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Special Counsel for Debtor Tattooed Chef, Inc.

UNITED STATES BANKRUPTCY COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

- ☐ ITELLA INTERNATIONAL LLC, a
California limited liability company
☐ ITTELLA'S CHEF, LLC, a California
limited liability company
☒ TATTOOED CHEF, INC., a Delaware
corporation
☐ MYJOJO, INC., a Delaware corporation
☐ NEW MEXICO FOOD
☐ DISTRIBUTORS, INC., a New Mexico
corporation
☐ KARSTEN TORTILLA FACTORY, LLC, a
New Mexico limited liability company
☐ BCI ACQUISITION, INC., a Delaware
corporation
☐ TTCF-NM HOLDINGS INC., a New Mexico
corporation
☐ All Debtors

Debtors and Debtors in
Possession

Case No. 2:23-bk-14154-SK

**APPLICATION FOR FINAL
COMPENSATION OF GIBSON, DUNN &
CRUTCHER LLP AS SPECIAL
LITIGATION COUNSEL;
DECLARATION OF JEFFREY C.
KRAUSE IN SUPPORT**

Hearing

Date: June 12, 2024

Time: 10:00 a.m.

Place: Courtroom 1575
255 East Temple Street
Los Angeles, CA 90012

[Also via ZoomGov]

**FINAL FEE APPLICATION OF GIBSON,
DUNN & CRUTCHER LLP AS SPECIAL LITIGATION COUNSEL;
DECLARATION OF JEFFREY C. KRAUSE IN SUPPORT**

Gibson, Dunn & Crutcher, LLP (“Gibson Dunn”) files this final fee application (the “Application”) for its services as special litigation counsel pursuant to sections 331 of title 11 of the United States Code (the “Bankruptcy Code”) for Tattooed Chef, Inc. and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (the “Debtors”) in connection with (a) the following two actions filed, in the United States District Court for the Central District of California, against Tattooed Chef by: (i) Terry Bassett Jr. and Kristopher Klecz, derivatively on behalf of Tattooed Chef on March 17, 2023 and April 3, 2023 (the “Shareholder Derivative Action”) and (ii) Dinko Mihaylov on December 23, 2022 (the “Securities Putative Class Action” and collectively with the Shareholder Derivative Action, the “Securities Litigation”), and (b) a securities-related investigation (the “Investigation” and collectively, with the Securities Litigation, the “Securities Actions”). In support of this Application, the Debtors submit herewith the Declaration of Jeffrey Krause, a partner of Gibson Dunn (the “Krause Declaration”).

I.

Requested Relief

1. By this Application, Gibson Dunn seeks final compensation for services rendered in connection with the Investigation in the amount of \$680,521.50 and reimbursement of related costs in the amount of \$1,868.20.¹ Gibson Dunn seeks compensation for professional services rendered in connection with the Investigation on an hourly basis and the reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and any further procedures and orders of the Court. Gibson Dunn does not seek compensation from the Debtors for the Securities Litigation, because such fees have been or will be paid by the Debtors’ directors’ and officers’ insurance carriers under existing policies (the “D&O Policies”), but does disclose in Exhibits

¹ The D&O carriers have not yet agreed to cover the services relating to the Investigation, either before or after the Petition Date, but the parties continue to negotiate and Gibson Dunn believes that the carriers will pay a portion of the fees and costs relating to the Investigation. The portion of any such payment by the carriers that relates to services and costs during the chapter 11 cases will be applied to reduce any fees awarded.

D –I the fees and costs incurred in the Securities Litigation during the chapter 11 cases. The total coverage under the D&O Policies includes \$20 million of Side ABC coverage and \$10 million in Side A coverage.

II.

Jurisdiction

2. This Court has jurisdiction over this Application pursuant 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding under 28 U.S.C. §§ 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

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

4. The bases for the relief requested herein are sections 331 of the Bankruptcy Code.

III.

General Background

5. The Debtors each filed a voluntary petition under Chapter 11 of the Bankruptcy Code on July 2, 2023 (the “Petition Date”). The Debtors operated their businesses, managed their financial affairs, and operated their bankruptcy estates as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

6. Additional information regarding the Debtors’ business, assets, capital structure, and the circumstances leading to the filing of the Chapter 11 Case is set forth in the *Omnibus Declaration of Edward Bidanset in Support of Emergency First Day Motions* [Docket No. 15] (the “First Day Declaration”) and the Disclosure Statement.

7. Tattooed Chef is a defendant, among others, in the Securities Litigation. Gibson Dunn has represented Tattooed Chef and several of the individual defendants in the Securities Litigation and the Investigation since January 2023. The individual defendants represented by Gibson Dunn² are or

² Gibson Dunn represents: (i) Salvatore Galletti (Director & Officer – President, Chief Executive Officer); (ii) Stephanie Dieckmann (Officer – Chief Financial Officer, former Chief Operations Officer); (iii) Sarah Galletti (Officer – Chief Marketing Officer); (iv) David Boris (Director); (v) Paula Ciaramitaro (Director); (vi) Jennifer Fellner (Director); (vii) Edward Gelfand (Director); (viii) Ryan Olohan (Director); (ix) Marie Quintero-Johnson (Director); (x) Bryan Rosenberg (Director); and (xi) Daniel Williamson (Director).

were as of the Petition Date officers and directors of the Debtors and assert indemnification rights against the Debtors for their costs of defending the Securities Actions.

8. The Investigation was commenced prior to the Petition Date. Gibson Dunn responded to the Investigation on behalf of the Debtors. The Debtors continued to manage the Securities Litigation and the Investigation during the chapter 11 cases. The Securities Litigation was stayed pursuant to Bankruptcy Code § 362(a), but the Investigation was not stayed. The Debtors have confirmed a chapter 11 plan.

IV.

Gibson Dunn's Qualifications

9. Gibson Dunn is a leading international law firm with over 2,000 attorneys in major cities throughout the United States, Europe, the Middle East, Asia, and South America. The firm maintains offices in Los Angeles, Century City, Orange County, San Francisco, Palo Alto, New York City, Dallas, Houston, Denver, and Washington, D.C., as well as in London, Paris, Munich, Frankfurt, Brussels, Abu Dhabi, Dubai, Singapore, Beijing and Hong Kong. Gibson Dunn has a client roster that includes many of the world's leading public companies, financial institutions, and Fortune 500 corporations. The biographies of the members of Gibson Dunn who have provided the bulk of the services to the Debtors are attached hereto as Exhibit A and incorporated herein by this reference.

10. Gibson Dunn has extensive expertise and experience in virtually all aspects of the law that may arise in connection with its representation of Tattooed Chef in the Securities Litigation and the Investigation. The primary Gibson Dunn attorneys who are representing Tattooed Chef have extensive and relevant experience representing clients involved in securities-related litigation and investigations or in connection with complex chapter 11 cases.

11. Gibson Dunn began representing Tattooed Chef in connection with the Securities Litigation and the Investigation in January 2023. Having represented Tattooed Chef in the Securities Litigation and the Investigation for eight months prior to the Petition Date, Gibson Dunn had developed significant familiarity with the central factual and legal issues involved in the Securities Actions. Gibson Dunn had also devoted significant time and effort analyzing, devising, and implementing a comprehensive strategy designed to protect the interests of Tattooed Chef. Additionally, Gibson Dunn

1 worked closely with the Debtors' management and other professionals, and other parties familiar with
2 the events at issue in the Securities Litigation and the Investigation. Gibson Dunn was thus uniquely
3 qualified to provide effective and efficient services to Tattooed Chef as a result of its relevant
4 experience and expertise regarding the Securities Actions.

5 V.

6 **Services Provided**

7 12. This Court authorized the Debtors to employ Gibson Dunn to represent Tattooed Chef
8 in connection with the Securities Litigation and the Investigation, including: (a) representing Tattooed
9 Chef in connection with the Securities Actions and any litigation or investigations related thereto or
10 arising therefrom; (b) responding to discovery and information requests; (c) defending against any
11 claims that may be raised in the course of the Securities Actions; (d) drafting pleadings or responses to
12 motions or objections in the Securities Actions; (e) negotiating with opposing parties regarding any
13 potential settlements of the Securities Actions, and (f) interacting and coordinating with other
14 professionals involved in the Securities Actions. *See Order Authorizing Employment and*
15 *Compensation of Gibson Dunn & Crutcher LLP As Special Counsel Pursuant to 11 U.S.C. §327(e) as*
16 *of the Petition Date* [Docket No. 468].

17 13. When it was employed the Debtors and Gibson Dunn believed that Gibson Dunn's
18 compensation for representing Tattooed Chef and the individual defendants in connection with the
19 Securities Litigation and the Investigation would be paid by the insurance carriers under existing D&O
20 Policies. The D&O Policies provide coverage to the individual defendants and Tattooed Chef in
21 connection with the Securities Actions. The carriers have accepted responsibility to pay for the fees in
22 connection with the Securities Litigation but have asserted that they are purportedly not liable for the
23 fees incurred in defending the Investigation. The parties continue to negotiate over the coverage of the
24 Investigation and any payments by the carriers attributable to the fees incurred during the chapter 11
25 cases will be applied against any fees awarded by this Court.

VI.

Professional Compensation

14. Gibson Dunn has not received any payments from the Debtors as compensation for professional services performed relating to its professional services provided in connection with the Securities Litigation or the Investigation. Gibson Dunn has received payments by the D&O carriers for services related to the Securities Litigation during the pendency of the chapter 11 cases and is not seeking any payments for such services from the Debtors. Because to date the carriers have denied coverage of the Investigation, Gibson Dunn seeks compensation for its services in connection with the Investigation during these chapter 11 case.³

15. Gibson Dunn seeks compensation for professional services rendered in connection with the Investigation on an hourly basis and the reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and any further procedures and orders of the Court. Gibson Dunn seeks compensation for its services in connection with the Investigation based on its standard hourly rates, which is consistent with its prepetition billing practices with respect to Tattooed Chef. Gibson Dunn's standard hourly rates for the time-keepers who worked on the Investigation during the chapter 11 cases are set forth in Exhibit B.

16. Gibson Dunn's hourly rates are set at a level designed to compensate Gibson Dunn fairly for the work of its attorneys and paraprofessionals. Hourly rates vary with the experience and seniority of the individuals assigned. These hourly rates are subject to periodic adjustments to reflect economic and other conditions.⁴ The rate structure provided by Gibson Dunn is appropriate and not significantly different from: (a) the rates Gibson Dunn charges for other similar types of representations in

³ Gibson Dunn incurred fees for services rendered in connection with the Investigation prior to the Petition Date for which it is not seeking compensation in this Application. If a settlement is reached with the carriers any amounts paid by them for the Investigation will be allocated to both the prepetition and post-petition Investigation related services.

⁴ For example, like many of its peer law firms, Gibson Dunn adjusts the hourly billing rate of attorneys and paraprofessionals each year in the form of: (i) step increases historically awarded in the ordinary course on the basis of advancing seniority and promotion; and (ii) periodic increases within each attorney's and paraprofessional's current level of seniority.

1 bankruptcy and non-bankruptcy matters; or (b) the rates that other comparable counsel would charge
2 to do work substantially similar to the work Gibson Dunn will perform for the Debtor.

3 17. It is Gibson Dunn's policy to charge its clients in all areas of practice for identifiable,
4 non-overhead expenses incurred in connection with the client's case that would not have been incurred
5 except for representation of that particular client. Gibson Dunn charges its clients only the amount
6 actually incurred by Gibson Dunn in connection with such items. Examples of such expenses include
7 postage, overnight mail, courier delivery, transportation, overtime expenses, computer-assisted legal
8 research, photocopying, airfare, meals, and lodging. In addition, Gibson Dunn professionals also may
9 charge their overtime meals and overtime transportation consistent with prepetition practices.
10 Consistent with past practice, Gibson Dunn will charge no more than \$0.10 per page for standard
11 duplication services. Gibson Dunn does not charge its clients for incoming facsimile transmissions.

12 18. The Debtors did not make any payments or provide any retainer to Gibson Dunn in
13 contemplation of or in connection with the Debtors' chapter 11 case. Gibson Dunn has relied on the
14 availability of coverage under the D&O Policies in providing services to date without a retainer, but
15 the D&O carrier has asserted that the services in connection with the Investigation are not covered,
16 though the parties continue to negotiate for payment of at least a portion of such fees. If the carriers
17 commit to make such a payment Gibson Dunn will supplement this fee application to disclose the
18 amount to be paid by the carriers and reduce the payment sought from the Debtors.

19 19. Pursuant to Bankruptcy Rule 2016(b), Gibson Dunn has neither shared nor agreed to
20 share: (a) any compensation it has received or may receive on behalf of the Debtor with another party
21 or person, other than with the attorneys associated with Gibson Dunn; or (b) any compensation another
22 person or party has received or may receive on behalf of the Debtor.

23 VII.

24 Basis for Relief

25 20. Section 330(a) of the Bankruptcy Code provides that a debtor in possession's counsel's
26 compensation shall be subject to bankruptcy court approval.

27 11 U.S.C. § 330(a).
28

21. During the chapter 11 cases the Investigation was not stayed and, therefore, Gibson Dunn continued to represent Tattooed Chef in responding to the Investigation. The Investigation has now been concluded.

22. Gibson Dunn has also continued to represent Tattooed Chef and the Individual Defendants in the Securities Litigation. Pursuant to Bankruptcy Code § 362(a) the Securities Litigation against Tattooed Chef has been stayed and the District Court has exercised its discretion to stay each lawsuit in its entirety. The services in connection with the Securities Litigation have, therefore, related primarily to coordination with the chapter 11 cases, preservation of documents as the Debtors wound down, and periodically updating the District Court on status. The D&O Carrier has agreed to pay for the fees and costs relating to the Securities Litigation and, therefore, Gibson Dunn is not seeking payment of fees relating to the Securities Litigation. It has, however, disclosed such fees and costs in Exhibit E - Exhibit J, inclusive.

VIII.

Request For Final Compensation And Allowance

A. Legal Standard

23. Bankruptcy Code section 330(a) provides for the award of fees and costs to professionals employed in a bankruptcy case for:

- (1) reasonable compensation for actual, necessary services rendered by such . . . professional person . . . based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under this title; and
- (2) reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a).

24. In determining the award of compensation, courts generally consider “the nature, the extent, and the value of the professional’s services.” *In re Auto Parts Club, Inc.*, 211 B.R. 29, 33 (9th Cir. B.A.P. 1997). However, “the primary method used to determine a reasonable attorney fee in a bankruptcy case is to multiply the number of hours expended by an hourly rate.” *In re Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983); *In re Powerine Oil Co.*, 71 B.R. 767, 772 (9th Cir. B.A.P. 1986) (holding that the fees calculated by multiplying the number of hours to the hourly rate creates a

1 presumption of reasonableness); *In re Montgomery Drilling Co.*, 121 B.R. 32, 39 (Bankr. E.D. Cal.
2 1990). Bankruptcy Code section 330(a)(3), in turn, provides for the allowance of final compensation
3 or reimbursement of all reasonable fees and expenses incurred prior to the filing of a final application.

4 25. Professional services rendered by Gibson Dunn have been itemized by professional,
5 noting each professional's rate, number of hours, and total compensation requested. *See* Krause
6 Declaration Exhibit B. Each duty and task performed by Gibson Dunn has been performed by the
7 attorney most qualified to render such services at his or her ordinary hourly rate in the most efficient
8 manner as required by the circumstances of the Investigation.

9 **B. Reasonableness of Compensation and Costs Requested**

10 26. Gibson Dunn requests final compensation and allowance for the fees of its attorneys at
11 their respective customary hourly rates. The hourly rate of each professional who rendered services in
12 connection with the Investigation is set forth in Exhibit B to the Krause Declaration. Courts have held
13 that the prevailing market rate in the community is indicative of a reasonable hourly rate. *See, e.g., In*
14 *re Auto Parts Club, Inc.*, 224 B.R. 445, 449 (Bankr. S.D. Cal. 1998). Gibson Dunn believes that the
15 hourly rates charged for its attorneys are reasonable and competitive with the hourly rates charged by
16 law firms of comparable size and quality with similar expertise and levels of experience as Gibson
17 Dunn. Gibson Dunn submits that, based upon the factors considered pursuant to Bankruptcy Code
18 sections 330 and 331, the quality of the services provided and the results that have been achieved to
19 date more than justify allowance of the amounts requested.

20 27. The Local Bankruptcy Rules require that an application for reimbursement of expenses
21 include a summary listing all of the expenses incurred. The total costs of expenses incurred for which
22 Gibson Dunn seeks final allowance is \$1,868.20. All of the expenses are summarized in Exhibit D and
23 described below.

24 28. To assist the Court in reviewing Gibson Dunn's request for reimbursement of these
25 costs, Gibson Dunn's accounting procedures for the categories of costs and expenses for which it seeks
26 reimbursement by this Application are described below.

- 27
 - **Computer Research Expense.** In the course of its representation of the Debtors, Gibson Dunn
28 found it necessary and cost efficient to research some aspects of the issues briefed during these
cases by means of computer research services. Gibson Dunn bills the actual cost of using

PACER directly to its clients without any surcharge. The total expenses incurred by Gibson Dunn in the “Computer Research Expense” category were \$1,462.10.

- **In-House Duplication.** Gibson Dunn’s internal photocopy projects are electronically logged and billed directly to the client at the cost of ten cents (10¢) per page. This rate is uniformly set by Gibson Dunn as its best estimate of the actual costs of furnishing photocopying services and is comparable to the rate charged by a substantial number of other law firms in the community in both bankruptcy and nonbankruptcy engagements. The total expenses charged by Gibson Dunn in the “Copy Production” category were \$34.70.
- **Messenger Expense.** Urgent time deadlines involved in these cases occasionally necessitated the use of independent messengers, primarily court messengers. In such instances, Gibson Dunn uses outside messenger services, and charges its clients the rates set by such messenger services, without adding any surcharges. The total expenses charged by Gibson Dunn in the “Messenger Expense” category were \$359.80.
- **Postage.** The cost of transmitting mail by Gibson Dunn is billed directly to its clients. Postage is logged and billed directly to Gibson Dunn’s clients through use of a computer system. Gibson Dunn calculates postage costs at the rates set by the U.S. Postal Service for the weight and class of a given mailing. The total expenses incurred in the “Postage” category were \$9.00.

IX.

Conclusion

WHEREFORE, the Gibson Dunn requests that the Court enter an order: (i) granting the Application; (ii) awarding Gibson Dunn as special litigation counsel fees in the amount of \$680,521.50 and costs in the amount of \$1,868.20, to which any amounts paid by the carriers with respect to the post-petition services relating to the Investigation will be applied to reduce the amount awarded; and (iii) granting such other relief as the Court may deem just and proper.

Dated: May 22, 2024

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Jeffrey C. Krause
JEFFREY C. KRAUSE

**DECLARATION OF JEFFREY C. KRAUSE
IN SUPPORT OF APPLICATION FOR FINAL COMPENSATION OF
GIBSON, DUNN & CRUTCHER LLP AS SPECIAL LITIGATION COUNSEL**

I, Jeffrey C. Krause, hereby declare as follows:

1. I am an attorney admitted to practice law before all courts of the State of California and in the United States District Court for the Central District of California. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP ("Gibson Dunn") specializing in restructuring and bankruptcy litigation.⁵ I am one of the attorneys primarily responsible for obtaining this Court's approval of the firm's employment to serve as special counsel to chapter 11 debtor Tattooed Chef (the "Debtor") in the above-captioned chapter 11 cases.

2. I submit this declaration in support of the Gibson Dunn's final fee application (the "Application"). Except as otherwise noted, I have personal knowledge of the matters set forth herein.

3. Gibson Dunn is a leading international law firm with over 2,000 attorneys in major cities throughout the United States, Europe, the Middle East, Asia, and South America. The firm maintains offices in Los Angeles, Century City, Orange County, San Francisco, Palo Alto, New York City, Dallas, Houston, Denver, and Washington, D.C., as well as in London, Paris, Munich, Frankfurt, Brussels, Abu Dhabi, Dubai, Singapore, Beijing and Hong Kong. Gibson Dunn also has a client roster that includes many of the world's leading public companies, financial institutions, and Fortune 500 corporations.

4. Gibson Dunn has extensive expertise and experience in virtually all aspects of the law that may arise in connection with its representation of Tattooed Chef in the Securities Litigation and the Investigation. The primary Gibson Dunn attorneys who would represent Tattooed Chef have extensive and relevant experience representing clients involved in securities and related litigation.

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⁵ Capitalized terms not otherwise defined in this Declaration shall have the meanings ascribed to them in the Application.

5. The Exhibits attached hereto as Exhibit A – J accurately set forth the following information

Exhibit A – Biographies

Exhibit B – Hourly rates and hours billed to the Investigation by each billing professional

Exhibit C – Detailed narrative of time billed to Investigation

Exhibit D – Costs incurred relating to the Investigation

Exhibit E – Hourly rates and hours billed to the Securities Putative Class Action by each billing professional

Exhibit F – Detailed narrative of time billed to Securities Putative Class Action

Exhibit G – Costs in connection with Securities Putative Class Action

Exhibit H – Hourly rates and hours billed to the Shareholder Derivative Action by
each billing professional

Exhibit I – Detailed narrative of time billed to Shareholder Derivative Action

Exhibit J – Costs in connection with Securities Litigation

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this Declaration on May 22, 2024, at Los Angeles, California.

/s/ Jeffrey C. Krause
JEFFREY C. KRAUSE

107450114.1

Exhibit A



Jeffrey C. Krause

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Jeffrey C. Krause is a partner in the Los Angeles office of Gibson, Dunn & Crutcher. He is a member of the firm's Business Restructuring and Reorganization Practice Group. He has a broad corporate restructuring practice and has handled significant debtor and creditor representations, as well as representations of acquirers of assets from chapter 11 debtors, lessors and secured and unsecured creditors. He is a fellow of the American College of Bankruptcy. Jeff was listed as an Outstanding Restructuring Lawyer by *Turnarounds & Workouts* in 2018 and was named Bankruptcy and Creditor Debtor Rights/Insolvency and Reorganization Lawyer of the Year 2017 for Los Angeles by *Best Lawyers*.

Jeff frequently advises boards and shareholders on fulfilling fiduciary duties and minimizing litigation risks when the companies they serve encounter financial distress. He also advises lenders in structuring transactions to minimize risks that are likely to arise when borrowers become financially distressed and parties seeking to acquire debt of troubled borrowers in order to drive the restructuring process or acquire assets of the borrower. Jeff has represented defendants in preference actions, fraudulent transfer actions and large, complex commercial disputes, including lender liability claims. He has represented landlords in large complex chapter 11 cases and out-of-court restructuring transactions. He also has represented both debtors and creditors in chapter 9 municipal restructuring cases.

Jeff has represented secured lenders in chapter 11 cases and out-of-court restructuring transactions, including the mortgage holders in recent chapter 11 cases of the owners of the Fairmont San Jose and Bishop's Lodge, as well as PDL BioPharma, Inc., Deutsche Bank, Kayne Saybrook, FINOVA Capital (after Berkadia acquired the right to manage FINOVA), Lend Lease, Beal Bank, Home Savings and Loan, Bank of Hawaii, CapitalSource, and the Colonial Williamsburg Foundation, as a secured creditor in the chapter 11 case of Carter's Grove, LLC.

Jeff has represented debtors in chapter 11 cases and out-of-court restructuring transactions, including the following:

- Mac Acquisition, LLC, dba Romano's Macaroni Grill, in chapter 11 in Delaware
- Daughters of Charity Health System in an out-of-court restructuring
- Standard Register Co., a printing and marketing company, in chapter 11 in Delaware
- Real Mex Restaurants, as a reorganized debtor after it exited from chapter 11
- THQ Inc., a video game developer, in chapter 11 in Delaware
- Specific Media in its out-of-court restructuring and transfer of assets to Time, Inc.
- R.E. Loans, LLC, a real estate lender, in chapter 11 in Texas
- Pacific Monarch Resorts, Inc., a time share developer, in chapter 11 in California
- Falcon Products, a furniture manufacturer, in chapter 11 in Missouri

- Boston Chicken, dba Boston Markets, a restaurant chain, in chapter 11 in Arizona
- Lindquist & Craig Hotels, a hotel and resort owner/operator, in chapter 11 in California
- DeKalb Poultry Research, Inc., an egg producer, in chapter 11 in Illinois
- Watts Health Foundation, Inc., an HMO and clinic operator, in chapter 11 in California

Jeff has represented multiple ad hoc creditor groups and official committees, as well as key members of committees, including the following:

- Member of the ad hoc group of subrogation claimants in the chapter 11 case of Pacific Gas & Electric
- Ad hoc group of unsecured noteholders in the chapter 11 case of Briggs & Stratton
- Ad hoc group of first lien lenders in the chapter 11 case of NPC International, Inc.
- Member of the Official Creditors Committee in the chapter 11 case of Verity Health System
- Official Committee of Unsecured Creditors in the chapter 11 case of Azabu Buildings
- Official Equity Committee in the chapter 11 case of AMERCO
- Member of an unofficial committee of secured bondholders in the chapter 11 case Eastern Airlines

Jeff also has represented multiple investors in various chapter 11 cases, distressed acquisitions and out-of-court restructuring transactions, including the following:

- Monarch Alternative Capital as the acquirer of assets related to the Shopko chapter 11 cases
- Acquirer of Boston Markets in out-of-court distressed transaction
- Woodridge Capital in connection with proposals to acquire assets from chapter 11 debtors
- Aurora Capital in connection with potential distressed acquisitions
- Stone Canyon Capital in assessing potential acquisitions from chapter 11 debtors
- Ranch Capital, LLC in multiple matters, including Seitel, Inc.'s chapter 11 case in Delaware and as the sponsor of a chapter 11 plan for Hawaiian Airlines, Inc.

In 2021 and 2022, Jeff was selected as a Band 1 lawyer in *Chambers USA: America's Leading Lawyers for Business*. He was selected in the 2022 and 2023 editions of the Lawdragon 500 Leading U.S. Bankruptcy & Restructuring Lawyers and has been recognized since 2003 by *The Best Lawyers in America®* in the area of Bankruptcy & Creditor Debtor Rights/Insolvency & Reorganization Law, and by *Who's Who Legal Restructuring & Insolvency*.

Jeff has served as an Adjunct Professor, University of Southern California School of Law, 1994-2000 and 2002; Loyola School of Law, 1987 and 1988. He is a member of the Los Angeles County Bar Association (Former Member of Executive Committee of Section on Commercial Law and Bankruptcy and Past Chair of Pro Bono Debtor Assistance Project) and the American Bar Association (Member, Sections on Litigation and Business Law; Past Co-Chairman of Bankruptcy and Insolvency Committee of the Litigation Section); The State Bar of California (Former Member, UCC Committee, Business Law Section, 1987-1990; Former Member, Debtor-Creditor Committee, Business Law Section, 1992-1995); Los Angeles Bankruptcy Forum (Past President); California Bankruptcy Forum (Former Director); Financial Lawyers Conference (Former Board Member, 1999-2002). He served as President of the Turnaround Management Association, Southern

California Chapter in 2017 and was Co-Chair of the 2017 Turnaround Management Association Western Regional Conference. He served as a member of the TMA Distressed Investing Conference Planning Committee during 2022 and was named as a Trustee of the TMA Global Leadership for 2022.

Jeff is the author of: "California Real Property Financing: Bankruptcy and Secured Real Property Transactions," CEB, 1989 (Contributing Author); Steinberg, Bankruptcy Litigation, 1989 (Contributing Author); "Whose Lawyer Are You: Fiduciary Obligations of Debtor in Possession's Counsel," 31 Beverly Hill Bar Ass'n Journal, Vol. 2 (1997); "In a Class All Their Own," Vol. 20, No. 5, Los Angeles Lawyers 42 (July-August 1997); "Appellate Practice Educational Materials for Federal Judicial Center Programs for New Bankruptcy Appellate Panel Judges," (1996 and 1997); "The Bias of the Courts Against Single Asset Real Estate Cases is Creating Bad Law in the Area of Classification," 22 Cal. Bankr. J. 45, 1994; "United States Trustee Guidelines Regarding Prepetition Retainers," 18 Cal. Bankr. J. 135, 1990; "Treatment of Prepetition Retainers," 17 Cal. Bankr. J. 153, 1989; "Foreclosure Sales Should Not Be Treated As Fraudulent Transfers," 1 ABA Bankr. Litigation Newsletter 7 (1993); "Non-Collusive Foreclosure Sales of Real Property Are Not Avoidable As Fraudulent Transfers," 3 ABA Bankr. Litigation Newsletter 18 (1995); Consultant, Bernhardt, California Mortgage and Deed of Trust Practice (2d ed. 1989 CEB).

Jeff is a frequent speaker on restructuring topics. Jeff has participated in the following educational programs: American Bankruptcy Institute Complex Financial Restructuring Program in 2019, 2020 and 2022; UCLA School of Law School and Financial Lawyers Conference: *Bankruptcy Nuts and Bolts all day seminar: Asset Sales under Bankruptcy Code section 363 and Executory Contracts under Bankruptcy Code section 365*; USC Gould School of Law Real Estate Law and Business Forum: *Real Estate Valuation in Workouts and Chapter 11 Bankruptcy Cases and Other Valuation Triggering Events*; Los Angeles Bankruptcy Forum: *Be WARNed: Risks of Liability for Insiders, Secured Lenders and Buyers for Unpaid Employment Related Claims*; Turnaround Managers Association, Southern California Chapter: *Distressed Valuations – "What is the Right Real Estate Valuation Approach and How to Plead Your Case!"*; Turnaround Managers Association, Annual Western Regional Conference: *Litigation of Valuation Issues for Operating Businesses and Cramdown Interest Rates After Momentive*; California Receiver's Forum: *Labor and Employment Issues for Receivers Administering Operating Business*; American Bankruptcy Institute Battleground West: *Healthcare Restructuring*; and Los Angeles Bankruptcy Forum: *Recent Developments Debate Program*.

Jeff attended the University of California at Los Angeles, where he received his B.S. in Economics in 1977, and his J.D. in 1980. Jeff served on the *UCLA Law Review*, and was elected to the Order of the Coif.



Craig Varnen

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Craig Varnen is a litigation partner in the Los Angeles office of Gibson, Dunn & Crutcher. Craig serves as a Co-Chair of the Firm's National Securities Litigation Practice Group, which is consistently recognized as one of the best securities litigation groups in the country. Craig is an experienced trial attorney who has represented clients in a broad range of "bet the company" commercial disputes. His practice focuses on complex commercial litigation, with an emphasis on securities litigation. Craig has decades of experience representing public companies and their officers/directors in the defense of federal and state securities class actions, derivative actions and government proceedings. These cases often involve claims related to public offerings, accounting and disclosure practices, mergers and acquisitions, insider trading, corporate governance issues or allegations of breaches of fiduciary duties. Craig is also regularly retained to conduct high-profile internal investigations, as well as advise boards and officers on fiduciary duty and corporate governance issues. He has also handled a wide range of other business and class action litigation, including many different types of consumer class actions, cases involving the misappropriation of trade secrets, employment litigation, and insurance matters. He also often counsels clients in employment contract-related matters.

Craig is currently ranked by *Chambers USA* in the category of Securities Litigation. He is frequently asked to speak on a variety of topics relating to securities and complex commercial litigation, and is listed as pre-approved panel counsel for the major D&O insurance carriers. He has been selected by his peers for inclusion in the Securities Litigation category as one of *The Best Lawyers in America* since 2021. From 2012-2022, he was recognized by *Southern California Super Lawyer* for his business litigation expertise. He was also named a Southern California Rising Star by *Super Lawyers*.

Recent Experience Includes: *

- Defended, including acting as lead counsel in a successful two-week trial, a publicly traded Fortune 500 company in a complex merger litigation arising from its acquisition by way of mergers of several limited partnerships in which it served as the general partner.
- Defended Fortune 500 multinational lender in securities fraud lawsuits and multiple government investigations.
- Defended CFO of a Fortune 500 media company in high profile securities fraud and derivative lawsuits.
- Defended the former chairman/CEO of Countrywide Financial Corporation in a series of securities fraud and regulatory lawsuits arising from the demise of the mortgage banking industry.
- Defended a national bank in a securities fraud lawsuit relating to a multiple auto loan-backed securitizations.
- Represented Fortune 500 financial services company in securities fraud and derivative lawsuits filed in both federal and state court.
- Represented Fortune 500 biopharmaceuticals company in high-profile securities fraud and derivative lawsuits.
- Defended the world's largest event promoter/venue operator in a high-profile consumer class action lawsuit.

- Represented a prominent casino in a high profile litigation brought by a director alleging corporate governance and breach of fiduciary duty related claims.
- Represented the chief financial officer of a prominent publicly traded interactive entertainment company in securities fraud and derivative lawsuits filed in both federal and state court.
- Defended multiple companies in lawsuits involving the theft of trade secrets by former employees.
- Defended one of the country's largest cable operators in a complex securities class action lawsuit and government investigations relating to accounting and reporting practices.
- Defended a regional bank and its board of directors in a complex class action litigation resulting from a \$851 million business combination with another bank.
- Defended one of the country's largest oil companies and its board of directors in a complex class action litigation resulting from its \$18 billion merger with another oil company.
- Defended the chief financial officer of a publicly traded software company in a complex securities class action lawsuit and government investigation relating to accounting and reporting practices.
- Defended a technology company in a complex securities class action lawsuit resulting from its \$2 billion acquisition of a competing company.
- Defended one of the nation's preeminent private wealth managers in a FINRA arbitration.
- Prosecuted litigation on behalf of a municipal agency that was one of the largest investors in the Orange County
- Prosecuted litigation on behalf of a municipal agency that was one of the largest investors in the Orange County Investment Pool against Wall Street securities professionals following the pool's collapse due to its investment in complex derivative securities.

* Includes representative matters handled prior to joining Gibson, Dunn & Crutcher LLP.

Prior to joining the Firm, Craig was a long-time partner at the law firm of Irell & Manella LLP, where he was Chair of the firm's Securities Litigation group, Vice Chair of its Litigation group, and a repeat member of its Executive Committee.

Craig served as a law clerk for the Hon. Cynthia Holcomb Hall in the United States Court of Appeals for the Ninth Circuit.

Craig graduated from the University of California San Diego with a Bachelor of Arts in Economics. He graduated *summa cum laude* and Phi Beta Kappa. He earned his law degree from University of California, Berkley School of Law where he was an editor of the California Law Review, and was elected to the Order of the Coif.

Craig serves on the board of trustees of the Curtis School.

Craig is admitted to practice law in the state of California, before the United States District Court for the Central and Northern Districts of California, and the U.S. Court of Appeals for the Ninth Circuit.



Alexander K. Mircheff

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Alex Mircheff is a partner in Gibson Dunn's Los Angeles office. His practice emphasizes securities and appellate litigation, and he has substantial experience representing issuers, officers, directors, and underwriters in class action and shareholder derivative matters.

Alex has handled matters across a variety of industries, including biotech, financial services, accounting, real estate, entertainment, engineering, manufacturing, and consumer products.

Multiple of Alex's wins in stockholder class actions have been recognized as "Defense Verdict of the Year" by publications including *The Recorder* and *Los Angeles Daily Journal*. Those matters include dismissals of claims for hundreds of millions of dollars against Herbalife; and against Arrowhead Research Co., where he was lead counsel at the trial court and on appeal.

Alex's clients have also included UBS; Deutsche Bank; Goldman Sachs; Edward Jones; Dole; Panda Restaurant Group; Toyota; Deloitte; PwC; Trust Company of the West; major retail, construction, and media companies; law firms, and others.

Alex is recognized by *Chambers USA* as an Up and Coming lawyer in Securities Litigation and was selected by his peers for inclusion in the 2023 and 2024 editions of *The Best Lawyers in America*® in the area of Securities Litigation. He has been named a "Rising Star" by the Southern California "Superlawyers" edition of *Los Angeles Magazine* and a "Next Generation Lawyer" by *Legal 500* in the area of M&A: Litigation Defense. Before joining the firm, Alex served as a law clerk to the Honorable Cynthia Holcomb Hall of the United States Court of Appeals for the Ninth Circuit and to the Honorable Gary A. Feess of the United States District Court for the Central District of California.

Alex earned his law degree *summa cum laude* from Loyola Law School in Los Angeles, where he was the winner of the William T. Aggeler Award for ranking first in his graduating class, elected Order of the Coif, and served as an editor on the *Loyola Law Review*.

Alex is admitted to practice before the Supreme Court of the United States, the U.S. Courts of Appeals for the Seventh, Eighth, and Ninth Circuits, and all California federal and state courts.

Alex is also a past Chair of the Board of Directors for California YMCA Youth & Government, a statewide organization with a mission of promoting civic engagement and character development in high school and middle school students.



Allison Kostecka

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Allison K. Kostecka is of counsel in the Denver office of Gibson, Dunn & Crutcher. She practices in the firm's Litigation Department, where she focuses on securities litigation, antitrust investigations and litigation, other complex commercial litigation, and data privacy. Since 2016, Allison has been recognized by *Super Lawyers* as a Colorado "Rising Star." She is recognized by *Best Lawyers: Ones to Watch® in America* for Antitrust Law, Litigation-Antitrust, and Commercial Litigation and has been listed in the publication since 2021.

Allison represents companies in a range of complex, civil litigation matters. She has defended multiple companies in derivative lawsuits and securities class actions before federal and state courts. In addition, Allison has represented clients in a variety of antitrust and consumer protection matters before administrative bodies and federal courts. For over 10 years, she represented a large energy company in multiple federal court actions that exposed a fraudulently obtained, multi-billion dollar judgment against the company. In addition to working on extensive discovery, preliminary injunction actions, and both pre-and post-judgment motions practice related to this transnational matter, Allison was on both the trial and appellate teams for this matter.

Representative Securities Litigation and Derivative Matters:

- *Immunomedics, Inc.*: Representing Immunomedics, Inc. and certain of its officers and directors in their defense of a securities class action based on alleged misstatements and omissions regarding a data integrity breach. Discovery in this matter is ongoing.
- *ViewRay, Inc.*: Represented ViewRay, Inc. and certain of its officers in their defense of securities class action allegations based on statements regarding the company's backlog. The U.S. District Court for the Northern District of Ohio granted the defendants' motion to dismiss the putative class action complaint with prejudice.
- *Trinity Industries, Inc.*: Represented Trinity Industries, Inc. and certain of its officers in their defense of securities class action allegations based on an overturned jury verdict in a False Claims Act case. This case ultimately settled.
- *Patriarch Partners and Lynn Tilton*: Represented Ms. Tilton and her companies in a variety of federal and state court actions regarding ownership and control of multiple portfolio companies.
- *Thompson Creek Metals Company Inc.*: Defended Thompson Creek Metals Company and its officers and directors against an individual shareholder's lawsuit alleging securities fraud and common law claims. The U.S. District Court for the District of Colorado granted defendants' motion for summary judgment, the Tenth Circuit affirmed, and the U.S. Supreme Court denied *certiorari*.
- *Molycorp, Inc.*: Defended Molycorp, Inc. and its outside Board members in connection with two different securities class actions filed in federal district courts in Colorado and New York, a consolidated derivative action filed in the Delaware Court of Chancery, a consolidated derivative action filed in federal court in Colorado; and related shareholder demands. In the securities class actions, both the federal courts in Colorado and New York granted the defendants' motions to dismiss before the actions were ultimately settled. The related Delaware derivative action was dismissed on the pleadings.

- *Gold Resources Corp.*: Successfully defended Gold Resources Corp. and its directors and officers in derivative litigation and a parallel securities class action filed in the U.S. District Court for the District of Colorado. The claims in both matters arose out of alleged misrepresentations and a minor restatement of financial results. After the securities class action was dismissed on the pleadings, and the dismissal was affirmed by the Tenth Circuit, the plaintiffs voluntarily dismissed the derivative action.
- *FTV Capital*: Defended individuals and FTV Capital private equity limited partners and general partner on LLC receiver's breach of fiduciary duty claims. The case was dismissed by a Colorado state court on the defendants' motion and the dismissal was affirmed on appeal, with review denied by Colorado Supreme Court.
- *SM Energy*: Defended officers of SM Energy in a shareholder derivative action asserting claims of breach of fiduciary duty and unjust enrichment. The lawsuit, which was filed in Colorado state court, was dismissed on the pleadings and no appeal was filed.
- *Advanced Emissions Solutions, Inc.*: Defended Advanced Emissions and its officers in securities class actions filed in the U.S. District Court for the District of Colorado after the company announced a restatement of its financial statements, and in related shareholder derivative lawsuits. While a motion to dismiss the securities class action was pending, the parties agreed to settle the lawsuits.

Other Representative Commercial Litigation Matters:

- *Johns Manville Corporation*: Representing Johns Manville Corporation in its defense of antitrust claims brought by a competitor in the U.S. District Court for the District of Colorado. After the plaintiff's initial complaint was dismissed on the pleadings, the plaintiff was granted leave to file an amended complaint and discovery ensued. After nearly two years of discovery, the U.S. District Court for the District of Colorado granted Johns Manville's motion for summary judgment, and dismissed the matter in its entirety.
- *Chevron Corporation*: Represented Chevron Corporation in its successful RICO suit against the purveyors of what *The Wall Street Journal* called the legal "fraud of the century." Since 2010, Allison was an active member of the team pursuing claims against the U.S. lawyer who masterminded an extortion scheme against Chevron. Gibson Dunn obtained a trial verdict in favor of Chevron in 2014. Allison was a member of the Gibson Dunn team that subsequently obtained Second Circuit affirmance of that trial verdict and persuaded the U.S. Supreme Court to deny review. Allison continues to represent Chevron in post-judgment proceedings during which Chevron secured a finding of willful contempt from the U.S. District Court for the Southern District of New York against the U.S. lawyer for his violation of multiple court orders.
- *Ingram Micro*: Defended Ingram Micro in three antitrust cases filed against the company, among others. The U.S. District Court for the District of Colorado granted the defendants' motion to dismiss the antitrust claims, but allowed discovery to proceed on state law tort claims. Ingram Micro settled the claims against it in 2018.
- *Eclipse Aviation Corporation*: Defended former employees of Eclipse Aviation Corporation on claims of negligent misrepresentation and alleged violations of New Mexico Unfair Practices Act in three cases in state court in New Mexico. These cases ultimately settled.

Allison is registered to practice law in the State of Colorado, as well as in the U.S. Courts of Appeal for the Sixth, Tenth, and Eleventh Circuits and the U.S. District Courts for the District of Colorado and the Northern District of Ohio.



Brian Yang

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Brian Yang is an associate in the Orange County office of Gibson, Dunn & Crutcher. He currently practices in the firm's Litigation Department.

Brian earned his law degree *cum laude* in 2019 from the University of Michigan Law School, where he served as Executive Editor of the Michigan Technology Law Review. During law school, he was a Student Attorney for the Child Welfare Appellate Clinic and the Environmental Law Clinic.

He earned his Bachelor of Arts degree in Political Science from the University of California, Berkeley, where he graduated with high distinction.

Brian is admitted to practice law in the state of California.



Thomas J. Kim

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Thomas J. Kim is a partner in the Washington D.C. office of Gibson, Dunn & Crutcher, LLP, where he is a member of the firm's Securities Regulation and Corporate Governance Practice Group. Thomas focuses his practice on a broad range of SEC disclosure and regulatory matters, including capital raising and tender offer transactions and shareholder activist situations, as well as corporate governance, environmental social governance and compliance issues. He also advises clients on SEC enforcement investigations – as well as boards of directors and independent board committees on internal investigations – involving disclosure, registration, corporate governance and auditor independence issues.

Thomas has extensive experience handling regulatory matters for companies with the SEC, including obtaining no-action and exemptive relief, interpretive guidance and waivers, and responding to disclosures and financial statement reviews by the Division of Corporation Finance.

Thomas served at the SEC for six years as the Chief Counsel and Associate Director of the Division of Corporation Finance, and for one year as Counsel to the Chairman.

As Chief Counsel, Thomas was responsible for the Division's no-action, interpretive and exemptive positions. He also led several rulemaking initiatives including eliminating the prohibition on general solicitation in Rule 506 and Rule 144A offerings, the concept release on the U.S. proxy system, and the interpretive release on the use of company websites. In recent years, because of his SEC experience on the question of what is a security, he has advised many cryptocurrency companies on whether their particular digital assets constitute securities.

Before joining Gibson Dunn, Thomas was a partner with Sidley Austin LLP. Prior to his tenure at the SEC, Thomas served as Corporate and Securities Counsel for General Electric.

Thomas has been recognized by *Chambers USA* in the Securities Regulation: Advisory category since 2015. He is also recognized by *The Best Lawyers in America*®, *Who's Who Legal*, and the *NACD Directorship 100* and is a Fellow of the American College of Governance Counsel. Thomas is the Chair of the Northwestern Pritzker Law School's Annual Securities Regulation Institute. He also chairs the ABA's Securities Law Opinions Subcommittee of the Federal Regulation of Securities Committee. As a past member of the ABA's Committee on Corporate Laws, he edited two editions of the ABA's *Corporate Director's Guidebook*.



Katy Baker

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Katy R. Baker is an associate in the San Francisco office of Gibson, Dunn & Crutcher. She currently practices in the firm's Litigation Department, representing clients in complex commercial litigation matters with a focus on securities litigation. Katy also maintains an active pro bono practice, focusing on civil rights impact litigation and immigration related proceedings.

She earned her J.D. and her LL.M. in International and Comparative Law, *cum laude*, from Duke Law School in 2020. While in law school, Katy was a Fellow with the Bolch Judicial Institute and served as the Senior Executive Editor of the Duke Journal of Comparative & International Law. Prior to her legal studies, she earned her B.A., *summa cum laude*, in Political Science and Religious Studies from California State University, Bakersfield.

Katy is admitted to practice law in the State of California.



Kate Oh

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koh@gibsondunn.com

Kate (Shinhae) Oh is an associate in the Orange County office of Gibson, Dunn & Crutcher. She currently practices in the firm's Litigation Department.

Kate earned her law degree *cum laude* in 2022 from University of California, Irvine, School of Law, where she received the Faculty Award for the highest grade in Lawyering Skills, Advanced Legal Research, International Anti-Corruption Seminar, International Justice Clinic, and the Dean's Award for the second-highest grade in Evidence. While in law school, she served as a judicial extern to Justice Raymond J. Ikola of California Court of Appeal, Fourth District, Division Three, and was an associate editor in *UC Irvine Law Review* and *UC Irvine Journal of International, Transnational, and Comparative Law*.

Prior to attending law school, she worked as a reporter at a national daily newspaper in South Korea, where she covered South Korea and U.S. politics, among others. Kate earned her Bachelor of Arts in Political Science and Diplomacy from Yonsei University, South Korea, in 2014.

Kate is admitted to practice in the State of California.

Exhibit B

Tattooed Chef, Inc.

SEC SUBPOENA
95063-00004

For Services Rendered Through December 31, 2023

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
BAKER, KATY	157.3	\$1,005	\$158,086.50
HOFFMAN, MATTHEW A.	2.3	\$1,810	\$4,163.00
KOSTECKA, ALLISON K.	32.9	\$1,305	\$42,934.50
KRAUSE, JEFFREY C.	0.7	\$1,810	\$1,386.00
MIRCHEFF, ALEXANDER KOSTA	1.5	\$1,750	\$2,658.00
OH, SHINHAE	113	\$770	\$87,010.00
VARNEN, CRAIG I.	106.4	\$1,770	\$188,328.00
YANG, BRIAN	171.1	\$1,145	\$195,955.50

Total Services	<u>\$ 680,521.50</u>
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Total Services, Costs/Charges	\$ 680,521.50
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BALANCE DUE	<u>\$ 680,521.50</u>
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Due and Payable Upon Receipt

Tattooed Chef, Inc.

SEC SUBPOENA
95063-00004

For Services Rendered Through April 30, 2024

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
KRAUSE, JEFFREY C.	0.7	\$1,810	\$1,386.00
MIRCHEFF, ALEXANDER KOSTA	0.2	\$1,750	\$383.00
YANG, BRIAN	0.4	\$1,145	\$504.00

Total Services	<u>\$ 2,273.00</u>
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Total Services, Costs/Charges	\$ 2,273.00
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BALANCE DUE	<u>\$2,273.00</u>
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Exhibit C

GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306

Federal Taxpayer ID #95-1611234

May 22, 2024

Invoice No. 2023055628

Tattooed Chef, Inc.

For Services Rendered and Costs/Charges Advanced Through December 31, 2023

	Services Rendered	Totals
95063-00004 SEC Subpoena	\$ 680,521.50	\$ 680,521.50
Totals	\$ 680,521.50	\$ 680,521.50

PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING: \$ 680,521.50

TOTAL OUTSTANDING BALANCE DUE \$ 680,521.50

Remit By Wire To:

Wells Fargo Bank
333 South Grand Avenue
Los Angeles, CA 90071-1515
Name of account: Gibson, Dunn & Crutcher LLP
Account No: 4600-146039
ABA No: 121000248
Attn: Treasury Department
Please include the invoice number in the wire instructions.

Remit By Mail To:

Gibson, Dunn & Crutcher LLP
PO Box 840723
Los Angeles, CA 90084-0723

*Please enclose the remittance copy of
this invoice with your payment in the
enclosed Reply Envelope to ensure
proper credit.*

Please note that payments received after the invoice date are not reflected.

For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

Invoice Date: May 22, 2024

Invoice No. 2023055628

Due and Payable Upon Receipt

SEC SUBPOENA
95063-00004

Detail Services:

07/03/23		
3.80	Varnen, Craig I	Review bankruptcy related filings (2.9); strategize re SEC investigation in light of bankruptcy issues (0.9).
1.80	Oh, Shinhae	Conduct QC review of documents in preparation of SEC production
07/05/23		
2.50	Varnen, Craig I	Review bankruptcy related filings (2.2); strategize re SEC investigation in light of bankruptcy issues (0.3).
1.70	Oh, Shinhae	Conduct QC review of documents in preparation of SEC production.
07/06/23		
2.40	Varnen, Craig I	Review bankruptcy related filings (1.7); strategize re SEC investigation in light of bankruptcy issues (0.7).
2.20	Oh, Shinhae	Conduct QC review of documents in preparation of SEC production.
07/07/23		
2.00	Varnen, Craig I	Review bankruptcy related filings (1.4); strategize re SEC investigation in light of bankruptcy issues (0.6).
1.10	Kostecka, Allison K	Participate in call with SEC re bankruptcy implications and report on same to internal team and client (0.5); correspond with Epiq re responses to question log questions and status of ongoing review (0.6).
1.60	Yang, Brian	Conduct second level review of documents for production to SEC.
07/10/23		
0.20	Mircheff, Alexander K	Read correspondence from team regarding Cargile representation, insurance, bankruptcy issues.
1.70	Varnen, Craig I	Handle issues relating to document productions (0.7); respond to client requests for information (0.3); consider BK effect on SEC investigation and related litigation matters (0.7).
2.10	Yang, Brian	Conduct second level review of documents for production to SEC.
1.20	Garcia, Katherine R	Quality check documents reviewed for production to SEC.

Due and Payable Upon Receipt

1.10	Oh, Shinhae	Conduct QC review of documents in preparation of SEC production.
07/11/23		
0.10	Mircheff, Alexander K	Correspondence with team regarding status, insurance.
1.80	Varnen, Craig I	Respond to client requests for information (0.6); status call (0.3); consider bankruptcy effect on SEC investigation and related litigation matters (0.9).
0.70	Kostecka, Allison K	Participate in call to discuss strategy and next steps in light of bankruptcy filing (0.5); correspond with insurance broker to touch base on items going forward (0.2).
0.60	Yang, Brian	Coordinate strategy re SEC investigation and securities litigation in light of bankruptcy filing.
1.00	Oh, Shinhae	Conduct QC review of documents in preparation of SEC production.
07/12/23		
1.20	Varnen, Craig I	Consider bankruptcy effect on SEC investigation and related litigation matters.
07/13/23		
1.10	Hoffman, Matthew A	Analyze D&O policy provisions and draft/review emails with J. Krause and J. Varnen re same.
1.10	Varnen, Craig I	Consider bankruptcy effect on SEC investigation and related matters.
07/14/23		
1.50	Varnen, Craig I	Consider bankruptcy effect on SEC investigation and related matters.
0.90	Oh, Shinhae	Conduct QC review of documents in preparation of SEC production.
07/17/23		
0.70	Hoffman, Matthew A	Conference with C. Varnen and J. Krause re D&O coverage issues.
2.00	Varnen, Craig I	Respond to client inquiries (0.9); client call (0.3); consider bankruptcy effect on SEC investigation and related matters (0.8).
1.60	Kostecka, Allison K	Prepare for next rolling production (0.4); discuss status of investigation and plan in light of bankruptcy with internal team (0.7); call with client to discuss status and coverage issues (0.5).
1.60	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.

Due and Payable Upon Receipt

2.50	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
0.50	Oh, Shinhae	Draft letter to SEC and FOIA letter in preparation of sixth production to SEC.
2.50	Oh, Shinhae	Conduct QC review of documents in preparation of SEC production.
07/18/23		
0.90	Varnen, Craig I	Respond to client inquiries.
1.40	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
3.50	Oh, Shinhae	Review documents for responsiveness, draft hot document chronology, and apply redactions in preparation of SEC production.
07/19/23		
0.20	Mircheff, Alexander K	Correspondence with C. Varnen, A. Kostecka regarding analysis for client call.
2.40	Varnen, Craig I	Prepare for board call (1.1); board call (0.9); emails re document production (0.4).
1.60	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
0.10	Oh, Shinhae	Review draft production letter and FOIA letter in preparation of SEC production.
07/20/23		
0.40	Varnen, Craig I	Strategy emails re SEC issues.
1.90	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
1.40	Oh, Shinhae	Review documents and finalize sixth production to SEC.
07/21/23		
0.10	Mircheff, Alexander K	Correspondence with B. Yang regarding document review, production.
1.10	Varnen, Craig I	Strategy emails re SEC issues (0.5); emails re document production (0.6).
0.70	Kostecka, Allison K	Review and edit production and FOIA letter for next rolling production (0.4); participate in telephone call with counsel for Forum merger re SEC investigation updates and correspond with team re the same (0.3).
2.00	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same (1.8); revise production cover letter and FOIA letter (0.2).

Due and Payable Upon Receipt

07/24/23		
0.50	Varnen, Craig I	Strategy emails re SEC related issues.
1.70	Yang, Brian	Conduct second level review of documents for production to SEC.
07/25/23		
0.60	Varnen, Craig I	Strategy emails re SEC related issues.
0.60	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
07/26/23		
0.50	Varnen, Craig I	Respond to client inquiries.
1.40	Yang, Brian	Conduct second level review of documents for production to SEC.
1.60	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
4.20	Oh, Shinhae	Conduct QC review of internal controls related documents in preparation of SEC production.
07/27/23		
0.10	Mircheff, Alexander K	Correspondence with team regarding SEC letter.
1.10	Varnen, Craig I	Work on SEC strategy issues (0.8); emails re client inquiries (0.3).
2.40	Yang, Brian	Conduct second level review of documents for production to SEC.
1.10	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
07/28/23		
0.90	Varnen, Craig I	Work on SEC strategy issues.
2.50	Yang, Brian	Conduct second level review of documents for production to SEC.
4.20	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
07/31/23		
1.50	Varnen, Craig I	Call with insurers (0.4); work on SEC strategy issues (0.6); emails re client inquiries (0.5).
1.10	Kostecka, Allison K	Participate in call to discuss status of bankruptcy proceeding and strategy for ongoing investigation (0.5); participate in call with Sompco (insurer) re status of bankruptcy and filing request for comfort order (0.6).
1.80	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
0.10	Garcia, Katherine R	Strategize with B. Yang re plan for SEC production.

Due and Payable Upon Receipt

SEC SUBPOENA
95063-00004

Detail Services:

08/01/23		
1.50	Varnen, Craig I	Work on SEC strategy issues (0.8); emails re client inquiries (0.7).
0.50	Kostecka, Allison K	Review correspondence re documents slated for next production to SEC and discuss the same with internal team.
6.50	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
0.20	Oh, Shinhae	Conduct quality check review of documents in preparation of SEC production.
08/02/23		
1.60	Varnen, Craig I	Emails re effect of bankruptcy issues on existing matters.
4.20	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
0.90	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
2.20	Oh, Shinhae	Draft production letter and hot document chronology in preparation of SEC production.
08/03/23		
2.30	Varnen, Craig I	Work on document production to SEC (1.2); emails re effect of bankruptcy issues on existing matters (1.1).
1.20	Kostecka, Allison K	Review chronology of noteworthy documents and selected email exchanges in advance of SEC production (0.5); review draft of production letter and FOIA letter for upcoming production (0.4); prepare for next rolling production to the SEC (0.3).
3.50	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
3.90	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
1.70	Oh, Shinhae	Draft production cover letter and finalize redactions for seventh production.
08/04/23		
1.80	Varnen, Craig I	Work on document production to SEC (0.9); emails re effect of bankruptcy issues on existing matters (0.9).

Due and Payable Upon Receipt

2.10	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
08/07/23		
1.00	Varnen, Craig I	Communications re bankruptcy and insurance issues (0.7); emails re effect of bankruptcy issues on existing matters (0.3).
4.90	Yang, Brian	Revise SEC production cover letter (0.9); coordinate and finalize production of documents to SEC (1.7); conduct second level review of documents for production to SEC (2.3).
1.60	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
0.50	Oh, Shinhae	Review and revise SEC production letter.
08/08/23		
1.00	Varnen, Craig I	Communications re bankruptcy and insurance issues (0.5); emails re effect of bankruptcy issues on existing matters (0.5).
08/09/23		
0.80	Varnen, Craig I	Communications re bankruptcy and insurance issues (0.4); emails re effect of bankruptcy issues on existing matters (0.4).
1.30	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
08/10/23		
1.00	Varnen, Craig I	Work on court filings (0.6); other communications re bankruptcy and insurance issues as pertains to securities matters (0.4).
5.00	Yang, Brian	Draft SEC production cover letter and FOIA letter (0.3); conduct second level review of documents for production to SEC (4.3); review and revise draft retention application (0.4).
0.40	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
08/11/23		
0.80	Varnen, Craig I	Work on court filings (0.6); other communications re bankruptcy and insurance issues as pertains to securities matters (0.2).
0.90	Kostecka, Allison K	Review and comment on application for employment to be filed in bankruptcy litigation.
4.90	Yang, Brian	Conduct second level review of documents for production to SEC (4.3); review and revise draft retention application (0.6).
1.10	Garcia, Katherine R	Quality check documents reviewed for production to SEC.

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2.10	Oh, Shinhae	Conduct quality check review of documents in preparation of SEC production.
08/13/23		
0.70	Oh, Shinhae	Conduct quality check review of documents in preparation of SEC production.
08/14/23		
1.00	Varnen, Craig I	Work on court filings (0.7); other communications re bankruptcy and insurance issues as pertains to securities matters (0.3).
1.50	Yang, Brian	Conduct second level review of documents for production to SEC (1.3); coordinate conflicts check for retention application (0.2).
08/15/23		
0.60	Varnen, Craig I	Work on court filings (0.4); other communications re bankruptcy and insurance issues as pertains to securities matters (0.2).
1.60	Yang, Brian	Conduct second level review of documents for production to SEC (1.1); coordinate conflicts check for retention application (0.5).
08/16/23		
1.10	Varnen, Craig I	Work on proposed court filings (0.7); other communications re bankruptcy and insurance issues as pertains to securities matters (0.4).
0.50	Kostecka, Allison K	Review and discuss progress on SEC production and plan for moving forward.
4.80	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
08/17/23		
1.00	Varnen, Craig I	Work on court filings (0.5); emails re bk strategy re securities matters (0.5).
4.10	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
3.20	Oh, Shinhae	Draft hot document chronology and apply redaction in preparation of SEC production.
08/18/23		
0.50	Varnen, Craig I	Work on court filings.
0.80	Kostecka, Allison K	Review and provide comments on application for employment and declaration supporting the same for bankruptcy court.

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4.10	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
2.40	Oh, Shinhae	Prepare for SEC production and apply redaction to documents.
3.40	Oh, Shinhae	Conduct quality check review of auditor materials in preparation of SEC production.
08/21/23		
1.10	Kostecka, Allison K	Review key documents from rolling production set (0.6); review and revise draft production letter (0.3); review and revise draft FOIA letter (0.2).
3.10	Yang, Brian	Coordinate and finalize production of documents to SEC (1.2); conduct second level review of documents for production to SEC (1.9).
0.20	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
0.60	Oh, Shinhae	Conduct quality check review of auditor materials in preparation of SEC production.
08/22/23		
1.00	Varnen, Craig I	Work on court filings (0.8); other communications re bankruptcy and insurance issues as pertains to securities matters (0.2).
1.70	Yang, Brian	Conduct second level review of documents for production to SEC.
08/23/23		
0.70	Varnen, Craig I	Work on court filings.
3.50	Yang, Brian	Conduct second level review of documents for production to SEC.
2.80	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
1.30	Oh, Shinhae	Conduct quality check review of auditor materials in preparation of SEC production.
08/24/23		
0.70	Varnen, Craig I	Work on court filings (0.3); deal with SEC document production issues (0.4).
3.70	Yang, Brian	Conduct second level review of documents for production to SEC.
0.80	Garcia, Katherine R	Quality check documents reviewed for production to SEC.
08/25/23		
1.00	Varnen, Craig I	Work on court filings (0.5); deal with SEC document production issues (0.5).

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3.30	Yang, Brian	Conduct second level review of documents for production to SEC.
08/28/23		
0.70	Varnen, Craig I	Deal with SEC document production issues.
3.00	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
08/29/23		
1.20	Varnen, Craig I	Work on court filings (0.3); deal with SEC document production issues (0.9).
3.80	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
1.90	Garcia, Katherine R	Redact documents reviewed for production to SEC.
08/30/23		
2.20	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
4.60	Garcia, Katherine R	Redact documents reviewed for production to SEC.
08/31/23		
0.80	Varnen, Craig I	Work on court filings and related documents.
2.10	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
0.30	Garcia, Katherine R	Redact documents reviewed for production to SEC.

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09/01/23		
0.90	Varnen, Craig I	Work on court filings and related documents.
0.20	Yang, Brian	Coordinate production of documents to SEC.
3.40	Oh, Shinhae	Review and draft hot document chronology in preparation of SEC production
09/05/23		
0.70	Varnen, Craig I	Strategy emails.
09/06/23		
0.70	Varnen, Craig I	Strategy emails.
09/07/23		
0.60	Varnen, Craig I	Strategy emails.
0.90	Kostecka, Allison K	Review noteworthy documents in rolling production set and discuss same with internal team (0.7); review production letters for rolling production (0.2).
2.90	Yang, Brian	Conduct second level review of documents for production to SEC and coordinate production of same.
09/08/23		
0.80	Varnen, Craig I	Work on SEC document production related issues.
1.00	Yang, Brian	Coordinate production of documents to SEC.
09/09/23		
0.30	Yang, Brian	Coordinate production of documents to SEC.
09/11/23		
0.70	Varnen, Craig I	Strategy communications.
0.70	Yang, Brian	Conduct second level review of documents for production to SEC.
1.00	Oh, Shinhae	Review documents and confer with team in preparation of SEC production
09/12/23		
0.70	Varnen, Craig I	Strategy communications.
0.80	Baker, Katy	Quality check documents reviewed for production to SEC.

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0.30	Oh, Shinhae	Review internal control related documents in preparation of SEC production
09/13/23		
0.70	Varnen, Craig I	Strategy communications.
2.70	Baker, Katy	Quality check documents reviewed for production to SEC.
0.80	Oh, Shinhae	Review public facing documents in preparation of SEC production.
09/14/23		
0.60	Varnen, Craig I	Strategy communications.
1.30	Baker, Katy	Quality check documents reviewed for production to SEC.
09/15/23		
0.60	Varnen, Craig I	Strategy communications.
0.60	Kostecka, Allison K	Prepare for call with SEC re ongoing investigation (0.3); participate in call to discuss preservation efforts in light of asset sale (0.3).
0.50	Yang, Brian	Review status of SEC productions.
4.40	Baker, Katy	Quality check documents reviewed for production to SEC.
09/16/23		
0.50	Yang, Brian	Review status of SEC productions.
09/17/23		
3.60	Oh, Shinhae	Review documents in preparation of SEC production.
09/18/23		
0.80	Varnen, Craig I	Strategy communications.
1.20	Kostecka, Allison K	Prepare for and participate in a call with the SEC to discuss the ongoing investigation (.4); summarize call for client and discuss next steps for investigation (.5); correspond re call with Epiq global and impact of bankruptcy on ongoing investigation (.3).
1.90	Yang, Brian	Conduct second level review of documents for production to SEC.
3.90	Baker, Katy	Quality check documents reviewed for production to SEC.
1.40	Oh, Shinhae	Review stock-related documents in preparation of SEC production.
09/19/23		
0.90	Varnen, Craig I	Strategy communications.
0.30	Kostecka, Allison K	Correspond re preservation for SEC investigation (.3).

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5.10	Yang, Brian	Conduct second level review of documents for production to SEC.
0.90	Baker, Katy	Quality check documents reviewed for production to SEC.
09/20/23		
0.80	Varnen, Craig I	Strategy communications.
1.60	Kostecka, Allison K	Prepare for call with client re preservation in light of asset sale (.5); participate in call with client re preservation in light of asset sale and correspond with C. Varnen and A. Mircheff re the same (1.1).
3.50	Yang, Brian	Conduct second level review of documents for production to SEC (1.8); prepare for and participate in meeting with S. Dieckmann and A. Kostecka re preservation of documents (0.9); draft correspondence re collection strategy and preservation obligations (0.8).
09/21/23		
0.60	Varnen, Craig I	Strategy communications.
1.20	Kostecka, Allison K	Correspond with Epiq re forensic collection process (0.4); prepare list of custodians and sources for forensic collection (0.3); review correspondence re quality check of next rolling production set and discuss the same (0.5).
5.90	Yang, Brian	Conduct second level review of documents for production to SEC.
1.60	Baker, Katy	Quality check documents reviewed for production to SEC.
1.40	Oh, Shinhae	Review financial related documents in preparation of SEC production.
09/22/23		
0.50	Varnen, Craig I	Strategy communications.
0.60	Kostecka, Allison K	Participate in call with Epiq to discuss forensic collection (.4); correspond with client re forensic collection (0.2).
3.10	Yang, Brian	Conduct second level review of documents for production to SEC.
1.20	Baker, Katy	Quality check documents reviewed for production to SEC.
09/25/23		
0.50	Varnen, Craig I	Strategy communications.
0.50	Yang, Brian	Coordinate collection of custodial files for preservation.
0.80	Baker, Katy	Quality check documents reviewed for production to SEC.

09/26/23		
0.40	Varnen, Craig I	Strategy communications.
0.40	Kostecka, Allison K	Review Sharefile and custodian lists and propose strategy for forensic collection (.4).
2.00	Yang, Brian	Conduct second level review of documents for production to SEC (0.7); participate in meeting with Epiq and B. Thomas re collection of custodial files for preservation and coordinate follow up re same (1.3).
1.90	Baker, Katy	Quality check documents reviewed for production to SEC.
09/27/23		
0.90	Varnen, Craig I	Strategy communications re court filings.
0.80	Kostecka, Allison K	Correspond with client and vendor re forensic collection efforts (0.4); participate in call to discuss status and impact of bankruptcy on ongoing investigation (0.4).
1.30	Yang, Brian	Coordinate collection of custodial files for preservation.
6.50	Baker, Katy	Quality check documents reviewed for production to SEC.
09/28/23		
0.50	Varnen, Craig I	Strategy communications re court filings.
0.20	Kostecka, Allison K	Correspond with client re status of comfort order and impact on services needed for ongoing investigation.
0.90	Yang, Brian	Conduct second level review of documents for production to SEC.
3.60	Baker, Katy	Quality check documents reviewed for production to SEC.
0.10	Oh, Shinhae	Review documents in preparation of SEC production.
09/29/23		
0.40	Varnen, Craig I	Strategy communications re court filings.
0.30	Kostecka, Allison K	Correspond and propose strategy for responding to inquiry re subpoena to accounting firm.
1.70	Baker, Katy	Quality check documents reviewed for production to SEC.
1.60	Oh, Shinhae	Review stock related documents in preparation of SEC production.

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10/02/23		
0.80	Varnen, Craig I	Strategy communications re SEC status and document production issues.
1.20	Yang, Brian	Conduct second level review of documents for production to SEC (0.8); coordinate collection of custodial files for preservation (0.4).
0.20	Baker, Katy	Quality check documents reviewed for production to SEC.
0.80	Oh, Shinhae	Review financial-related documents in preparation of SEC production.
10/03/23		
0.50	Varnen, Craig I	Strategy communications re SEC status and document production issues.
0.80	Kostecka, Allison K	Participate in call with Deloitte's counsel re production and privilege claims (0.3); prepare list of privileged names for Deloitte's counsel (0.5).
0.60	Yang, Brian	Coordinate second level review of documents for production to SEC.
4.70	Baker, Katy	Quality check documents reviewed for production to SEC.
1.90	Oh, Shinhae	Review financial-related documents in preparation of SEC production.
10/04/23		
0.70	Varnen, Craig I	Strategy communications re SEC status and document production issues.
2.40	Baker, Katy	Quality check documents reviewed for production to SEC.
2.10	Oh, Shinhae	Review financial-related documents in preparation of SEC production.
10/05/23		
0.90	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
0.60	Yang, Brian	Coordinate second level review of documents for production to SEC (0.2); coordinate collection of custodial files for preservation (0.4).
2.10	Baker, Katy	Quality check documents reviewed for production to SEC.

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10/06/23		
0.50	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
1.20	Yang, Brian	Coordinate second level review of documents for production to SEC (0.6); coordinate collection of custodial files for preservation (0.6).
5.10	Baker, Katy	Quality check documents reviewed for production to SEC.
0.80	Oh, Shinhae	Review documents in preparation of SEC production and coordinate with team re onsite collection.
10/07/23		
2.60	Oh, Shinhae	Review financial-related documents in preparation of SEC production.
10/08/23		
0.50	Oh, Shinhae	Review financial-related documents in preparation of SEC production.
10/09/23		
5.90	Baker, Katy	Quality check documents reviewed for production to SEC.
1.20	Oh, Shinhae	Review financial-related documents in preparation of SEC production.
0.20	Oh, Shinhae	Prepare for onsite collection of data.
10/10/23		
1.70	Varnen, Craig I	Prepare for client call (1.2); strategy communications re SEC status and related bankruptcy issues (0.5).
0.80	Baker, Katy	Quality check documents reviewed for production to SEC.
4.30	Oh, Shinhae	Attend onsite data collection and oversee collection process.
10/11/23		
2.00	Varnen, Craig I	Prepare for and attend client call (1.6); strategy communications re SEC status and related bankruptcy issues (0.4).
0.90	Kostecka, Allison K	Correspond with counsel for Forum merger re status of investigation (0.4); correspond with client re contact and preservation information (0.5).
10/12/23		
0.70	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
2.70	Baker, Katy	Quality check documents reviewed for production to SEC.

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1.70	Oh, Shinhae	Review financial-related documents in preparation of SEC production.
 10/13/23		
0.80	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
1.30	Kostecka, Allison K	Participate in call with client to discuss forensic collection (0.2); correspond with Epiq re next steps for forensic collection (0.3); review protective order proposed in bankruptcy for impacts on investigation (0.8).
0.30	Oh, Shinhae	Attend client call re data collection process for preservation.
1.90	Oh, Shinhae	Review stock-related documents in preparation of SEC production.
 10/16/23		
1.70	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues (0.7); consider motion to dismiss arguments (1.0).
0.60	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
0.30	Yang, Brian	Coordinate second level review of documents for production to SEC.
 10/17/23		
0.90	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
 10/18/23		
1.00	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
1.00	Yang, Brian	Coordinate second level review of documents for production to SEC (0.7); conduct privilege review of Deloitte documents for production to SEC (0.3).
4.50	Baker, Katy	Strategize with team re document review (0.3); quality check documents reviewed for production to SEC (4.2).
0.40	Oh, Shinhae	Review and develop strategy re privilege review of Deloitte documents.
 10/19/23		
1.00	Yang, Brian	Coordinate second level review of documents for production to SEC (0.4); conduct privilege review of Deloitte documents for production to SEC (0.6).
9.80	Baker, Katy	Analyze Deloitte documents for potential privilege.

2.60	Oh, Shinhae	Review financial and stock related documents in preparation of SEC production.
10/20/23		
1.00	Yang, Brian	Cooordinate production of documents to SEC (0.5); conduct second level review of documents for production to SEC (0.5).
7.40	Baker, Katy	Analyze Deloitte documents for potential privilege (5.2); redact personally identifiable information from documents marked for upcoming SEC production (2.2).
2.10	Oh, Shinhae	Draft hot document summary in preparation of SEC production.
10/23/23		
0.90	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
1.20	Yang, Brian	Coordinate production of documents to SEC (0.9); conduct privilege review of Deloitte documents for production to SEC (0.3).
3.60	Baker, Katy	Analyze Deloitte documents for potential privilege (3.4); quality check production set (.2).
10/24/23		
0.70	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
2.30	Yang, Brian	Revise production letter and coordinate production of documents to SEC (1.6); review collection of custodial files and coordinate follow up re same (0.7).
0.30	Baker, Katy	Analyze Deloitte documents for potential privilege.
1.50	Oh, Shinhae	Review and analyze collection reports in preparation of preservation collection.
10/25/23		
1.40	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues (0.6); handle document production issues.(0.8).
1.30	Kostecka, Allison K	Review production letter and FOIA letter for next rolling production (0.5); review and discuss noteworthy documents (0.8).
3.30	Yang, Brian	Coordinate production of documents to SEC (1.2); review collection of custodial files and coordinate follow up re same (0.2); conduct second level review of documents for production to SEC (0.7); conduct privilege review of Deloitte documents for production to SEC (1.2).

9.00	Baker, Katy	Analyze Deloitte documents for potential privilege (6.8); conduct second level review of documents for production to SEC (2.2).
1.00	Oh, Shinhae	Review and analyze collection report in preparation of preservation collection.
10/26/23		
1.30	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.
0.90	Kostecka, Allison K	Review noteworthy documents from privilege review and discuss the same (0.6); review correspondence re preservation collection (0.3).
3.00	Yang, Brian	Conduct second level review of documents for production to SEC (2.8); review collection of custodial files and coordinate follow up re same (0.2).
5.30	Baker, Katy	Conduct second level review of documents for production to SEC.
0.30	Oh, Shinhae	Review collections report in preparation of preservation collection.
10/27/23		
0.20	Mircheff, Alexander K	Review recommendations of associate re privilege calls from Deloitte production.
1.10	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
1.50	Yang, Brian	Conduct second level review of documents for production to SEC.
1.80	Baker, Katy	Conduct second level review of documents for production to SEC.
2.10	Oh, Shinhae	Review auditor facing documents for responsiveness and privilege in preparation of SEC production.
10/28/23		
4.50	Baker, Katy	Conduct second level review of documents for production to SEC.
10/30/23		
2.00	Varnen, Craig I	Prepare for and attend board meeting (1.5); strategy communications re SEC status and related bankruptcy issues (0.5).
1.10	Yang, Brian	Conduct second level review of documents for production to SEC.

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5.80	Baker, Katy	Conduct second level review of documents for production to SEC.
0.40	Oh, Shinhae	Prepare for additional collection for preservation.
10/31/23		
0.80	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy issues.
4.00	Yang, Brian	Conduct second level review of documents for production to SEC.
5.80	Baker, Katy	Conduct second level review of documents for production to SEC.

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11/01/23		
1.00	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
6.50	Yang, Brian	Conduct second level review of documents for production to SEC.
0.40	Baker, Katy	Conduct second-level review of documents for production to SEC.
11/02/23		
0.90	Varnen, Craig I	Strategy communications re insurance and related bk issues.
4.60	Yang, Brian	Conduct second level review of documents for production to SEC and draft summary of hot documents.
11/03/23		
1.10	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
2.00	Kostecka, Allison K	Review correspondence and respond to questions re forensic collection (0.3); correspond with Epiq global and D&O broker re outstanding fees for comfort order (0.3); correspond with internal team re status of comfort order negotiations (0.5); review and revise proposed production letter and FOIA letter for production (0.4); review document chronology associated with upcoming production and ask questions re the same (0.5).
1.70	Yang, Brian	Coordinate production of documents to SEC and revise production letter and FOIA letter for same (1.5); coordinate collection of custodial files for preservation (0.2).
0.60	Baker, Katy	Conduct second-level review of documents for production to SEC.
0.30	Oh, Shinhae	Prepare for remote collection of data.
11/05/23		
1.30	Varnen, Craig I	Strategy communications re bankruptcy and insurance related issues.
0.60	Kostecka, Allison K	Draft update for Chief Restructuring Officer re comfort order negotiations and discuss the same with internal team.

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11/06/23		
1.20	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
0.90	Kostecka, Allison K	Edit update correspondence to clients re comfort order (0.4); participate in call to discuss topics for call with insurance tower (0.5).
1.80	Yang, Brian	Conduct second level review of documents for production to SEC.
3.30	Oh, Shinhae	Review stock-related documents in preparation of SEC production.
0.20	Oh, Shinhae	Prepare for collection of board materials for preservation.
11/07/23		
1.20	Varnen, Craig I	Strategy communications re insurance and related bk issues.
0.40	Yang, Brian	Conduct privilege review of Deloitte documents for production to SEC.
4.90	Oh, Shinhae	Review stock and financial related documents in preparation of SEC production.
11/08/23		
0.70	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
0.70	Yang, Brian	Conduct privilege review of Deloitte documents for production to SEC.
3.90	Oh, Shinhae	Review stock related documents in preparation of SEC production.
0.30	Oh, Shinhae	Attend remote collection of Slack data.
11/09/23		
0.60	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
0.20	Yang, Brian	Conduct second level review of documents for production to SEC.
0.30	Oh, Shinhae	Attend remote data collection in preparation of preservation.
3.80	Oh, Shinhae	Review stock and financial related documents in preparation of SEC production.
11/10/23		
0.80	Varnen, Craig I	Strategy communications re SEC status and related bk issues.

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1.70	Oh, Shinhae	Review financial related documents and prepare for data collection in preparation of SEC production.
11/13/23		
0.50	Hoffman, Matthew A	Draft and review emails re D&O coverage (0.4); conference with A. Mircheff re same (0.1).
0.40	Mircheff, Alexander K	Review, analyze coverage letter; discussion with team re same.
0.50	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
0.60	Kostecka, Allison K	Review correspondence from Sompo along with formal order of investigation from SEC.
0.30	Yang, Brian	Analyze supplemental coverage position letter (0.2); coordinate review of documents for production to SEC (0.1).
3.00	Oh, Shinhae	Review financial related documents in preparation of SEC production.
11/14/23		
0.50	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
0.20	Yang, Brian	Coordinate review of documents for production to SEC.
0.90	Baker, Katy	Conduct second-level review of documents for production to SEC.
3.20	Oh, Shinhae	Review financial related documents in preparation of SEC production and prepare for data collection of board materials.
11/15/23		
0.60	Varnen, Craig I	Strategy communications re SEC status and related bk issues.
0.40	Yang, Brian	Coordinate review of documents for production to SEC.
3.50	Baker, Katy	Conduct second-level review of documents for production to SEC.
0.80	Oh, Shinhae	Review and finalize collection of board meeting notes in preparation of preservation.
11/16/23		
0.50	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.

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1.70	Kostecka, Allison K	Participate in call with broker re insurance policies (0.5); draft summary of next steps and billing issues for wider Gibson Dunn team (0.4); review policies and coverage letters in preparation for call with broker and insurer (0.8).
0.30	Yang, Brian	Review order allowing insurers to fund D&O policies and coordinate strategy re insurer position on SEC investigation (0.1); coordinate review of documents for production to SEC (0.2).
4.20	Baker, Katy	Conduct second-level review of documents for production to SEC.
11/17/23		
0.20	Kostecka, Allison K	Discuss coverage question with C. Varnen.
2.30	Baker, Katy	Conduct second-level review of documents for production to SEC.
11/19/23		
0.70	Kostecka, Allison K	Review SEC communications and draft talking points for call re focus of investigation.
11/20/23		
0.90	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.
1.10	Kostecka, Allison K	Review formal order and subpoenas and pull language specific to covered individuals per request from insurer (0.8); participate in call with insurer to discuss questions re investigation (0.3).
0.20	Yang, Brian	Coordinate production of documents to SEC.
0.50	Baker, Katy	Conduct second-level review of documents for production to SEC.
11/21/23		
0.90	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.
0.70	Yang, Brian	Conduct second level review of documents for production to SEC.
0.80	Baker, Katy	Conduct second-level review of documents for production to SEC.
3.00	Oh, Shinhae	Apply redaction to documents and review for privilege in preparation of SEC production.
11/22/23		
0.80	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.

Due and Payable Upon Receipt

0.60	Oh, Shinhae	Apply redaction and review for privilege in preparation of SEC production.
11/24/23		
0.50	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.
11/27/23		
0.70	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.
0.50	Yang, Brian	Coordinate production of documents to SEC and review summary of hot documents.
2.20	Oh, Shinhae	Draft hot document summary and apply redaction in preparation of SEC production.
11/28/23		
0.80	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.
1.20	Kostecka, Allison K	Review and analyze noteworthy documents for upcoming production (0.5); review and revise production letter and FOIA letter (0.4); participate in call with C. Varnen to discuss strategy and next steps for matter (0.3).
1.70	Yang, Brian	Draft production cover letter and FOIA letter and coordinate production of documents to SEC.
11/29/23		
0.70	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.
0.70	Yang, Brian	Coordinate production of documents to SEC.
11/30/23		
0.60	Varnen, Craig I	Strategy communications re SEC status and related bk and insurance issues.

Due and Payable Upon Receipt

SEC SUBPOENA
95063-00004

Detail Services:

12/01/23	0.80	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.
12/04/23	0.30	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.
12/05/23	0.40	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.
	0.40	Kostecka, Allison K	Participate in call to discuss status of investigation and next steps.
12/06/23	0.40	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.
12/07/23	0.40	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.
12/08/23	0.50	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.
12/11/23	0.50	Varnen, Craig I	Strategy communications re SEC status and related bankruptcy and insurance issues.

Due and Payable Upon Receipt

SEC SUBPOENA
95063-00004

Detail Services:

01/26/24		
0.20	Yang, Brian	Review tracker of Board materials for potential production.
01/30/24		
0.20	Yang, Brian	Review hot document summaries and witness interview memoranda.

Due and Payable Upon Receipt

SEC SUBPOENA
95063-00004

Detail Services:

04/02/24		
0.40	Krause, Jeffrey C	Emails from and to H. Winstead, A. Kostecka re demand letter.
04/17/24		
0.20	Mircheff, Alexander K	Review termination letter; correspondence with client, GDC team re same.
0.30	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff re SEC letter.

Due and Payable Upon Receipt

Exhibit D

Tattooed Chef, Inc.

SEC SUBPOENA
95063-00004

COSTS/CHARGES	TOTAL
DOCUMENT RETRIEVAL SERVICE	\$ 2.60
IN HOUSE DUPLICATION	34.70
ON-LINE RESEARCH (WESTLAW)	1,462.10
POSTAGE	9.00
MESSENGER AND COURIER EXPENSE	359.8
Total Costs/Charges	\$1,868.20
BALANCE DUE	\$1,868.20

SEC SUBPOENA
95063-00004

Detail Costs/Charges:

Document Retrieval Service

03/06/23	2.60	PACER Usage March 2023
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In House Duplication

04/14/23	7.50	In House Duplication Charge via Equitrac - 04/14/23
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On-Line Research (Westlaw)

04/17/23	840.00	OH, SHINHAЕ 04/17/23 95063-00004 WESTLAW RESEARCH AND PRINTING CHARGES
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Postage

04/20/23	1.50	Postage from April 1, 2023 to April 15, 2023
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SEC SUBPOENA
95063-00004

Detail Costs/Charges:

Messenger and Courier Expense
02/24/23 33.35

VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-
20230304 DATE: 3/4/2023 Ship Date 02/24/2023 Tracking No:
1Z9754630194538022 From: Craig Varnen, Gibson, Dunn &
Crutcher LLP, IRVINE, CA To: Office of Freedom of, U.S.
Securities and Exchange, WASHINGTON, DC

SEC SUBPOENA
95063-00004

Detail Costs/Charges:

<u>In House Duplication</u>		
03/10/23	0.40	In House Duplication Charge via Equitrac - 03/10/23

SEC SUBPOENA
95063-00004

Detail Costs/Charges:

Messenger and Courier Expense

04/14/23 33.06

VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230422 DATE: 4/22/2023 Ship Date 04/14/2023 Tracking No: 1Z9754630199830232 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: Office of Freedom of, U.S. Securities and Exchange, WASHINGTON, DC

05/11/23 32.42

VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230513 DATE: 5/13/2023 Ship Date 05/11/2023 Tracking No: 1Z9754630194758339 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: Office of Freedom of, U.S. Securities and Exchange, WASHINGTON, DC

Postage

05/16/23 1.50

Postage from May 1, 2023 to May 15, 2023

SEC SUBPOENA
95063-00004

Detail Costs/Charges:

In House Duplication

06/09/23	0.40	In House Duplication Charge via Equitrac - 06/09/23
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Messenger and Courier Expense

06/09/23	19.84	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230617 DATE: 6/17/2023 Ship Date 06/09/2023 Tracking No: 1Z9754630191429048 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: Securities and Excha, Office of Freedom of Inform, WASHINGTON, DC
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On-Line Research (Westlaw)

06/25/23	600.00	OH, SHINHAЕ 06/25/23 95063-00004 WESTLAW RESEARCH AND PRINTING CHARGES
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Postage

06/16/23	1.26	Postage from June 1, 2023 to June 15, 2023
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Specialized Research

06/28/23	22.10	Oh, Shinhae 06/28/2023 Practical Law US
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SEC SUBPOENA
95063-00004

Detail Costs/Charges:

In House Duplication
07/21/23

1.60

In House Duplication Charge via Equitrac - 07/21/23

SEC SUBPOENA
95063-00004

Detail Costs/Charges:

In House Duplication

08/07/23	0.80	In House Duplication Charge via Equitrac - 08/07/23
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Messenger and Courier Expense

07/21/23	19.88	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230729 DATE: 7/29/2023 Ship Date 07/21/2023 Tracking No: 1Z9754630198543830 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: US Securities & Exch, Office of FOIA Operations, WASHINGTON, DC
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08/07/23	33.13	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230812 DATE: 8/12/2023 Ship Date 08/07/2023 Tracking No: 1Z9754630199761183 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: and Privacy Act Oper, Office of Freedom of Inform, WASHINGTON, DC
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Postage

08/16/23	0.63	Postage from August 1, 2023 to August 15, 2023
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SEC SUBPOENA
95063-00004

Detail Costs/Charges:

In House Duplication

09/08/23	0.90	In House Duplication Charge via Equitrac - 09/08/23
09/11/23	0.80	In House Duplication Charge via Equitrac - 09/11/23

Messenger and Courier Expense

08/21/23	33.56	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230826 DATE: 8/26/2023 Ship Date 08/21/2023 Tracking No: 1Z9754630196804669 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: US Securities & Exch, FOIA Office, WASHINGTON, DC
09/08/23	33.70	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230916 DATE: 9/16/2023 Ship Date 09/08/2023 Tracking No: 1Z9754630191644421 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: US Securities & Exch, Office of Freedom of Inform, WASHINGTON, DC
09/11/23	33.70	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20230916 DATE: 9/16/2023 Ship Date 09/11/2023 Tracking No: 1Z9754630194230041 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: FOIA, U.S. Securities Exchange Co, WASHINGTON, DC

Postage

09/01/23	0.63	Postage from August 16, 2023 to August 31, 2023
09/18/23	2.22	Postage from September 1, 2023 to September 15, 2023

SEC SUBPOENA
95063-00004

Detail Costs/Charges:

<u>In House Duplication</u>		
10/25/23	0.80	In House Duplication Charge via Equitrac - 10/25/23

SEC SUBPOENA
95063-00004

Detail Costs/Charges:

In House Duplication

11/06/23	0.80	In House Duplication Charge via Equitrac - 11/06/23
11/15/23	19.90	In House Duplication Charge via Equitrac - 11/15/23
11/29/23	0.80	In House Duplication Charge via Equitrac - 11/29/23

Messenger and Courier Expense

10/25/23	33.49	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20231028 DATE: 10/28/2023 Ship Date 10/25/2023 Tracking No: 1Z9754630199794602 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: U.S. Securities and, Office of Freedom of Info., WASHINGTON, DC
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11/06/23	20.40	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-20231111 DATE: 11/11/2023 Ship Date 11/06/2023 Tracking No: 1Z9754630194389416 From: Brian Yang, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: US Securities & Exch, Office of FOIA Operations, WASHINGTON, DC
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Postage

11/01/23	0.63	Postage from October 16, 2023 to October 31, 2023
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SEC SUBPOENA
95063-00004

Detail Costs/Charges:

Messenger and Courier Expense

11/29/23 33.27

VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS-
20231202 DATE: 12/2/2023 Ship Date 11/29/2023 Tracking No:
1Z9754630198756646 From: Brian Yang, Gibson, Dunn &
Crutcher LLP, IRVINE, CA To: U.S. Securities and, Office of FOIA
Operations, WASHINGTON, DC

Postage

12/01/23 0.63

Postage from November 16, 2023 to November 30, 2023

Exhibit E

Tattooed Chef, Inc.

CLASS ACTION SECURITIES LAWSUIT
95063-00002

For Services Rendered Through December 31, 2023

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
GJUKOVIKJ, DANILO	15.60	\$195.00	\$3,042.00
KIM, THOMAS J.	0.50	\$1,865.00	\$972.50
KOSTECKA, ALLISON K.	23.20	\$1,255.00	\$30,276.00
KRAUSE, JEFFREY C.	54.40	\$1,730.00	\$98,464.00
MIRCHEFF, ALEXANDER	2.80	\$1,670.00	\$4,900.00
KOSTA	41.70	\$1,105.00	\$47,746.50
MYERS, JANIEL J.	3.00	\$745.00	\$2,310.00
OH, SHINHAЕ	32.70	\$1,690.00	\$57,879.00
VARNEN, CRAIG I.	0.70	\$425.00	\$311.50
WOMACK, LAUREN	5.60	\$1,105.00	\$6,412.00
ELIZABETH			
YANG, BRIAN			

Total Services

\$252,313.50

BALANCE DUE

\$252,313.50

Tattooed Chef, Inc.

CLASS ACTION SECURITIES LAWSUIT
95063-00002

For Services Rendered Through April 30, 2024

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
KOSTECKA, ALLISON K.	9.70	\$1,435	\$13,919.50
KRAUSE, JEFFREY C.	58.20	\$1,980	\$115,236.00
MIRCHEFF, ALEXANDER	1.30	\$1,915	\$2,489.50
KOSTA	3.00	\$1,260	\$3,780.00
MYERS, JANIEL J.	0.20	\$1,060	\$219.00
OH, SHINHAE	0.20	\$335	\$67.00
UBENCE, CORINNE L.	8.20	\$1,935	\$15,867.00
VARNEN, CRAIG I.	1.30	\$1,260	\$1,638.00

Total Services			\$153,216.00
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BALANCE DUE			\$153,216.00
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Exhibit F

GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306

Federal Taxpayer ID #95-1611234

May 22 2024

Invoice No. 2023083489

Tattooed Chef, Inc.

For Services Rendered Through April 30 2024

		Services Rendered	Totals
95063-00002	Class action securities	\$ 405,529.50	\$ 405,529.50
Totals		\$ 405,529.50	\$ 405,529.50
Total Balance Due			\$ 405,529.50

Remit By Wire To:

Wells Fargo Bank
333 South Grand Avenue
Los Angeles, CA 90071-1515
Name of account: Gibson, Dunn & Crutcher LLP
Account No: 4600-146039
ABA No: 121000248
Attn: Treasury Department
Please include the invoice number in the wire instructions.

Remit By Mail To:

Gibson, Dunn & Crutcher LLP
PO Box 840723
Los Angeles, CA 90084-0723

*Please enclose the remittance copy of
this invoice with your payment in the
enclosed Reply Envelope to ensure
proper credit.*

Please note that payments received after the invoice date are not reflected.

For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

Invoice Date: May 22, 2024

Invoice Date: May 22, 2024

Due and Payable Upon Receipt

CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Services:

07/03/23		
0.20	Krause, Jeffrey C	Emails from and to B. Yang, K. Oh re bankruptcy filing.
0.60	Krause, Jeffrey C	Review first day declaration.
1.50	Varnen, Craig I	Strategize re and outline motion to dismiss arguments.
0.40	Kostecka, Allison K	Review bankruptcy petition and prepare filings regarding the same in securities action.
0.30	Yang, Brian	Revise and finalize notice of suggestion of bankruptcy and coordinate filing of same.
1.80	Oh, Shinhae	Revise and prepare for filing of notices re suggestion of bankruptcy for securities class action.
07/05/23		
0.20	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, B. Yang re notice of first day hearings.
1.90	Varnen, Craig I	Strategize re and outline motion to dismiss arguments (1.2); review draft court filings (0.7)
0.90	Yang, Brian	Review and analyze bankruptcy filings.
07/06/23		
1.00	Krause, Jeffrey C	Observe hearing on first-day motions.
0.20	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff re hearing on first-day motions.
1.80	Varnen, Craig I	Strategize re and outline motion to dismiss arguments (1.1); review draft court filings (0.7).
07/07/23		
2.90	Varnen, Craig I	Strategize and outline motion to dismiss arguments (1.9); handle emails from co-counsel (0.4); review court filings and orders (0.6).
0.60	Kostecka, Allison K	Review and discuss orders entered regarding bankruptcy stay and circulate the same to client.
2.10	Yang, Brian	Draft and revise motion to dismiss brief (1.9); review order re notice of bankruptcy and automatic stay and coordinate motion to dismiss strategy in response to same (0.2).

0.60	Oh, Shinhae	Analyze court order and update team re automatic bankruptcy stay
07/08/23		
0.20	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka re stay and insurance policies.
07/10/23		
0.20	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kosteka re stay and insurance policies.
0.80	Varnen, Craig I	Consider motion to dismiss arguments.
0.80	Kostecka, Allison K	Review bankruptcy petition and brief and analyze for implications for securities claims.
07/11/23		
0.60	Krause, Jeffrey C	Conference call with C. Varner, A. Kostecka, B. Yang re litigation and SEC investigation.
0.20	Krause, Jeffrey C	Telephone conference with J. Myers re application to be employed.
0.50	Varnen, Craig I	Strategy emails.
07/12/23		
0.10	Mircheff, Alexander K	Correspondence with A. Kostecka, B. Yang regarding status, strategy in light of bankruptcy stay for company.
0.70	Varnen, Craig I	Strategy emails.
0.80	Kostecka, Allison K	Participate in call with broker to discuss litigation status and steps going forward (0.5); correspond with counsel for C. Cargile re litigation stay (0.3).
07/13/23		
0.30	Krause, Jeffrey C	Emails from and to C. Varner, A. Kostecka, B. Yang, M. Hoffman re insurance coverage.
0.40	Varnen, Craig I	Strategy emails.
0.50	Kostecka, Allison K	Draft motion to dismiss amended complaint.
2.60	Gjukovikj, Danilo	Legal research into case law in the Central District of California on sufficiency of allegations against individual defendants in 10b-5 actions.
07/14/23		
0.60	Varnen, Craig I	Strategy emails.
0.20	Kostecka, Allison K	Coordinate process for application for employment from bankruptcy court.

6.70	Gjukovikj, Danilo	Legal research into sufficiency of scienter pleadings in the Central District of California (4.0); draft portion of a memorandum addressing pleading requirements and making arguments for motion to dismiss (1.5); analyze complaints in past cases for specific allegations against named defendants (1.2).
07/17/23		
0.50	Varnen, Craig I	Strategy emails.
0.30	Kostecka, Allison K	Correspond with counsel for BDO re stay order.
4.40	Gjukovikj, Danilo	Analyze first amended complaint for mentions of individual defendants (.8); draft summary tables with mentions, and analyze for specific allegations against individuals (1.5); draft and revise summary of arguments for dismissal (2.1).
07/18/23		
0.50	Varnen, Craig I	Strategy emails.
0.80	Kostecka, Allison K	Draft summaries of all outstanding actions in preparation for board of directors call.
1.90	Gjukovikj, Danilo	Legal research into outcomes for motion to dismiss claims against individual defendants (1.0); draft email summary of findings (.4); revise draft memorandum addressing arguments for motion to dismiss (.5).
07/19/23		
1.00	Krause, Jeffrey C	Conference call with Board, S. Dieckmann, D. Levine, C. Varnen re status of litigation and insurance coverage issues.
0.40	Varnen, Craig I	Strategy emails.
1.10	Kostecka, Allison K	Prepare for and participate in call with Board to discuss status of ongoing litigation and impact of bankruptcy.
07/21/23		
0.20	Krause, Jeffrey C	Emails from and to J. Myers re employment application.
0.50	Varnen, Craig I	Strategy emails.
0.60	Myers, Janiel J	Draft 327(e) special counsel employment application.
07/24/23		
0.50	Varnen, Craig I	Strategy emails.
07/25/23		
0.40	Varnen, Craig I	Strategy emails.
0.70	Myers, Janiel J	Draft 327(e) employment application to file with bankruptcy court.

07/26/23

0.50 Kostecka, Allison K

Review arguments for dismissal of audit committee directors in motion to dismiss.

07/31/23

0.60 Krause, Jeffrey C

Conference call with A. Kostecka, C. Varnen, D. Neale re insurance coverage.

0.20 Krause, Jeffrey C

Telephone conference with M. Hoffman re insurance coverage.

0.40 Krause, Jeffrey C

Conference call with A. Kostecka, C. Varnen re insurance coverage.

CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Services:

08/01/23			
0.20	Krause, Jeffrey C		Emails from and to C. Varnen re insurance coverage.
08/04/23			
0.90	Myers, Janiel J		Review bankruptcy rules and local rules for applications.
08/05/23			
3.20	Myers, Janiel J		Draft application for bankruptcy court employment.
08/07/23			
0.40	Krause, Jeffrey C		Conference call with J. Myers, A. Kostecka re application to be employed under Bankruptcy Code 327(e).
0.40	Kostecka, Allison K		Participate in call to discuss status of securities litigation in preparation for filing in bankruptcy matter.
0.40	Myers, Janiel J		Confer with J. Krause and A. Kostecka re additional information for employment application.
08/10/23			
1.00	Krause, Jeffrey C		Revise application to be employed.
0.80	Myers, Janiel J		Revise draft of employment application (0.6); review comments from J. Krause and B. Yang (0.2).
08/11/23			
0.50	Krause, Jeffrey C		Emails from and to A. Kostecka, J. Myers re application to be employed.
1.10	Myers, Janiel J		Draft Krause declaration (1.0); review comments from litigation team on employment application (0.1).
08/13/23			
0.30	Krause, Jeffrey C		Revise Krause Declaration.
0.30	Krause, Jeffrey C		Emails from and to J. Myers re Krause Declaration.
1.60	Myers, Janiel J		Review comments on declaration from J. Krause (0.1); conduct research on employment application rules and precedent applications (0.8); revise application (0.7).
08/14/23			
0.80	Myers, Janiel J		Review Tattooed Chef bankruptcy petitions for creditor names in connection with bankruptcy cases and employment application filing.

08/15/23		
0.40	Krause, Jeffrey C	Revise employment application.
0.40	Myers, Janiel J	Revise employment application (0.1); email correspondence with J. Krause and B. Yang re application and conflicts report (0.1); call with J. Krause re same (0.1); review J. Krause markup of draft application (0.1).
08/16/23		
0.40	Krause, Jeffrey C	Revise application to be employed.
3.10	Myers, Janiel J	Review conflicts report in connection with application (2.0); revise Krause declaration in support of employment application (1.1).
08/18/23		
0.60	Krause, Jeffrey C	Revise Krause Declaration re employment.
0.30	Myers, Janiel J	Finalize employment application for external distribution.
08/19/23		
0.20	Krause, Jeffrey C	Emails from and to D. Neale, J. Myers re application to be employed.
08/22/23		
0.20	Krause, Jeffrey C	Emails from and to D. Neale, C. Varnen re employment application.
08/23/23		
0.30	Krause, Jeffrey C	Emails from and to J. Myers re application to be employed.
0.70	Myers, Janiel J	Revise employment application to incorporate L. Neale comments.
08/24/23		
0.10	Krause, Jeffrey C	Telephone conference with J. Myers re employment application.
0.30	Krause, Jeffrey C	Emails from and to J. Myers re employment application.
0.20	Krause, Jeffrey C	Emails from and to D. Neale re relief from stay for carrier.
1.00	Myers, Janiel J	Revise employment application and declaration; email correspondence with D. Trujillo re same.
08/28/23		
0.20	Krause, Jeffrey C	Emails from and to D. Neale re insurance stipulation.
08/29/23		
0.20	Krause, Jeffrey C	Telephone conference with R. Maroko re application to be employed.
0.10	Krause, Jeffrey C	Emails from and to R. Maroko re insurance policies.

0.30	Krause, Jeffrey C	Draft stipulation re insurance.
0.20	Krause, Jeffrey C	Emails from and to J. Myers re insurance policies at issue.
1.10	Myers, Janiel J	Review, revise, and finalize employment application.
08/31/23		
1.20	Krause, Jeffrey C	Draft stipulation for relief from stay re insurance.
0.90	Krause, Jeffrey C	Draft order re stipulation for relief from stay re insurance.
0.60	Krause, Jeffrey C	Revise stipulation and order.
0.50	Krause, Jeffrey C	Emails from and to A. Kostecka, J. Myers re employment application.
0.40	Krause, Jeffrey C	Emails from and to C. Varnen, D. Neale re insurance proceeds access.
0.80	Kostecka, Allison K	Review draft stipulation and propose order for comfort order and respond to inquiries re the litigation for the same.
1.40	Myers, Janiel J	Draft exhibit for stipulation (0.6); revise application (0.7); email correspondence with J. Krause and litigation team re same (0.1).

CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Services:

09/01/23		
0.40	Krause, Jeffrey C	Revise application to employ Gibson.
1.10	Myers, Janiel J	Attend to employment application (0.2); draft order re same (0.8); email correspondence to Levene Neale and J. Krause re application (0.1).
09/05/23		
0.40	Kostecka, Allison K	Correspond with counsel for C. Cargile re D&O insurance.
09/07/23		
0.40	Krause, Jeffrey C	Telephone conference with/emails from and to J. Myers re employment application.
0.20	Krause, Jeffrey C	Emails from and to J. Myers, T. Arnold re insurance stipulation.
0.80	Myers, Janiel J	Revise retention application to reflect comments from Levene Neale (0.5); confer with J. Krause re same (0.1); confer with J. Krause re insurance stipulation (0.1).
09/09/23		
0.30	Krause, Jeffrey C	Emails from and to C. Varnen, J. Myers re employment and insurance stipulation.
09/14/23		
0.30	Krause, Jeffrey C	Revise employment application.
0.20	Krause, Jeffrey C	Emails from and to J. Myers re employment application.
0.40	Krause, Jeffrey C	Emails from and to S. Dieckmann, A. Kostecka re computerized records.
09/15/23		
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka re preservation of records.
0.30	Krause, Jeffrey C	Telephone conference with A. Kostecka re preservation of electronic records.
0.40	Krause, Jeffrey C	Review notice and get all pleadings filed.
0.20	Krause, Jeffrey C	Emails from and to C. Varner, A. Kostecka re insurance coverage.
0.80	Myers, Janiel J	Draft notice for retention application.

09/16/23		
0.10	Krause, Jeffrey C	Emails from and to J. Myers re submission of order.
0.10	Krause, Jeffrey C	Emails from and to T. Arnold and D. Neale re comfort order.
09/18/23		
0.60	Krause, Jeffrey C	Emails from and to D. Neale, J. Myers re bankruptcy status.
0.60	Krause, Jeffrey C	Emails from and to T. Arnold, C. Varner re SEC inquiry.
0.20	Myers, Janiel J	Review chip land sale documents.
09/19/23		
0.30	Krause, Jeffrey C	Emails from and to E. Roymisher, C. Varnen re budget.
09/20/23		
0.30	Krause, Jeffrey C	Emails from and to R. Carrasco re insurance stipulation.
09/21/23		
0.20	Krause, Jeffrey C	Telephone conference with R. Maroko re employment application.
0.60	Krause, Jeffrey C	Draft supplemental statement in support of employment application.
0.20	Krause, Jeffrey C	Emails from and to B. Yang, C. Varnen, A. Kostecka, A. Mircheff re supplemental information.
0.20	Krause, Jeffrey C	Emails from and to D. Neale re SEC inquiry.
09/22/23		
0.20	Krause, Jeffrey C	Emails from and to D. Neale, A. Kosetka, C. Varnen re SEC inquiry.
09/25/23		
0.30	Krause, Jeffrey C	Review cases cited by US Trustee in call.
0.20	Krause, Jeffrey C	Confer with D. Trujillo re submission of order re employment.
09/27/23		
0.20	Krause, Jeffrey C	Emails from and to B. Yang and R. Carrasco re committee inquiry.
0.40	Krause, Jeffrey C	Conference call with A. Kostecka, C. Varner, J. Myers re fee application process.
0.30	Krause, Jeffrey C	Telephone conference with US Trustee re fee application process objection.
0.30	Krause, Jeffrey C	Emails from and to D. Neale re comfort order.

0.80	Myers, Janiel J	Call with A. Kostecka, C. Varnen and J. Myers re status of fee application and comfort order (0.6); review docket for comfort order (0.2).
0.80	Yang, Brian	Draft status report re bankruptcy status.
09/28/23		
0.30	Krause, Jeffrey C	Review materials to respond to UST concerns.
0.50	Myers, Janiel J	Conduct research on fee application redactions.
0.10	Yang, Brian	Revise status report re bankruptcy status.
09/29/23		
0.20	Krause, Jeffrey C	Telephone conference with T. Kim re fee application process.
0.20	Krause, Jeffrey C	Emails from and to J. Myers re fee application process.
0.10	Krause, Jeffrey C	Emails from and to D. Neale, C. Varnen, A. Kostecka re Deloitte inquiry.
0.70	Myers, Janiel J	Email correspondence with J. Krause re research on sealed fee applications; review docket re UCC members; calendar objection deadline.

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Detail Services:

10/02/23		
0.40	Krause, Jeffrey C	Emails from and to B. Yang, D. Neale, A. Kostecka, C. Varnen, J. Myers re status conference report to district court.
0.50	Krause, Jeffrey C	Conference call with C. Varnen, A. Mircheff, A. Kostecka, B. Yang re status conference report and preparation.
0.50	Krause, Jeffrey C	Revise employment order.
0.70	Mircheff, Alexander K	Call with team re preparation for status conference re bankruptcy.
1.20	Kostecka, Allison K	Draft and revise joint report for upcoming status conference (0.4); participate in call to discuss strategy and updates for status conference (0.8).
0.20	Myers, Janiel J	Review drafts of joint status reports.
10/03/23		
0.30	Krause, Jeffrey C	Revise employment order and lodge same.
0.50	Kostecka, Allison K	Correspond re joint status report on status of bankruptcy.
1.10	Myers, Janiel J	Review revised proposed order; confer with J. Krause re same; coordinate with paralegal for filing proposed order.
0.50	Womack, Lauren E	.Prepare notice of lodging of proposed order (0.3); file notice and proposed order (0.2).
10/04/23		
0.80	Varnen, Craig I	Work on court filings.
0.20	Myers, Janiel J	Review notice of proposed order.
10/05/23		
0.20	Krause, Jeffrey C	Emails from and to J. Myers, C. Varnen re order re employment and comfort order.
0.50	Krause, Jeffrey C	Emails from and to A. Kostecka, C. Varnen, A. Mircheff re status conference report and relief from stay.
0.20	Mircheff, Alexander K	Correspondence with team re status report, bankruptcy issues.
0.60	Varnen, Craig I	Work on draft court filings.

0.90	Kostecka, Allison K	Participate in conference call to discuss status report (0.3); review insert from plaintiff's counsel re status conference and propose response to the same (0.6).
0.70	Myers, Janiel J	Review language from plaintiffs for joint status report (0.2); email correspondence with J. Krause re same (0.1); review docket re status of comfort order (0.2); email Levene Neale re same (0.2).
1.40	Yang, Brian	Review plaintiffs' insert to joint status report re bankruptcy and coordinate filing of same (1.1); participate in strategy meeting re status conference and motion to dismiss (0.3).
10/06/23		
0.10	Mircheff, Alexander K	Review bullets prepared by B. Yang in connection with status conference.
10/09/23		
0.40	Krause, Jeffrey C	Emails from and to A. Mircheff re status conference.
0.20	Krause, Jeffrey C	Emails from and to S. Dieckmann, C. Varnen re strategy call.
0.20	Mircheff, Alexander K	Correspondence with team re status report, bankruptcy issues.
2.20	Varnen, Craig I	Prepare for court hearing.
1.50	Kostecka, Allison K	Participate in call to discuss strategy for upcoming status conference (0.3); participate in call with M. Williams to discuss preservation efforts (0.2); correspond with client and Epiq re preservation efforts (0.4); correspond with client re status update (0.3); correspond with counsel for C. Cargile re status conference (0.3).
0.30	Myers, Janiel J	Email correspondence with J. Krause re sale orders and comfort order (0.1); review bankruptcy docket re same (0.1); email correspondence with Levene Neale team re filing of comfort order (0.1).
10/10/23		
0.10	Mircheff, Alexander K	Discuss response to Cargile counsel with A. Kostecka.
0.80	Kostecka, Allison K	Circulate and discuss court order re joint status conference (0.4); monitor and discuss forensic collection efforts (0.4).
10/11/23		
0.80	Krause, Jeffrey C	Conference call with A. Kostecka, C. Varnen, A. Mircheff, S. Dieckmann re stay and litigation strategy.
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka, C. Varnen re preparation for meeting.

1.30	Mircheff, Alexander K	Client call re status, strategy.
1.30	Kostecka, Allison K	Participate in call with Audit Committee to discuss status of securities litigation and strategy going forward.
10/13/23		
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka re protective order.
0.60	Krause, Jeffrey C	Review protective order.
10/16/23		
0.60	Krause, Jeffrey C	Emails from and to A. Kostecka re protective order.
3.60	Myers, Janiel J	Review and summarize sale proceed allocation stipulation and order, sale order, Gibson employment order, motion for comfort order, and motion for 2004 examination and notice.
10/17/23		
0.30	Krause, Jeffrey C	Emails from and to D. Neale, B. Givens, C. Varnen re protective order.
0.30	Krause, Jeffrey C	Emails from and to J. Myers re review of bankruptcy court pleadings.
0.80	Myers, Janiel J	Revise summary email re bankruptcy sale pleadings (0.3); email correspondence with J. Krause re same (0.3); review bankruptcy docket for update on sale (0.2).
10/18/23		
0.20	Krause, Jeffrey C	Review motion for comfort order re insurance.
10/25/23		
0.70	Kostecka, Allison K	Participate in call with insurance broker to discuss status of D&O coverage.
10/26/23		
0.60	Krause, Jeffrey C	Conference call with A. Kostecka, C. Varnen re Committee's objection.
0.50	Krause, Jeffrey C	Review Committee's objection.
0.20	Krause, Jeffrey C	Emails from and to J. Myers re insurance proceeds.
0.30	Krause, Jeffrey C	Telephone conference with J. Myers re insurance proceeds.
1.60	Kostecka, Allison K	Review and analyze objection to comfort order filed in bankruptcy proceeding (0.5); discuss implications for litigation of objection to comfort order filed in bankruptcy action (0.5); draft and circulate update to clients on status of litigation (0.6).

3.30	Myers, Janiel J	Email correspondence with J. Krause and litigation team re committee objection (0.1); call with J. Krause re research for committee objection (0.1); conduct research re same (3.1).
10/27/23		
0.20	Krause, Jeffrey C	Review motion for BR 2004 examination.
0.20	Krause, Jeffrey C	Emails from and to D. Neale re Committee's objection.
2.40	Myers, Janiel J	Conduct research in connection with Committee objection to comfort order.
10/28/23		
0.40	Krause, Jeffrey C	Emails from and to J. Myers re payment from insurance proceeds.
0.30	Myers, Janiel J	Confer with J. Krause re research on insurance proceeds.
10/30/23		
0.30	Krause, Jeffrey C	Prepare for board call.
0.20	Krause, Jeffrey C	Emails from and to D. Neale re discovery.
1.40	Krause, Jeffrey C	Conference call with board, D. Neale, A. Kostecka, C. Varnen re litigation.
0.60	Krause, Jeffrey C	Conference call with C. Varnen, A. Kostecka, T. Kim re insurance objection by Committee.
2.30	Kostecka, Allison K	Discuss objection to comfort order and impact on litigation strategy with internal team (0.7); participate in call with clients to discuss status of litigation and strategy going forward (1.3); prepare for strategy call with client (0.3).
1.80	Myers, Janiel J	Review and analyze insurance policies; email correspondence with J. Krause re same.
10/31/23		
0.30	Krause, Jeffrey C	Telephone conference with J. Myers re insurance comfort order reply.
0.60	Krause, Jeffrey C	Review insurance policies.
0.30	Krause, Jeffrey C	Emails from and to D. Neale re insurance policies.
0.20	Krause, Jeffrey C	Emails from and to B. Givens re insurance.
0.10	Mircheff, Alexander K	Correspondence with C. Varnen re call with insurers.
0.50	Kostecka, Allison K	Correspond with broker re impact of objection to comfort order and strategy in response (.5).

0.30 Myers, Janiel J

Confer with J. Krause re strategy for Committee negotiations.

1.60 Myers, Janiel J

Conduct research and analyze cases re insurance proceeds.

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Detail Services:

11/01/23		
0.30	Krause, Jeffrey C	Review order and application to prepare for call with B. Givens.
0.30	Krause, Jeffrey C	Telephone conference with B. Givens re employment application.
0.20	Krause, Jeffrey C	Telephone conference with J. Myers re amended order.
0.80	Krause, Jeffrey C	Emails from and to, and telephone conference with A. Kostecka re amended order.
1.40	Kostecka, Allison K	Prepare for meet and confer with counsel for creditors committee as it relates to defense costs for ongoing litigation.
1.70	Myers, Janiel J	Analyze cases on insurance proceeds (1.0); call with J. Krause re same and potential settlement with committee (0.2); revise proposed order re same (0.5).
11/02/23		
1.00	Krause, Jeffrey C	Revise comfort order.
0.70	Krause, Jeffrey C	Emails from and to D. Neale, C. Varnen, Carriers' counsel re comfort order.
0.60	Kostecka, Allison K	Review proposed stipulation and discuss the same and impact on litigation strategy.
11/03/23		
0.30	Krause, Jeffrey C	Emails from and to A. Kostecka re process and Committee.
0.20	Krause, Jeffrey C	Emails from and to B. Givens re process for paying fees.
11/04/23		
0.10	Krause, Jeffrey C	Emails from and to B. Givens re proposed order.
0.20	Krause, Jeffrey C	Review status report; emails from and to A. Kostecka, J. Myers re same.
11/05/23		
0.60	Krause, Jeffrey C	Emails from and to G. Varnen, A. Kostecka re settlement with Committee.
11/06/23		
0.60	Krause, Jeffrey C	Draft stipulation for comfort order.

0.70	Krause, Jeffrey C	Emails from and to clients re stipulation with committee and disclosure of SEC fees.
11/07/23		
0.50	Krause, Jeffrey C	Emails from and to T. Arnold and B. Givens re comfort order stipulation.
2.00	Kostecka, Allison K	Review amended complaint and draft motion to dismiss and draft talking points in preparation for update call with insurers (0.8); investigate allegations of insider trading by S. Galletti (0.6); participate in update call with insurance tower (0.6).
11/08/23		
0.20	Krause, Jeffrey C	Emails from and to T. Arnold, B. Givens re interim fee application and stipulation.
11/09/23		
0.60	Krause, Jeffrey C	Review motion to prosecute claims.
11/13/23		
0.20	Krause, Jeffrey C	Emails from and to B. Givens re derivative complaint.
0.20	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff re coverage.
0.10	Krause, Jeffrey C	Emails from and to J. Fellner re update progress.
11/14/23		
0.10	Kostecka, Allison K	Correspond re preservation steps for hardcopy documents.
11/15/23		
0.70	Krause, Jeffrey C	Attend hearing on comfort order and status conference.
0.20	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka re hearing on comfort order and status conference.
0.20	Krause, Jeffrey C	Emails from and to B. Givens re comfort order.
11/16/23		
0.40	Krause, Jeffrey C	Conference call with C. Varnen, A. Kostecka re insurance coverage for SEC investigation.
0.20	Krause, Jeffrey C	Emails from and to C. Varnen and A. Kostecka re CRO.
11/20/23		
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka re subpoena.
11/28/23		
0.30	Krause, Jeffrey C	Emails from and to A. Kostecka, A. Mircheff, C. Varnen re SEC investigation and securities litigation.

0.60	Kostecka, Allison K	Draft update to client re settlement discussions and respond to client questions re the same.
0.10	Oh, Shinhae	Review and analyze court order re status conference and related deadlines.
11/29/23		
0.20	Krause, Jeffrey C	Emails from and to E. Gelfand, A. Kostecka re coverage issues.
1.20	Varnen, Craig I	Strategize re settlement related issues.
11/30/23		
0.60	Varnen, Craig I	Strategize re settlement related issues.

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12/01/23		
0.50	Varnen, Craig I	Strategize re settlement related issues.
0.20	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka re updates for clients.
0.30	Oh, Shinhae	Review and finalize collection of board materials for preservation.
12/04/23		
0.30	Varnen, Craig I	Strategize re settlement related issues.
0.20	Oh, Shinhae	Finalize data collection for preservation.
12/05/23		
0.50	Varnen, Craig I	Strategize re settlement related issues.
0.40	Krause, Jeffrey C	Conference call with A. Kostecka, C. Varnen re litigation strategy.
12/06/23		
0.60	Varnen, Craig I	Strategize re settlement related issues.
12/07/23		
0.30	Varnen, Craig I	Strategize re settlement related issues.
12/08/23		
0.40	Varnen, Craig I	Strategize re settlement related issues.
0.20	Krause, Jeffrey C	Emails from and to D. Neale re committee derivative claims.
0.10	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka re committee derivative claims.
12/11/23		
0.50	Kim, Thomas J	Telephone call with C. Varnen, J. Krause and A. Kostecka re insurance coverage issues.
0.50	Varnen, Craig I	Strategize re settlement related issues.
0.40	Krause, Jeffrey C	Conference call with T. Kim, C. Varnen, A. Kostecka re derivative claims and coverage.
0.50	Krause, Jeffrey C	Review D&O policy.

0.30	Krause, Jeffrey C	Emails from and to A. Kostecka, A. Mircheff, C. Varnen re coverage exclusions.
12/12/23		
0.60	Varnen, Craig I	Strategize re substantive defenses.
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka, J. Fellner re committee derivative claims.
12/13/23		
1.20	Varnen, Craig I	Strategize re settlement related issues (0.6); internal emails re case status (0.6).
0.30	Krause, Jeffrey C	Review derivative standing decision.
0.40	Krause, Jeffrey C	Emails to and from C. Varnen, A. Kostecka re SEC investigation questions.
12/14/23		
0.80	Varnen, Craig I	Strategy emails re potential settlement options.
0.30	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka re committee request for standing.
0.30	Krause, Jeffrey C	Emails from and to D. Neale re committee request for standing.
12/15/23		
0.60	Varnen, Craig I	Strategize re settlement related issues (0.4); internal emails re case status (0.2).
12/16/23		
0.80	Varnen, Craig I	Call re case status and related issues.
12/18/23		
0.80	Varnen, Craig I	Strategize re settlement related issues (0.5); internal emails re case status (0.3).
0.60	Krause, Jeffrey C	Conference call with A. Kostecka, C. Varnen, T. Kim, E. Gelfand re strategy.
0.10	Krause, Jeffrey C	Emails from and to T. Kim re preparation for client call.
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka, C. Varnen re draft complaint.
12/19/23		
0.70	Varnen, Craig I	Strategize re settlement related issues (0.4); internal emails re case status (0.3)
12/20/23		
0.80	Varnen, Craig I	Strategize re settlement related issues (0.4); internal emails re case status (0.4).

0.30	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, D. Neale re committee's request re complaint.
12/21/23		
1.20	Varnen, Craig I	Strategize re settlement related issues.
12/22/23		
1.00	Varnen, Craig I	Strategize re settlement related issues (0.5); internal emails re case status (0.5).
12/26/23		
0.80	Varnen, Craig I	Strategize re settlement related issues (0.5); internal emails re case status (0.3).
0.30	Krause, Jeffrey C	Telephone conference with S. Carroll re committee's request re standing.
0.40	Krause, Jeffrey C	Emails from and to D. Neale, A. Kostecka, C. Varnen re committee request for standing.
12/27/23		
0.20	Krause, Jeffrey C	Review admin bar date, emails from and to J. Myers re same.
12/28/23		
0.50	Varnen, Craig I	Strategize re settlement related issues.
12/29/23		
0.50	Varnen, Craig I	Strategize re settlement related issues.
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka, C. Varnen, A. Mircheff re protective order.
12/30/23		
0.30	Krause, Jeffrey C	Review confidentiality order and acknowledgement; emails from and to A. Kostecka re same.
12/31/23		
0.20	Krause, Jeffrey C	Emails from and to E. Gelfand, C. Varnen, A. Kostecka re SEC investigation.

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01/02/24		
1.20	Varnen, Craig I	Prepare for hearing (0.9); work on proposed filings (0.3).
0.50	Krause, Jeffrey C	Conference call with C. Varnen, A. Kostecka re derivative standing request.
0.70	Krause, Jeffrey C	Review complaint and research on standing legal standard.
0.30	Krause, Jeffrey C	Emails from and to D. Neale, T. Arnold re insurance and confidentiality.
0.20	Krause, Jeffrey C	Emails from and to S. Carrol re confidentiality.
0.60	Kostecka, Allison K	Review and revise proposed joint status report in preparation for January 11 status conference.
01/03/24		
1.50	Varnen, Craig I	Prepare for hearing (1.2); work on proposed filings (0.3).
0.60	Krause, Jeffrey C	Review cases on administrative priority.
0.70	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, J. Myers, A. Mircheff re administrative priority.
0.60	Krause, Jeffrey C	Draft email to client re open litigation issues created by Committee.
0.30	Krause, Jeffrey C	Review bankruptcy docket and comment on status conference report.
0.60	Kostecka, Allison K	Prepare for upcoming status conference with court.
01/04/24		
0.90	Varnen, Craig I	Prepare for hearing (0.5); work on proposed filings (0.4).
0.40	Krause, Jeffrey C	Prepare for board call.
0.20	Krause, Jeffrey C	Emails from and to S. Carroll re confidentiality and board issues.
0.50	Krause, Jeffrey C	Emails from and to board members re confidentiality.
0.20	Krause, Jeffrey C	Emails from and to A. Kostecka, A. Mircheff, C. Varnen re committee discussion.

1.30	Krause, Jeffrey C	Conference call with A. Kostecka, S. Dieckmann, B. Rosenberg, D. Bori, E. Gelfand, J. Fellner, D. Williamson, M. Quintero Johnson, P. Ciaramitaro, R. Olohan, S. Galletti, Sarah at Planted Ventures, C. Varnen, A. Mircheff re litigation.
0.50	Kostecka, Allison K	Draft and circulate summary of status of litigation and strategy for status conference to clients.
01/05/24		
0.20	Mircheff, Alexander K	Review plaintiff's insert for status report, correspondence re same.
0.40	Kostecka, Allison K	Review plaintiff's insert for joint status report and correspond re strategy with respect to the same.
1.00	Yang, Brian	Revise joint status report re bankruptcy proceeding and coordinate filing of same.
01/08/24		
0.10	Mircheff, Alexander K	Review status conference statement.
0.80	Varnen, Craig I	Work on court filings (0.6); review documents (0.2).
1.20	Krause, Jeffrey C	Conference call with C. Varnen, A. Kostecka, A. Mircheff, S. Dieckmann, S. Galletti re committee draft complaint and insurance coverage.
0.70	Krause, Jeffrey C	Conference call with A. Kostecka, B. Rosenberg re committee draft complaint and insurance coverage.
0.40	Krause, Jeffrey C	Emails from and to D. Neale, C. Varnen re committee draft complaint and insurance coverage.
0.30	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff re email to insurers.
0.30	Yang, Brian	Finalize and coordinate filing of joint status report re bankruptcy proceeding.
0.20	Ubence, Corinne L	Review and electronically file joint status report in CD Cal.
01/09/24		
0.10	Mircheff, Alexander K	Review order vacating status conference, correspondence re same.
0.20	Varnen, Craig I	Review documents.
0.40	Krause, Jeffrey C	Emails from and to S. Carroll, A. Kostecka re committee's position on litigation.
0.20	Krause, Jeffrey C	Emails from and to D. Neale, A. Kostecka re committee request.

0.30	Kostecka, Allison K	Review court orders re status conference and correspond with clients re the same.
0.20	Oh, Shinhae	Analyze court order and update team re status conference.
01/10/24		
0.40	Varnen, Craig I	Review documents.
0.60	Krause, Jeffrey C	Conference call with M. Trokenheim, A. Kostecka, D. Amantea, C. Varnen re Committee's request.
0.30	Krause, Jeffrey C	Emails from and to M. Trokenheim, A. Kostecka, D. Amantea, C. Varnen re Committee's request.
0.20	Krause, Jeffrey C	Emails from and to S. Carrol re committee's draft complaint.
01/11/24		
0.30	Varnen, Craig I	Review documents.
1.30	Krause, Jeffrey C	Draft grounds for opposing standing motion.
0.30	Krause, Jeffrey C	Emails from and to D. Neale, CRO, C. Varnen, A. Kostecka re creditors committee request.
0.50	Krause, Jeffrey C	Conference call with D. Neale, CRO, C. Varnen, A. Kostecka re creditors committee request.
01/12/24		
0.70	Krause, Jeffrey C	Review creditors committee's draft complaint.
0.40	Krause, Jeffrey C	Conference call with M. Trokenheim, E. Roymisher re claim re committee's potential litigation.
0.70	Krause, Jeffrey C	Emails from and to A. Kostecka and C. Varnen re reply re committee request for standing and call with insurer.
01/16/24		
0.50	Varnen, Craig I	Review documents.
0.50	Krause, Jeffrey C	Conference call with A. Mircheff, C. Varnen, A. Kostecka re reply to committee.
2.20	Krause, Jeffrey C	Revise reply to committee.
01/17/24		
0.60	Varnen, Craig I	Review documents.
1.20	Krause, Jeffrey C	Emails from and to A. Kostecka, A. Mircheff, C. Varnen re reply to committee's standing request.
0.20	Krause, Jeffrey C	Emails from and to S. Dieckmann, E. Gelfand, S. Galletti re committee response.

0.20	Krause, Jeffrey C	Emails from and to D. Neale, T. Arnold re committee response.
01/18/24		
0.40	Varnen, Craig I	Review documents.
0.80	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff, E. Gelfand, S. Dieckmann re committee standing request.
0.30	Krause, Jeffrey C	Emails from and to D. Neale re preparation for call with committee.
1.40	Kostecka, Allison K	Revise draft letter re creditors' committee standing to pursue derivative claims and respond to questions and requests for information re the same.
01/19/24		
0.20	Krause, Jeffrey C	Prepare for call with committee counsel.
0.60	Krause, Jeffrey C	Conference call with D. Neale, S. Carroll re derivative complaint.
0.50	Krause, Jeffrey C	Revise email to committee.
0.30	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff re committee's assertion of claims.
01/20/24		
0.50	Krause, Jeffrey C	Review organization chart and claims at each entity.
01/22/24		
0.30	Krause, Jeffrey C	Emails from and to D. Neale re response to committee.
1.00	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff re committee's allegations.
01/23/24		
0.40	Krause, Jeffrey C	Emails from and to D. Neale, C. Varnen, A. Kostecka re strategy vis à vis committee.
01/24/24		
0.40	Krause, Jeffrey C	Emails from and to D. Neale, S. Carroll re standing.
1.70	Krause, Jeffrey C	Review case law on standing of committee in LLC cases.
1.50	Krause, Jeffrey C	Emails from and to C. Varnen, A. Kostecka, A. Mircheff re committee demand.
0.20	Krause, Jeffrey C	Telephone conference with S. Carrol re insurance and draft complaint.
01/25/24		
0.40	Krause, Jeffrey C	Emails from and to D. Neale, S. Carroll re committee demand.

0.20	Krause, Jeffrey C	Emails from and to S. Dieckmann, A. Kostecka re litigation.
01/26/24		
0.80	Krause, Jeffrey C	Telephone conference with S. Dieckmann re documents.
0.70	Krause, Jeffrey C	Emails from and to D. Neale, T. Arnold re documents.
01/27/24		
0.30	Krause, Jeffrey C	Emails from and to D. Neale, T. Arnold, A. Kostecka, C. Varnen re documents requested by committee.
01/29/24		
1.00	Krause, Jeffrey C	Review committee's pleadings and status.
0.40	Krause, Jeffrey C	Conference call with D. Neale, A. Kostecka, C. Varnen re communications with committee.
0.20	Krause, Jeffrey C	Emails from and to - communications with committee.
0.20	Krause, Jeffrey C	Emails from and to T. Arnold re shareholder litigation.
01/30/24		
0.30	Mircheff, Alexander K	Correspondence with A. Kosteka, B. Yang re potential settlement strategy, key documents.
0.30	Myers, Janiel J	Confer with J. Krause re disclosure statement summary.
01/31/24		
0.30	Mircheff, Alexander K	Review background materials in connection with potential settlement strategy.
1.70	Krause, Jeffrey C	Review research.
0.30	Krause, Jeffrey C	Telephone conference with N. Whetstone re briefing.
0.80	Krause, Jeffrey C	Emails from and to C. Varnen, A. Mircheff, A. Kostecka, N. Whetstone re standing.
0.40	Krause, Jeffrey C	Emails from and to E. Gelfand re strategy and insurance coverage.

Exhibit G

Tattooed Chef, Inc.

CLASS ACTION SECURITIES LAWSUIT
95063-00002

COSTS/CHARGES	TOTAL
DOCUMENT RETRIEVAL SERVICE	\$ 37.50
<u>EDISCOVERY DATABASE HOSTING FEES</u>	158.10
<u>ON-LINE RESEARCH (WESTLAW)</u>	360.00
<u>IN-HOUSE DUPLICATION</u>	22.60
<u>POSTAGE</u>	61.44
<u>MESSENGER AND COURIER EXPENSE</u>	19.67

Total Costs/Charges	\$659.31
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BALANCE DUE	\$659.31
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CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

Document Retrieval Service

06/27/23	2.40	PACER Usage June 2023
06/29/23	3.30	PACER Usage June 2023
06/30/23	3.70	PACER Usage June 2023

eDiscovery Database Hosting Fees

07/28/23	15.81	July_2023-eDiscovery_Database_Hosting_Fees-C/M_95063-00002
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On-Line Research (Westlaw)

07/03/23	360.00	SUAREZ-PALOMO,VICTORIA 07/03/23 95063-00002 WESTLAW RESEARCH AND PRINTING CHARGES
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Specialized Research

07/03/23	3.80	Hansen, Dulce 07/03/2023 PACER
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CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

Document Retrieval Service

07/03/23	0.10	PACER Usage July 2023
07/03/23	7.20	PACER Usage July 2023

eDiscovery Database Hosting Fees

08/28/23	15.81	August_2023-eDiscovery_Database_Hosting_Fees-C/M_95063-00002
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Specialized Research

08/18/23	1.00	Yang, Brian 08/18/2023 PACER
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CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

Document Retrieval Service

08/18/23	4.30	PACER Usage August 2023
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eDiscovery Database Hosting Fees

09/27/23	15.81	September_2023-eDiscovery_Database_Hosting_Fees- C/M_95063-00002
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Specialized Research

09/15/23	6.50	Trujillo, Danielle S. 09/15/2023 PACER
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09/21/23	3.10	Trujillo, Danielle S. 09/21/2023 PACER
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CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

eDiscovery Database Hosting Fees

10/26/23	15.81	October_2023-eDiscovery_Database_Hosting_Fees-C/M_95063-00002
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In House Duplication

10/04/23	22.60	In House Duplication Charge via Equitrac - 10/04/23
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Postage

10/02/23	43.59	Postage from September 1, 2023 to September 30, 2023
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Specialized Research

10/04/23	3.80	Trujillo, Danielle S. 10/04/2023 PACER
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CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

Document Retrieval Service

10/03/23	0.90	PACER Usage October 2023
10/10/23	0.90	PACER Usage October 2023

eDiscovery Database Hosting Fees

11/27/23	15.81	November_2023-eDiscovery_Database_Hosting_Fees- C/M_95063-00002
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Postage

11/01/23	17.85	Postage from October 1, 2023 to October 31, 2023
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CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

eDiscovery Database Hosting Fees

12/26/23	15.81	December_2023-eDiscovery_Database_Hosting_Fees- C/M_95063-00002
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Messenger and Courier Expense

12/01/23	19.67	VENDOR: UNITED PARCEL SERVICE, INC. INVOICE#: UPS- 20231209 DATE: 12/9/2023 Ship Date 12/01/2023 Tracking No: 1Z9754630191949665 From: kate Oh, Gibson, Dunn & Crutcher LLP, IRVINE, CA To: Stephanie Dieckmann, SAN PEDRO, CA
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CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

<u>eDiscovery Database Hosting Fees</u>		
01/31/24	15.81	January_2024-eDiscovery_Database_Hosting_Fees-C/M_95063-00002
 <u>Specialized Research</u>		
01/08/24	2.40	Ubence, Corinne L. 01/08/2024 PACER

CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

<u>Document Retrieval Service</u>		
01/05/24	1.10	PACER Usage January 2024
01/08/24	2.40	PACER Usage January 2024
<u>eDiscovery Database Hosting Fees</u>		
02/29/24	15.81	February_2024-eDiscovery_Database_Hosting_Fees-C/M_95063-00002

CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

<u>eDiscovery Database Hosting Fees</u>		
03/26/24	15.81	March_2024-eDiscovery_Database_Hosting_Fees-C/M_95063-00002

CLASS ACTION SECURITIES LAWSUIT
95063-00002

Detail Costs/Charges:

eDiscovery Database Hosting Fees		
04/25/24	15.81	April_2024-eDiscovery_Database_Hosting_Fees-C/M_95063-00002

Exhibit H

Tattooed Chef, Inc.

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

For Services Rendered Through December 31, 2023

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
KIM, THOMAS J.	1.30	\$1,865.00	\$2,528.50
KOSTECKA, ALLISON K.	8.00	\$1,255.00	\$10,440.00
MIRCHEFF, ALEXANDER	0.50	\$1,670.00	\$875.00
KOSTA	1.80	\$745.00	\$1,386.00
OH, SHINHAE	6.90	\$1,690.00	\$12,213.00
VARNEN, CRAIG I.	3.20	\$1,105.00	\$3,664.00

Total Services			\$ 31,106.50
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BALANCE DUE			\$31,106.50
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Tattooed Chef, Inc.

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

For Services Rendered Through April 30, 2024

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
BAKER, KATY	1.50	\$1,220.00	\$1,890.00
FARAG, MICHAEL G.	5.00	\$1,220.00	\$6,300.00
KANG, AUSTIN	0.50	\$515.00	\$270.50
KOSTECKA, ALLISON K.	41.20	\$1,385.00	\$59,122.00
KRAUSE, JEFFREY C.	8.70	\$1,925.00	\$17,226.00
MIRCHEFF, ALEXANDER	15.70	\$1,850.00	\$30,065.50
KOSTA	10.50	\$1,060.00	\$11,497.50
OH, SHINHAЕ	10.20	\$815.00	\$8,619.00
SARKISSIAN, AXEL	2.70	\$1,060.00	\$2,956.50
SPAN, SUZANNE E.	56.70	\$1,870.00	\$109,714.50
VARNEN, CRAIG I.	4.60	\$1,060.00	\$5,037.00
WHETSTONE, NICHOLAS	12.40	\$1,220.00	\$15,624.00
YANG, BRIAN			

Total Services \$ 268,322.50

BALANCE DUE \$268,322.50

Exhibit I

GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306

Federal Taxpayer ID #95-1611234

May 22, 2024

Invoice No. 2023083492

Tattooed Chef, Inc.

For Services Rendered and Costs/Charges Advanced Through July 31, 2023

		Services Rendered	Totals
95063-00005	Shareholder derivative	<u>\$299,429.00</u>	<u>\$299,429.00</u>
Totals		\$299,429.00	\$299,429.00
Current Balance Due			<u>\$299,429.00</u>

Remit By Wire To:

Wells Fargo Bank
333 South Grand Avenue
Los Angeles, CA 90071-1515
Name of account: Gibson, Dunn & Crutcher LLP
Account No: 4600-146039
ABA No: 121000248
Attn: Treasury Department
Please include the invoice number in the wire instructions.

Remit By Mail To:

Gibson, Dunn & Crutcher LLP
PO Box 840723
Los Angeles, CA 90084-0723

*Please enclose the remittance copy of
this invoice with your payment in the
enclosed Reply Envelope to ensure
proper credit.*

Please note that payments received after the invoice date are not reflected.
For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

Invoice No. 2023083492

Due and Payable Upon Receipt

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

Detail Services:

07/03/23

0.20 Kostecka, Allison K

Review bankruptcy petition and prepare filings regarding the same in derivative action (.2).

1.80 Oh, Shinhae

Revise and prepare for filing of notices re suggestion of bankruptcy for derivative action

07/07/23

0.10 Mircheff, Alexander K

Review order from court regarding bankruptcy.

0.90 Varnen, Craig I

Strategize re recent court filings and orders.

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

Detail Services:

10/02/23		
1.20	Yang, Brian	Revise status report re bankruptcy status (0.4); participate in meeting re strategy for status conference (0.8).
10/03/23		
0.10	Mircheff, Alexander K	Edit status report.
0.90	Varnen, Craig I	Work on court filings.
0.80	Varnen, Craig I	Work on draft court filings.
0.80	Yang, Brian	Draft correspondence to plaintiffs' counsel re joint status report re bankruptcy (0.3); revise joint status report re bankruptcy and coordinate filing of same (0.5).
10/04/23		
0.10	Mircheff, Alexander K	Edit status report.
0.70	Varnen, Craig I	Work on draft court filings.
0.30	Kostecka, Allison K	Participate in call with client to discuss stipulation (0.1); finalize stipulation for derivative action (0.2).
0.80	Yang, Brian	Revise joint status report re bankruptcy and coordinate filing of same.
10/05/23		
0.70	Varnen, Craig I	Work on court filings.
10/06/23		
0.90	Varnen, Craig I	Prepare for court hearing.
10/09/23		
0.60	Varnen, Craig I	Handle issues relating to new schedule and motion to dismiss.
10/10/23		
0.50	Varnen, Craig I	Handle issues relating to new schedule and motion to dismiss.
10/11/23		
0.90	Varnen, Craig I	Handle issues relating to new schedule and motion to dismiss.

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

Detail Services:

11/28/23

0.20 Mircheff, Alexander K

Review update to client re status (0.1); discussion with C.
Varnen re settlement strategy (0.1).

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

Detail Services:

12/11/23			
0.80	Kostecka, Allison K		Discuss potential derivative claims by creditors' committee (0.4); draft update to clients re the potential new derivative claims (0.4).
12/14/23			
0.40	Kostecka, Allison K		Review correspondence and discuss potential new derivative claims by creditors' committee.
12/16/23			
0.80	Kim, Thomas J		Telephone call with J. Krause, A. Kostecka and C. Varnen re insurance coverage issues.
0.90	Kostecka, Allison K		Discuss developments in discussions with creditors committee re new derivative claims and coverage for those claims.
12/18/23			
0.50	Kim, Thomas J		Telephone call with A. Kostecka, J. Krause and E. Gelfand re status of derivative case and coverage issues.
0.70	Kostecka, Allison K		Participate in call with E. Gelfand to discuss potential new derivative claims and coverage for the same (0.5); send email to E. Gelfand answering questions from call (0.2).
12/19/23			
0.40	Kostecka, Allison K		Participate in call with S. Dieckmann to discuss potential new derivative claims.
0.40	Yang, Brian		Review draft creditors' committee complaint.
12/20/23			
2.30	Kostecka, Allison K		Review and analyze proposed complaint from creditors committee.
12/26/23			
1.10	Kostecka, Allison K		Draft a confidentiality agreement for sharing draft derivative complaint with clients.
12/29/23			
0.90	Kostecka, Allison K		Review and analyze protective order proposed by Committee and propose strategy re use of the same for draft complaint.

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

Detail Services:

01/02/24		
0.40	Mircheff, Alexander K	Correspondence with C. Varnen, A. Kostecka re status conference (0.1); review standards for derivative action in bankruptcy posture, correspondence from J. Krause re same (0.3).
1.80	Varnen, Craig I	Emails re derivative complaint (0.8); prepare for client call (0.6); call re current status (0.4).
0.60	Kostecka, Allison K	Discuss draft derivative complaint and proposed confidentiality agreement.
0.60	Yang, Brian	Draft joint status report re bankruptcy proceeding and coordinate strategy re same.
01/03/24		
1.30	Mircheff, Alexander K	Review, analyze proposed complaint from creditors committee (0.5); discussion with C. Varnen, A. Kostecka re status hearing, strategy re proposed complaint (0.6); correspondence with A. Kostecka, J. Krause re next steps (0.2).
1.40	Varnen, Craig I	Emails re derivative complaint (0.8); prepare for client call (0.6).
0.40	Kostecka, Allison K	Revise update to clients on the creditors' committee draft derivative complaint.
1.20	Yang, Brian	Revise joint status report re bankruptcy proceeding and confer with co-defendants' and plaintiffs' counsel re same (0.9); coordinate strategy re status conference and bankruptcy proceeding (0.3).
01/04/24		
1.50	Mircheff, Alexander K	Review plaintiffs' edits to status report (0.1); board call (1.4).
0.10	Mircheff, Alexander K	Review correspondence with directors re status.
2.80	Varnen, Craig I	Prepare for call with board (1.2); call with board (1.1); emails re follow up (0.5).
1.90	Kostecka, Allison K	Participate in call with clients to discuss new derivative complaint (1.4); prepare talking points for C. Varnen for call with clients (0.5).

0.50	Yang, Brian	Revise joint status report re bankruptcy proceeding and coordinate filing of same (0.4); review litigation update (0.1).
0.20	Kang, Austin	Review and electronically file joint status report re bankruptcy in CD Cal.
01/05/24		
1.90	Varnen, Craig I	Strategize re potential derivative claims by creditors ctee.
1.00	Varnen, Craig I	Review and edit court filings (0.7); emails re same (0.3).
0.60	Krause, Jeffrey C	Emails from and to B. Yang, A. Kostecka re status conference report.
0.40	Krause, Jeffrey C	Emails from and to B. Rosenberg and A. Kostecka re confidentiality agreement and draft complaint.
0.40	Krause, Jeffrey C	Emails from and to S. Dieckmann re draft complaint.
0.40	Kostecka, Allison K	Correspond with clients re proposed derivative complaint from creditors committee.
01/08/24		
1.70	Mircheff, Alexander K	Prepare for client call re draft complaint (0.2); client call re draft complaint, next steps (1.2); correspondence with J. Krause re insurer call (0.1); review S. Dieckmann correspondence re allegations (0.2).
3.00	Varnen, Craig I	Prepare for client meeting (0.9); client call (0.9); emails re strategy issues (1.2).
3.50	Kostecka, Allison K	Review draft complaint from creditors committee and prepare outline of arguments for client call (1.4); participate in call with B. Rosenberg to discuss draft complaint (0.6); participate in call with clients to discuss draft complaint (1.2); correspond with brokers re notice of potential new claim (0.3).
01/09/24		
0.10	Mircheff, Alexander K	Review correspondence re derivative complaint, insurance matters from J. Krause.
1.60	Varnen, Craig I	Analyze derivative complaint (1.1); emails re strategy issues (0.5).
01/10/24		
2.00	Varnen, Craig I	Analyze derivative complaint (1.2); emails re strategy issues (0.8).
0.30	Kostecka, Allison K	Participate in call to discuss response to creditor's committee question.

01/11/24		
0.90	Mircheff, Alexander K	Call re strategy for response to committee.
1.80	Varnen, Craig I	Analyze derivative complaint (0.9); communications re strategy issues (0.9).
1.50	Kostecka, Allison K	Participate in conference call with Debtor and counsel to discuss draft derivative complaint (0.4); discuss strategy for drafting objection to bankruptcy standing for committee (0.6); research and draft objection to bankruptcy standing (0.5).
1.80	Farag, Michael G	Review draft complaint (0.2); conduct legal research re standing (1.5); confer with J. Krause re same (0.1).
01/12/24		
0.20	Mircheff, Alexander K	Review draft correspondence re proposed complaint circulated by J. Krause.
2.40	Varnen, Craig I	Work on response to derivative complaint (1.9); communications re strategy issues (0.5).
3.00	Kostecka, Allison K	Research case law and draft letter providing justification to the Debtors for not consenting to the creditors' committee's standing to file a derivative complaint.
3.20	Farag, Michael G	Review draft complaint (0.1); conduct legal research re standing (2.6); draft analysis of same (0.4); confer with J. Krause re same (0.1).
01/15/24		
2.40	Varnen, Craig I	Work on submission re derivative case (1.8); communications re opposition to derivative case (0.6).
7.60	Kostecka, Allison K	Research case law, review documents, and draft letter providing justification to the Debtors for not consenting to the creditors' committee's standing to file a derivative complaint.
01/16/24		
0.70	Mircheff, Alexander K	Review draft response letter re proposed complaint (0.2); call with GDC team re strategy (0.5).
2.40	Varnen, Craig I	Work on submission re derivative case (1.7); communications re opposition to derivative case (0.7).
0.90	Kostecka, Allison K	Participate in conference call to discuss response to Debtor on standing question (0.5); review SEC filings and circulate language re stock ownership for response to Debtor (0.4).
01/17/24		
0.50	Mircheff, Alexander K	Review, edit draft correspondence to creditor's committee.

2.80	Varnen, Craig I	Work on submission re derivative case (1.9); communications re opposition to derivative case (0.9).
1.20	Kostecka, Allison K	review and revise letter to Debtors re committee standing to pursue derivative claims (0.8); correspond with clients re draft committee letter (0.4).
01/18/24		
2.00	Varnen, Craig I	Work on submission re derivative case (1.5); communications re opposition to derivative case (0.5).
01/19/24		
0.10	Mircheff, Alexander K	Correspondence with J. Krause re new position from creditor's committee.
3.00	Varnen, Craig I	Edit bankruptcy court filing (2.3); strategy communications re derivative case (0.7).
01/22/24		
0.50	Mircheff, Alexander K	Call with GDC team re trustee issues, litigation strategy.
1.10	Varnen, Craig I	Strategy communications re derivative case.
0.90	Kostecka, Allison K	Participate in call to discuss meet and confer with creditors' committee (0.5); review draft update to clients re discussion with creditors' committee (0.4).
01/23/24		
1.20	Varnen, Craig I	Communications re opposition to derivative case.
0.40	Kostecka, Allison K	Review questions coming out of meet and confer with creditors' committee and respond to questions re the same.
01/24/24		
0.20	Mircheff, Alexander K	Correspondence with J. Krause, C. Varnen, A. Kostecka re status.
1.90	Varnen, Craig I	Communications re opposition to derivative case.
0.50	Kostecka, Allison K	Review correspondence from creditors committee and provide additional information to J. Krause.
01/25/24		
1.10	Varnen, Craig I	Communications re opposition to derivative case.
0.30	Whetstone, Nicholas	Conversation with J. Krause re derivative standing.
01/26/24		
0.90	Varnen, Craig I	Communications re opposition to derivative case.
01/29/24		
0.50	Mircheff, Alexander K	Strategy call with J. Krause re document requests from committee.

0.90	Varnen, Craig I	Communications re opposition to derivative case.
1.40	Kostecka, Allison K	Participate in call with internal team to discuss potential response to the Committee's requests for information and representations re existing information (0.5); participate in call with D. Neale to discuss response to Committee's requests for additional information (0.5); participate in call with Epiq to discuss use of materials reviewed for ongoing litigations, including new derivative matter (0.4).
01/30/24		
0.20	Mircheff, Alexander K	Call with A. Kosteka re status.
1.40	Varnen, Craig I	Communications re opposition to derivative case.
0.50	Krause, Jeffrey C	Emails from and to B. Givens, S. Carroll, D. Neale, T. Arnold re committee motion for standing.
0.20	Krause, Jeffrey C	Emails from and to J. Myers, C. Varnen, A Kostecka re plan.
0.30	Krause, Jeffrey C	Emails from and to E. Gelfand, S. Dieckmann, A. Kostecka, C. Varnen re plan.
0.20	Krause, Jeffrey C	Telephone conference with J. Myers re plan.
0.50	Krause, Jeffrey C	Confer with A. Sarkissian re research to oppose committee's motion for standing.
0.30	Kostecka, Allison K	Discuss strategy for defense of new derivative claims with A. Mircheff.
2.60	Whetstone, Nicholas	Research related to LLC creditor committee's ability to seek derivative standing.
0.70	Sarkissian, Axel	Meet with J. Krause to discuss scope of research project re derivative standing and timing of derivative suits ahead of a trustee appointment; begin work on same.
01/31/24		
1.80	Varnen, Craig I	Communications re opposition to derivative case.
0.90	Whetstone, Nicholas	Research related to LLC creditor committee's ability to seek derivative standing.
2.10	Sarkissian, Axel	Research caselaw re double derivative shareholder claims in bankruptcy.

SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

Detail Services:

02/01/24			
2.60	Span, Suzanne E		Confer with J. Krause re plan and disclosure statement research (0.3); correspond with J. Myers, J. Krause re plan and disclosure statement research (0.4); review and analyze disclosure statement and plan (1.9).
1.50	Sarkissian, Axel		Research caselaw re double derivative shareholder claims in bankruptcy.
02/02/24			
0.40	Kostecka, Allison K		Discuss processing images of S. Dieckmann computer in order to respond to Committee's request.
0.40	Yang, Brian		Review collection status of S. Dieckmann custodial data and coordinate processing of same.
0.10	Span, Suzanne E		Correspond with J. Krause, J. Myers re plan distribution issues.
1.70	Oh, Shinhae		Review report of forensic data collected from custodians in preparation of document production
0.20	Sarkissian, Axel		Research caselaw re double derivative claims in bankruptcy; conference with J. Krause re same.
02/04/24			
4.00	Sarkissian, Axel		Research caselaw re the limitation of a creditor committee's authorities when multiple committees are present in one case; research caselaw re the timing of a grant of standing to a creditor's committee; draft e-mail memorandum re same.
02/05/24			
2.30	Mircheff, Alexander K		Call with team re strategy for forthcoming motion (0.9); correspondence with K. Oh re Caremark research (0.3); review background materials in connection with challenge to motion for standing (0.4); call with S. Dieckmann, E. Gelfand re status, strategy (0.7).
0.70	Krause, Jeffrey C		Conference call with E. Gelfand, S. Dieckmann, A. Mircheff, A. Kostecka, C. Varnen re strategy.
0.70	Krause, Jeffrey C		Conference call with A. Mircheff, A. Kostecka, C. Varnen re strategy.
0.80	Krause, Jeffrey C		Emails from and to D. Neale, T. Arnold re documents requested by committee.

0.60	Krause, Jeffrey C	Review decision on derivative standing.
0.40	Krause, Jeffrey C	Review research re derivative claims.
0.20	Krause, Jeffrey C	Telephone conversation with A. Sarkissian re derivative claims.
1.70	Kostecka, Allison K	Participate in call to discuss document collection and review for committee's requests (0.9); discuss processing of preserved images for new derivative production (0.3); participate in call with client to discuss new derivative claims and plan for accessing data (0.5).
0.20	Yang, Brian	Coordinate processing of S. Dieckmann custodial data.
0.60	Oh, Shinhae	Review collection report and prepare for processing of custodial forensic data
1.80	Oh, Shinhae	Review and analyze case law re applicability of Caremark standard in parent-subsiary structure.
0.80	Whetstone, Nicholas	Internal meeting re litigation strategy.
1.70	Sarkissian, Axel	Research caselaw re the timing of a grant of standing to a creditor's committee; draft e-mail memorandum re same; attend team conference re expected upcoming filings.
02/06/24		
0.20	Mircheff, Alexander K	Review K. Oh research re standard of care issues.
4.70	Oh, Shinhae	Conduct legal research re applicability of Caremark standard to subsidiary oversight claims and viability of derivative claims by subsidiary stockholders.
1.00	Oh, Shinhae	Draft memorandum re standard of care in subsidiary oversight claims.
02/07/24		
0.10	Mircheff, Alexander K	Correspondence with A. Kostecka re client information request.
0.30	Oh, Shinhae	Review case law re Caremark standard applied in subsidiary oversight claims.
02/08/24		
0.50	Mircheff, Alexander K	Comment on response to information request for client (0.3); correspondence with K. Oh re standard of care research (0.2).
0.40	Krause, Jeffrey C	Emails from and to A. Kostecka, A. Mircheff re documentation.

1.00	Kostecka, Allison K	Draft and circulate correspondence to clients re document review and fact development for litigations (0.6); review research for motion to dismiss potential new derivative complaint (0.4).
0.20	Oh, Shinhae	Review and analyze case law re standard of care on subsidiary oversight claims.
0.20	Oh, Shinhae	Review loading process of custodial data into relativity database.
02/09/24		
0.80	Kostecka, Allison K	Correspond re preservation and data for potential new derivative claims.
02/11/24		
0.10	Mircheff, Alexander K	Correspondence with J. Krause re document issues.
02/12/24		
0.20	Mircheff, Alexander K	Correspondence with J. Krause, C. Varnen, A. Kostecka re document issues, status.
0.70	Kostecka, Allison K	Correspond re document preservation and review for anticipated litigation.
02/14/24		
0.30	Mircheff, Alexander K	Correspondence with B. Yang, team re document search strategy.
0.50	Kostecka, Allison K	Prepare for searching S. Dieckmann files for production to Committee.
1.10	Yang, Brian	Review S. Dieckmann documents in connection with potential derivative complaint.
02/15/24		
0.30	Kostecka, Allison K	Discuss database for searching and producing documents to committee for new derivative complaint.
0.20	Yang, Brian	Coordinate strategy re review of S. Dieckmann documents in connection with potential derivative complaint.
02/16/24		
0.10	Mircheff, Alexander K	Correspondence with J. Krause re document review, production plan.
0.20	Kostecka, Allison K	Correspond re review of files for new derivative action.
0.20	Yang, Brian	Coordinate review of S. Dieckmann documents in connection with potential derivative complaint.
02/17/24		
0.20	Krause, Jeffrey C	Review status report.

02/20/24		
0.60	Kostecka, Allison K	Discuss progress on production for creditors' committee with J. Krause and circulate information re the same (0.4); discuss correspondence to S. Dieckmann re database searches with B. Yang (0.2).
0.30	Yang, Brian	Coordinate review of S. Dieckmann documents in connection with potential derivative complaint.
02/21/24		
0.50	Kostecka, Allison K	Correspond with Epiq re documents for potential production to Committee (0.2); review and revise recommendation re response to Committee on new derivative claims and administrative fees (0.3).
0.20	Yang, Brian	Coordinate review of S. Dieckmann documents in connection with potential derivative complaint.
02/22/24		
0.20	Mircheff, Alexander K	Correspondence with team re production strategy.
0.20	Krause, Jeffrey C	Emails from and to A. Mircheff, A. Kostecka re document production.
0.30	Krause, Jeffrey C	Telephone conference with J. Myers re amended plan and disclosure statement.
1.70	Kostecka, Allison K	Participate in call with S. Dieckmann re search for materials responsive to Committee request (0.4); review documents tagged as responsive to Committee request (0.8); search for additional responsive documents to Committee request (0.5).
1.10	Yang, Brian	Participate in meeting with A. Kostecka and S. Dieckmann re documents to rebut allegations in potential derivative complaint and coordinate review of same.
02/23/24		
0.10	Mircheff, Alexander K	Correspondence with A. Kostecka, C. Varnen re status, potential document production.
0.40	Kostecka, Allison K	Correspond re proposed production set for Committee's counsel.
02/26/24		
0.40	Mircheff, Alexander K	Review documents identified by S. Dieckmann, B. Yang for potential production.
02/27/24		
0.90	Mircheff, Alexander K	Call with C. Varnen, J. Krause, A. Kostecka re status, strategy (0.7); review documents for potential production identified by team (0.2)

0.80	Kostecka, Allison K	Participate in call to discuss documents to produce to Committee and bankruptcy status.
0.80	Yang, Brian	Participate in meeting re strategy for responding to potential derivative complaint (0.7); review S. Dieckmann documents in connection with same (0.1).
02/28/24		
0.50	Mircheff, Alexander K	Review documents flagged by associates, S. Dieckmann for potential production (0.3); correspondence with team re strategy (0.2).
5.00	Kostecka, Allison K	Search for and review documents for production to creditors' committee (4.5); participate in call to discuss upcoming work for Epiq related to the litigations (0.5).
0.40	Yang, Brian	Review business plan documents in connection with potential derivative complaint.
02/29/24		
0.20	Mircheff, Alexander K	Correspondence with team re document production.
0.90	Kostecka, Allison K	Review comments from client on production files and discuss the same with B. Yang (0.4); respond to questions from client re status of proposed complaint (0.5).
1.10	Yang, Brian	Review and coordinate production of business plan documents to creditors' committee in connection with potential derivative complaint.

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Detail Services:

03/01/24		
0.20	Mircheff, Alexander K	Correspondence with B. Yang, J. Krause re document issues.
0.70	Varnen, Craig I	Communications re opposition to derivative case and related items.
0.70	Krause, Jeffrey C	Emails from and to B. Yang re document production.
1.30	Yang, Brian	Draft production cover letter to creditors' committee and coordinate production of business plan documents to creditors' committee in connection with potential derivative complaint.
03/04/24		
0.90	Varnen, Craig I	Communications re opposition to derivative case and related items.
03/05/24		
0.80	Varnen, Craig I	Communications re opposition to derivative case and related items.
03/06/24		
0.50	Varnen, Craig I	Communications re opposition to derivative case and related items.
0.10	Yang, Brian	Confer with L. Neale re document production.
03/07/24		
0.60	Varnen, Craig I	Communications re opposition to derivative case and related items.
03/08/24		
0.50	Varnen, Craig I	Communications re opposition to derivative case and related items.
03/11/24		
0.50	Varnen, Craig I	Communications re opposition to derivative case and related items.
03/12/24		
0.10	Mircheff, Alexander K	Correspondence with A. Kostecka re status.
0.80	Varnen, Craig I	Communications re opposition to derivative case and related items.

03/13/24			
0.70	Varnen, Craig I		Communications re opposition to derivative case and related items.
03/14/24			
0.80	Varnen, Craig I		Communications re opposition to derivative case and related items.
03/15/24			
0.50	Varnen, Craig I		Communications re opposition to derivative case and related items.
03/18/24			
0.30	Mircheff, Alexander K		Call with GDC team re strategy, status.
0.60	Varnen, Craig I		Communications re opposition to derivative case and related items.
0.50	Kostecka, Allison K		Participate in call to discuss strategy for litigations and upcoming call with clients.
03/19/24			
0.60	Varnen, Craig I		Communications re opposition to derivative case and related items.
03/20/24			
0.60	Varnen, Craig I		Communications re opposition to derivative case and related items.
03/21/24			
0.50	Varnen, Craig I		Communications re derivative case and related items.
03/22/24			
0.50	Varnen, Craig I		Communications re opposition to derivative case and related items.
03/25/24			
0.50	Varnen, Craig I		Emails re derivative case and related items.
0.10	Baker, Katy		Correspond with team re upcoming status conference.
03/26/24			
0.40	Varnen, Craig I		Communications re opposition to derivative case and related items.
0.20	Krause, Jeffrey C		Emails from and to B. Yang re status report.
0.60	Yang, Brian		Revise joint status report re status of bankruptcy proceeding.
1.20	Baker, Katy		Draft joint status updates.
0.10	Baker, Katy		Telephone conference with attorney for accounting firm re status.

03/27/24

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| 0.10 | Mircheff, Alexander K | Review status report. |
| 0.50 | Varnen, Craig I | Communications re opposition to derivative case and related items. |
| 0.20 | Krause, Jeffrey C | Emails from and to A. Mircheff, C. Varnen, A. Kostecka, B. Yang re status conference report. |
| 0.40 | Kostecka, Allison K | Review statement for joint status conference and discuss same with larger team. |
| 1.10 | Yang, Brian | Revise joint status report re bankruptcy proceeding and confer with plaintiffs' counsel re same. |

03/28/24

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| 0.50 | Varnen, Craig I | Communications re opposition to derivative case and related items. |
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03/29/24

- | | | |
|------|-----------------|--|
| 0.60 | Varnen, Craig I | Communications re derivative case and related items. |
|------|-----------------|--|

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Detail Services:

04/01/24			
0.40	Yang, Brian		Revise joint status report re bankruptcy proceeding and confer with plaintiffs' counsel re same.
04/03/24			
1.50	Varnen, Craig I		Work on court filings (0.8); strategize re court filings (0.7).
0.40	Yang, Brian		Finalize and coordinate filing of joint status report re bankruptcy proceeding.
0.30	Kang, Austin		Electronically file joint status reports in CD Cal.
04/05/24			
0.20	Yang, Brian		Coordinate strategy re status conference re bankruptcy proceeding.
04/17/24			
0.10	Baker, Katy		Correspond with attorney for accounting firm re status.

Exhibit J

Tattooed Chef, Inc.

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<u>COSTS/CHARGES</u>	TOTAL
ON-LINE RESEARCH (WESTLAW)	\$4,420.80
SPECIALIZED RESEARCH	\$694.23

Total Costs/Charges	<u>\$5,115.03</u>
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BALANCE DUE	<u>\$5,115.03</u>
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Detail Costs/Charges:

On-Line Research (Westlaw)

01/11/24	480.00	FARAG,MICHAEL 01/11/24 95063-00005 WESTLAW RESEARCH AND PRINTING CHARGES
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01/12/24	120.00	FARAG,MICHAEL 01/12/24 95063-00005 WESTLAW RESEARCH AND PRINTING CHARGES
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Specialized Research

01/11/24	7.70	Farag, Michael G. 01/11/2024 PACER
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01/12/24	411.00	Farag, Michael G. 01/12/2024 Bloomberg Law
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Detail Costs/Charges:

On-Line Research (Westlaw)

02/05/24	240.00	OH,SHINHAЕ	02/05/24	95063-00005	WESTLAW RESEARCH AND PRINTING CHARGES
02/06/24	3,460.80	OH,SHINHAЕ	02/06/24	95063-00005	WESTLAW RESEARCH AND PRINTING CHARGES
02/08/24	120.00	OH,SHINHAЕ	02/08/24	95063-00005	WESTLAW RESEARCH AND PRINTING CHARGES

Specialized Research

02/06/24	150.00	Oh, Shinhae	02/06/2024	Lexology (lexology.com)
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SHAREHOLDER DERIVATIVE LAWSUIT
95063-00005

Detail Costs/Charges:

<u>Specialized Research</u>			
02/29/24	108.53	King, Robert	02/29/2024 Intelligize
03/26/24	5.50	Baker, Katy	03/26/2024 PACER

SHAREHOLDER DERIVATIVE LAWSUIT
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Detail Costs/Charges:

Specialized Research

03/01/24	2.70	PACER Usage March 2024
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03/26/24	5.40	PACER Usage March 2024
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Specialized Research

04/05/24	1.70	Yang, Brian 04/05/2024 PACER
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

333 South Grand Avenue, Los Angeles, California 90071-3197

A true and correct copy of the foregoing document entitled (*specify*): **APPLICATION FOR FINAL COMPENSATION OF GIBSON, DUNN & CRUTCHER LLP AS SPECIAL LITIGATION COUNSEL; DECLARATION OF JEFFREY C. KRAUSE IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **May 22, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See Attached

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **May 22, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See Attached

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 22, 2024
Date

Danielle Trujillo
Printed Name

/s/ Danielle Trujillo
Signature

SERVICE LIST

SERVED BY UNITED STATES MAIL:

Hon. Sandra R. Klein
U.S. Bankruptcy Court
Roybal Federal Building
255 E. Temple St., Ste. 1582
Los Angeles, CA 90012

SERVED BY COURT VIA NEF:

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