise retention application (.1)	0.20	\$187.00
B160	09/06/24	DC	Review conflicts report	0.30	\$109.50
B160	09/12/24	DC	Review conflict report and finalize schedules to Cohen Declaration	1.40	\$511.00
B160	09/16/24	DMP	Correspondence with J. Cohen and K. Moynihan regarding retention application and parties in interest list (.2)	0.20	\$270.00

B160	09/20/24	EGM	Review Lowenstein retention application (.3); attend to emails from K. Moynihan and N. Rowles re filing of same (.2)	0.50	\$432.50
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Code	Date	Timekeeper	Time Narrative	Hours	Amount
B160	09/20/24	KEM	Correspondence with N. Rowles regarding retention applications (.1); finalize Lowenstein retention application (.2)	0.30	\$280.50
B160	09/24/24	KEM	Review MWE revisions to Lowenstein retention application (.1); correspondence with G. Finizio and N. Rowles regarding same (.2); finalize retention application (.2); email to the Committee regarding same (.1)	0.60	\$561.00
B160	09/25/24	DC	Update Fee Application Spreadsheet (.1); confer with local counsel re: monthly and interim deadlines(.1)	0.20	\$73.00
B160	09/25/24	DMP	Correspondence to M. Mandell regarding retention applications for MWE and LS (.1)	0.10	\$135.00
B160	09/25/24	KEM	Correspondence from G. Finizio and N. Rowles regarding retention applications (.1)	0.10	\$93.50
B160	09/26/24	DC	E-mails with E. Mannix re: pro hac vice admission of M. Kaplan, review and update ECF accounts for LS attorneys	0.30	\$109.50
B160	09/26/24	KEM	Correspondence from G. Finizio and N. Rowles regarding A&M retention application (.2)	0.20	\$187.00
B160	09/27/24	DMP	Correspondence with N. Rowles regarding A&M retention application and filing LS retention application	0.30	\$405.00
B160	10/10/24	DC	Review interim compensation order, update fee application chart and calendar deadlines	0.30	\$109.50
B160	10/11/24	DC	Commence drafting LS' first monthly fee application	0.90	\$328.50
B160	10/11/24	EGM	Review and revise LS September invoice	2.70	\$2,335.50
B160	10/11/24	KEM	Correspondence with N. Rowles regarding UST comments to LS retention order (.1); revise proposed retention order (.2)	0.30	\$280.50
B160	10/14/24	KEM	Review email from N. Rowles to UST regarding LS retention order	0.10	\$93.50
B160	10/14/24	KEM	Correspondence from G. Finizio regarding Trilogy adversary proceeding and intervention	0.10	\$93.50
B160	10/15/24	DC	Continue drafting LS' first monthly fee statement	0.60	\$219.00
B160	10/15/24	GF	Review revised LS retention order	0.10	\$107.50
B160	10/16/24	DMP	Telephone call with G. Finizio regarding MWE retention application (.1); telephone call with M. Helt regarding MWE retention application and UST comments (.2); telephone call with M. Mandell regarding same (.1)	0.40	\$540.00
B160	10/22/24	DC	E-mails with E. Mannix re: status of entry of retention order and time period covering the first monthly fee statement	0.20	\$73.00
B160	10/22/24	DC	Review and circulate committee retention orders (.2); and prepare summary chart for first monthly fee application (.3)	0.50	\$182.50
B160	10/22/24	JC	Review September prebill and comment re: same	0.60	\$849.00
B160	10/23/24	DC	Continue drafting LS' first monthly fee application	0.50	\$182.50
B160	10/24/24	DC	Review sample fee application provided by local counsel, revise, format and redline Lowenstein's first monthly fee statement	1.10	\$401.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B160	10/29/24	DC	Review and incorporate comments and revisions to LS' first monthly fee application and compile exhibits	0.40	\$146.00
B160	10/29/24	EGM	Review and revise first monthly fee statement (.3); email D. Claussen re same (.1)	0.40	\$346.00
B160	10/30/24	DC	E-mails with D. Posner and local counsel re: filing deadline for first monthly fee application	0.20	\$73.00
B160	10/30/24	DMP	Review first monthly application and correspondence with D. Claussen regarding same	0.40	\$540.00
B160	10/30/24	KEM	Review email from N. Rowles regarding first monthly fee statement	0.10	\$93.50
B160	10/31/24	DC	Further revisions to LS' first monthly fee application, format and finalize same for filing	1.00	\$365.00
B160	10/31/24	DMP	Correspondence with D. Claussen regarding MWE and Lowenstein fee applications (.2); telephone call with E. Mannix regarding first monthly fee application (.1)	0.30	\$405.00
B160	11/05/24	DC	Commence drafting LS' First Interim Fee Application	1.00	\$365.00
B160	11/06/24	JC	Review october monthly prebill for compliance with UST guidelines	1.20	\$1,698.00
B160	11/08/24	DC	Draft e-mail to E. Mannix re: status of exhibits to October monthly fee statement	0.10	\$36.50
B160	11/08/24	DMP	Emails with committee professionals regarding WIP/pro fee budgets	0.40	\$540.00
B160	11/08/24	EGM	Review and revise Lowenstein October invoice	0.60	\$519.00
B160	11/08/24	GF	Emails with committee professionals regarding WIP/pro fee budgets	0.10	\$107.50
B160	11/11/24	DC	E-mails with E. Mannix re: service of monthly fee statements pursuant to the interim compensation order	0.10	\$36.50
B160	11/11/24	EGM	Review and revise Lowenstein October invoice (3.4); emails with N. Rowles and G. Finizio re service of first monthly fee statements (.3)	3.70	\$3,200.50
B160	11/11/24	GF	Emails with D. Posner, A. Gonzalez, and E. Mannix regarding fee statements and estimates (.2)	0.20	\$215.00
B160	11/12/24	DC	Review Notice of Reconstitution of Committee, revise summary section of LS' Second Monthly Fee Statement	0.40	\$146.00
B160	11/18/24	KEM	Correspondence with L. Foody regarding first monthly fee statements	0.10	\$93.50
B160	11/21/24	DC	Edit and format LS' Second Monthly Fee Statement	0.40	\$146.00
B160	11/25/24	DC	Continue drafting LS' October Monthly Fee Statement	0.80	\$292.00
B160	11/25/24	KEM	Correspondence with N. Rowles regarding monthly fee statements	0.10	\$93.50
B160	11/26/24	DC	E-mails with local counsel re: remittance of payment on September monthly fee statement and update fee application status chart	0.20	\$73.00
B160	11/26/24	EGM	Email D. Posner and J. Cohen re October invoice	0.10	\$86.50
B160	11/26/24	GF	Review final fee application deadlines and procedures and emails regarding same	0.20	\$215.00
B160	11/26/24	KEM	Correspondence from D. Claussen and N. Rowles regarding monthly fee statement	0.10	\$93.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B160	11/27/24	EGM	Emails with D. Claussen and N. Rowles re Lowenstein's October monthly fee statement	0.20	\$173.00
B160	11/27/24	KEM	Correspondence from E. Mannix, D. Claussen and N. Rowles regarding monthly fee statements (.1); review monthly fee statement (.2)	0.30	\$280.50
B160	12/02/24	DC	Update fee application status chart and prepare interim invoice	0.30	\$109.50
B160	12/04/24	DC	Commence drafting cover sheet for LS' Final Fee Application	0.50	\$182.50
B160	12/05/24	DC	E-mails with attorney team (LS and MWE) re: timing and strategy with respect to monthly and final fee applications	0.30	\$109.50
B160	12/09/24	EGM	Review and revise Lowenstein November invoice	1.40	\$1,211.00
Total B160 - Fee/Employment Applications				36.30	\$26,220.00
<u>B165 Employment and Retention Applications - Others</u>					
B165	08/28/24	ESC	Call with Province re: pitch issues (.1); confer with A&M re: same (.1)	0.20	\$217.00
B165	08/28/24	JC	Review financial advisor materials submitted for consideration	1.40	\$1,981.00
B165	08/29/24	JC	Telephone call with financial advisor candidates	1.60	\$2,264.00
B165	09/03/24	GF	Emails with R. Newman and E. Mannix regarding A&M retention application (.1)	0.10	\$107.50
B165	09/12/24	KEM	Email from D. Claussen regarding revised retention application	0.10	\$93.50
B165	09/16/24	GF	Emails with R. Newman and K. Martorana regarding A&M retention	0.10	\$107.50
B165	09/16/24	KEM	Correspondence with J. Cohen and N. Rowles regarding retention applications	0.20	\$187.00
B165	09/23/24	GF	Emails with K. Moynihan regarding retention papers	0.10	\$107.50
B165	09/24/24	GF	Emails with K. Moynihan and J. Cohen regarding OCP motion (.1); review N. Rowles summary of OCP motion (.1)	0.20	\$215.00
B165	09/24/24	GF	Emails with K. Moynihan and N. Rowles regarding retention applications (.1); email to J. Cohen regarding status of retention applications (.1)	0.20	\$215.00
B165	09/25/24	DMP	Correspondence with MWE and Lowenstein teams regarding OCP motion	0.20	\$270.00
B165	09/26/24	GF	Emails with N. Rowles regarding A&M retention (.1); emails with D. Posner regarding A&M retention (.1)	0.20	\$215.00
B165	09/27/24	GF	Emails with N. Rowles regarding A&M retention application	0.10	\$107.50
B165	10/02/24	GF	Review revised retention orders for Weil and PPP	0.10	\$107.50
B165	10/18/24	DMP	Review email from D. Perry regarding MWE retention application (.2); correspondence with J. Cohen and D. Perry regarding same (.1); telephone call with D. Perry regarding same and regarding proposed email to UST (.2); telephone call with C. Gibbs regarding same (.2)	0.70	\$945.00
B165	11/08/24	EGM	Email from J. Silber re OCP schedule amendment to add Baker McKenzie (Hong Kong)	0.10	\$86.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B165	11/08/24	GF	Review request to expand OCP list (.1) and respond to same (.1)	0.20	\$215.00
B165	11/08/24	KEM	Correspondence from J. Silber regarding additional OCP	0.10	\$93.50
B165	11/27/24	GF	Review report regarding payments to OCPs	0.10	\$107.50
B165	11/29/24	GF	Review Weil fee statement for September	0.10	\$107.50
Total B165 - Employment and Retention Applications - Others				6.10	\$7,750.00
<u>B175 Fee Applications and Invoices - Others</u>					
B175	11/11/24	JC	Review Portage fee statement and comment re: same	0.40	\$566.00
B175	11/14/24	EGM	Review invoices from Planet Depos for various deposition transcripts	0.30	\$259.50
B175	11/21/24	GF	Review Portage expenses	0.10	\$107.50
B175	12/09/24	GF	Review emails regarding next monthly fee statement	0.10	\$107.50
Total B175 - Fee Applications and Invoices - Others				0.90	\$1,040.50
<u>B185 Assumption/Rejection of Leases and Contracts</u>					
B185	08/30/24	GF	Review proposed rejection procedures	0.30	\$322.50
B185	08/31/24	JC	Review Ambi rejection motion and related objection	1.20	\$1,698.00
B185	09/01/24	DMP	Review Ambi Robotics objection to lease rejection	0.20	\$270.00
B185	09/01/24	KEM	Correspondence from J. Cohen and D. Posner regarding rejection damage motion	0.10	\$93.50
B185	09/04/24	DMP	Correspondence with LS and A&M teams regarding lease rejection motion	0.10	\$135.00
B185	09/04/24	KEM	Correspondence with A. Gonzalez regarding omnibus rejection motion (.1); reivew rejection procedures motion (.3); correspondence with G. Finizio regarding revisions to rejection procedures motion (.2); research regarding rejection procedures precedent in S.D. Tex. (.1); revise rejection procedures order (.2)	0.90	\$841.50
B185	09/05/24	DMP	Review K. Moynihan markup of lease rejection motion	0.10	\$135.00
B185	09/05/24	GF	Review revisions to rejection procedures (.3) and research prior precedent for abandoned property (.3)	0.60	\$645.00
B185	09/05/24	KEM	Email to R. Lindsey regarding rejection procedures order (.1); calls with A. Cohen regarding rejection procedures order (.1); call with G. Finizio regarding same (.1); review rejection procedures order regarding Weil comments (.1)	0.40	\$374.00
B185	09/06/24	GF	Review further revised markups from Weil on second day orders (.4) and emails with K. Moynihan regarding same (.2); call with A. Cohen regarding September 9 hearing (.1); emails with D. Posner regarding September 9 hearing status (.1)	0.80	\$860.00
B185	09/08/24	KEM	Review revised rejection procedures order	0.20	\$187.00
B185	09/09/24	GF	Emails with K. Moynihan regarding consultation rights for rejection procedures	0.10	\$107.50
B185	09/09/24	KEM	Correspondence with A. Anglade regarding rejection procedures order	0.10	\$93.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B185	09/10/24	GF	Emails with K. Moynihan regarding additional changes to rejection procedures	0.10	\$107.50
B185	09/10/24	KEM	Review rejection procedures redline (.1); correspondence with G. Finizio regarding same (.1)	0.20	\$187.00
B185	09/11/24	KEM	Review revised rejection procedures order (.1); correspondence with G. Finizio and A. Anglade regarding same (.1)	0.20	\$187.00
B185	09/13/24	KEM	Review revised rejection procedures order and correspondence with A. Anglade regarding same	0.10	\$93.50
B185	09/18/24	DMP	Correspondence with Weil regarding lease rejection and rejection damage claims	0.20	\$270.00
B185	09/23/24	KEM	Correspondence from G. Finizio and R. Newman regarding Gatik rejection damages	0.10	\$93.50
B185	09/25/24	GF	Call with L. Tauro regarding case update and potential adversary complaint as to equipment lease (.2); report to team regarding potential adversary complaint and other case updates (.3)	0.50	\$537.50
B185	09/25/24	JC	Correspondence with G. Finizio re: disguised lease analysis	1.20	\$1,698.00
B185	09/25/24	KEM	Correspondence with D. Clausen regarding rejection objection deadline	0.10	\$93.50
B185	09/26/24	DMP	Correspondence with G. Finizio and J. Cohen regarding analysis of Trilogy agreements (.2); review and analysis of issues related to Gatik contract rejection and K. Moynihan email memo re same (.4)	0.60	\$810.00
B185	09/26/24	EGM	Attend to emails from G. Finizio and K. Moynihan re Gatik and Trilogy agreements (.2); review and analyze Trilogy agreements, including master lease (.3)	0.50	\$432.50
B185	09/26/24	EJS	Review terms of certain equipment lease agreements (.6); email correspondence with K. Moynihan re findings re: same (.2)	0.80	\$572.00
B185	09/26/24	GF	Emails with L. Citron regarding Trilogy leases (.2); call with L. Citron regarding Trilogy lease (.1); email report to team regarding Trilogy lease review (.2); follow up email to L. Tauro regarding Trilogy lease (.1); review K. Moynihan email regarding Gatik rejection damages (.1); review limitation of liability language in Gatik agreement (.3)	1.00	\$1,075.00
B185	09/26/24	KEM	Correspondence with G. Finizio regarding Gatik contracts and rejection (.1); review and analysis of same with G. Finizio (.2); review and analysis of Gatick contracts (.7); research regarding related rejection damages (.8); email to D. Posner and G. Finizio regarding same (.3); correspondence from G. Finizio regarding Trilogy contracts (.1)	2.20	\$2,057.00
B185	09/26/24	LAC	Review of equipment leases	2.70	\$3,955.50
B185	09/27/24	DMP	Correspondence with G. Finizio and K. Moynihan regarding Gatik rejection notice and analysis	0.20	\$270.00
B185	09/27/24	KEM	Correspondence from G. Finizio regarding Gatick rejection damages (.1); review Trilogy contracts (.8)	0.90	\$841.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B185	09/29/24	GF	Review draft motion to assume and assign non-real property lease	0.10	\$107.50
B185	09/30/24	DMP	Review K. Moynihan email regarding Gatik rejection analysis	0.10	\$135.00
B185	09/30/24	DMP	Correspondence with G. Finizio and A&M regarding Trilogy lease (.2); correspondence from L. Taura regarding same (.1)	0.30	\$405.00
B185	09/30/24	EGM	Email T. Palisi re Orlando assumption motion	0.10	\$86.50
B185	09/30/24	GF	Emails with A&M regarding Trilogy complaint (.1); emails with Weil team regarding Trilogy leases (.2); review second notice of contract rejections (.1)	0.40	\$430.00
B185	09/30/24	JC	Review Gatik claims analysis and discuss with K. Moynihan	0.80	\$1,132.00
B185	09/30/24	JC	Review Trilogy agreements and discuss with E. Mannix	1.30	\$1,839.50
B185	09/30/24	KEM	Email to J. Cohen, D. Posner, and G. Finizio regarding Gatik contract analysis (.3); review second omnibus rejection notice (.1); review email from L. Tauro regarding Trilogy leases (.1)	0.50	\$467.50
B185	10/01/24	DMP	Correspondence with A&M regarding Gatik rejection damages and analysis of same (.2); correspondence with G. Finizio and K. Moynihan regarding rejection notice – information and extension of objection (.2); correspondence from K. Moynihan regarding call with Weil re same (.1)	0.50	\$675.00
B185	10/01/24	GF	Emails with K. Moynihan regarding rejection notices	0.20	\$215.00
B185	10/01/24	JC	Review and comment on Trilogy Motion and draft complaint	2.10	\$2,971.50
B185	10/01/24	KEM	Correspondence with R. Newman regarding Gatik rejection damages (.1); correspondence with A. Anglade regarding first rejection notice and related leases (.1); correspondence with G. Finizio regarding first rejection notice objection deadline (.1); call with L. Tauro regarding first rejection notice (.1); email to J. Cohen, D. Posner and G. Finizio regarding same (.1)	0.50	\$467.50
B185	10/01/24	LAC	Review of equipment leases	0.50	\$732.50
B185	10/02/24	DMP	Review correspondence from K. Moynihan regarding lease rejection motion (.2); review correspondence from G. Finizio with A&M regarding lease rejections and estimates of rejection damages of NJ lease (.2); correspondence with K. Moynihan, J. Cohen, M. Helt and MWE/Lowenstein teams regarding lease rejection, damages, assignment and avoidance (.4); review email from N. Rowles regarding review and analysis of Orlando lease motion (.2)	1.00	\$1,350.00
B185	10/02/24	GF	Emails with A&M team regarding summary of real property leases (.2); emails with K. Moynihan regarding lease rejections (.1); review email from R. Newman regarding real property rejection damage claims (.1); review emails from J. Cohen and M. Helt regarding rejection notices (.1)	0.50	\$537.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B185	10/02/24	KEM	Correspondence with A. Anglade regarding rejected real property leases (.1); correspondence with J. Cohen, G. Finizio and M. Helt regarding same (.2)	0.30	\$280.50
B185	10/03/24	EGM	Attend to email with N. Rowles re comments to the Orlando assumption motion	0.20	\$173.00
B185	10/04/24	GF	Review rejection damages for phase 2 leases	0.20	\$215.00
B185	10/04/24	KEM	Correspondence from N. Rowles regarding Orlando lease assumption (.1); correspondence from G. Finizio, L. Tauro and A. Anglade regarding rejection damages and lease guarantees (.1)	0.20	\$187.00
B185	10/07/24	DMP	Review summary of master leases received from Weil	0.20	\$270.00
B185	10/07/24	KEM	Review Debtor lease summary	0.10	\$93.50
B185	10/10/24	GF	Review master lease summary from Weil	0.20	\$215.00
B185	10/11/24	JC	Review stipulations resolving lease rejections	0.40	\$566.00
B185	10/11/24	KEM	Correspondence from A. Anglade regarding landlord rejection stipulations	0.10	\$93.50
B185	10/14/24	DMP	Review lease rejection stipulations (.4); correspondence from G. Finizio and K. Moynihan regarding same (.3); review First Citizens objection to rejection (.3); correspondence with Lowenstein team regarding same and contractual privity issues (.2); correspondence with M. Helt regarding same (.2); review assumption agreement with Ryder (.3); correspondence with Lowenstein team regarding calculation of rejection damages for Ryder assumption (.1)	1.80	\$2,430.00
B185	10/14/24	GF	Review draft lease stipulations from Weil (.4); emails with K. Moynihan regarding same (.2); review First Citizens bank objection to lease rejection (.2); analysis of First Citizens bank claims (.4); review contractual privity analyses (.4)	1.60	\$1,720.00
B185	10/14/24	JC	Review draft stipulation resolving Ryder claim and agreement issues	0.60	\$849.00
B185	10/14/24	JC	Review rejection notice objection and discuss same with G. Finizio	0.60	\$849.00
B185	10/14/24	KEM	Call with A. Anglade regarding rejection stipulations (.1); review rejection stipulations (.2); correspondence with G. Finizio and A. Anglade regarding same (.2); correspondence with J. Cohen regarding Ryder settlement (.1)	0.60	\$561.00
B185	10/15/24	GF	Emails with K. Moynihan regarding lease stipulations	0.20	\$215.00
B185	10/15/24	KEM	Draft email to G. Finizio regarding landlord rejection stipulations	0.10	\$93.50
B185	10/16/24	DMP	Review email from Weil regarding rejection damages estimate	0.10	\$135.00
B185	10/16/24	GF	Review updated rejection damages circulated by Weil team	0.10	\$107.50
B185	10/16/24	KEM	Correspondence with D. Posner and G. Finizio regarding Trilogy rejection statement (.1); review rejection damages estimate re second notice of rejection (.1)	0.20	\$187.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B185	10/18/24	KEM	Correspondence with M. Helt regarding Trilogy rejection response (.1); correspondence from P. Guffy regarding landlord claims (.1)	0.20	\$187.00
B185	10/21/24	DMP	Review draft of objection to Trilogy lease rejection and edit same (.5); correspondence with Lowenstein team regarding same (.1); review AmbiRobotics objection to rejection motion (.3); review Trilogy objection revised by K. Moynihan (.3); review Trilogy response to rejection motion (.2); correspondence with MWE and Lowenstein teams regarding objection to Trilogy lease rejection (.3)	1.70	\$2,295.00
B185	10/21/24	GF	Review draft statement regarding Trilogy rejection (.1); prepare email to K. Moynihan regarding edits to Trilogy statement (.3); calls (2x) with K. Moynihan regarding Trilogy (.3); review revised Trilogy statement (.2); emails with J. Cohen regarding Trilogy statement (.1)	1.00	\$1,075.00
B185	10/21/24	JC	Multiple correspondence re: proposed Trilogy rejection	0.60	\$849.00
B185	10/21/24	KEM	Revise Trilogy rejection objection (1.4); call with D. Posner regarding same (.1); review Trilogy rejection motion (.4); review Trilogy adversary complaint (.6); correspondence with C. Gibbs, M. Helt, and J. Foody regarding Trilogy reservation of rights (.4); call with E. Mannix regarding Trilogy statement (.2); calls with G. Finizio regarding same (.3); calls with M. Helt regarding same (.3); correspondence with J. Cohen, D. Posner and G. Finizio regarding Trilogy objection (.3); review Trilogy response to rejection motion (.2); correspondence with J. Cohen, D. Posner and G. Finizio regarding same (.1); review docket regarding Ambi rejection and 10/23 hearing (.1)	4.40	\$4,114.00
B185	10/22/24	DMP	Review Trilogy proof of claim	0.40	\$540.00
B185	10/22/24	JC	Review debtors' reply to Trilogy objection	0.40	\$566.00
B185	10/22/24	JC	Review Trilogy objection and related discussions with K. Moynihan	0.80	\$1,132.00
B185	10/23/24	DMP	Conference call with K. Moynihan and P. Guffy (counsel for landlord) regarding lease rejection and equipment in premises	0.40	\$540.00
B185	10/23/24	KEM	Attend hearing on rejection of Ambi contract (2.2); review pleadings regarding same (.5); call with DFW (landlord) counsel regarding lease issues (.4); correspondence with R. Newman regarding Ryder settlement (.1)	3.20	\$2,992.00
B185	10/24/24	GF	Review as-filed motion to assume certain Ryder Truck contracts (.3); emails with A&M team regarding same (.1)	0.40	\$430.00
B185	10/29/24	KEM	Review notice of ruling conference regarding Ambi claim (.1); review revised Trilogy order (.1)	0.20	\$187.00
B185	10/30/24	GF	Review draft rejection notice sent by A. Anglade	0.10	\$107.50
B185	10/30/24	KEM	Correspondence with D. Posner and N. Rowles regarding 11/1 ruling conference on Ambi rejection (.1); review third rejection notice (.2)	0.30	\$280.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B185	11/01/24	GF	Participate in oral ruling regarding Ambi rejection (.5); review post-hearing rejection orders (.1)	0.60	\$645.00
B185	11/01/24	KEM	Attend oral ruling conference regarding Ambi rejection	0.50	\$467.50
B185	11/04/24	DMP	Correspondence with MWE regarding order with respect to Trilogy lease rejection	0.20	\$270.00
B185	11/04/24	GF	Emails with N. Rowles regarding Trilogy status (.1); review emergency motion for scheduling order (.1)	0.20	\$215.00
B185	11/05/24	KEM	Review rejection damages for third rejection notice	0.10	\$93.50
B185	11/12/24	KEM	Correspondence with R. Newman regarding Ryder rejection damages	0.10	\$93.50
B185	11/13/24	GF	Review email from K. Moynihan regarding analysis of Ryder Truck motion to assume	0.20	\$215.00
B185	11/13/24	KEM	Email to J. Cohen, D. Posner and G. Finizio regarding Ryder settlement (.4); review Ryder settlement motion (.5)	0.90	\$841.50
B185	11/14/24	KEM	Email to L. Tauro regarding Ryder settlement	0.10	\$93.50
B185	11/19/24	EGM	Review Debtors' motion to assume and assign contracts and leases	0.20	\$173.00
B185	11/19/24	GF	Review reply to lease rejection from Cheeta Supply	0.10	\$107.50
B185	11/21/24	JC	Review motion to assume Penske contracts and related relief	0.30	\$424.50
B185	11/26/24	KEM	Email to L. Tauro and A. Cohen regarding Penske settlement	0.10	\$93.50
B185	11/27/24	EGM	Review stipulation and agreed order re DFW lease	0.10	\$86.50
B185	11/27/24	GF	Review lease rejection stipulations (.2); emails with K. Moynihan regarding lease rejection stipulation (.2)	0.40	\$430.00
B185	11/27/24	KEM	Review DFW lease stipulation (.2); correspondence with G. Finizio regarding same (.3)	0.50	\$467.50
B185	11/29/24	DMP	Correspondence with G. Finizio and Weil regarding lease rejection and lease rejection damages (.2)	0.20	\$270.00
B185	11/29/24	GF	Diligence regarding rejection damages claim in DFW lease stipulation (.5); emails with Weil team regarding same (.2); review proofs of claim filed by DFW landlord (.4)	1.10	\$1,182.50
B185	12/02/24	GF	Review as-filed stipulation for DFW lease	0.10	\$107.50
Total B185 - Assumption/Rejection of Leases and Contracts				53.50	\$61,408.00
<u>B190 Other Contested Matters (excluding assumption/rejection motions)</u>					
B190	09/02/24	GF	Review draft document requests (.7) and email to team regarding suggestions to same (.3)	1.00	\$1,075.00
B190	09/03/24	GF	Review revised document requests	0.80	\$860.00
B190	09/03/24	GF	Call with R. Newman regarding Committee comments on second day motions (.2); follow up emails with R. Newman regarding critical vendor relief (.1); review critical vendor data in VDR (.2)	0.50	\$537.50
B190	09/25/24	GF	Review emails regarding deposition scheduling (.1)	0.10	\$107.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B190	09/26/24	GF	Participate in litigation strategy call (.7); email to C. Gibbs regarding litigation strategy (.1); additional research regarding potential estate litigation claims (1.2)	2.00	\$2,150.00
B190	09/27/24	GF	Review emails from M. Kaplan, C. Gibbs, and J. Cohen regarding litigation strategy (.2); review document tracker from A&M (.2)	0.40	\$430.00
B190	10/07/24	GF	Review document review update from E. Mannix (.1); emails with M. Kaplan regarding extended timeline (.2); review hot docs circulated by E. Mannix (1.1)	1.40	\$1,505.00
B190	10/10/24	GF	Review emails from A. Gonzalez regarding outstanding PB document requests	0.20	\$215.00
B190	10/18/24	GF	Review PBI 30(b)(6) notice (.3) and prepare email with edits to same (.7)	1.00	\$1,075.00
B190	12/04/24	GF	Review adversary proceeding docket and upcoming deadlines	0.10	\$107.50
B190	12/05/24	GF	Emails with K. Moynihan regarding Trilogy adversary proceeding	0.10	\$107.50
B190	12/07/24	GF	Review replies to Trilogy Motion to Dismiss	0.40	\$430.00
Total B190 - Other Contested Matters (excluding assumption/rejection motions)				8.00	\$8,600.00
<u>B195 Non-Working Travel</u>					
B195	10/31/24	MAK	Travel to Stamford, CT for deposition of J. Fairweather	1.60	\$824.00
B195	11/01/24	EGM	Travel to and from J. Fairweather deposition	3.80	\$1,643.50
B195	11/01/24	MAK	Travel from Stamford, CT re: deposition of J. Fairweather	2.40	\$1,236.00
B195	11/04/24	EGM	Travel to G. Bryan deposition at Weil office and return	1.00	\$432.50
B195	11/04/24	KEM	Travel to Stamford	1.50	\$701.25
B195	11/05/24	CG	Traveling to and from Gibson Dunn office for M. Shea deposition	2.30	\$632.50
B195	11/05/24	EGM	Travel to and from Gibson Dunn office for deposition of M. Shea	0.70	\$302.75
B195	11/06/24	CG	Travel to New York for E. Kaup deposition	1.20	\$330.00
B195	11/06/24	EGM	Travel to and from Weil office for deposition of E. Kaup	1.10	\$475.75
B195	11/06/24	KEM	Travel to NY from Stamford	1.50	\$701.25
B195	11/19/24	DMP	Travel to Houston for confirmation hearing	6.00	\$4,050.00
B195	11/19/24	GF	Travel from New York to Texas for confirmation hearing	2.80	\$1,505.00
B195	11/19/24	KEM	Travel from NY to Houston	7.80	\$3,646.50
B195	11/20/24	DMP	Travel from Houston to NY	6.00	\$4,050.00
B195	11/20/24	GF	Return travels from Houston	2.80	\$1,505.00
B195	11/20/24	KEM	Travel from Houston to New York	6.80	\$3,179.00
Total B195 - Non-Working Travel				49.30	\$25,215.00
<u>B200 - Operations</u>					
<u>B210 Business Operations</u>					
B210	10/01/24	KEM	Review monthly operating reports	0.20	\$187.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B210	10/09/24	JC	Review A&M report on cash flow	0.30	\$424.50
B210	10/21/24	KEM	Correspondence from J. Sullivan regarding shared services agreement	0.10	\$93.50
Total B210 - Business Operations				0.60	\$705.00
<u>B230 Financing/Cash Collateral</u>					
B230	08/31/24	EGM	Emails with L. Foody and R. Lindsey re proposed final order in connection with DIP motion	0.20	\$173.00
B230	08/31/24	KEM	Correspondence with E. Mannix and L. Foody regarding DIP Order	0.10	\$93.50
B230	09/01/24	GF	Emails with M. Helt regarding DIP motion	0.10	\$107.50
B230	09/01/24	KEM	Review revisions to cash management order (.1); correspondence with G. Finizio regarding DIP Financing issues list (.1)	0.20	\$187.00
B230	09/02/24	JC	Review and comment on proposed final order for cash management	0.40	\$566.00
B230	09/03/24	DMP	Correspondence with M. Helt regarding status of DIP negotiations and DIP issues	0.20	\$270.00
B230	09/04/24	DMP	Telephone call with M. Helt regarding review of DIP, objection, issues list and strategy (.3); telephone call with J. Cohen regarding same (.2); review DIP issues list prepared by MWE and briefly compare to DIP Order (.6); correspondence with J. Cohen and G. Finizio regarding same (.1)	1.20	\$1,620.00
B230	09/04/24	GF	Review draft final DIP order (1.0); review DIP issues list (.4); prepare comments to DIP issues list (.4); emails with M. Helt regarding DIP issues (.2)	2.00	\$2,150.00
B230	09/04/24	JC	Telephone call with D. Posner re: DIP financing issues list status	0.40	\$566.00
B230	09/05/24	DMP	Correspondence with LS and MWE regarding DIP and DIP issues (.3); conference call with MWE and LS regarding DIP issues and strategy (.2); correspondence with R. Newman regarding DIP budget (.1); correspondence from Weil regarding adjourning DIP hearing to 9/17 (.1); correspondence with MWE and LS regarding objection deadline for adjourned DIP (.2); correspondence with G. Finizio and J. Cohen regarding objection deadline for adjourned DIP hearing (.2)	1.10	\$1,485.00
B230	09/05/24	EGM	Review DIP issues list from M. Helt (.2); participate in call with MWE team, D. Posner, J. Cohen and G. Finizio re Committee's DIP issues (.2)	0.40	\$346.00
B230	09/05/24	GF	Call with MWE and LS teams regarding DIP financing (.5); email to A&M regarding DIP negotiations (.1); review PPP variance report (.2); call with M. Helt regarding DIP matters (.3); emails with M. Helt and J. Cohen regarding new DIP hearing date and objection deadline (.2)	1.30	\$1,397.50
B230	09/05/24	KEM	Call with MWE on DIP Issues (.2); review DIP issues list (.4); correspondence from G. Finizio regarding extension of DIP hearing and objection deadline (.1)	0.70	\$654.50
B230	09/08/24	GF	Emails with M. Helt, Gibson team and Weil team regarding DIP issues	0.10	\$107.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B230	09/08/24	KEM	Correspondence from L. Tauro regarding DIP call	0.10	\$93.50
B230	09/09/24	GF	Call with MWE, Gibson Dunn, and Weil teams regarding DIP issues list (.7); follow up DIP issues call with M. Helt (.3).	1.00	\$1,075.00
B230	09/09/24	KEM	Call with G. Finizio, M. Helt, N. Rowles, L. Tauro and K. Martorana regarding DIP issues list	0.80	\$748.00
B230	09/10/24	DMP	Review correspondence with MWE regarding DIP order and negotiations regarding same	0.20	\$270.00
B230	09/10/24	GF	Review A&M cash flow presentation (.5) and prepare email to A&M with comments thereto (.1), prepare email report regarding September 9 DIP call (.1); review draft of marked DIP order from N. Rowles (.8); prepare email to N. Rowles with additional DIP order edits (.4); review edits to DIP note (.2) and email to N. Rowles regarding DIP note (.1)	2.20	\$2,365.00
B230	09/10/24	JC	Review proposed revisions to final DIP Order	0.60	\$849.00
B230	09/11/24	DMP	Review email from Weil regarding DIP advancement to sub and CV payment (.1); correspondence with A&M regarding same (.2)	0.30	\$405.00
B230	09/11/24	DMP	Correspondence with J. Cohen and G. Finizio regarding DIP order and avoidance actions against PBI and lien on avoidance actions (.2); correspondence with R. Newman regarding DIP and CV payments (.2)	0.40	\$540.00
B230	09/11/24	GF	Call with Weil team and Gibson team regarding final DIP order (.6); calls with M. Helt (2x) regarding DIP issues (.6); emails with R. Lindsey and R. Newman regarding DIP consent letter (.2); review further revised DIP order (.5); emails with J. Cohen regarding DIP order (.2); review comments to DIP note (.2)	2.20	\$2,365.00
B230	09/11/24	JC	Review DIP consent letter and discuss with D. Posner	0.40	\$566.00
B230	09/11/24	KEM	Call with G. Finizio, M. Helt, K. Martorana, and L. Tauro regarding DIP order (.6); correspondence from J. Cohen and G. Finizio regarding revised DIP Order (.1)	0.70	\$654.50
B230	09/12/24	DMP	Review language from DIP order on causes of action against PBI as collateral and correspondence with LS team regarding same (.1); review email chain from MWE regarding DIP negotiations and language (.2); correspondence with J. Cohen and G. Finizio regarding DIP and open issues/objection (.2)	0.50	\$675.00
B230	09/12/24	GF	Review drafts of further revised DIP order (.5); review Enviva DIP precedent (.4); review statements of financial affairs regarding DIP issues (.5); emails with J. Cohen regarding DIP status (.1); multiple emails with N. Rowles and M. Helt regarding DIP order (.3); review emails from G. Dunn regarding DIP collateral (.2); call with N. Rowles and M. Helt regarding open DIP issues (.5)	2.50	\$2,687.50
B230	09/12/24	KEM	Correspondence from J. Cohen, G. Finizio and J. Rowles regarding revised DIP Order, objection and hearing	0.10	\$93.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B230	09/13/24	DMP	Correspondence with MWE and Lowenstein teams regarding DIP negotiations and issues (.5); correspondence with Weil and Gibson regarding DIP negotiations and extension (.3); review draft of reservation of rights (.2); correspondence with G. Finizio and J. Cohen regarding draft of reservation of rights (.2); review G. Finizio edits to reservation of rights (.2)	1.40	\$1,890.00
B230	09/13/24	DMP	Conference call with MWE and Lowenstein teams regarding DIP order and negotiations including strategy (.5); extensive correspondence with Lowenstein and MWE teams regarding DIP issues and negotiations (1.1)	1.60	\$2,160.00
B230	09/13/24	GF	Call with MWE and LS teams regarding DIP strategy (.5); calls with K. Martorana regarding DIP status (.5) and report to MWE and LS teams regarding same (.1); emails regarding professional fee sub-budget (.2); review revised DIP order from N. Rowles (.2); emails with N. Rowles regarding DIP objection (.1); call with K. Martorana regarding W&E list (.1) and emails with M. Helt regarding same (.1)	1.80	\$1,935.00
B230	09/13/24	JC	Zoom call with MWE and LS re: open DIP issues	0.70	\$990.50
B230	09/13/24	JC	Correspondence with committee re: open DIP issues	0.30	\$424.50
B230	09/13/24	KEM	Correspondence from J. Cohen, G. Finizio, M. Helt and N. Rowles regarding status of DIP negotiations (.3); review revised DIP Order (.1); review revised DIP note (.1)	0.50	\$467.50
B230	09/14/24	GF	Emails with M. Helt and N. Rowles regarding DIP negotiations (.3); review revised DIP order and DIP note reflecting DIP resolution (.5); email to N. Rowles regarding edits to DIP note (.2) revise draft reservation of rights for DIP motion (1.4)	2.40	\$2,580.00
B230	09/14/24	KEM	Review draft DIP reservation of rights (.1); correspondence from J. Cohen, G. Finizio, N. Rowles, and L. Tauro regarding DIP Order and related negotiations (.2)	0.30	\$280.50
B230	09/15/24	DMP	Correspondence with MWE and Lowenstein teams regarding DIP negotiations (.8); correspondence with Weil and Gibson regarding DIP negotiations and extension of deadline to object (.4)	1.20	\$1,620.00
B230	09/15/24	GF	Calls with M. Helt (.3) and K. Martorana (.3) regarding DIP resolution; emails with LS and MWE teams regarding DIP status (.2); review further revised DIP order regarding DIP resolution (.2); email to J. Cohen and D. Posner regarding changes to DIP order (.1)	1.10	\$1,182.50
B230	09/15/24	KEM	Correspondence from J. Cohen, G. Finizio, N. Rowles regarding DIP negotiations status (.3); review revised DIP order (.1)	0.40	\$374.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B230	09/16/24	DMP	Correspondence from K. Martorana of Gibson regarding DIP Order and budget (.1); review revised draft of ROR from MWE (.2); correspondence with MWE regarding DIP ROR (.2); correspondence with J. Cohen and G. Finizio regarding DIP ROR (.2); telephone call with M. Helt regarding DIP and ROR (.1); correspondence with Weil and Gibson regarding DIP, DIP order and submission of CNO (.2); correspondence with Weil, Gibson, MWE and Lowenstein regarding CNO on DIP and revised budget (.1); review revised budget (.1)	1.20	\$1,620.00
B230	09/16/24	GF	Emails with K. Martorana regarding DIP status (.1); review revised DIP statement (.3) emails with J. Cohen and D. Posner regarding DIP pleading (.2); review revised DIP order filed with CNO (.6); review revised DIP note filed with CNO (.2); emails with N. Rowles regarding revised DIP order (.1)	1.50	\$1,612.50
B230	09/16/24	JC	Review and discuss draft reservation of rights with MWE	0.70	\$990.50
B230	09/16/24	KEM	Correspondence from J. Cohen, G. Finizio and K. Martorana regarding final DIP order and objection (.2); review revised reservation of rights (.2); review revised final DIP order (.1); review revised budget (.1)	0.60	\$561.00
B230	10/31/24	GF	Review PPP's updated budget	0.20	\$215.00
B230	10/31/24	KEM	Review email from G. Finizio regarding updated DIP budget	0.10	\$93.50
Total B230 - Financing/Cash Collateral				36.40	\$42,107.50

B300 - Claims and Plan**B310 Claims Administration and Objections**

B310	09/03/24	JC	Review bar date motion	0.40	\$566.00
B310	09/23/24	GF	Emails with M. Kaplan regarding contractual privity issues (.1); review vendor contracts regarding contractual privity issue (.8)	0.90	\$967.50
B310	09/24/24	KEM	Call with E. Mannix regarding PBI unsecured claims	0.10	\$93.50
B310	09/30/24	GF	Review critical vendor matrix sent by Weil	0.10	\$107.50
B310	10/09/24	GF	Review \$8 million litigation proof of claim filing and emails with E. Seltzer regarding same	0.10	\$107.50
B310	10/10/24	GF	Emails regarding P.I. proof of claim	0.20	\$215.00
B310	10/10/24	KEM	Call with A. Cohen regarding Ryder settlement (.1); email to J. Cohen, D. Posner and G. Finizio regarding same (.2); correspondence from J. Cohen and G. Finizio regarding personal injury claim (.1)	0.40	\$374.00
B310	10/14/24	GF	Emails with M. Helt regarding Oaktree claim objection	0.10	\$107.50
B310	10/14/24	JC	Review proposed Oaktree claim objection and related discuss with M. Helt	0.70	\$990.50
B310	10/15/24	GF	Call with L. Tauro regarding Oaktree claim objection (.1) and email to team regarding same (.1); review register of filed claims to date (.2)	0.40	\$430.00
B310	10/15/24	KEM	Review Ryder settlement	0.60	\$561.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B310	10/16/24	GF	Call with L. Tauro and M. Helt regarding Oaktree claim objection (.3); follow up call with M. Helt regarding Oaktree (.3) and prepare summary email regarding same (.3)	0.90	\$967.50
B310	10/17/24	GF	Call with M. Helt regarding Oaktree claim (.2); review solicitation procedures regarding 3018 motion (.3)	0.50	\$537.50
B310	10/21/24	DMP	Review matrix received from Debtors regarding critical vendor payments (.1); review Dollar Shave Club claim (.2); correspondence with Lowenstein team regarding Dollar Shave Club claim (.2)	0.50	\$675.00
B310	10/21/24	EJS	Review Dollar Shave Club proof of claim and accompanying exhibits (.3); prepare summary of same (.2); email correspondence with Lowenstein team re same (.2)	0.70	\$500.50
B310	10/21/24	GF	Emails with M. Helt and L. Tauro regarding Oaktree claim objection (.1); emails with C. Gibbs regarding Oaktree claim objection next steps (.2); call with M. Helt regarding Oaktree claim objection next steps (.1)	0.40	\$430.00
B310	10/21/24	JC	Review certain large filed claims	1.20	\$1,698.00
B310	10/21/24	KEM	Correspondence with R. Newman regarding critical vendor matrix (.1); correspondence from G. Finizio and C. Gibbs regarding Oaktree R. 3018 motion (.1)	0.20	\$187.00
B310	10/22/24	EJS	Prepare and populate large claims tracker (.6); email correspondence with J. Cohen re same (.1)	0.70	\$500.50
B310	10/22/24	GF	Review list of filed claims post-bar date (.1); review Trilogy proof of claim (.2)	0.30	\$322.50
B310	10/22/24	JC	Multiple correspondence with E. Seltzer re: claims review and reconciliation	0.80	\$1,132.00
B310	10/22/24	KEM	Review claims register (.4); correspondence from J. Cohen and E. Seltzer regarding claims analysis (.1); review A&M claims analysis (.2)	0.70	\$654.50
B310	10/23/24	CG	Participate in call with E. Seltzer (.3); commence research for proof of claim tracker and possible claim objections for Trilogy leases (1.2)	1.50	\$825.00
B310	10/23/24	CG	Participate in call with E. Seltzer re editing proof of claim tracker with changes	0.20	\$110.00
B310	10/23/24	EJS	Review Trilogy proofs of claim (.2); revise C. Gauvin updates to claims tracker (.2); email correspondence with E. Mannix and C. Gauvin re same (.1).	0.50	\$357.50
B310	10/24/24	CG	Investigate claims register to update claims summary	0.40	\$220.00
B310	10/24/24	EGM	Review draft large claims analysis analysis from C. Gauvin (.4) and email C. Gauvin re same (.1)	0.50	\$432.50
B310	10/24/24	GF	Emails with A&M regarding claims pool analysis (.2); review claims analysis (.2)	0.40	\$430.00
B310	10/24/24	KEM	Correspondence from G. Finizio and R. Newman regarding claims pool	0.10	\$93.50
B310	10/24/24	KEM	Correspondence with E. Seltzer regarding claims analysis (.1); review claims analysis (.1); correspondence from R. Newman regarding claims analysis (.1); correspondence from G. Finizio regarding Ryder settlement (.1)	0.40	\$374.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B310	10/25/24	CG	Discuss with E. Seltzer final changes to large claim tracker; draft, proofread and send large claim tracker to E. Mannix for her review	0.40	\$220.00
B310	10/25/24	CG	Conduct analysis of proofs of claim and reverse tracker	2.00	\$1,100.00
B310	10/25/24	CG	Investigate certain proofs of claim and update tracking chart on same	2.70	\$1,485.00
B310	10/25/24	EJS	Call with C. Gauvin re claims and claims tracker (.5); follow-up call with same re same (.2); review filed proofs of claim and associated addenda (1.1); update claims tracker accordingly (.8); video-conference w/ C. Gauvin to conduct claims analysis (1.4); correspondence with Lowenstein team re claims issues (.2)	4.20	\$3,003.00
B310	10/25/24	GF	Emails with A. Gonzalez regarding claims pool analysis	0.10	\$107.50
B310	10/26/24	GF	Review updated claims register filings	0.10	\$107.50
B310	10/28/24	JC	Review Oaktree response to claims estimation filing	0.60	\$849.00
B310	10/29/24	JC	Review A&M claims analysis	0.80	\$1,132.00
B310	10/29/24	KEM	Review A&M recovery analysis	0.10	\$93.50
B310	10/30/24	CG	Review Debtors' counsel correspondence re Committee's objection to Debtors' Motion to Reject Trilogy Contracts	0.10	\$55.00
B310	10/30/24	DMP	Telephone call M. Bishop regarding clients claim	0.20	\$270.00
B310	11/01/24	GF	Review A&M contractual privity claims reconciliation deck	0.40	\$430.00
B310	11/03/24	GF	Call with A&M team regarding contractual privity analysis (.6); follow up call with D. Posner regarding next steps (.1)	0.70	\$752.50
B310	11/04/24	GF	Call with D. Posner, M. Helt and D. Green regarding Oaktree claim	0.50	\$537.50
B310	11/08/24	DMP	Review updated claims register	0.10	\$135.00
B310	11/08/24	GF	Review updated claims register	0.10	\$107.50
B310	11/13/24	DMP	Review K. Moynihan summary and analysis of Ryder claim settlement	0.20	\$270.00
B310	11/13/24	GF	Review A&M GUC claims analysis regarding plan markup	0.40	\$430.00
B310	11/14/24	DMP	Correspondence with J. Cohen, K. Moynihan and G. Finizio regarding Ryder claim settlement	0.20	\$270.00
B310	11/21/24	GF	Review updated claims register for status of GUC claims	0.20	\$215.00
B310	11/26/24	GF	Emails with K. Moynihan regarding follow up inquiries on Penske claims	0.10	\$107.50
B310	11/30/24	GF	Review amended proof of claim from Ambi Robotics (.2); review schedule of large GUC claims (.3)	0.50	\$537.50
B310	12/02/24	JC	Review amended claim filed by Ambi Robotics	0.40	\$566.00
B310	12/04/24	DMP	Correspondence with LS team regarding amendment to proof of claim re rejection damages for AmbiRobotics	0.20	\$270.00
B310	12/04/24	EJS	Review amended Ambi Robotics proof of claim (.2); email correspondence with G. Finizio re same (.1)	0.30	\$214.50
B310	12/04/24	EJS	Review proposed revisions to Opt-In Letter	0.20	\$143.00
B310	12/04/24	GF	Emails with E. Seltzer regarding Ambi's amended proof of claim	0.10	\$107.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B310	12/04/24	JC	Review Ambi robotics amended claim and discuss with E. Seltzer	0.80	\$1,132.00
B310	12/04/24	KEM	Correspondence from G. Finizio and E. Seltzer regarding Ambi claim	0.10	\$93.50
B310	12/06/24	EJS	Call with C. Gauvin re exclusivity motion (.1); review summary of same prepared by C. Gauvin (.1)	0.20	\$143.00
B310	12/06/24	KEM	Calls with E. Seltzer regarding amended schedules (.2); correspondence with E. Seltzer regarding same (.2); review amended schedules (.2)	0.60	\$561.00
B310	12/09/24	GF	Review 5th circuit case regarding billing date approach for stub rent claims	0.40	\$430.00
Total B310 - Claims Administration and Objections				32.90	\$30,843.00
<u>B320 Plan and Disclosure Statement (including Business Plan)</u>					
B320	08/28/24	JC	Review disclosure statement and related filings	1.30	\$1,839.50
B320	08/28/24	JC	Review restructuring support agreement and related exhibits	1.40	\$1,981.00
B320	08/29/24	GF	Begin review of chapter 11 plan of liquidation	1.70	\$1,827.50
B320	08/29/24	JC	Review disclosure statement, motion and solicitation materials	2.20	\$3,113.00
B320	08/30/24	JC	Continued review of disclosure statement	1.40	\$1,981.00
B320	09/02/24	JC	Review A&M comments to first day motions and proposed orders	1.10	\$1,556.50
B320	09/02/24	JC	Review and comment on proposed revisions to final Critical Vendor motion	1.20	\$1,698.00
B320	09/02/24	JC	Review and comment on proposed revisions to final order for insurance motion	0.60	\$849.00
B320	09/03/24	JC	Continued review of RSA, Disclosure Statement and related Exhibits	2.20	\$3,113.00
B320	09/04/24	GF	Begin review of debtors' disclosure statement	2.20	\$2,365.00
B320	09/05/24	GF	Continue review of disclosure statement and related exhibits	1.10	\$1,182.50
B320	09/05/24	JC	Continued review of RSA, DS and related filings	2.20	\$3,113.00
B320	09/05/24	KEM	Correspondence from J. Cohen, D. Posner and E. Mannix regarding disclosure statement motion	0.10	\$93.50
B320	09/06/24	DMP	Begin review of plan	1.10	\$1,485.00
B320	09/06/24	JC	Continued review of Disclosure Statement	1.20	\$1,698.00
B320	09/09/24	DMP	Review and analysis of plan	1.20	\$1,620.00
B320	09/10/24	DMP	Begin review and analysis of disclosure statement	2.30	\$3,105.00
B320	09/10/24	JC	Review settlement agreement and disclosure statement	1.30	\$1,839.50
B320	09/11/24	DMP	Review disclosure statement (.5); review draft of issues list with disclosure statement (.5); correspondence with G. Finizio and K. Moynihan regarding same (.1)	1.10	\$1,485.00
B320	09/11/24	GF	Analysis of draft issues list for Disclosure Statement (.6); email to K. Moynihan regarding same (.1)	0.70	\$752.50
B320	09/11/24	JC	Review DS issues list and preliminary objection	1.30	\$1,839.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	09/11/24	KEM	Review disclosure statement (2.1); prepare disclosure statement issues list (1.1); review solicitation motion (.3); review RSA (.5); correspondence with D. Posner and G. Finizio regarding DS issues (.1); review disclosure statement precedent in S.D. Tex. (.4)	4.50	\$4,207.50
B320	09/12/24	DMP	Confer with G. Finizio and K. Moynihan regarding Disclosure Statement issues and objection to same (.2); review and analysis of proposed plan (2.2)	2.40	\$3,240.00
B320	09/12/24	EGM	Review and analyze Disclosure Statement and Plan in connection with issues list and creditor questions	1.00	\$865.00
B320	09/12/24	GF	Prepare additional edits to Disclosure Statement issues list (.3); review R. Shaw precedent regarding releases (.3)	0.60	\$645.00
B320	09/12/24	JC	Review and discuss correspondence with creditor inquiring about claims pool composition	1.10	\$1,556.50
B320	09/12/24	JC	Review DS issues list and discuss same with K. Moynihan	1.40	\$1,981.00
B320	09/12/24	KEM	Review and analysis of disclosure statement issues with D. Posner and G. Finizio (.1); revise disclosure statement issues list (.6); review and analysis of Plan (2.3); draft Disclosure Statement issues list (.7); call with E. Mannix regarding Disclosure Statement issues (.2)	3.90	\$3,646.50
B320	09/13/24	DMP	Correspondence with J. Cohen, G. Finizio, K. Moynihan and E. Mannix regarding disclosure statement issues list (.1); review revised disclosure statement issues list (.2)	0.30	\$405.00
B320	09/13/24	EGM	Attend to emails from K. Moynihan re Disclosure Statement issues list	0.50	\$432.50
B320	09/13/24	JC	Review updated disclosure statement issues list and discuss with K. Moynihan	1.30	\$1,839.50
B320	09/13/24	KEM	Review and analysis of Plan (1.8); call with G. Finizio regarding disclosure statement issues list (.2); call with J. Cohen regarding disclosure statement objection (.2); revise disclosure statement issues list (.6); email to Weil regarding disclosure statement issues list (.1); prepare disclosure statement objection outline (.4)	3.30	\$3,085.50
B320	09/16/24	DMP	Review and analysis of plan issues	1.20	\$1,620.00
B320	09/16/24	KEM	Correspondence with G. Finizio regarding PB Canada claim (.2); review Plan regarding treatment of same (.2)	0.40	\$374.00
B320	09/17/24	DMP	Review and analysis of disclosure statement and issues for objection draft (1.1); correspondence with K. Moynihan regarding draft objection (.1)	1.20	\$1,620.00
B320	09/17/24	GF	Review liquidation analysis (.3); research objections for disclosure statement to adjourn case timeline (.6)	0.90	\$967.50
B320	09/17/24	KEM	Draft disclosure statement objection (6.0); review liquidation analysis (.3)	6.30	\$5,890.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	09/18/24	DMP	Review and analysis of issues and arguments for disclosure statement objection (.5); review and edit draft of disclosure statement objection (.8); correspondence with Lowenstein team regarding disclosure statement objection (.2); review and analysis of Weil's responses on DS issues (.5); review K. Moynihan annotations on Weil responses and draft email to team with thoughts on same (.5); correspondence with Lowenstein team regarding statement re disclosure statement and solicitation letter and edits thereto (.5)	3.00	\$4,050.00
B320	09/18/24	DMP	Review G. Finizio edits to draft statement re disclosure statement and email to team re same (.2); review and edit draft of committee letter for solicitation package (.3); review revised disclosure statement issues list (.2); correspondence with Lowenstein team regarding disclosure statement issues and responses from Weil (.5); review Weil responses to disclosure statement issues list (.4); correspondence with Lowenstein team and Weil regarding conference call re disclosure statement issues (.3); review disclosure statement order and solicitation materials (.7); review K. Moynihan mark up of same (.2)	2.80	\$3,780.00
B320	09/18/24	EGM	Review and revise objection to disclosure statement and solicitations procedure motion (1.2); review and revise Committee's statement in connection with Disclosure Statement (.4); attend to emails with J. Cohen, D. Posner, G. Finizio, and K. Moynihan re same (.4)	2.00	\$1,730.00
B320	09/18/24	GF	Review Debtor responses to Disclosure Statement issues list (.3); prepare email to K. Moynihan regarding follow up disclosure requests (.8); review E. Mannix comments to disclosure issues (.1); prepare revisions to disclosure statement objection (1.1); review disclosure precedent from Benefytt Technologies case (.3)	2.60	\$2,795.00
B320	09/18/24	JC	Review Debtors' proposed edits to disclosure statement and discuss with K. Moynihan	2.20	\$3,113.00
B320	09/18/24	JC	Review Disclosure Statement and UCC precedent from SD Texas for objections on similar grounds	2.60	\$3,679.00
B320	09/18/24	JC	Review draft disclosure statement objection and comment re: same	2.40	\$3,396.00
B320	09/18/24	JC	Review liquidation analysis and discuss with A&M	0.80	\$1,132.00
B320	09/18/24	KEM	Draft disclosure statement objection (3.1); correspondence with J. Cohen, D. Posner, G. Finizio and E. Mannix regarding same (.4); revise disclosure statement objection (.4); draft statement on disclosure statement (2.4); review Weil comments to disclosure statement issues list (.2); correspondence with J. Cohen, D. Posner, and G. Finizio regarding same (.4); revise disclosure statement issues list (.4); draft solicitation letter (1.6)	8.90	\$8,321.50
B320	09/18/24	MAK	Review and comment on objection to disclosure statement (.7); inter-office e-mails re: the same (.5)	1.20	\$1,236.00
B320	09/19/24	EGM	Review revised Statement in connection with Disclosure Statement and attend to emails re same	0.40	\$346.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	09/19/24	GF	Review revised committee letter to include in solicitation package (.3); review updated disclosure statement issues list from Weil (.2); review email from K. Moynihan regarding updated disclosures (.1); emails with K. Moynihan regarding remaining open disclosure issues (.1); review opt out precedent for disclosure statement purposes (.5)	1.20	\$1,290.00
B320	09/19/24	JC	Review draft solicitation letter and comment re: same	0.80	\$1,132.00
B320	09/19/24	JC	Continued review of proposed DS revisions and comments re: same	1.40	\$1,981.00
B320	09/19/24	KEM	Revise Committee solicitation letter (.3); correspondence with J. Cohen, D. Posner and G. Finizio regarding same (.1); correspondence with N. Rowles regarding disclosure statement hearing and witness and exhibit list (.2); revise disclosure statement issues list (.4); call with D. Posner regarding same (.1); revise solicitation order and procedures (2.9); email to Debtors' counsel regarding disclosure statement issues list (.1); review Debtors' comments to disclosure statement issues list (.3); correspondence with J. Cohen, D. Posner and G. Finizio regarding same (.2); correspondence with G. Finizio regarding outstanding disclosure statement issues (.2); review draft witness and exhibit list (.1)	4.90	\$4,581.50
B320	09/20/24	DC	Review and download objections to Disclosure Statement	0.20	\$73.00
B320	09/20/24	DMP	Review G. Finizio comments to disclosure order and solicitation materials (.1); review revised disclosure statement order and solicitation procedures (.2); conference call with Weil and Lowenstein teams regarding disclosure statement (.4); review revised statement in connection with Disclosure statement (.1); correspondence with Lowenstein same regarding same and regarding solicitation letter (.2); review email from Weil regarding removal of reference to PBI Canada intercompany from disclosure statement disclosures (.2); correspondence with Lowenstein team regarding disclosures, response to Weil and revised statement re same (.3)	1.50	\$2,025.00
B320	09/20/24	EGM	Review revised drafts of Statement in connection with disclosure statement and Committee's letter (.4); attend to email from J. Silber re disclosure statement revisions (.2)	0.60	\$519.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	09/20/24	GF	Participate on call with Weil team regarding disclosure statement (.4); review disclosure statement order (.5); review solicitation procedures (.5); email to K. Moynihan regarding edits to disclosure statement order and procedures (.3); emails with N. Rowles and K. Moynihan regarding disclosure statement hearing (.1); review UST issues list for disclosure statement (.1); review K. Moynihan email regarding call with UST on disclosure statement (.1); analysis of UST objection to disclosure statement (.4); revise committee statement and ROR to disclosure statement (.5); review agenda for September 23 hearing (.1); prepare edits to draft committee letter for solicitation package (.3); emails with N. Rowles regarding filing of committee statement and letter (.1); review MWE edits to committee statement and letter (.1); review email from J. Silber with edits to disclosure statement (.2); emails with K. Moynihan regarding further edits to disclosure statement (.2); begin prep for September 23 hearing disclosure statement hearing (.3)	4.20	\$4,515.00
B320	09/20/24	JC	Call with Weil re: modifications of DS to address committee comments	0.60	\$849.00
B320	09/20/24	JC	Review multiple revisions of DS, solicitation procedures order and related pleadings	2.10	\$2,971.50
B320	09/20/24	KEM	Revise solicitation order (.4); correspondence with G. Finizio regarding same (.2); email to J. Silber regarding same (.1); review disclosure statement issues raised by UST (.1); correspondence with N. Rowles regarding 9/22 hearing (.1); call with Debtors' counsel regarding disclosure statement issues (.4); call with Debtors' counsel and UST regarding disclosure statement issues (.2); email to J. Cohen and G. Finizio regarding same (.1); correspondence with J. Silber regarding disclosure statement/PB claim amount (.2); calls with A. Cohen regarding disclosure statement revisions (.1); email to J. Cohen and G. Finizio regarding same (.1); correspondence with G. Finizio regarding Committee DS statement and solicitation letter (.2)	2.20	\$2,057.00
B320	09/21/24	KEM	Correspondence with T. Palisi regarding disclosure statement revisions (.1); review revised solicitation order and procedures (.1); correspondence with A. Anglade regarding same (.1)	0.30	\$280.50
B320	09/22/24	DMP	Review redline of disclosure statement (.7); review G. Finizio email regarding summary of UST objection to Disclosure Statement (.2)	0.90	\$1,215.00
B320	09/22/24	GF	Prepare for disclosure statement hearing (1.6); call with J. Cohen regarding disclosure statement hearing prep (.3); review revised Disclosure Statement documents filed by Debtors in advance of September 23 hearing (.7)	2.60	\$2,795.00
B320	09/22/24	KEM	Review amended disclosure statement (.5); correspondence with J. Silber regarding same (.1); correspondence from G. Finizio and N. Rowles regarding disclosure statement hearing (.1); review email from G. Finizio regarding UST objection to disclosure statement (.1)	0.80	\$748.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	09/23/24	DC	Download and circulate Joint Amended Plan, Disclosure Statement and revised proposed order	0.30	\$109.50
B320	09/23/24	DMP	Review UST objection to the Disclosure Statement (.7); review outline for Disclosure Statement hearing talking points (.2); correspondence with G. Finizio and J. Cohen regarding hearing preparation (.2); attend Disclosure Statement hearing (.5)	1.60	\$2,160.00
B320	09/23/24	EGM	Review email from G. Finizio re disclosure statement hearing update and outcome	0.20	\$173.00
B320	09/23/24	EJS	Review and analyze Debtors' proposed chapter 11 plan	1.00	\$715.00
B320	09/23/24	GF	Review revised disclosure statement documents (1.3); review debtors' response to US Trustee disclosure statement objection (.2); prepare professionals report regarding hearing (.3); prepare email to client regarding hearing (.2); call with D. Posner and C. Gibb regarding hearing (.1); call with L. Tauro regarding confirmation hearing date (.1)	2.20	\$2,365.00
B320	09/23/24	JC	Review UST objection to DS and discuss with G. Finizio	1.20	\$1,698.00
B320	09/23/24	JC	Review Debtors' reply to UST objection	0.60	\$849.00
B320	09/24/24	GF	Emails with team regarding potential edits to Committee solicitation letter (.1); prepare revisions to Committee's solicitation letter (.3) and emails with L. Tauro regarding same (.2); review solicitation versions of plan and disclosure statement (.4)	1.00	\$1,075.00
B320	09/24/24	JC	Review contractual privity issue and discuss same with M. Kaplan	1.30	\$1,839.50
B320	09/24/24	KEM	Review RSA regarding secured claims treatment (.2); correspondence from G. Finizio and L. Tauro regarding solicitation letter (.1)	0.30	\$280.50
B320	09/25/24	DC	Review Disclosure Statement Order and download amended plan and disclosure statement, review pleadings filed, update critical dates memo for circulation to the committee and update attorney calendar	0.70	\$255.50
B320	09/25/24	DMP	Review redline of solicitation letter	0.10	\$135.00
B320	09/25/24	GF	Call with A. Anglade regarding final version of committee solicitation letter (.1); review final draft of same (.1)	0.20	\$215.00
B320	09/25/24	KEM	Review revised solicitation letter	0.10	\$93.50
B320	10/01/24	GF	Analysis of plan regarding confirmation objections	2.20	\$2,365.00
B320	10/01/24	KEM	Review and analysis with G. Finizio of confirmation timeline extension (.2); review and analysis of same with E. Mannix (.1)	0.30	\$280.50
B320	10/02/24	JC	Review and analyze theories for plan objections	2.40	\$3,396.00
B320	10/03/24	GF	Review class gerrymandering research (.8); review plan gatekeeper research (1.4)	2.20	\$2,365.00
B320	10/03/24	KEM	Confer with G. Finizio regarding artificial impairment (.1); correspondence with E. Seltzer regarding same (.1)	0.20	\$187.00
B320	10/04/24	KEM	Draft letter to Court regarding status conference on confirmation timeline	0.40	\$374.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	10/06/24	GF	Prepare markup of amended chapter 11 plan	1.20	\$1,290.00
B320	10/08/24	GF	Review research regarding gatekeeper provisions (1.1); confer with K. Moynihan regarding letter requesting extension of confirmation schedule (.2)	1.30	\$1,397.50
B320	10/09/24	GF	Emails with R. Newman regarding plan confirmation schedule (.1); prepare comments to draft letter regarding confirmation timeline (1.6); confer with K. Moynihan regarding draft letter (.1); prepare draft responses to committee member inquiries on plan (.6)	2.40	\$2,580.00
B320	10/09/24	JC	Zoom call with PBI and Debtors' counsel re: confirmation timeline	0.40	\$566.00
B320	10/09/24	KEM	Call with Committee, Debtor, and PBI counsel regarding confirmation timeline (.3); review and analysis of confirmation issues with D. Posner and M. Kaplan (.3); correspondence with N. Rowles regarding same (.1); draft letter to Court regarding confirmation timeline (3.7); review email from G. Finizio regarding confirmation issues (.1); call with G. Finizio regarding status conference letter (.1); review G. Finizio revisions to status conference letter (.3)	4.90	\$4,581.50
B320	10/10/24	DMP	Correspondence with Lowenstein team regarding letter re status conference (.8); review and edit letter to Court re status conference (.7); review and analysis of theories of recovery and memorandum regarding same (2.1)	3.60	\$4,860.00
B320	10/10/24	EGM	Review and revise letter to the Court requesting conference to discuss extension of the confirmation timeline (1.4); discuss same with M. Kaplan (.2); attend to emails from J. Cohen, D. Posner, G. Finizio and K. Moynihan re same (.3)	1.90	\$1,643.50
B320	10/10/24	GF	Review and revise multiple drafts of letter regarding confirmation timeline (.7) and emails with team regarding same (.2); review updated letter requesting status conference (.2)	1.10	\$1,182.50
B320	10/10/24	JC	Review and revise draft letter to chambers re: conference request	1.20	\$1,698.00
B320	10/11/24	GF	Call with D. Posner regarding meet and confer as to confirmation timeline (.1); review final letter for confirmation timeline prior to filing (.6); review emails with MWE regarding confirmation letter (.2); emails with K. Moynihan regarding confirmation letter (.1); review contested confirmation issues regarding objection outline (1.6)	2.60	\$2,795.00
B320	10/11/24	JC	Multiple correspondence with Debtors' counsel re: status conference	0.60	\$849.00
B320	10/11/24	JC	Zoom call with PBI and Debtors re: confirmation timeline	0.60	\$849.00
B320	10/11/24	JC	Review and revise letter to court	0.80	\$1,132.00
B320	10/11/24	JC	Multiple correspondence with D. Posner and M. Kaplan re: status conference and related issues	1.20	\$1,698.00
B320	10/14/24	DMP	Correspondence with team regarding confirmation objection (.2)	0.20	\$270.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	10/14/24	GF	Emails with R. Newman regarding plan confirmation (.1); continue analysis of confirmation brief outline (.6); review disparate treatment research (.5)	1.20	\$1,290.00
B320	10/14/24	KEM	Correspondence with G. Finizio regarding confirmation outline (.1); correspondence from M. Helt regarding Oaktree claim (.1)	0.20	\$187.00
B320	10/15/24	DMP	Review and analysis with theories and issues of plan objection (.8); confer with G. Finizio regarding same (.3)	1.10	\$1,485.00
B320	10/15/24	GF	Prepare for call regarding confirmation objection (.3); call with K. Moynihan regarding confirmation objection (.8); research regarding plan objection outline (.9)	2.00	\$2,150.00
B320	10/15/24	JC	Telephone call with M. Kaplan re: status conference	0.70	\$990.50
B320	10/15/24	KEM	Call with G. Finizio regarding confirmation objection (.8); correspondence with D. Claussen regarding status conference (.1)	0.90	\$841.50
B320	10/16/24	DMP	Correspondence with G. Finizio and M. Helt regarding objection to Oaktree claim, call with Debtors and 3018 motion (.4); review solicitation procedures motion and notice regarding same (.7)	1.10	\$1,485.00
B320	10/16/24	EGM	Participate in call with LS team to prepare for status conference on extension of confirmation timeline (.6); draft summary of strategy for status conference call (.9)	1.50	\$1,297.50
B320	10/16/24	GF	Review disparate treatment research (.5); continue to update confirmation brief outline (.4)	0.90	\$967.50
B320	10/16/24	KEM	Draft confirmation objection outline (.6); research regarding same (.2)	0.80	\$748.00
B320	10/17/24	DBB	Confer with F. Finizio re release issues (.2); research re 524(e) and effect of releases on co-obligors (.8); e-mails with G. Finizio re same (.1)	1.10	\$1,248.50
B320	10/17/24	EJS	Review PBI and Debtors' responses to status conference request letter (.3); prepare summaries of same for Lowenstein team (.2); email correspondence with G. Finizio and J. Cohen re same (.1); prepare revised talking points/arguments for status conference re extension of confirmation timeline (1.9); correspondence with E. Mannix re same (.2)	2.70	\$1,930.50
B320	10/17/24	EJS	Review outline re potential confirmation objection arguments	0.30	\$214.50
B320	10/17/24	GF	Review reply letters from Debtors and Pitney Bowes regarding plan confirmation (.5); emails with E. Seltzer regarding reply letters (.1); calls with K. Moynihan regarding confirmation outline (.3) and prepare revisions to same (1.1)	2.00	\$2,150.00
B320	10/17/24	JC	Prepare for status conference re: confirmation	1.60	\$2,264.00
B320	10/17/24	JC	Zoom call with M. Kaplan and C. Gibbs re: status conference	0.80	\$1,132.00
B320	10/17/24	JC	Review responsive letters from PBI and Debtors	0.80	\$1,132.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	10/17/24	KEM	Calls with G. Finizio regarding confirmation outline (.7); email to LS team regarding same (.2); draft confirmation outline (3.1); research regarding same (1.1); correspondence with G. Finizio regarding same (.4); correspondence from M. Helt regarding Oaktree claim (.1)	5.60	\$5,236.00
B320	10/18/24	JC	Telephone conferences with M. Kaplan re: discovery schedule to confirmation	1.20	\$1,698.00
B320	10/18/24	KEM	Call with D. Posner, M. Kaplan, G. Finizio, E. Mannix and E. Seltzer regarding confirmation strategy (.9); attend status conference on confirmation timeline extension (.6); correspondence with E. Mannix regarding status conference (.1)	1.60	\$1,496.00
B320	10/18/24	MAK	Prepare for status conference on confirmation hearing discovery	1.40	\$1,442.00
B320	10/18/24	MAK	Inter-office strategy call re: confirmation preparation	0.90	\$927.00
B320	10/19/24	JC	Review confirmation objection outline and comment re: same	1.10	\$1,556.50
B320	10/21/24	DMP	Telephone call with K. Moynihan regarding confirmation time-line and adjusting dates (.1); review and analysis of outline of confirmation objection issues and facts (1.4); review proposed confirmation deadlines and email K. Moynihan regarding same (.2); correspondence with G. Finizio and J. Cohen regarding Oaktree claim objection and 3018 motion (.2); correspondence with Lowenstein and MWE teams regarding Oaktree and 3018 motion (.2)	2.10	\$2,835.00
B320	10/21/24	GF	Review confirmation schedule from K. Moynihan (.1) and prepare suggestions to same (.2); email to K. Moynihan regarding confirmation schedule (.1)	0.40	\$430.00
B320	10/21/24	JC	Multiple correspondence with M. Kaplan re: document review and confirmation prep	1.10	\$1,556.50
B320	10/21/24	JC	Review plan confirmation objection outline and comment re: same	1.40	\$1,981.00
B320	10/21/24	KEM	Correspondence with J. Cohen and D. Posner regarding confirmation objection outline (.1); revise confirmation outline (.1); correspondence with MWE and A&M teams regarding same (.1); draft revised confirmation timeline (.3); correspondence with G. Finizio regarding same (.1); correspondence from M. Kaplan regarding immediate confirmation issues (.1)	0.80	\$748.00
B320	10/22/24	DMP	Review and analysis of confirmation schedule with K. Moynihan and G. Finizio	0.20	\$270.00
B320	10/22/24	GF	Review articles regarding artificially impaired accepting class	0.50	\$537.50
B320	10/22/24	JC	Case strategy meeting with D. Posner re: plan confirmation	0.90	\$1,273.50
B320	10/22/24	KEM	Call with D. Posner, G. Finizio, and E. Mannix regarding immediate confirmation action items (.5); revise proposed confirmation timeline (.1); correspondence with D. Posner and G. Finizio regarding same (.1)	0.70	\$654.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	10/23/24	DMP	Review and analysis of adjusted schedule for confirmation time-line (.3); correspondence with Lowenstein team regarding same (.3); telephone call with L. Tauro regarding same and discovery (.5)	1.10	\$1,485.00
B320	10/23/24	EGM	Review draft letter to Weil and Gibson Dunn teams re settlement proposal in connection with confirmation	0.30	\$259.50
B320	10/23/24	GF	Review and revise letter regarding contractual privity settlement construct (1.3); call with D. Posner regarding letter (.1); email to LS team regarding letter (.3); review A&M contract analysis spreadsheet (.3)	2.00	\$2,150.00
B320	10/23/24	KEM	Correspondence with D. Posner and L. Tauro regarding call and confirmation schedule (.1); call with D. Posner regarding same (.1); correspondence with J. Cohen regarding confirmation schedule (.1); correspondence from D. Posner and G. Finizio regarding settlement letter (.1)	0.40	\$374.00
B320	10/24/24	GF	Continue drafting committee letter regarding report and voting recommendation	3.30	\$3,547.50
B320	10/24/24	JC	Review and revise draft settlement letter	0.80	\$1,132.00
B320	10/25/24	JC	Review draft settlement letter and comment re: same	0.60	\$849.00
B320	10/25/24	KEM	Call with G. Finizio regarding confirmation issues and immediate tasks (.4); review M. Helt email regarding settlement proposal (.1)	0.50	\$467.50
B320	10/27/24	KEM	Correspondence with M. Kaplan regarding strategy call	0.10	\$93.50
B320	10/28/24	GF	Continue working on Committee letter regarding voting recommendation and investigation report (3.9); calls with E. Mannix, M. Kaplan, and D. Posner regarding voting recommendation letter (.3); update confirmation brief outline (1.1)	5.30	\$5,697.50
B320	10/28/24	KEM	Call with D. Posner regarding confirmation issues	0.10	\$93.50
B320	10/29/24	DMP	Review Oaktree and DRF responses to objection to Oaktree claim for voting purposes	0.20	\$270.00
B320	10/29/24	EJS	Review draft Committee plan recommendation letter re voting and releases	0.30	\$214.50
B320	10/29/24	JC	Review and revise draft investigation letter to creditors	1.20	\$1,698.00
B320	10/30/24	DMP	Review and analysis of plan release language in response to committee member questions (.3); correspondence with G. Finizio, K. Moynihan and E. Seltzer regarding same (.2)	0.50	\$675.00
B320	10/30/24	GF	Call with K. Moynihan regarding plan objection (.4); review email inquiry from creditor regarding plan opt outs (.2); prepare response regarding opt out inquiry (.3)	0.90	\$967.50
B320	10/30/24	KEM	Call with G. Finizio regarding confirmation objection (.4); review and analysis of plan release issues (.2); correspondence with G. Finizio regarding same (.1); review revised settlement proposal (.1); correspondence with G. Finizio regarding same (.1)	0.90	\$841.50
B320	10/31/24	DC	Review SDTX local rules and complex rules re: page limitation for objection to confirmation	0.40	\$146.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	10/31/24	GF	Call with committee members regarding plan releases and opt outs (.3); report to team regarding call on opt outs (.2); review research regarding artificially impaired accepting class (.8); calls with E. Mannix regarding contractual privity analysis (.2)	1.50	\$1,612.50
B320	10/31/24	KEM	Call with G. Finizio regarding confirmation objection (.2); correspondence with E. Mannix regarding confirmation objection (.1); email to E. Mannix, E. Seltzer and C. Gauvin regarding confirmation objection (.3); research regarding confirmation objection (.4); draft confirmation objection (.9); correspondence with D. Claussen regarding confirmation objection (.1)	2.00	\$1,870.00
B320	11/01/24	CG	Analyze and discuss possible arguments in support of postponement of voting and tabulation	0.20	\$110.00
B320	11/01/24	CG	Participate in call regarding confirmation objection with K. Moynihan and E. Seltzer	0.80	\$440.00
B320	11/01/24	DMP	Review notice to creditors regarding investigation report (.1); correspondence with J. Cohen, G. Finizio and K. Moynihan regarding same (.2)	0.30	\$405.00
B320	11/01/24	EJS	Video call w/ K. Moynihan and C. Gauvin re plan objection strategy (.8); prepare materials re same (.2)	1.00	\$715.00
B320	11/01/24	EJS	Coordinate logistics for Confirmation Hearing	0.30	\$214.50
B320	11/01/24	GF	Emails with J. Cohen and D. Posner regarding committee voting/investigation letter (.2); update committee letter (.5); prepare notice regarding extension to file committee letter (.4); review liquidating plan precedent regarding indemnification provisions (.4)	1.50	\$1,612.50
B320	11/01/24	GF	Emails with K. Moynihan regarding standing letter (.2); call with K. Moynihan regarding plan objection (.4); emails with K. Hackbart and K. Moynihan regarding ballot request (.1); review updated plan objection outline (.2)	0.90	\$967.50
B320	11/01/24	JC	Multiple correspondence with Debtors and PBI counsel regarding: settlement letter	0.80	\$1,132.00
B320	11/01/24	JC	Review and comment on investigation letter	1.40	\$1,981.00
B320	11/01/24	KEM	Call with G. Finizio regarding confirmation objection (.5); draft confirmation objection (5.5); call with E. Seltzer and C. Gauvin regarding confirmation objection and discovery (.8); call with D. Posner regarding confirmation objection and depositions (.4); correspondence with A. Cohen and committee member regarding committee member ballot (.2)	7.40	\$6,919.00
B320	11/02/24	DMP	Conference call with R. Newman and A. Gonzalez regarding declaration in support of objection to confirmation	0.30	\$405.00
B320	11/02/24	EJS	Correspondence with K. Moynihan re plan objection	0.10	\$71.50
B320	11/02/24	GF	Review plan supplement (.7); pre-call with D. Posner prior to all hands settlement call (.1); participate in all hands settlement call (.6); prepare summary of call (.2); emails with D. Posner and K. Moynihan regarding settlement call (.1)	1.70	\$1,827.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/02/24	KEM	Draft confirmation objection (6.1); correspondence with E. Mannix regarding depositions and confirmation objection (.3); call with G. Finizio regarding settlement (.3); review plan supplement (.3); correspondence with R. Newman and A. Gonzalez regarding confirmation objection (.1); correspondence with E. Seltzer regarding same (.1)	7.20	\$6,732.00
B320	11/02/24	MAK	Review potential exhibits for deposition of M. Shea (3.6); review and analyze PBI responses to committee discovery (.9); review potential exhibits for deposition of E. Kaup (1.8)	6.30	\$6,489.00
B320	11/03/24	EGM	Call with Lowenstein and Alvarez & Marsal teams re settlement negotiations	0.60	\$519.00
B320	11/03/24	EGM	Call with K. Moynihan re confirmation objection strategy	0.50	\$432.50
B320	11/03/24	JC	Multiple correspondence with LS team re: settlement discussions with PBI and Debtors	1.30	\$1,839.50
B320	11/03/24	KEM	Draft confirmation objection (7.9); research regarding same (1.8); correspondence with G. Finizio regarding same (.3); call with LS and A&M teams regarding settlement (.6).	10.60	\$9,911.00
B320	11/03/24	MAK	Conference call with LS and A&M team re: settlement proposal	0.50	\$515.00
B320	11/04/24	CG	Participate in team meeting regarding confirmation objection and alter ego theory	0.50	\$275.00
B320	11/04/24	DMP	Conference call with Lowenstein and A&M regarding confirmation objection strategy (.5); review counter proposal from Gibson/Weil (.2)	0.70	\$945.00
B320	11/04/24	GF	Call with A&M team regarding alter ego theories (.6); call with K. Moynihan regarding confirmation objection (.5); review and revise drafts of confirmation objection (6.3); analysis of PBI settlement counterproposal (.3); update committee's plan voting recommendation letter (.3)	8.00	\$8,600.00
B320	11/04/24	JC	Review and discuss settlement construct with D. Posner and team	1.40	\$1,981.00
B320	11/04/24	JC	Review and discuss PBI settlement proposal	1.40	\$1,981.00
B320	11/04/24	KEM	Call with G. Finizio regarding confirmation objection (.6); review redline of confirmation objection (.2); revise confirmation objection (.2); review settlement counteroffer (.2); correspondence with D. Posner and G. Finizio regarding counteroffer (.1); call with LS and A&M teams regarding confirmation objection (.6)	1.90	\$1,776.50
B320	11/05/24	DMP	Review voting letter final and email comments regarding same (.2); correspondence with G. Finizio and J. Cohen regarding same (.2)	0.40	\$540.00
B320	11/05/24	EJS	Call with K. Moynihan re confirmation objection	0.20	\$143.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/05/24	GF	Call with Spot's counsel regarding voting ballots (.3); update plan voting letter for filing (.3); emails with A. Kropp regarding settlement status (.1); continue updating confirmation brief (4.8); call with E. Mannix and K. Moynihan regarding alter ego arguments (.1); review deposition transcripts to update brief (1.4); emails with Ambi Robotics regarding voting ballots (.3)	7.30	\$7,847.50
B320	11/05/24	JC	Review and comment on PBI settlement counteroffer	1.10	\$1,556.50
B320	11/05/24	KEM	Draft confirmation objection (2.5); calls with G. Finizio regarding confirmation objection (.6); correspondence with E. Seltzer regarding same (.2); call with E. Seltzer regarding same (.2); call with G. Finizio and E. Mannix regarding same (.2); correspondence with G. Finizio regarding settlement (.1)	3.80	\$3,553.00
B320	11/06/24	EGM	Meetings with M. Kaplan, D. Posner and G. Finizio re settlement discussions (.3); attend to emails re settlement counteroffers and discussions with Debtors and Pitney Bowes related to same (.5)	0.80	\$692.00
B320	11/06/24	EJS	Review settlement terms and related correspondence with Lowenstein team	0.30	\$214.50
B320	11/06/24	GF	Update internal side-by-side analysis for committee call (.5); continue to revise confirmation brief (1.1); call with L. Tauro and M. Kaplan regarding confirmation deadlines (.1); prepare counterproposal letter for plan settlement (2.3); prepare revisions to same (.3); emails with K. Moynihan regarding settlement letter (.1)	4.40	\$4,730.00
B320	11/06/24	JC	Settlement discussions with M. Shea	0.40	\$566.00
B320	11/06/24	JC	Review and revise multiple versions of revised settlement letter	0.80	\$1,132.00
B320	11/06/24	KEM	Review revised term sheet (.2); correspondence with J. Cohen, D. Posner, G. Finizio and R. Newman regarding same (.5); revise term sheet (.2); call with M. Kaplan and G. Finizio regarding confirmation objection and settlement (.1); correspondence with E. Seltzer regarding deposition transcript review (.1)	1.10	\$1,028.50
B320	11/06/24	MAK	Conference call with M. Hilty re: litigation strategy	0.30	\$309.00
B320	11/06/24	MAK	Conference call with MWE team re: confirmation litigation strategy	0.50	\$515.00
B320	11/06/24	MAK	Review and analyze rough deposition transcripts to begin creating outlines for confirmation witness examinations	5.40	\$5,562.00
B320	11/07/24	DMP	Call with R. Newman regarding claims pool questions (.2); review BRG deck regarding category 1 and 2 creditors (.2); review stipulation extending confirmation objection deadline (.1)	0.50	\$675.00
B320	11/07/24	EGM	Attend to emails from R. Newman and G. Finizio re settlement discussions with Debtors and Pitney Bowes	0.50	\$432.50
B320	11/07/24	EJS	Review settlement counter-proposals and related correspondence	0.30	\$214.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/07/24	GF	Call with L. Tauro regarding settlement (.1); call with K. Martorana regarding settlement (.2); email report to team regarding call with K. Martorana (.2); call with M. Helt regarding settlement (.4); emails with K. Moynihan regarding confirmation objection (.1); call with M. Kaplan regarding confirmation deadlines (.1); prepare revised settlement letter (.5) and email to A&M team regarding same (.2)	1.80	\$1,935.00
B320	11/07/24	GF	Call with R. Newman regarding claims pool questions (.2); review BRG deck regarding category 1 and 2 creditors (.2); review stipulation extending confirmation objection deadline (.1) and emails with K. Moynihan regarding same (.1)	0.60	\$645.00
B320	11/07/24	JC	Settlement discussions with M. Shea, D. Posner and G. Finizio	1.40	\$1,981.00
B320	11/07/24	JC	Review and revision to multiple versions of settlement letter	1.20	\$1,698.00
B320	11/07/24	KEM	Correspondence with E. Seltzer regarding deposition testimony (.2); correspondence from J. Cohen, D. Posner, G. Finizio and R. Newman regarding settlement terms (.5); review MWE insert for confirmation objection (.3); review correspondence from M. Shea regarding settlement proposal (.1); review deposition testimony for confirmation objection (.5); review stipulation extending confirmation objection deadline (.1); correspondence with G. Finizio regarding same (.1); call with M. Kaplan regarding same (.1); review revised counterproposal (.1)	2.00	\$1,870.00
B320	11/07/24	MAK	Review and analyze rough deposition transcripts to continue creating outlines for confirmation witness examinations	4.70	\$4,841.00
B320	11/07/24	MAK	Review and analyze Oaktree confirmation insert	1.80	\$1,854.00
B320	11/08/24	DMP	Review Harbor plan objection	0.20	\$270.00
B320	11/08/24	DMP	Emails with G. Finizio and J. Cohen regarding next steps for plan settlement (.2); emails with A&M regarding plan settlement (.2); call with G. Finizio (2x) regarding settlement status (.2); call with Spot Freight's counsel regarding plan settlement (.7); follow up email to Spot Freight (.1); call with G. Finizio and J. Cohen regarding next steps (.2); telephone calls (x2) K. Martorana regarding settlement (.3); call with J. Cohen and G. Finizio regarding call with K. Martorana (.2); review and analysis of Debtors'/PBI's counter and committee response regarding analysis of open issue regarding avoidance actions (1.8); multiple calls and emails with G. Finizio and J. Cohen regarding same (.8)	4.70	\$6,345.00
B320	11/08/24	EGM	Attend to emails from J. Cohen, D. Posner and G. Finizio re potential settlement updates	0.30	\$259.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/08/24	GF	Emails with D. Posner and J. Cohen regarding next steps for plan settlement (.2); emails with A&M regarding plan settlement (.2); call with D. Posner (2x) regarding settlement status (.2) call with Spot Freight's counsel regarding plan settlement (.7); follow up email to Spot Freight (.1); review Liberty Insurance limited plan objection (.2); review Harbor plan objection (.2); call with D. Posner and J. Cohen regarding next steps (.2); emails with K. Moynihan regarding stipulation to extend plan settlement	2.00	\$2,150.00
B320	11/08/24	JC	Strategy calls with D. Posner, G. Finizio re: ongoing settlement discussions	1.30	\$1,839.50
B320	11/08/24	JC	Review filed objections to plan confirmation	1.40	\$1,981.00
B320	11/08/24	KEM	Correspondence with L. Tauro regarding confirmation stipulation (.1); call with L. Tauro regarding same (.1); correspondence with G. Finizio regarding same (.1); correspondence with E. Seltzer regarding confirmation objection (.1); review deposition citations for confirmation objection (.2); calls with G. Finizio regarding settlement and confirmation (.5); review settlement term sheet (.3); correspondence from J. Cohen, D. Posner, G. Finizio and R. Newman regarding settlement (.4)	1.80	\$1,683.00
B320	11/08/24	MAK	Review and analyze rough deposition transcripts to continue creating outlines for confirmation witness examinations (3.3); review and analyze potential exhibits for confirmation hearing (1.9)	5.20	\$5,356.00
B320	11/09/24	DMP	Exchanges with G. Finizio and K. Moynihan regarding plan settlement status and next steps	0.10	\$135.00
B320	11/09/24	GF	Exchanges with D. Posner and K. Moynihan regarding plan settlement status and next steps	0.10	\$107.50
B320	11/11/24	DMP	Review UST objection to confirmation	0.70	\$945.00
B320	11/11/24	EJS	Review UST and Harbor confirmation objections (.4); draft summary for Lowenstein team (.2); email correspondence with internal team re same (.1)	0.70	\$500.50
B320	11/11/24	GF	Review objections to plan confirmation (1.2); review plan regarding implementation of settlement construct to same (.5)	1.70	\$1,827.50
B320	11/11/24	JC	Review UST and Harbor plan objections	1.20	\$1,698.00
B320	11/11/24	KEM	Call with D. Posner, G. Finizio, L. Tauro and A. Cohen regarding plan and confirmation hearing (.4); email to J. Cohen, M. Kaplan and E. Mannix regarding same (.3); call with G. Finizio regarding same (.1); review E. Seltzer email regarding objections to confirmation (.1)	0.90	\$841.50
B320	11/12/24	DMP	Review and revise RoR regarding confirmation and settlement (.2); correspondence with Lowenstein team regarding same (.2); review voting declaration (.2)	0.60	\$810.00
B320	11/12/24	EJS	Review Shipmonk and Chubb confirmation objections (.7); prepare summary and analysis of same for Lowenstein team (.5); review Plan redline from Weil re insurance language (.2); email correspondence with Lowenstein team re settlement issues (.3)	1.70	\$1,215.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/12/24	EJS	Email correspondence with Lowenstein team re settlement status (.1); review Committee's reservation of rights (.1); review additional confirmation objections (.4) and draft summary of same (.6); related email correspondence with Lowenstein team (.1); review Weil Plan draft (.4)	1.70	\$1,215.50
B320	11/12/24	GF	Emails with K. Moynihan regarding revisions to Plan reservation of rights (.3); emails with L. Tauro regarding reservation of rights and next steps (.1); review revised Reservation of Rights (.1); analysis of draft amended plan (3.4) and confirmation order (1.3); email to K. Moynihan regarding comments to plan (.9); review K. Moynihan comments to plan (.2) and respond to same (.1); review Chubb plan objection (.2); review notice of reconstitution of committee (.1)	6.70	\$7,202.50
B320	11/12/24	KEM	Draft reservation of rights regarding confirmation (.5); correspondence with J. Cohen and G. Finizio regarding same (.3); revise reservation of rights (.4); review and analysis of amended plan issues with G. Finizio (.1); correspondence with N. Rowles regarding reservation of rights filing (.1); correspondence with E. Seltzer regarding confirmation objections (.1); review amended plan (1.4); correspondence with G. Finizio regarding same (.2); review G. Finizio comments to amended plan (.2); email to J. Cohen and D. Posner regarding amended plan issues (.4); call with G. Finizio regarding letter in support of confirmation (.1); draft letter in support of confirmation (.5)	4.30	\$4,020.50
B320	11/13/24	DMP	Review K. Moynihan and G. Finizio comments and questions on markup of the plan (.3); review marked plan re settlement (1.7); review confirmation order (.7); correspondence with J. Cohen, G. Finizio and K. Moynihan regarding plan markup (.3); review settlement correspondence against markup of plan (.9); review Lowenstein proposed edits to plan (.8); correspondence with G. Finizio, J. Cohen and K. Moynihan regarding further edits to plan per Lowenstein markup (.3)	5.00	\$6,750.00
B320	11/13/24	EJS	Review Plan and Confirmation Order redlines from Weil in connection with settlement (.8); email correspondence with Lowenstein team re same (.2) call with K. Moynihan re Committee letter in support of confirmation (.2); review and synthesize settlement term sheets in connection with same (1.1); draft Committee letter in support of confirmation (5.9); calls (.4) and correspondence (.3) with K. Moynihan re same	8.90	\$6,363.50
B320	11/13/24	GF	Emails with J. Cohen regarding plan markup (.2); emails with L. Tauro regarding plan comments (.1); prepare comments to confirmation order (1.3); review updated draft of second amended plan (.6); prepare additional comments to second amended plan (1.7); review draft witness and exhibit list for confirmation hearing (.3); review draft letter in support of confirmation (.5); emails with K. Moynihan regarding next steps for chapter 11 plan (.2)	4.90	\$5,267.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/13/24	JC	Review draft of second amended plan and comment re: same	3.20	\$4,528.00
B320	11/13/24	JC	Review and discuss plan objections with E. Seltzer	1.30	\$1,839.50
B320	11/13/24	JC	Review and comment on proposed edits to draft of second amended plan and draft confirmation order	1.60	\$2,264.00
B320	11/13/24	KEM	Correspondence with J. Cohen, D. Posner, and G. Finizio regarding Plan (.7); calls with G. Finizio regarding same (.6); email to E. Seltzer regarding letter in support of confirmation (.2); calls with E. Seltzer regarding letter in support of confirmation (.7); revise plan (3.2); review confirmation order (.6); correspondence with G. Finizio regarding same (.1); correspondence with D. Posner and G. Finizio regarding confirmation hearing witness and exhibit list (.1); review draft letter in support of plan (.4)	6.60	\$6,171.00
B320	11/14/24	DMP	Review G. Finizio further edits to plan re settlement (.1); correspondence with G. Finizio, J. Cohen and K. Moynihan regarding plan language (.5); review revisions to plan and confirmation order received from Weil (.5); correspondence with J. Cohen, G. Finizio and K. Moynihan regarding same (.3)	1.40	\$1,890.00
B320	11/14/24	EGM	Review comments to amended plan and emails from G. Finizio, K. Moynihan, and J. Cohen re same (.5); emails from K. Moynihan on confirmation order (.3)	0.80	\$692.00
B320	11/14/24	EJS	Review (.2) and summarize (.2) Federal Insurance Company Confirmation Objection; call with K. Moynihan re Committee Letter in support of Confirmation (.1); revise same (2.4); follow-up email correspondence with G. Finizio and K. Moynihan re same (.1)	3.00	\$2,145.00
B320	11/14/24	EJS	Email correspondence with D. Posner and J. Finizio re Confirmation Hearing (.2); prepare materials for same (3.5)	3.70	\$2,645.50
B320	11/14/24	GF	Emails with K. Moynihan regarding plan markup (.2); review final plan markup prior to circulating same to Weil (.5); emails with L. Tauro regarding plan markup (.2); emails with E. Seltzer regarding confirmation hearing binders (.1); review revised plan markup from Weil (1.1); prepare list of open issues (.5); multiple calls with L. Tauro regarding plan issues (.4); prepare edits to letter in support of plan (2.1); confer with D. Posner on next steps for plan (.1); emails with A&M team regarding letter in support of plan (.2); review updated letter in support of plan (.3); emails with E. Seltzer and K. Moynihan regarding letter in support of plan (.1)	5.80	\$6,235.00
B320	11/14/24	JC	Further review of plan and confirmation order redlines	2.10	\$2,971.50
B320	11/14/24	JC	Multiple correspondence with committee members re: proposed redline of amended plan	1.10	\$1,556.50
B320	11/14/24	JC	Review next round of plan and confirmation redlines circulated by Debtors incorporating UCC and PBI comments	2.60	\$3,679.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/14/24	KEM	Revise plan (.3); correspondence with G. Finizio regarding same (.2); correspondence with N. Rowles regarding confirmation witness and exhibit list (.1); email to L. Tauro and A. Cohen regarding revised plan (.2); call with E. Seltzer regarding letter in support of confirmation (.1); calls with G. Finizio regarding amended plan (.3); review revised confirmation order (.1); correspondence with G. Finizio regarding same (.1); revise letter in support of confirmation (.4); correspondence with G. Finizio regarding same (.1); correspondence from R. Newman regarding recovery ranges (.1); review revised plan with PBI comments (.5); correspondence from J. Cohen and G. Finizio regarding same (.2)	2.70	\$2,524.50
B320	11/15/24	DMP	Extensive correspondence with J. Cohen, G. Finizio and K. Moynihan regarding plan language, avoidance actions and crafting language (1.2); correspondence with Gibson regarding plan language (.3); review email from J. Cannizzaro regarding comments to plan language (.2)	1.70	\$2,295.00
B320	11/15/24	EJS	Review Weil Plan markups (.5); revise Committee Letter in support of Confirmation re same (1.4); email correspondence with J. Finizio and K. Moynihan re Confirmation Hearing adjournment, strategy, and next steps (.3)	2.20	\$1,573.00
B320	11/15/24	GF	Review multiple drafts of updated plan and prepare comments to same (3.2); emails with K. Moynihan regarding open issues on plan (.2); call with PBI's counsel regarding plan issues (.5); email report to team regarding call with PBI (.1); call with K. Moynihan regarding plan negotiations (.3); emails with J. Cohen and D. Posner regarding next steps on plan (.2); prepare additions to draft letter in support of plan (.5); calls with L. Tauro regarding confirmation hearing (.2); call with D. Posner regarding plan status (.1); review latest redline of confirmation order (.3)	5.60	\$6,020.00
B320	11/15/24	JC	Multiple correspondence with G. Finizio and D. Posner re: dispute over plan language with PBI	1.20	\$1,698.00
B320	11/15/24	JC	Review redlines to address open plan issue	1.60	\$2,264.00
B320	11/15/24	JC	Telephone calls with M. Shea re: plan disputed language	1.10	\$1,556.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/15/24	KEM	Prepare list of remaining Plan issues (.4); correspondence with G. Finizio regarding same (.2); prepare for call with M. Bishop regarding plan (.3); call with G. Finizio and M. Bishop regarding Plan (.2); email to J. Cohen and D. Posner regarding same (.2); revise Plan (.9); calls with G. Finizio regarding plan (.6); review and analysis of claims reconciliation issues (.3); correspondence with G. Finizio regarding same (.1); review stipulation adjourning confirmation hearing (.1); correspondence with R. Lindsey regarding same (.1); correspondence with R. Newman regarding confirmation hearing (.1); review witness and exhibit list (.1); correspondence with N. Rowles regarding same (.1); correspondence with E. Seltzer regarding confirmation hearing and letter in support of confirmation (.1); review revised letter in support of confirmation (.1); correspondence from J. Cohen and G. Finizio regarding outstanding plan issues (.2); review revisions to avoidance action language in plan (.1)	4.20	\$3,927.00
B320	11/16/24	DMP	Review email and mark up received from Gibson (.5); correspondence with G. Finizio, J. Cohen and K. Moynihan regarding same (.3); review proposed response to Gibson changes (.2); correspondence with Gibson and Lowenstein regarding additional edits to plan language (.3); review draft of letter in support of confirmation (.4)	1.70	\$2,295.00
B320	11/16/24	EJS	Email correspondence with J. Finizio re Committee Letter ISO Confirmation (.1); review latest version of Plan re same (.3); revise Letter in support of Confirmation (.6)	1.00	\$715.00
B320	11/16/24	GF	Review plan markups from PBI's counsel (.6); emails with team regarding plan markup (.2); call with K. Martorana regarding plan markup (.1); emails with A&M regarding recovery tables (.2); emails with committee professionals regarding potential committee call on November 18 (.2); prepare further revised plan markup (.6); review contractual privity analysis regarding plan revisions (.3)	2.20	\$2,365.00
B320	11/16/24	KEM	Review revised letter in support of confirmation (.1); revise same (.3); correspondence with G. Finizio and E. Seltzer regarding same (.1); email to J. Cohen and D. Posner regarding same (.1); review correspondence from K. Martorana regarding revised Plan (.1); review plan revisions (.2); correspondence from G. Finizio regarding avoidance action language (.2)	1.10	\$1,028.50
B320	11/17/24	DMP	Review revised plan language from Gibson (.4); correspondence with G. Finizio, J. Cohen and K. Moynihan regarding same (.3)	0.70	\$945.00
B320	11/17/24	GF	Review Plan markups from PBI and prepare edits to same (.5); emails with K. Martorana regarding next steps on plan process (.2); review A&M recovery tables (.3); call with R. Newman regarding A&M demonstrative (.1); review updated demonstrative (.1); revise email to committee regarding call to discuss plan settlement (.1)	1.30	\$1,397.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/17/24	KEM	Correspondence with G. Finizio regarding amended plan and recoveries (.2); correspondence from K. Martorana regarding plan amendments (.1); review A&M deck regarding plan amendments (.1); review revised plan (.2)	0.60	\$561.00
B320	11/18/24	DMP	Review Weil markup of Plan (.2); review draft of plan support letter (.2); correspondence with J. Cohen and E. Seltzer regarding same (.2); telephone call with L. Tauro and G. Finizio regarding revisions to plan (.2); review G. Finizio proposed revisions and correspondence regarding same (.2); review edits to confirmation order received from Weil (.2); correspondence with K. Martorana regarding edits to plan language (.5); review comments to confirmation order from K. Martorana (.1); review draft of committee letter in support of plan (.5); review further edits to plan (.5)	2.80	\$3,780.00
B320	11/18/24	EJS	Continue review and markup of Plan (2.1); call with K. Moynihan re creditor recoveries (.2); revise Committee Letter In Support of Confirmation (3.5); email correspondence with Lowenstein team including J. Cohen, D. Posner, G. Finizio, and K. Moynihan re issues in connection with same (.9)	6.70	\$4,790.50
B320	11/18/24	GF	Review revised letter in support of plan (.2); call with L. Tauro regarding plan (.2); call with D. Posner regarding plan edits (.2); call with K. Martorana regarding plan edits (.1); review revised language to add to plan (.7); review declarations in support of plan (.5); multiple calls with K. Moynihan regarding plan status (.3); review redline of confirmation order (.2); review emails from Weil with additional plan comments (.2); emails with K. Moynihan regarding confirmation order (.1); review debtors' confirmation brief (.4); review witness and exhibit lists for confirmation hearing (.2)	3.30	\$3,547.50
B320	11/18/24	JC	Review further redline of plan and confirmation order from Debtors' counsel	0.90	\$1,273.50
B320	11/18/24	JC	Review draft UCC statement in support letter and comment re: same	1.10	\$1,556.50
B320	11/18/24	KEM	Review amended plan (.5); correspondence with G. Finizio regarding same (.1); review correspondence from J. Cohen, G. Finizio and E. Seltzer regarding letter in support of confirmation (.3); call with E. Seltzer regarding letter in support of confirmation (.1); review revised letter (.4); correspondence with E. Seltzer regarding same (.2); calls with G. Finizio regarding Plan (.3); email to C. Gibbs regarding confirmation hearing (.1); correspondence with J. Mezzatesta regarding plan (.1); correspondence with J. Bishop (MWE) regarding confirmation hearing preparation (.2); review amended confirmation order (.2); correspondence with G. Finizio and D. Perry regarding amended plan (.2)	2.70	\$2,524.50
B320	11/19/24	DC	Download Plan and Disclosure Statement pleadings to electronic folders and circulate Notice of Agenda for Confirmation Hearing	0.50	\$182.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/19/24	DMP	Review letter in support of confirmation (.5); correspondence with G. Finizio and J. Cohen regarding clarifying language in plan re Avoidance Actions (.5); correspondence with L. Tauro and K. Martorana regarding same (.4); correspondence with J. Cannizzaro regarding same (.3); correspondence with G. Finizio, J. Cohen, K. Moynihan, E. Mannix and E. Seltzer regarding clarifying language in plan (.3); correspondence with M. Williams and K. Martorana regarding clarifying language (.3); correspondence with L. Tauro and G. Finizio regarding language and insertion in an amended plan (.3); correspondence with E. Seltzer regarding letter in support of plan and modifications thereto (.3); review Trilogy emergency motion to continue confirmation and objection to confirmation (.3); confer with K. Moynihan and G. Finizio regarding emergency motion and confirmation hearing (.4)	3.60	\$4,860.00
B320	11/19/24	EGM	Review Committee letter in support of confirmation (.3); review revisions to same (.1); email N. Rowles re filing of Committee letter (.1); review and analyze motion Trilogy motion to continue confirmation (.3); email Lowenstein team re same (.1); review draft avoidance action language for amended plan and send revisions to G. Finizio (.2); call with G. Finizio re same (.1); review draft third amended plan and discuss same with G. Finizio (.1)	1.30	\$1,124.50
B320	11/19/24	EJS	Finalize Committee Letter in support of confirmation (2.2); email correspondence with Lowenstein team re same (.6); review Trilogy confirmation objection (.3); review Third Amended Plan and associated filings ahead of confirmation (.3); email correspondence with Lowenstein team re issues in connection with confirmation (.7)	4.10	\$2,931.50
B320	11/19/24	GF	Multiple emails with Gibson Dunn team regarding Avoidance Actions (.3); call with K. Martorana regarding Avoidance Actions (.1); emails with committee members regarding updated plan (.3); calls and emails with E. Mannix regarding additional language on Avoidance Actions (.2); correspondence with D. Posner and J. Cohen regarding plan strategy (.2); call with RXO's counsel regarding updated plan (.2); emails with L. Tauro regarding updated plan (.1); review updated letter in support of plan (.1); emails with E. Seltzer and E. Mannix regarding letter in support of plan (.2); review Oaktree reply in support of plan (.1); prepare for confirmation hearing (1.6); review Trilogy emergency motion to extend confirmation (.2); call with L. Tauro regarding Trilogy motion (.2); email to team regarding discussions with Weil on Trilogy (.1); emails with M. Helt and C. Gibbs regarding status of confirmation hearing (.3)	4.20	\$4,515.00
B320	11/19/24	JC	Multiple correspondence with PBI counsel re: plan language	1.20	\$1,698.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/19/24	KEM	Review Trilogy motion to continue confirmation hearing (.2); review and analysis of same with G. Finizio (.2); correspondence from G. Finizio and C. Gibbs regarding same (.1); correspondence from J. Cohen, G. Finizio and L. Tauro regarding amendments to plan (.2); correspondence from E. Mannix and E. Seltzer regarding Committee letter (.1)	0.80	\$748.00
B320	11/20/24	EJS	Call with G. Finizio re same (.2); draft Committee hearing summary (.5); email correspondence with LS team re same (.3); revise hearing summary (.2)	1.20	\$858.00
B320	11/20/24	GF	Review voting declaration (.2); review second plan supplement (.2); review updated hearing agendas (.1); call with E. Seltzer regarding committee email regarding confirmation hearing (.1); review and revise committee email (.2)	0.80	\$860.00
B320	11/20/24	JC	Review plan supplement, confirmation brief, declarations and related filings	2.20	\$3,113.00
B320	11/20/24	MAK	Review and analyze confidentiality designations of deposition transcripts by PBI and Debtor	2.20	\$2,266.00
B320	11/21/24	DC	Review amended plan pleadings and update electronic case files	0.60	\$219.00
B320	11/21/24	DMP	Review second plan supplement in particular budget and independent managers (.2); correspondence with J. Cohen and G. Finizio regarding same (.2); correspondence with L. Tauro regarding same (.2)	0.60	\$810.00
B320	11/21/24	EGM	Review and analyze Second Plan Supplement and email from G. Finizio re same	0.20	\$173.00
B320	11/21/24	GF	Emails with D. Posner and J. Cohen regarding plan supplement filing (.2); call with D. Posner regarding plan supplement filing (.1); emails from L. Tauro regarding confirmation updates (.1); review conditions to effective date (.1); review Highland Capital case regarding exculpation relief (.6); listen to audio excerpts from confirmation hearing regarding next steps (.4)	1.50	\$1,612.50
B320	11/21/24	JC	Review revised plan supplement and related wind down budget	0.40	\$566.00
B320	11/21/24	KEM	Correspondence from J. Cohen, D. Posner, and G. Finizio regarding wind down budget (.1); review wind down budget (.1)	0.20	\$187.00
B320	11/22/24	DMP	Conference call with Weil and G. Finizio regarding wind down budget and post-effective date structure (.5); telephone calls with M. Shea (x2) regarding same (.8).	1.30	\$1,755.00
B320	11/22/24	EGM	Review Trilogy statement regarding plan confirmation (.1); review emails from G. Finizio and J. Cohen re revised schedule of retained causes of action (.2)	0.30	\$259.50
B320	11/22/24	EJS	Review Trilogy statement re Plan objection (.1); internal correspondence with Lowenstein team re next steps in connection with same (.1)	0.20	\$143.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/22/24	GF	Emails with K. Moynihan regarding winddown budget (.2); review Trilogy statement regarding plan confirmation and email to team regarding same (.1); review draft plan supplement from Weil (.2); prepare edits to plan supplement (.5); call with Weil team regarding winddown budget and prepare email report to team regarding same (.6); follow up calls with D. Posner regarding winddown budget (.3)	1.90	\$2,042.50
B320	11/22/24	JC	Telephone call with D. Posner re: liquidating trust discussion with Weil	0.60	\$849.00
B320	11/22/24	KEM	Review email from G. Finizio regarding wind down budget (.1); correspondence from G. Finizio regarding schedule of retained causes of action (.1)	0.20	\$187.00
B320	11/23/24	DMP	Review schedule of potential avoidance actions to be filed as plan supplement (.2); correspondence with J. Cohen, G. Finizio and K. Moynihan regarding same and regarding revisions to same (.3)	0.50	\$675.00
B320	11/23/24	GF	Emails with K. Moynihan and Weil team regarding edits to plan supplement filing (.2); emails with J. Cohen and L. Tauro regarding comments to plan supplement filing (.2); review schedules and compare same to list of retained avoidance actions (1.0)	1.40	\$1,505.00
B320	11/23/24	KEM	Review retained causes of action schedule (.1); correspondence with J. Cohen, G. Finizio, E. Mannix, and L. Tauro regarding same (.2)	0.30	\$280.50
B320	11/24/24	DMP	Review revised schedule of potential avoidance actions (.2); correspondence with G. Finizio and K. Moynihan regarding same (.2); correspondence with L. Tauro regarding same (.2); correspondence with D. Perry, counsel to Ryder, regarding same (.2); review confirmation order (.3); correspondence with G. Finizio and K. Moynihan regarding same (.1)	1.20	\$1,620.00
B320	11/24/24	EJS	Review internal correspondence and Committee email re status of Plan and confirmation	0.30	\$214.50
B320	11/24/24	GF	Prepare for continued confirmation hearing	0.30	\$322.50
B320	11/24/24	GF	Review revised confirmation order (.2); emails with K. Moynihan regarding confirmation order (.1)	0.30	\$322.50
B320	11/24/24	KEM	Review revised confirmation order (.1); correspondence with J. Mezzatesta regarding same (.1)	0.20	\$187.00
B320	11/25/24	DC	Download and circulate supplemental plan documents	0.30	\$109.50
B320	11/25/24	DMP	Telephone call with L. Tauro regarding effective date and independent director	0.20	\$270.00
B320	11/25/24	GF	Review as-filed confirmation order	0.20	\$215.00
B320	11/26/24	DMP	Correspondence and calls with L. Taura regarding post effective date structure and independent managers (.4); correspondence with G. Finizio and J. Cohen regarding same (.2); correspondence with M. Shea regarding same (.3)	0.90	\$1,215.00
B320	11/26/24	EJS	Review entered Confirmation Order and Committee correspondence re Effective Date planning	0.20	\$143.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/26/24	GF	Emails with D. Posner and J. Cohen regarding winddown budget (.1); correspondence with D. Posner regarding oversight board work (.1); review plan supplement regarding independent manager costs (.1)	0.30	\$322.50
B320	11/26/24	KEM	Correspondence from J. Cohen and D. Posner regarding independent director post-effective date fees	0.20	\$187.00
B320	11/27/24	GF	Emails with L. Tauro regarding effective date	0.20	\$215.00
B320	11/27/24	KEM	Review correspondence from G. Finizio and L. Tauro regarding opt-in letter and effective date	0.10	\$93.50
B320	12/02/24	DMP	Telephone call with L. Tauro regarding independent directors, opt in letter and effective date (.2); confer with G. Finizio regarding same (.2)	0.40	\$540.00
B320	12/02/24	GF	Review draft of Opt-In letter from Weil	1.10	\$1,182.50
B320	12/03/24	DMP	Review opt in letter (.8); review Liquidating Agent Agreement (.3); correspondence with G. Finizio, K. Moynihan, E. Seltzer and J. Cohen regarding opt in letter and Liquidating Trust Agreement (.3); review G. Finizio mark up of Liquidating Agent Agreement and email re same (.1)	1.50	\$2,025.00
B320	12/03/24	EJS	Review and comment on Opt-In Letter (1.3); email correspondence with G. Finizio and K. Moynihan re same (.2)	1.50	\$1,072.50
B320	12/03/24	GF	Review draft liquidating agreement (.4); prepare comments to liquidation agreement (.5); compare plan provisions to opt-in letter (.5); prepare comments to draft opt-in letter (2.6); correspondence with K. Moynihan, E. Seltzer, and D. Posner regarding opt-in letter (.3)	4.30	\$4,622.50
B320	12/03/24	KEM	Review opt-in letter draft (.4); review and analysis of same with G. Finizio (.2); correspondence from G. Finizio and E. Seltzer regarding same (.2); revise opt-in letter (1.1); review Liquidating Agent Agreement (.3)	2.20	\$2,057.00
B320	12/04/24	DC	Review plan documents and docket for entry of Notice of Effective Date	0.30	\$109.50
B320	12/04/24	DMP	Correspondence with LS team regarding trust over sight board (.2); correspondence with creditors regarding same (.2); correspondence with Weil regarding markups of Liquidating Agent Agreement and Opt-In letter (.2); correspondence with G. Finizio and K. Moynihan regarding changes to Opt-In letter (.3)	0.90	\$1,215.00
B320	12/04/24	GF	Emails with K. Moynihan regarding markups of opt-in letter and liquidating agent agreement (.2); review updated liquidating agent agreement from Weil (.2); review email from J. Mezzatesta regarding opt-in letter (.2) and email to K. Moynihan regarding same (.1); review proposed edits to opt-in letter (.3)	1.00	\$1,075.00
B320	12/04/24	KEM	Email to Weil regarding Liquidating Agent agreement and opt-in letter (.1); correspondence with G. Finizio regarding revised opt-in letter (.2); correspondence from J. Cohen and G. Finizio regarding oversight board (.1); review revised liquidating agent agreement (.1)	0.50	\$467.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	12/05/24	DMP	Review Opt-In letter (.3); review Liquidating Agent Agreement (.5)	0.80	\$1,080.00
B320	12/05/24	GF	Emails with K. Moynihan regarding effective date documents (.1); review Gibson Dunn comments to opt-in letter (.2)	0.30	\$322.50
B320	12/05/24	KEM	Review revisions to opt-in letter (.4); correspondence with G. Finizio and J. Mezzatesta regarding same (.1)	0.50	\$467.50
B320	12/06/24	DMP	Correspondence with E. Seltzer regarding amendment to SSA (.2); correspondence with LS team regarding amendment to schedules (.2); correspondence with L. Tauro and G. Finizio regarding effective date (.2); review motion to extend exclusivity and email from C. Gauvin regarding same (.3)	0.90	\$1,215.00
B320	12/06/24	GF	Emails with Weil team regarding effective date documents (.2); calls with L. Tauro regarding effective date documents (.2); emails with C. Gauvin regarding motion to extend exclusivity (.1); email to D. Posner, J. Cohen and K. Moynihan regarding effective date status (.2)	0.70	\$752.50
B320	12/06/24	KEM	Correspondence from G. Finizio regarding oversight board (.1); review C. Gauvin email regarding motion to extend exclusivity (.1); correspondence from G. Finizio and L. Tauro regarding effective date (.1)	0.30	\$280.50
B320	12/07/24	DMP	Review final of effective date documents (.8); correspondence with E. Setlzer and G. Finizio regarding amendments to LLC agreements (.2); review side letter regarding PBI incremental funding (.2); correspondence with G. Finizio and K. Moynihan regarding liquidating trust agreement (.2)	1.40	\$1,890.00
B320	12/07/24	EJS	Review Opt-In Notice (.2) and Amendments to LLC Agreements (.3); prepare summary of findings (.2); email correspondence with G. Finizio re same (.1)	0.80	\$572.00
B320	12/07/24	GF	Emails with E. Seltzer and K. Moynihan regarding review of effective date documents sent by Weil (.2); review PBI commitment letter (.2); review amended winddown budget and compare to prior draft (.3)	0.70	\$752.50
B320	12/07/24	KEM	Correspondence from G. Finizio and R. Lindsey regarding side letter	0.10	\$93.50
B320	12/08/24	DMP	Review G. Finizio edits to notice of effective date	0.20	\$270.00
B320	12/08/24	EJS	Correspondence with Lowenstein team re Effective Date planning	0.10	\$71.50
B320	12/08/24	GF	Review effective date documents and prepare email to team regarding same (.5); email to Weil regarding comments/questions on effective date documents (.2)	0.70	\$752.50
B320	12/08/24	KEM	Correspondence from G. FInizio regarding effective date	0.10	\$93.50
B320	12/09/24	DMP	Review side letter (.1); correspondence with G. Finizio and Weil team regarding answers to questions and effective date (.2)	0.30	\$405.00
B320	12/09/24	EJS	Review Notice of Effective Date (.1); related correspondence with Lowenstein team (.1)	0.20	\$143.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	12/09/24	GF	Review package of updated closing documents as against confirmed plan and prepare comments to same (2.1); emails with Weil team regarding effective date (.2)	2.30	\$2,472.50
Total B320 - Plan and Disclosure Statement (including Business Plan)				513.10	\$561,674.50
<u>B400 - Bankruptcy-Related Advice</u>					
<u>B410 General Bankruptcy Advice/Opinions</u>					
B410	12/06/24	CG	Review and analyze Debtor's motion to extend exclusivity comfort order (59m); correspond and send Lowenstein's approval to Debtor's counsel (5m)	1.10	\$605.00
Total B410 - General Bankruptcy Advice/Opinions				1.10	\$605.00
<u>B430 Adversary Proceedings and Bankruptcy Court Litigation</u>					
B430	10/01/24	DMP	Review draft of complaint regarding recharaterization of Trilogy leases (.3); correspondence with Lowenstein team regarding same (.2)	0.50	\$675.00
B430	10/01/24	GF	Analysis of Trilogy adversary complaint (.5); confer with L. Citron regarding same (.1)	0.60	\$645.00
B430	10/02/24	KEM	Review Trilogy complaint	0.70	\$654.50
B430	10/08/24	GF	Analysis of Pitney Bowes motion to intervene in Trilogy adversary	0.80	\$860.00
B430	10/09/24	JC	Office call with D. Posner re: legal theory memo	0.80	\$1,132.00
B430	10/14/24	DMP	Correspondence with G. Finizio and Lowenstein team regarding Trilogy lease rejection and objection as well as intervening in adversary proceeding (.2); confer with G. Finizio regarding intervention in Trilogy adversary (.2); review PBI motion to intervene in Trilogy action re contract rejection (.4); review and analysis of intervention issue (.5)	1.30	\$1,755.00
B430	10/14/24	EGM	Call with M. Kaplan re motion to intervene (.3); review and analyze Trilogy adversary complaint and Pitney Bowes' motion to intervene (.8); email R. Zimmerman re same (.1)	1.20	\$1,038.00
B430	10/14/24	GF	Email to team regarding Trilogy matters (.2); research regarding intervention standards in Fifth Cir. (.5)	0.70	\$752.50
B430	10/15/24	EGM	Email R. Zimmerman re motion to intervene	0.30	\$259.50
B430	10/17/24	GF	Review standing motion precedent	1.70	\$1,827.50
B430	10/17/24	KEM	Correspondence with G. Finizio regarding standing motion	0.10	\$93.50
B430	10/17/24	RFZ	Draft motion to intervene	2.60	\$1,690.00
B430	10/18/24	GF	Continue to research standing motion precedent	0.90	\$967.50
B430	10/18/24	KEM	Correspondence with E. Mannix and R. Zimmerman regarding Call with R. Zimmerman regarding motion to intervene (.4); correspondence with R. Zimmerman regarding same (.3);	0.70	\$654.50

B430	10/18/24	KEM	Correspondence from E. Mannix regarding standing motion	0.10	\$93.50
B430	10/18/24	RFZ	Draft motion to intervene	5.60	\$3,640.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	10/21/24	DMP	Review and edit motion to intervene in adversary proceeding	1.20	\$1,620.00
B430	10/22/24	GF	Email to D. Posner regarding motion to intervene	0.10	\$107.50
B430	10/22/24	KEM	Correspondence with D. Posner and G. Finizio regarding motion to intervene (.1); review same (.3)	0.40	\$374.00
B430	10/24/24	GF	Emails with K. Moynihan regarding motion to intervene in Trilogy adversary (.1)	0.10	\$107.50
B430	10/24/24	KEM	Revise motion to intervene (4.1); correspondence with G. Finizio regarding same (.1)	4.20	\$3,927.00
B430	10/25/24	DMP	Review and edit motion to intervene in Trilogy adversary proceeding (1.1); review K. Moynihan and G. Finizio edits to same (.5); correspondence with G. Finizio and K. Moynihan regarding same (.3)	1.90	\$2,565.00
B430	10/25/24	GF	Prepare edits to motion to intervene in Trilogy adversary proceeding (1.5)	1.50	\$1,612.50
B430	10/25/24	JC	Review and comment on draft motion to intervene	1.20	\$1,698.00
B430	10/25/24	KEM	Revise motion to intervene (.3); email to J. Cohen and M. Kaplan regarding same (.1)	0.40	\$374.00
B430	10/27/24	EGM	Review and analyze draft motion to intervene in Trilogy adversary	0.40	\$346.00
B430	10/28/24	DMP	Review G. Finizio of motion to intervene	0.40	\$540.00
B430	10/28/24	GF	Prepare additional edits to motion to intervene in adversary	0.80	\$860.00
B430	10/28/24	KEM	Review G. Finizio revisions to motion to intervene	0.10	\$93.50
B430	10/29/24	CGS	Participate in meeting with R. Chahil re: research for forthcoming preliminary injunction and temporary restraining order motion	0.40	\$260.00
B430	10/29/24	EGM	Draft complaint re declaratory judgment	1.30	\$1,124.50
B430	10/29/24	JC	Strategy call with M. Kaplan re: declaratory relief	0.70	\$990.50
B430	10/29/24	RKC	Confer with M. Kaplan re: TRO/PI brief (0.1); strategize re: same (1.1); confer with C. Stewart re: research re: same (0.5)	1.70	\$1,504.50
B430	10/30/24	CGS	Conduct research re: forthcoming preliminary injunction/temporary restraining order (5); compose legal argument section for forthcoming preliminary injunction and temporary restraining order (2); conduct research re: bankruptcy cases of when debtors list incorrect creditors (3.50)	10.50	\$6,825.00
B430	10/30/24	KEM	Draft standing motion (2.4); call with G. Finizio regarding standing motion (.3)	2.70	\$2,524.50
B430	10/31/24	CG	Review Committee's motion to intervene in adversary proceeding between the Debtor and landlord	0.20	\$110.00
B430	10/31/24	DMP	Review MWE markup of motion to intervene in Trilogy adversary proceeding (.2); correspondence with G. Finizio and K. Moynihan regarding edits to motion to intervene (.2)	0.40	\$540.00
B430	10/31/24	GF	Review docket updates from Trilogy adversary proceeding (.1); emails with K. Moynihan regarding motion to intervene in Trilogy adversary (.2); review revised motion to intervene (.1)	0.40	\$430.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	10/31/24	KEM	Finalize motion to intervene (.1); email to MWE regarding filing of same (.1); review revisions to motion to intervene (.3); correspondence with L. Foody regarding same (.2); revise motion to intervene (.4)	1.10	\$1,028.50
B430	10/31/24	KEM	Draft standing motion	0.40	\$374.00
B430	10/31/24	RKC	Review research from C. Stewart re: PI/TRO motion	0.30	\$265.50
B430	11/01/24	CGS	Conduct research for forthcoming preliminary injunction and temporary injunction motion	5.00	\$3,250.00
B430	11/01/24	RKC	Draft preliminary injunction and temporary restraining order	1.20	\$1,062.00
B430	11/02/24	CGS	Conduct research and apply edits to draft brief for forthcoming preliminary injunction and temporary restraining order	6.00	\$3,900.00
B430	11/02/24	EGM	Continue to draft adversary complaint and review relevant contracts	2.60	\$2,249.00
B430	11/03/24	EGM	Continue to draft adversary complaint and review relevant contracts	7.20	\$6,228.00
B430	11/03/24	RKC	Revise preliminary injunction and temporary restraining order brief	0.90	\$796.50
B430	11/04/24	EGM	Continue drafting adversary complaint and email C. Stewart re same	2.20	\$1,903.00
B430	11/04/24	GF	Confer with M. Kaplan regarding declaratory relief strategy	0.10	\$107.50
B430	11/04/24	KEM	Email to MWE team regarding standing motion (.1); correspondence with D. Posner and M. Kaplan regarding same (.1)	0.20	\$187.00
B430	11/07/24	EGM	Email with C. Stewart re adversary complaint for declaratory relief (.1); discuss same with M. Kaplan (.1)	0.20	\$173.00
B430	11/08/24	GF	Review adversary docket	0.10	\$107.50
B430	11/11/24	GF	Review K. Moynihan report regarding adversary proceeding (.2); review adversary docket (.1)	0.30	\$322.50
B430	11/11/24	JC	Review Trilogy motion to oppose PBI intervention in adversary	0.70	\$990.50
B430	11/11/24	KEM	Correspondence with D. Claussen regarding adversary proceeding docket (.1); correspondence with G. Finizio regarding Trilogy adversary proceeding (.3); review Trilogy adversary docket (.4)	0.80	\$748.00
B430	11/12/24	DC	Review adversary proceeding docket and update attorney calendar with deadlines	0.20	\$73.00
B430	11/15/24	CG	Correspond with E. Seltzer and K. Moynihan on motion to dismiss filed in DRF adversary proceeding to strategise next steps	0.20	\$110.00
B430	11/15/24	DC	Review docket in the adversary proceeding, update critical dates memo and attorney calendar with objection deadlines	0.20	\$73.00
B430	11/15/24	EJS	Review pleadings filed in Trilogy Adversary Proceeding (1.3); draft memorandum for internal team re same (3.1); email correspondence with K. Moynihan re same (.1)	4.50	\$3,217.50
B430	11/15/24	JC	Review Trilogy motion to dismiss	0.80	\$1,132.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/15/24	KEM	Correspondence with E. Seltzer and C. Gauvin regarding Trilogy pleadings (.2); review E. Seltzer summary of DRF response in support of PBI's motion to intervene (.1)	0.30	\$280.50
B430	11/16/24	GF	Review E. Seltzer summary of Trilogy pleadings	0.20	\$215.00
B430	11/19/24	JC	Review emergency motion by Trilogy to delay confirmation and discuss same with team	1.20	\$1,698.00
B430	11/20/24	GF	Emails with K. Moynihan regarding Mitsubishi motion to intervene (.1); review motion to intervene (.2); review upcoming critical dates in adversary proceeding (.1)	0.40	\$430.00
B430	11/20/24	JC	Review Mitsubishi motion to intervene (0.5) and Trilogy sur-reply (0.1)	0.60	\$849.00
B430	11/21/24	GF	Emails with K. Moynihan regarding objection deadline for motion to intervene (.1); review PBI reply in support of intervention (.3)	0.40	\$430.00
B430	11/21/24	KEM	Correspondence with G. Finizio regarding motion to intervene objection deadline	0.10	\$93.50
B430	11/22/24	GF	Review adversary docket	0.10	\$107.50
B430	11/22/24	KEM	Correspondence with N. Rowles regarding motion to intervene CNO	0.10	\$93.50
B430	11/25/24	GF	Review adversary docket update from K. Moynihan and respond to same	0.10	\$107.50
B430	11/25/24	KEM	Review order regarding extension of Trilogy's time to respond to PBI motion to intervene	0.10	\$93.50
B430	11/26/24	GF	Review Trilogy withdrawal of sur-reply and upcoming critical dates for adversary proceeding (.1); review schedules regarding claims from Mitsubishi (proposed intervenor in adversary) (.2)	0.30	\$322.50
B430	11/27/24	GF	Review PBI notice of supplemental facts and authority in adversary proceeding	0.20	\$215.00
B430	12/04/24	DMP	Correspondence with G. Finizio and K. Moynihan regarding Trilogy motion to dismiss	0.20	\$270.00
B430	12/05/24	KEM	Email to A. Cohen regarding Trilogy motion to dismiss	0.10	\$93.50
B430	12/07/24	DMP	Review Trilogy's opposition to motion to dismiss	0.70	\$945.00
B430	12/07/24	KEM	Review debtor objection to trilogy motion to dismiss	0.20	\$187.00
B430	12/08/24	JC	Review Debtors' opposition to Trilogy MTD	0.70	\$990.50
B430	12/09/24	JC	Review Debtors' opposition to Trilogy MTD	0.70	\$990.50
Total B430 - Adversary Proceedings and Bankruptcy Court Litigation				91.50	\$81,982.00
<u>B430A Court Hearings</u>					
B430A	09/23/24	GF	Prepare for disclosure statement hearing (.7); participate in hearing (.5)	1.20	\$1,290.00
B430A	09/23/24	KEM	Attend disclosure statement hearing (.6); review email from G. Finizio regarding same (.1)	0.70	\$654.50
B430A	10/18/24	EJS	Prepare for (.2) and attend (.6) status conference re confirmation timeline; prepare summary of same for Lowenstein team (.5); correspondence with K. Moynihan and E. Mannix re same (.1)	1.40	\$1,001.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430A	10/18/24	GF	Participate in status conference regarding confirmation timeline	0.50	\$537.50
B430A	10/18/24	JC	Prepare for and participate in confirmation timeline status conference	2.40	\$3,396.00
B430A	10/18/24	MAK	Participate in status conference	0.70	\$721.00
B430A	10/28/24	CG	Correspond with E. Mannix re new deposition outline for witness M. Shea	0.30	\$165.00
B430A	11/20/24	DMP	Prepare for confirmation hearing (1.1); attend confirmation hearing (2.5)	3.60	\$4,860.00
B430A	11/20/24	EJS	Prepare for (.9) and attend (2.3) Confirmation Hearing	3.20	\$2,288.00
B430A	11/20/24	GF	Prepare for confirmation hearing (.5); attend confirmation hearing (2.5)	3.00	\$3,225.00
B430A	11/20/24	JC	Virtual participation in confirmation hearing	2.40	\$3,396.00
B430A	11/20/24	KEM	Prepare for confirmation hearing (.5); attend confirmation hearing (2.5)	3.00	\$2,805.00
B430A	11/25/24	DMP	Attend continued confirmation hearing	0.50	\$675.00
B430A	11/25/24	EJS	Review revised Plan and confirmation order ahead of Confirmation Hearing (.2); attend Confirmation Hearing (.5)	0.70	\$500.50
B430A	11/25/24	GF	Participate in continued confirmation hearing and emails with team regarding same	0.50	\$537.50
B430A	11/25/24	KEM	Attend confirmation hearing	0.50	\$467.50
Total B430A - Court Hearings				24.60	\$26,519.50
<u>B440 Schedules and Statements</u>					
B440	09/09/24	GF	Review schedules for preferential payments	0.60	\$645.00
B440	09/10/24	DC	Download and circulate Schedules and SOFA	0.50	\$182.50
B440	09/12/24	EGM	Review and analyze schedules in connection with creditor questions regarding treatment of unsecured creditors	0.30	\$259.50
B440	09/16/24	DMP	Correspondence with G. Finizio and K. Moynihan regarding large intercreditor claim on SOFAs	0.20	\$270.00
B440	09/16/24	GF	Call with A. Gonzalez regarding review of schedules (.2); review schedules regarding intercompany claims due to PBI-related entities (.4); email to K. Moynihan regarding A&M inquiry on scheduled intercompany claims (.1)	0.70	\$752.50
B440	09/17/24	DMP	Correspondence with G. Finizio and K. Moynihan regarding SOFA/SOAL and PBI Canada and intercompany receivable	0.30	\$405.00
B440	09/17/24	GF	Emails with K. Moynihan regarding intercompany claims due to PB Canada	0.20	\$215.00
B440	09/18/24	JC	Review A&M analysis of SOFA and SOAL	0.80	\$1,132.00
B440	09/30/24	GF	Review schedules regarding GUC claims pool sizing	0.30	\$322.50
B440	12/06/24	EJS	Review amended schedules for DRF Logistics and DRF LLC re unsecured claim amounts (.8); call with K. Moynihan re same (.1); email correspondence with G. Finizio re changes to schedules (.2)	1.10	\$786.50
Total B440 - Schedules and Statements				5.00	\$4,970.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
<u>B460 Other - Insurance Matters</u>					
B460	08/31/24	EGM	Review Insurance Motion and revise proposed final order related therto	1.30	\$1,124.50
B460	09/01/24	EGM	Further revise proposed final insurance order to incorporate G. Finizio comments	0.40	\$346.00
B460	09/01/24	KEM	Review revisions to insurance order	0.10	\$93.50
Total B460 - Other - Insurance Matters				<u>1.80</u>	<u>\$1,564.00</u>

EXHIBIT G

PROPOSED ORDER

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

In re:

DRF LOGISTICS, LLC, *et al.*,

Debtors.¹

§

§ Chapter 11

§

§ Case No. 24-90447 (CML)

§

§ (Jointly Administered)

**ORDER GRANTING FINAL APPLICATION OF LOWENSTEIN SANDLER LLP
AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM
AUGUST 28, 2024 THROUGH AND INCLUDING DECEMBER 9, 2024
(Docket No. ____)**

The Court has considered the *Final Application of Lowenstein Sandler LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Co-Counsel to the Official Committee of Unsecured Creditors for the Period from August 28, 2024 Through and Including December 9, 2024* (the “**Application**”) filed by Lowenstein Sandler LLP (the “**Applicant**”). The Court orders:

1. Applicant is allowed compensation and reimbursement of expenses of \$2,618,061.03 for the period set forth in the Application.
2. The compensation and reimbursement of expenses allowed in this Order are approved on a final basis.
3. The Debtors or the Liquidating Agent, as applicable, are authorized to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

Dated: _____, 2025

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: DRF Logistics, LLC (6861) and DRF, LLC (7236). The Debtors’ mailing address is 7171 Southwest Parkway, Bldg. 300, Suite 400, Austin, TX 78735.